



The 2010 Evaluation of the Qualifications and Credit Framework (QCF) Regulatory Arrangements

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Foreword

The Qualifications and Credit Framework (QCF) was introduced to support a programme of reform to vocational qualifications initiated by the previous Government. The reform programme covered the whole of the UK, although the QCF was introduced in England, Wales and Northern Ireland only.

Much has changed since the QCF was introduced, including a change of government and the establishment, in April 2010, of Ofqual, the regulator of qualifications in England and of vocational qualifications in Northern Ireland.

More recently, the Government has published its response to the Review of Vocational Education it commissioned from Professor Alison Wolf. This review considered vocational education in England for 14 to 19 year olds. Ofqual has, in turn, published a response to the report too (www.ofqual.gov.uk/wolfresponse).

The regulatory arrangements for the QCF were published in 2008. At that time, the three regulators – Ofqual, acting in interim form as part of the Qualifications and Curriculum Authority (QCA), DCELLS in Wales (now DfES) and CCEA in Northern Ireland - made a commitment to review the effectiveness of the arrangements. The evaluation took place over two years. This is the second and final report of the findings.

The QCF was introduced to support a programme of qualification reform. The current Government has signalled that it will introduce its own reform programme in England. In its response to the Wolf review, Ofqual made a commitment to bring regulatory discipline to the new reform programme, to avoid some of the difficulties that have beset qualifications' reform in the past.

We have highlighted in the report on the findings from the evaluation the lessons we can learn from the introduction of the QCF. These can be used to inform future qualification reform programmes.

Ofqual has also consulted on its proposals to introduce a single framework for all regulated qualifications, to which qualifications that follow different design and assessment requirements can be referenced. We are now taking these proposals forward.

This evaluation was launched, like the QCF itself, in a context different to that of today. Nevertheless, we can learn from the experiences of those who have worked within the QCF so that we carry forward the positive features of a system designed to meet the needs of learners and employers, whilst avoiding difficulties that can arise when qualifications intended for different purposes and for different learners are re-designed to conform to a common set of requirements.

Executive summary

This report is published jointly by the qualifications regulators in England, (Office of Qualifications and Examinations Regulations (Ofqual)), Wales (Department for Education and Skills (DfES), and Northern Ireland (Ofqual for vocational qualifications; and the Council for the Curriculum Examinations and Assessment (CCEA) for all other qualifications). It is the second report of a two-year project to evaluate the regulatory arrangements in place for the Qualifications and Credit Framework (QCF). Our aim was to consider the extent to which the regulatory arrangements for the QCF have delivered on our regulatory objectives to:

- meet the needs of learners
- maintain the standards and comparability of qualifications
- promote public confidence
- support equality and diversity
- ensure efficiency and value for money.

We have found the following:

Meeting the needs of learners

- The provision for credit accumulation and transfer (CAT) that is built into the regulatory arrangements provides potential benefits to learners. The potential for learners to identify and follow pathways that meet their particular needs, with or without direct support from employers, has been identified by many. However, there are significant challenges to the introduction of meaningful opportunities for credit accumulation and transfer and learners themselves have not yet expressed significant demand for CAT.
- There has been a small increase over the first year of the evaluation period in the use of the opportunities provided by the regulations to build flexibilities into qualifications and a more noticeable improvement in the quality of their use.
- The number of QCF qualifications has expanded greatly since the first year of evaluation. Much of the increase has been the result of the transfer of qualifications from the National Qualifications Framework (NQF) to the QCF. This transfer was driven by Government and funding policies. Significant efforts were required to convert qualifications to meet the technical requirements of the QCF. While that effort has clearly taken place, awarding organisations did not in all cases have the resources or the time to innovate and develop new QCF qualifications from scratch. However, over time the understanding of the QCF

and its requirements has developed and this is reflected in the quality of units that have been introduced more recently.

Maintaining standards and comparability

- Those involved with the development of qualifications have experienced difficulties in working with the regulations relating to:
 - qualification titles
 - grading achievement; and
 - assigning credit and guided learning hours (GLH).
- Concerns have been expressed to us that the regulatory arrangements, which provide for shared units to be assessed in different ways, might reduce the likelihood that standards will be maintained and be comparable, although we do not have direct evidence that this is the case. There are also concerns that the design features of the QCF are more suited to some qualifications – and to some of the learners and to some of the sectors for which they are designed - than to others.

Promoting public confidence

- We have not directly tested public confidence in qualifications designed to meet the regulatory arrangements of the QCF. However, the users we have surveyed have in the main reported that key stakeholders are largely unaware of the QCF. The small number of learners we spoke with during the evaluation had little awareness of the QCF.

Supporting equality and diversity

- The feedback is mixed on the appropriateness of the requirements on awarding organisations that are intended to make sure their qualifications are inclusive and accessible to learners. Some have welcomed the attention given in the regulatory arrangements to these requirements. Others believe that the requirements are unnecessary and/or conflict with their data protection obligations.

Ensuring efficiency and value for money

- The centralised approach to processes surrounding the development and subsequent regulation of units and qualifications has raised significant concerns about efficiency and value for money. There are concerns that innovation by awarding organisations in a regulated competitive market may be stifled by

regulation and, in particular, by the requirements to share units. Awarding organisations have reported significant expenditure in preparing for the QCF.

Conclusions on the regulatory arrangements

We have found that:

- The QCF has been populated with credit-based qualifications within a very short period of time. Awarding organisations and unit submitters did not always have full opportunities to learn from early experiences of the QCF. In some cases this may have had an impact on the extent to which the regulatory arrangements were satisfied.
- A unit that does not satisfy fully the design requirements of the QCF will not necessarily result in a poorly delivered or assessed unit. Often the supplementary materials produced by awarding organisations or assessment delivery by learning providers compensates for deficiencies in the way that the unit was designed. This raises questions about the value of aspects of the regulatory arrangements.
- The full range of flexibilities available within the QCF is not currently being used. There is an upward trend in the use of some design features. However, we need to consider whether the benefits of regulatory requirements that provide for infrequently used flexibilities outweigh the costs that might be incurred.
- The role of sector skills councils (SSCs) in the 'approval' of QCF qualifications has resulted in confusion with regard to accountability. Some awarding organisations have felt compelled to use units and/or design qualifications that they did not consider to be fit for purpose.
- The regulatory arrangements for the QCF are not in line with the more strategic approach to regulation that is being introduced. For example, the regulatory arrangements are based on the premise that all qualifications will be accredited by the regulators before they are made available to learners. This is no longer the case. The strategic approach to regulation requires the regulators to hold each awarding organisation accountable for its qualifications. The reported confusion about accountability when shared units are used must therefore be addressed.

Lessons for the future

Ofqual has recently consulted on its proposal to develop a single qualifications framework. In light of responses to that consultation, we have started to develop such a framework. As we do so, we will learn lessons from the introduction of the QCF, including the:

- pitfalls that can arise when awarding organisations are required to redesign a large number of qualifications, with a range of different characteristics and purposes, to conform to one set of design requirements
- need for clarity in the lines of accountability in qualifications design, approval and delivery
- need for credit, which is the 'currency' of units, to be assigned more consistently
- risk that detailed and/or poorly understood regulatory requirements can detract from, or overshadow, more important regulatory principles
- implications for commercial and/or competing organisations of sharing units and of collaborating with others to develop units
- challenge of imposing titling rules that do not align with established and understood titles.

1. Introduction

The regulatory arrangements for the QCF were introduced by Ofqual, the Department for Children, Education, Lifelong Learning and Skills (DCELLS) in Wales (now DfES) and CCEA in 2008. This report, published after the second year of a two-year project to evaluate the effectiveness of our approach to the regulation of the QCF, is published jointly by us. The report that was produced at the end of the first year's work can be found at www.ofqual.gov.uk/files/2010-01-15-the-2009-evaluation-of-qcf-regulation-2.pdf.

1.1 Background

The QCF provides a framework for the development, assessment and award of unit-based and credit-based qualifications. It provides a structure within which unit-based qualifications are located and achievements are recognised through the award of credits and qualifications. It allows the level and size of achievements to be easily identified. Its key feature is that it supports the accumulation and transfer of credits between qualifications and awarding organisations. It aims to ensure learners are given the maximum flexibility and range of opportunities to progress and receive recognition for their achievements. The scope of the framework is currently focused on vocational qualifications, but it was introduced with a view to its wider application.

The QCF has been developed over a number of years. The feasibility of a qualifications and credit framework was tested and trialled between April 2006 and July 2008. This work was led in England by the Qualifications and Curriculum Authority (QCA). Ofqual was established in interim form towards the end of the test and trial period. Following completion of the trials, we confirmed that we would implement a regulatory model for the QCF. The QCF was fully introduced in August 2008 when we published the *Regulatory Arrangements for the Qualifications and Credit Framework (2008)* (the regulatory arrangements).

The population of the QCF has grown substantially, in terms of both the number of qualifications in it and the number of learners engaged in QCF qualifications. At the end of the trials, there were 432 qualifications in the QCF. By the end of January 2010, there were around 2,500. At the end of February 2011, there were slightly over 7,500 qualifications in the QCF.

We set the regulatory requirements for the QCF and monitor compliance with them. In this context, we made a commitment to evaluate the impact of the implementation of the regulatory arrangements when we published them. As we noted in the regulatory arrangements (2008, p4):

'The qualifications regulators will evaluate regulatory issues that arise in the development of the QCF. In doing so, they will consider the suitability of these

arrangements and how well associated regulatory activity and the operation of the QCF are working. They will report publicly on their findings during the implementation of the QCF.'

We made this commitment because the QCF marked the introduction of a new set of regulatory requirements and procedures. It is good practice to study the effect of new requirements in operation. We also recognised the need, as the QCF developed, to take account of the issues raised in the tests and trials, minimise risks and further explore any unresolved issues. Evaluating the implementation of the QCF regulatory arrangements gave us the opportunity to take account of any issues caused by the fact that the QCF is new or that result from any elements of its design.

The context in which this evaluation has taken place is also important. Legislation to establish Ofqual as a non-ministerial government department was given royal assent in November 2009 and Ofqual formally came into existence in April 2010. Ofqual regulates qualifications in England and vocational qualification in Northern Ireland. DFES in Wales has powers broadly mirroring those of Ofqual. In Northern Ireland, Ofqual has taken responsibility for the regulation of all vocational qualifications; responsibility for other regulated qualifications lies with CCEA.

In addition, this evaluation needs to be considered in the context of the ongoing changes to the approach that we are taking to our regulatory role. Ofqual consulted in 2009 (*Regulating for Confidence in Standards* (2009)) and again in 2010 (*From Transition to transformation* (2010)) on how it should exercise its new powers and fulfil its duties. Any changes to the regulation of the QCF will be made in the context of the introduction of our new approach to regulation more widely.

In the report for the first year of the evaluation, we noted that the evaluation of the QCF was taking place at an early stage in its development. The *Regulatory Arrangements for the Qualifications and Credit Framework* (2008) was published in August 2008. While the increased volume of qualifications and units within the QCF alone shows how much further along in the process we are than a year ago, we are evaluating a regulatory framework with a maximum of two years' operation and evidence.

1.2 Evaluation approach

The regulatory arrangements are intended to:

- meet the needs of learners
- maintain standards and comparability
- promote public confidence

- support equality and diversity
- secure value for money.

We undertook the evaluation to enable us to form a view on the extent to which our regulation of the QCF has delivered on these aims. We have considered the key findings in relation to our requirements for the QCF and related our findings to these overarching aims. This has helped us to make an overall assessment about the effectiveness of our regulatory activities in ensuring our key objectives for the regulation of the QCF are met.

2. Methodology and report structure

We have gathered information and evidence from a wide range of sources to inform our evaluation. Our aim has been to consider fully the impact and implications of our regulation of the QCF.

The activities we undertook can be grouped under the following:

- feedback from key organisations making use of the QCF regulatory arrangements (for example awarding organisations, unit submitting organisations and SSCs), and from a limited number of centres and learners
- a review of samples of units and the rules of combination (RoC) that are used to form qualifications within the QCF
- a review of the relevant sections of the regulatory arrangements and their application in the regulatory processes that we have put in place to support the QCF.

2.1 Feedback from organisations

Those most directly affected by the implementation of the QCF were invited to share their views on, and experience of, its regulation. The mechanisms for this were a survey of 'users' and facilitated workshops with the same audience. The survey and workshops focused on those subject to regulation: awarding organisations, rules of combination and unit submitters, although any informed individual or organisation was welcome to comment. Respondents were given the opportunity to consider key questions about how the QCF is being regulated and to raise their own issues.

2.2 Review of samples of QCF qualifications, units and assessment arrangements

We undertook analysis of compliance with the regulatory arrangements of:

- all RoC submitted on or before 1st July 2010 and additional detailed scrutiny of a further 20 RoC (taken across organisations, sectors and levels)
- a sample of 1950 units (taken across organisations, sectors and levels) in the QCF unit databank
- a sample of 36 qualifications (taken across organisations, sectors and levels) in the QCF to consider the assessment arrangements used by centres delivering assessment to learners.

2.3 Review of information gathered from our regulatory processes

We reviewed the information gathered from the activities that we undertake to regulate the QCF, which are primarily the:

- recognition of organisations to operate in the QCF
- submission of credit-based qualifications onto The Register of Regulated Qualifications (<http://register.ofqual.gov.uk>)
- monitoring of organisations, units and qualifications in the QCF.

3. Evidence

3.1 Feedback from users of the QCF

The QCF as a concept

We found broad support for a unit- and credit-based qualifications framework. Some awarding organisation representatives who attended our workshops spoke positively about the opportunities the approach gives to learners and to employers to tailor training and qualifications to meet specific needs. However, the speed and the nature of the QCF's introduction had caused problems. The attempt to apply one set of design rules to a wide range of very different qualifications was criticised by many who commented. This makes it more difficult to make a judgement on the effectiveness of the regulatory arrangements. For some qualifications, the arrangements might work very well. But if a qualification is not suited to the unitised/credit-based approach it is possible that no regulatory arrangements that imposed those design features would be fully effective.

The figures that follow in this section provide a quantitative summary of the responses we received to the survey. These figures paint a broadly positive picture of the regulatory arrangements. The qualitative feedback we received – both to the survey and in the workshops – gave us further insight into the effectiveness of the regulatory arrangements and into some particular issues that have arisen as the QCF has been implemented. The major issues that were highlighted by many who responded are summarised below.

Titling

The QCF regulatory arrangements introduced rules on titling. Each qualification in the QCF has either certificate, award or diploma in its title. The title used reflects the size of the qualification.

Three main issues with the titling rules were reported:

- the rules have required that previously established and understood titles can no longer be used
- the title to be used is determined by the size of the qualification, not its level
- any qualification of 37 or more credits is called a diploma – albeit that the size of qualifications above this threshold is large, indeed limitless.

Assessment

The requirement that all learning outcomes and the corresponding assessment criteria must be achieved by a learner can make assessment burdensome. Assessment by examination becomes problematic when such a requirement is

applied. Qualifications that have traditionally been compensatory do not fit well into the QCF.

The requirement that each unit must be able to be assessed in its own right can introduce unnecessary cost and assessment burden. Taken together, these requirements have made it particularly difficult for higher level, including some professional qualifications, to be accommodated within the QCF.

The approach also makes grading difficult – if a learner has to demonstrate that they have achieved every learning outcome to be awarded a unit and in turn a qualification, it can be difficult to devise suitable grading methodologies.

Accountability

A recurring theme in the feedback from awarding organisations was the consequences of the regulatory requirement that a qualification has to be ‘approved of’ by an SSC. Each awarding organisation is accountable for the quality and standards of its qualifications. Some awarding organisations reported that their accountability has been compromised by the requirements of an SSC, as a condition of its approval, to incorporate particular units into its qualifications. Concerns are particularly strongly expressed when the units in question have been designed by the SSC itself.

The implications for an awarding organisation that incorporates a unit designed and owned by another body when that unit is subsequently identified as not meeting the regulatory requirements were also raised by some awarding organisations that contributed to the evaluation.

Commercial interests and innovation

Many awarding organisations reported that they had incurred substantial costs as a result of the introduction of the QCF. They did not know whether their investment in designing their qualifications in line with the QCF would prove to be worthwhile.

The expectation on awarding organisations to share the units that they had designed and developed with other awarding organisations raised concerns about return on their investments and on the incentives for them to invest further. Concerns were also raised that if an awarding organisation was required to share its units then it might be less inclined to be innovative in its approach.

Standards and comparability

The designers and owners of QCF units do not specify the assessment methodology to be used to assess a unit. This has led to concerns about standards. If a unit can be assessed in different ways, it may be more difficult to compare standards. The QCF provides for a unit designed by one organisation with specialist knowledge and

experience relevant to that qualification to be picked up and used by another organisation that lacks that knowledge and experience. Some users highlighted this feature of the QCF as a risk to standards.

The regulatory arrangements require that the level of a qualification is the same as at least 51 per cent of the credit attached to the units that make up the qualification. This means that a level might be attached to a qualification despite 49 per cent of the credits that are required for the award of the qualification being at a lower level. Concerns were raised that this provision may result in qualifications being overvalued.

Credit values

There were many comments made about the difficulties of allocating credit values to units in a consistent way. The value is based on the time it will typically take a learner working at the level of the unit to achieve the learning outcomes. The measure might be informed by evidence, but it will be partly subjective. However, some feedback suggested that discrepancies in approach were greater than might otherwise be expected or acceptable if every unit submitter and awarding organisation was properly and fairly applying the regulatory arrangements.

The relationship between units and qualifications

The regulatory arrangements require that the review date of a qualification (previously the end date) is no later than the earliest review date of any of the units that make up the qualification. This can provide a disincentive to include a particular unit within a qualification, or create instability in a qualification. Some suggested that this might be one reason for the proliferation of units, which was also reported to be a concern.

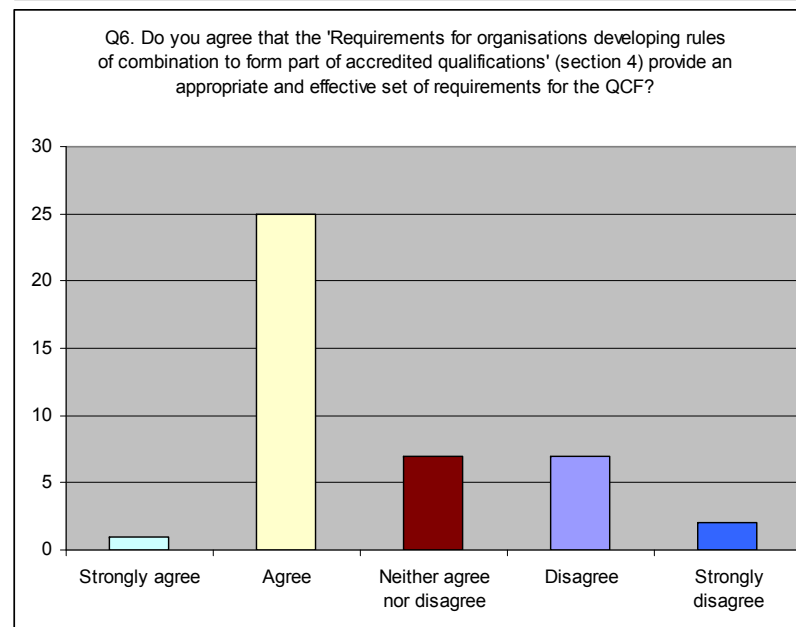
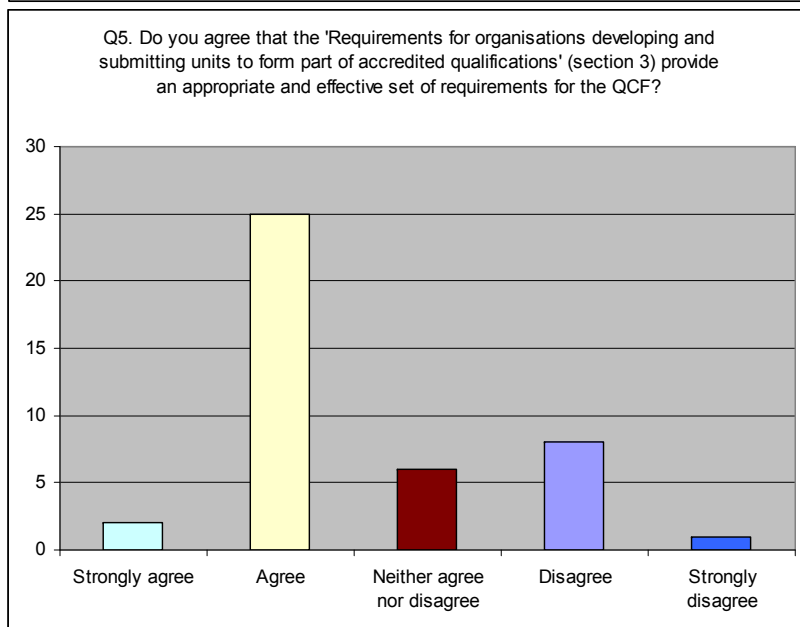
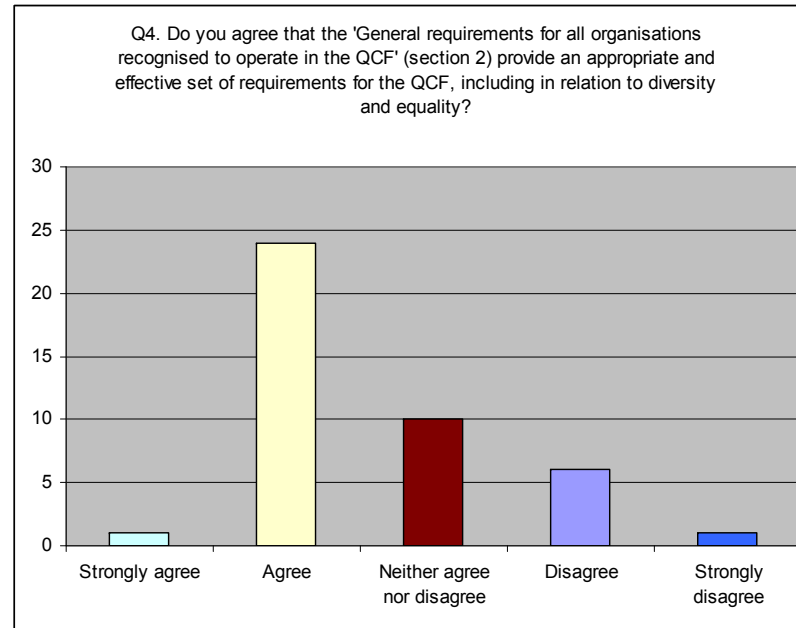
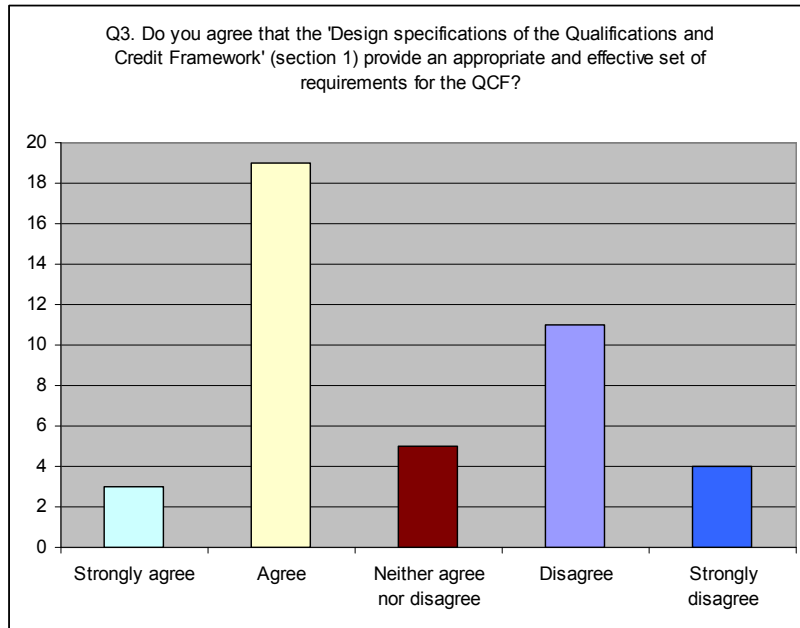
Overall comments

There was some positive endorsement for the regulatory arrangements and, for the QCF as a whole. The quantitative data reported in the figures paints a more positive picture than the qualitative data summarised above. For example, a majority of those who responded to the consultation agreed or strongly agreed that the overall design requirements for the QCF are appropriate and effective.

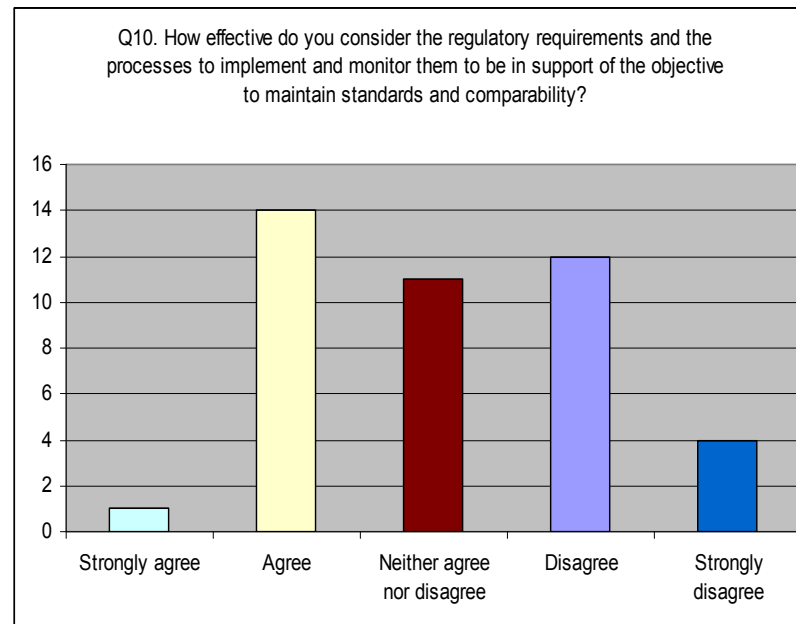
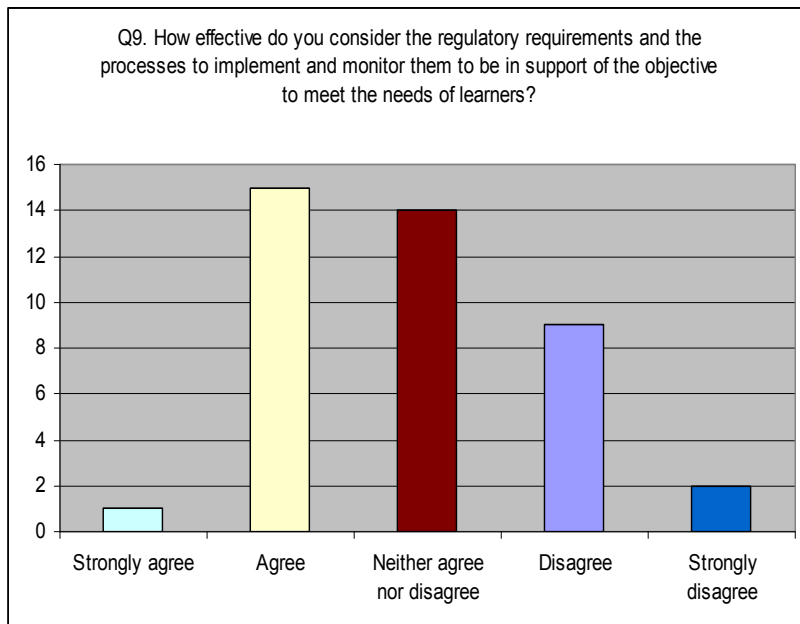
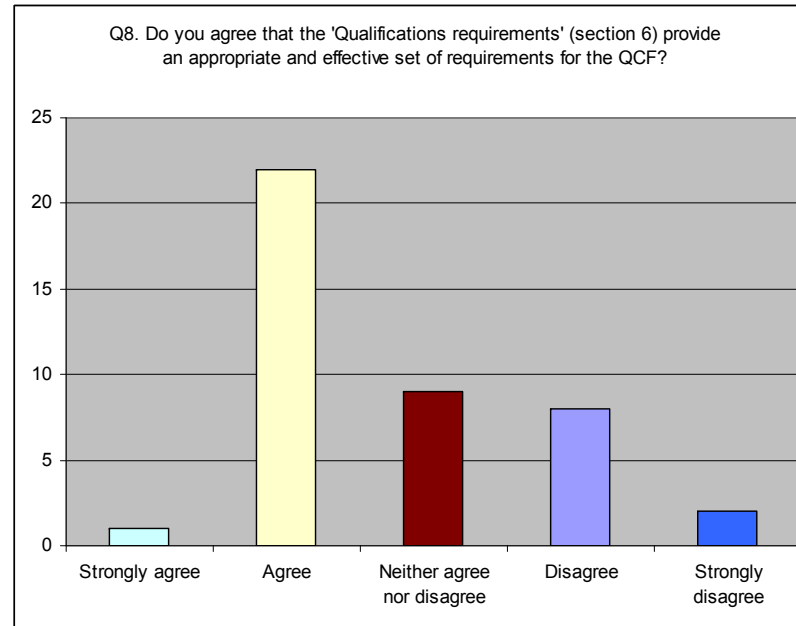
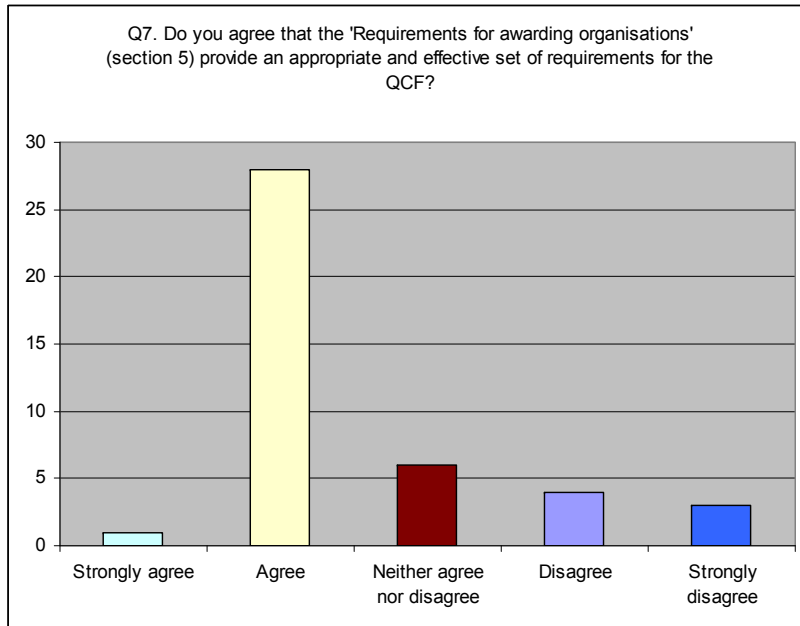
Some who responded found that the regulatory arrangements were appropriate, but that the way in which they were being used was undermining their value. There were criticisms about the consistency of advice provided by the regulators.

Others suggested that the model of the QCF, and therefore the regulatory arrangements, were fundamentally flawed.

The quantitative data set out below is taken from the responses to the online survey. The survey and a breakdown of the categories of organisations that responded to the survey are included in Annex 1.

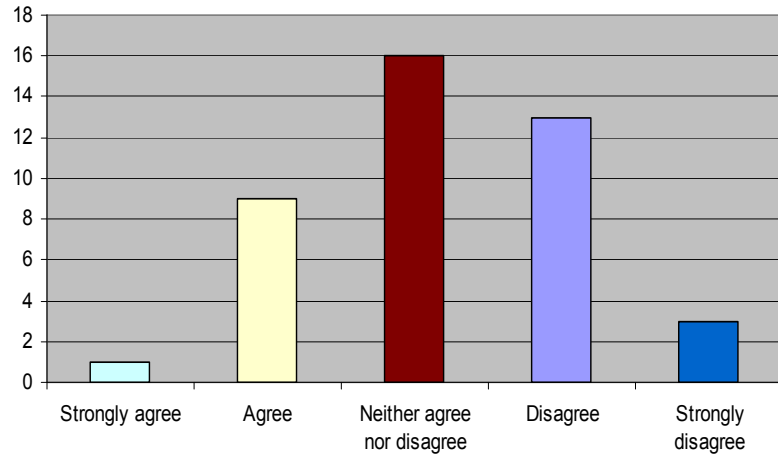


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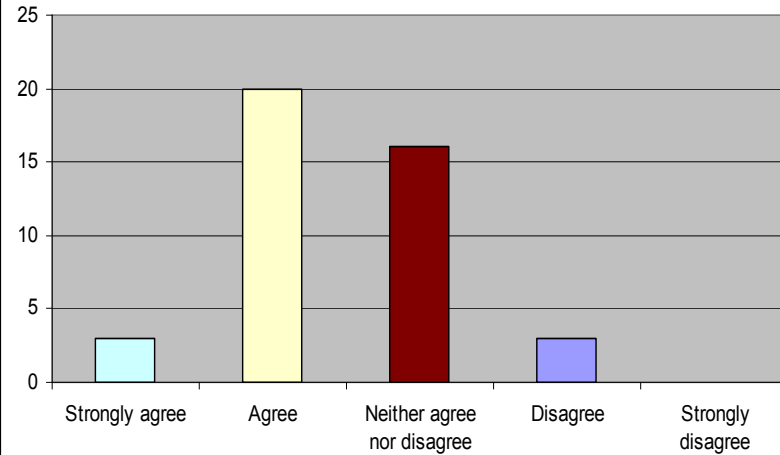


The 2010 Evaluation of the Qualifications and Credit Framework (QCF) Regulatory Arrangements

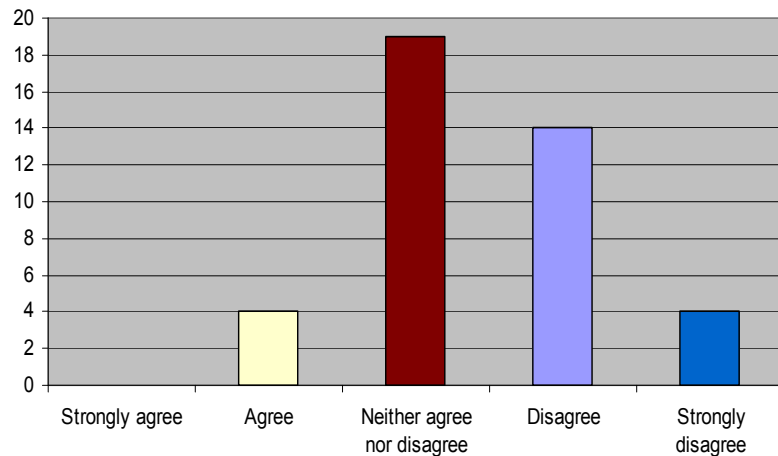
Q11. How effective do you consider the regulatory requirements and the processes to implement and monitor them to be in support of the objective to promote public confidence?



Q12. How effective do you consider the regulatory requirements and the processes to implement and monitor them to be in support of the objective to support equality and diversity?



Q13. How effective do you consider the regulatory requirements and the processes to implement and monitor them to be in support of the objective to ensure value for money?



3.2 Review of QCF qualification structures, units and assessment arrangements

Qualifications

In the QCF, qualification structures are determined by RoC, which stipulate the credits that need to be achieved by a learner through the completion of particular units, for a qualification to be awarded. RoC provide the structural mechanism by which credit can be accumulated and transferred between qualifications and awarding organisations in the QCF. The *Regulatory arrangements for the Qualification and Credit Framework* (2008) set out in section 1 include a number of requirements and flexibilities in relation to the design, development and operation of RoC. The requirements for organisations developing RoC are in section 4.

The QCF regulatory arrangements support and encourage (but do not require) the use of particular design features in RoC. There is a requirement that all RoC within the QCF must have a defined rationale and that the composition of each rule of combination should reflect this rationale.

To inform the evaluation, we set out to understand more about how, and to what extent, developers of RoC are applying the available flexibilities to qualifications in the QCF and to compare our findings with those of the evaluation we undertook in 2009.

The evidence that informed our understanding came primarily from a quantitative analysis of the RoC of all the qualifications accredited and units submitted onto the QCF by 1st July 2010. We used a similar approach to the 2009 evaluation. We coupled this with a detailed analysis of the RoC of 20 qualifications to consider the extent to which they incorporated the available RoC design features.

We used our legacy regulatory IT systems to collect the evidence, namely:

- Web Based Accreditation (WBA)
- Qualification Management Information System (QMIS)
- the National Database of Accredited Qualifications (NDAQ).

These systems limited our ability to effectively interrogate the data. The systems have since been replaced.

The detailed data resulting from the analysis of qualifications through their RoC can be found in Annex 2. The key points are included below.

Credits from equivalent units

Equivalencies were used in a very limited number of qualifications in the 2009 sample. Although we found a slight increase in their use in 2010, equivalencies are still rarely used when creating RoC. The implementation of our regulatory IT system (RITS), which we designed in part to support the implementation of the QCF, will help organisations that develop RoC to search for and identify equivalent units. The use of equivalencies might increase as a result.

Use of exemptions

An analysis of the data in 2009 found that in many cases the exemption field had not been used in line with the requirements of the QCF regulatory arrangements. The 2009 results showed that the total number of qualifications in the QCF that provided for exemptions was low, only nine per cent (866) of all the qualifications in the QCF at that time. In the 2010 sample, there was a ten per cent increase over the 2009 sample in the total qualifications that use the exemption field. In addition, where exemptions are identified, there is an increase from 34 per cent (58) to 81 per cent (704) in correct usage as set out in the regulatory arrangements. It is likely that both increased familiarity with opportunities to provide for exemptions and the desire to include units from existing NQF qualifications by awarding organisations have contributed to this upturn.

Some RoC developers have stated that exemptions are currently not appropriate or identified within a qualification. This was the case in 94 RoC (three per cent of the sample) and particularly in qualifications for the childcare and business/finance sector.

Pathways and endorsements

The analysis showed that there were nearly twice as many qualifications that feature pathways and endorsements in the 2010 sample compared with the 2009 sample. However, despite this, only just over seven per cent of all qualifications accredited in the QCF feature pathways and endorsements.

In some instances, pathways and endorsements were used to differentiate 'grades' of qualifications that fall into the same level of the QCF. For example, in performing arts, a qualification is offered at grades 6, 7 and 8, all of which are considered level 3 on the QCF. This is represented by an endorsement in the title of the qualification awarded.

Units linked to multiple qualifications

We interrogated the unit databank to identify the degree to which qualifications in the QCF feature opportunities for CAT for learners. We looked at data relating to units that are 'linked' to more than one accredited qualification. The data shows that the

majority of live units in the QCF are included in more than one accredited qualification. Of these units, most feature in between four and five qualifications. This is a considerable increase on the 2009 evaluation, where the average number of qualifications in which any unit featured, was two.

There was a notable increase (from 10 to 1799) in the number of units linked to ten or more qualifications. In part, this is a natural outcome of the increased number of qualifications in the framework. A three-fold increase in QCF qualifications might reasonably be expected to produce this scale of increase in the links between units and multiple qualifications. We undertook a more complex analysis of the data in order to ascertain the extent to which units owned by different organisations are included in qualifications offered by different organisations. We found extensive clustering of 'popular' units each used in high numbers of qualifications within the IT and construction sectors. This may reflect a collaborative approach between SSCs and awarding organisations in qualifications developed in these areas.

GLH in shared qualification development

Though the qualifications in the sample included many examples of good practice, in a small number of qualifications there were inconsistencies between credit values and GLH. In the 2009 evaluation, a third of the qualifications featured in the sample had a direct 1:10 ratio of credit value to GLH. However, this had reduced to less than 14 per cent of the qualifications we looked at in the 2010 evaluation, particularly in qualifications at level 1. We found some instances of qualifications that had identical content, credit value and RoC, but had different GLH values.

Units

In spring and summer 2010, we undertook a desk-based review of the extent to which 1950 QCF units complied with the regulatory requirements. As well as identifying the degree to which units in the QCF unit databank were compliant with the arrangements, the review provides us with a baseline for future sampling of units within the databank and informs our risk-based approach to monitoring the quality of units.

We identified that a large percentage of units did not comply with the full range of our regulatory requirements. We recognised, however, that:

- many of the units were developed early on in the implementation of the QCF
- the transfer of units and qualifications from the NQF to the QCF had taken place within a challenging timeframe

- the tendency for organisations to adopt a more collaborative approach to unit development, encouraged through the introduction of the QCF, had given rise to misunderstandings about where responsibility for the quality of units rested.

We also recognised that the narrow focus and desk-based nature of the unit review meant that no consideration could be given to the context in which the unit was being delivered or to materials developed to support use of the units. We expected that such materials might mitigate the potential impact of the issues identified, particularly given that many of the units sampled were based on existing NQF qualifications with well established arrangements for quality assuring their assessments.

To help us understand more about the units, we visited 28 unit-submitting organisations that owned significant numbers of the units that we had found to be non-compliant.

During these visits, we found a wide range of evidence that assured us that, where the units were being used in qualifications, the impact of the non-compliances we had found during the desk review was effectively mitigated by other arrangements. There was little risk of direct impact on learners or on the quality of the assessments. We were also reassured that organisations' ongoing review arrangements would identify and address any shortcomings in the way the units were presented. More recently developed units are generally being written in line with the regulatory arrangements.

We found the level of understanding of the QCF and the supporting regulatory arrangements had developed markedly since the early units were introduced. Many unit owners had, by the time we visited, enhanced their approach to unit design and development.

Assessment arrangements

We also gathered evidence on a range of assessment related matters arising from the application of the regulatory arrangements. In this context, we visited some Further Education colleges and reviewed 36 qualifications. The QCF arrangements place responsibility on the awarding organisation for ensuring suitable assessment practice by a centre.

Our key findings were:

- there was some confusion about grading, and one instance where, contrary to the regulatory arrangements, units were being graded but a qualification was not
- the centres visited all had good systems in place to ensure provision of access arrangements and allow reasonable adjustments for disabled learners when

appropriate. In the main, centre staff did not see this as an awarding organisation or QCF requirement, but as part of their own organisation's standard policies/procedures

- the centres' staff were aware that learners should be able to have their prior learning recognised where appropriate. However, none of the staff we spoke to had experience of dealing with claims for the recognition of prior learning (RPL). There may be some tensions between RPL and the effects that this currently has on funding for centres
- the centres' staff were aware of the need to ensure 'authenticity' of assessments. Learners were typically required to sign a statement that the work was theirs. In many cases the signed statement was an awarding organisation requirement and a template was part of the centre's guidance materials. In some centres, staff seemed unaware that there may be other methods of determining authenticity
- in some cases, centres did not appear to be clear about their responsibilities for ensuring that plagiarism or collusion does not take place. This was a concern for written assignments that are not completed under supervision.

3.3 Review of information gathered from regulatory processes

Awarding organisation recognition

We considered the effectiveness of our approach to recognising organisations to operate within the QCF. Many organisations applied to do so using our 'supplementary recognition' process. We sought feedback on the approach.

Many organisations found the process long and frustrating. We have already consulted on our proposal to reform our approach to recognition, partly in light of the lessons we have learned from supplementary recognition. We will be introducing a new approach shortly.

There are clear limitations to an approach that relies wholly on desk-based scrutiny of evidence put forward in support of an application. We are therefore introducing an approach that will include an opportunity to verify and challenge evidence directly with representatives of the organisation that is seeking recognition.

4. Conclusions and recommendations

4.1 Conclusions on the regulatory arrangements

We have considered the full range of evidence we gathered in coming to the following conclusions.

- The QCF has been populated with credit-based qualifications within a very short timescale. As only a small number of organisations took part in the test and trial phase, not all awarding organisations and unit submitters had an opportunity to learn from early experiences of the QCF. In some cases, this had an impact on the extent to which the regulatory arrangements were satisfied.
- A unit that does not satisfy the design requirements of the QCF will not necessarily result in a poorly delivered or assessed unit. Often the supplementary materials produced by awarding organisations or assessment delivery by learning providers mitigate against poorly designed units.
- The full range of flexibility available within the QCF is not being widely used. However, there is an encouraging upward trend in the use of some design features.
- The role of SSCs in the ‘approval of’ QCF qualifications has resulted in confusion with regard to accountability. Some awarding organisations have felt compelled to use units and/or design qualifications that they did not consider to be fully fit for purpose.
- Aspects of the design of the QCF and the regulatory arrangements that support it might provide challenges to confidence in the security of standards. For example, the provision for the same unit to be assessed in different ways by different awarding organisations.
- There may be implications for the operation of the market and the incentives for innovation that arise from the expectations that units will be shared.

4.2 Lessons learned

Ofqual has consulted recently on proposals for the development of a single qualifications framework. In light of the responses to that consultation we are starting to develop such a framework, learning lessons from the introduction of the QCF, including:

- the potential pitfalls of a central policy that drives awarding organisations to redesign a large number of qualifications, with a range of different characteristics and purposes, to conform to one set of design requirements

- the need for clarity in the lines of accountability in qualifications design, approval and delivery
- the need for credit, which is the 'currency' of units, to be assigned consistently
- the risk that detailed and/or poorly understood regulatory requirements can distract from, or overshadow, more important regulatory principles
- the implications for commercial and/or competing organisations of sharing units and of collaborating with others to develop units; and
- the challenge of imposing titling rules that do not align with established and understood titles.

Annex 1: Survey questions and responses – QCF regulatory arrangements

This document is included for reference and to enable you to print out and consider the questions before responding via the online questionnaire. Where possible, please use the online questionnaire rather than the Word version to submit your response. If you have any questions, please email sarah.tavener@ofqual.gov.uk or call the Ofqual helpline on 0300 303 3346.

Introduction

This survey is primarily aimed at those organisations that are subject to regulation by us or are involved in working with organisations regulated by us to create units and qualifications within the QCF; however, other informed organisations and individuals are very welcome to contribute.

The deadline for completing the questionnaire is **Friday 24th December**.

You can answer as many questions as you feel are relevant to you and your organisation.

The QCF is regulated by Ofqual, DCELLS and CCEA. This survey is an important part of a two-year project to evaluate the effectiveness of our approach to the regulation of the QCF. Further information on the QCF and our evaluation of it is available at www.ofqual.gov.uk/qualification-and-assessment-framework/89-articles/145-explaining-the-qualifications-and-credit-framework .

We thank you for taking the time to respond to this survey: if you have any questions, please contact us at sarah.tavener@ofqual.gov.uk and we will be happy to respond.

Survey responses

Q1. Are you responding on behalf of your organisation or as an informed individual?

| Total number of respondents | |
|-----------------------------|---------------------|
| 42 | |
| Organisation | Informed individual |
| 37 | 5 |

| Organisation category | Number |
|--|--------|
| Awarding organisation | 34 |
| SSC/SSB | 1 |
| Representative organisations | |
| Government agency | |
| Provider | |
| Employers and other interested parties | 1 |
| Unknown | 1 |

Q2. Have you or your organisation been directly involved with the QCF to date?

| Yes | No |
|-----|----|
| 42 | 0 |

Q3. Do you agree that the 'Design specifications of the Qualifications and Credit Framework' (section 1) provide an appropriate and effective set of requirements for the QCF?

| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree |
|-----------------------|--------------|-----------------------------------|-----------------|--------------------------|
| 3 | 19 | 5 | 11 | 4 |

- Q4.** Do you agree that the 'General requirements for all organisations recognised to operate in the Qualifications and Credit Framework' (section 2) provide an appropriate and effective set of requirements for the QCF, including in relation to diversity and equality?

| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree |
|-----------------------|--------------|-----------------------------------|-----------------|--------------------------|
| 1 | 24 | 10 | 6 | 1 |

- Q5.** Do you agree that the 'Requirements for organisations developing and submitting units to form part of accredited qualifications' (section 3) provide an appropriate and effective set of requirements for the QCF?

| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree |
|-----------------------|--------------|-----------------------------------|-----------------|--------------------------|
| 2 | 25 | 6 | 8 | 1 |

- Q6.** Do you agree that the 'Requirements for organisations developing rules of combination to form part of accredited qualifications' (section 4) provide an appropriate and effective set of requirements for the QCF?

| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree |
|-----------------------|--------------|-----------------------------------|-----------------|--------------------------|
| 1 | 25 | 7 | 7 | 2 |

Q7. Do you agree that the 'Requirements for awarding organisations' (section 5) provide an appropriate and effective set of requirements for the QCF?

| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree |
|-----------------------|--------------|-----------------------------------|-----------------|--------------------------|
| 1 | 28 | 6 | 4 | 3 |

Q8. Do you agree that the 'Qualifications requirements' (section 6) provide an appropriate and effective set of requirements for the QCF?

| Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree |
|-----------------------|--------------|-----------------------------------|-----------------|--------------------------|
| 1 | 22 | 9 | 8 | 2 |

How effective do you consider the regulatory requirements and the processes to implement and monitor them to be in support of the objective to:

Q9. Meet the needs of learners?

| Very effective | Effective | Neither effective or ineffective | Ineffective | Very ineffective |
|-----------------------|------------------|---|--------------------|-------------------------|
| 1 | 15 | 14 | 9 | 2 |

Q10. Maintain standards and comparability?

| Very effective | Effective | Neither effective or ineffective | Ineffective | Very ineffective |
|-----------------------|------------------|---|--------------------|-------------------------|
| 1 | 14 | 11 | 12 | 4 |

Q11. Promote public confidence?

| Very effective | Effective | Neither effective or ineffective | Ineffective | Very ineffective |
|-----------------------|------------------|---|--------------------|-------------------------|
| 1 | 9 | 16 | 13 | 3 |

Q12. Support equality and diversity?

| Very effective | Effective | Neither effective or ineffective | Ineffective | Very ineffective |
|-----------------------|------------------|---|--------------------|-------------------------|
| 3 | 20 | 16 | 3 | 0 |

Q13. Ensure value for money?

| Very effective | Effective | Neither effective or ineffective | Ineffective | Very ineffective |
|-----------------------|------------------|---|--------------------|-------------------------|
| 0 | 4 | 19 | 14 | 4 |

Q14. Please provide any other comments you have about the regulation of the QCF:

No new issues were raised in this question, but it gave respondents the chance to emphasise their key concerns.

Annex 2: Analysis of QCF qualifications and use of the design features

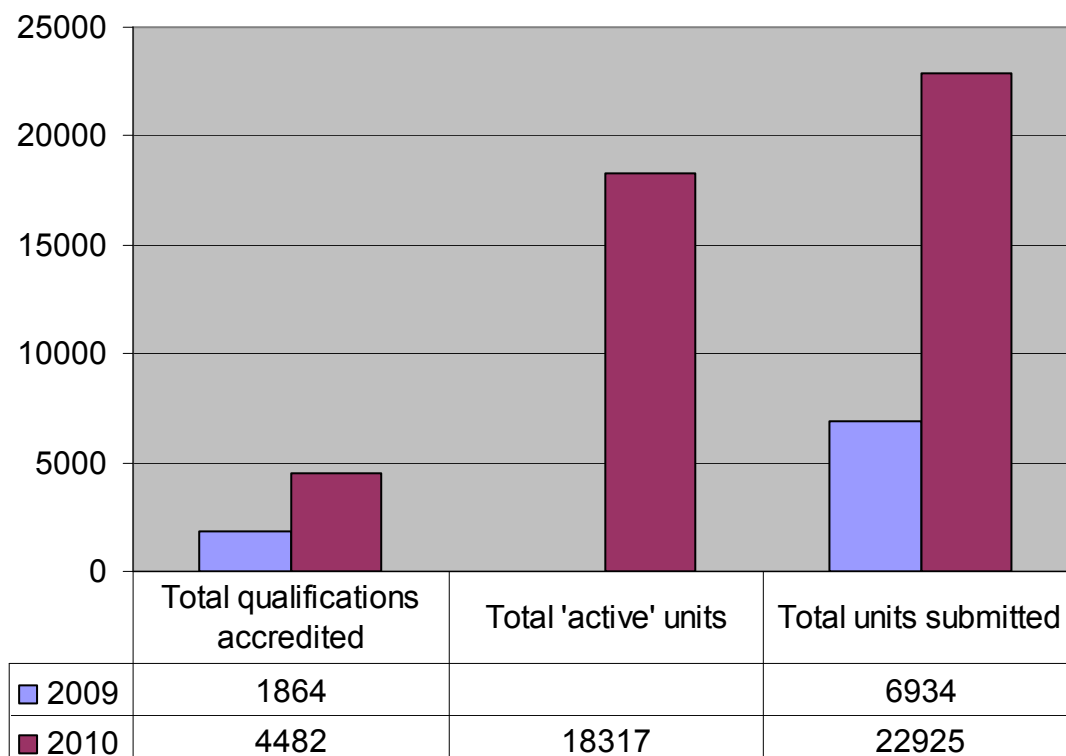
Baseline data

2009 Project year: captured on 1st August 2009

2010 Project year: captured on 1st July 2010

Table 1

| Project Year | Total qualifications accredited | Total 'active' units | Total units submitted |
|--------------|---------------------------------|----------------------|-----------------------|
| 2009 | 1864 | No data available | 6934 |
| 2010 | 4482 | 18317 | 22925 |



Credits from Equivalent Units

The data was interrogated to produce a list of all units that have been identified within a rule of combination as being equivalent to an optional or mandatory unit.

Table 2

| Project Year | Total qualifications where equivalences are used | Total units used as equivalences | Average qualifications in which an equivalent unit is featured | Equivalences across different awarding organisations |
|---------------------|---|---|---|---|
| 2009 | 6 | 10 | 2 | 0 |
| 2010 | 20 | 71 | 1.37 | 7 |

Exemptions

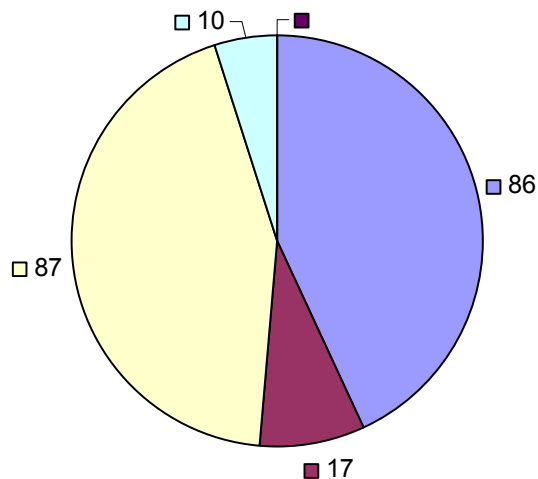
Information in relation to exemptions is recorded at qualification level and is entered by the submitting organisation.

Table 3

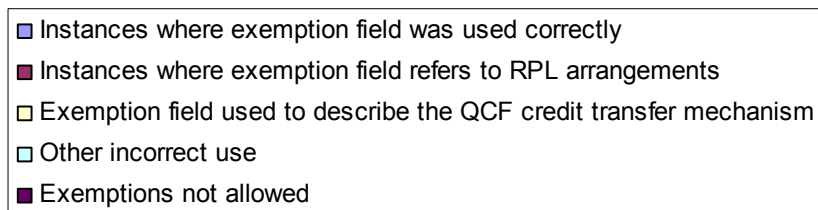
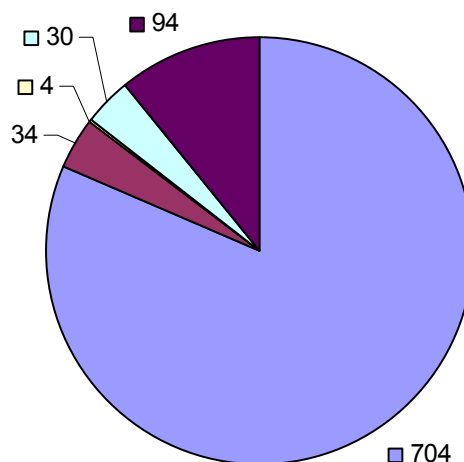
| Project Year | Total qualifications that use exemption field | Instances where exemption field was used correctly | Instances where exemption field refers to RPL arrangements | Exemption field used to describe the QCF credit transfer mechanism | Other incorrect use | Exemptions not allowed |
|---------------------|--|---|---|---|----------------------------|-------------------------------|
| 2009 | 172 | 58 | 17 | 87 | 10 | No data available |
| 2010 | 866 | 704 | 34 | 4 | 30 | 94 |

Exemptions

2009



2010



Pathways and Endorsements

A search on QMIS for RoC featuring pathways returned the following data:

Table 4

| Project Year | Total qualifications featured as pathways | Total number of pathways featured | Average number of pathways featured per qualification | Number of qualifications with one pathway | Highest number of pathways in a single qualification |
|--------------|---|-----------------------------------|---|---|--|
| 2009 | 70 | 309 | 4 | 10 | 14 |
| 2010 | 331 | 1567 | 4 | 23 | 48 |

Units linked to multiple qualifications

Table 5

| Project Year | Total number of 'live' units | Units linked to more than one qualification | Average number of qualifications in which these units feature | Highest number of qualifications to which one unit is linked | Number of units linked to ten or more qualifications |
|---------------------|-------------------------------------|--|--|---|---|
| 2009 | 6934 | 4753 | 2 | 150 | 10 |
| 2010 | 18317 | 12776 | 4.78 | 107 | 1799 |

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