

RO43 Annex 1: Decision Summary:

New Conditions on Total Qualification Time (TQT) and publication of revised specifications



Our original proposals

We proposed that the new conditions on describing the size of a qualification and requiring the publication of a specification that includes the size description and the level of the qualification should apply on 31 December 2017 to all qualifications not already on the Register, or submitted for accreditation, before 1 October 2015. We proposed that those conditions (E3.2(l), E3.2(m), E3.4, E3.5 and E7.1 to E7.5) should be effective for the following qualifications from 30 June 2016:

- (1) Qualifications that at 30 June 2016 are approved for use in DfE's KS4 or KS5 school performance measures
- (2) Qualifications in respect of which an awarding organisation intends to make an application for approval for use in DfE's KS4 or KS5 school performance measures (such qualifications should be compliant with the relevant Conditions at the time such an application is made)
- (3) Qualifications that at 30 June 2016 have been allocated a UCAS tariff value
- (4) Qualifications in respect of which an awarding organisation intends to make an application for a UCAS tariff (such qualifications should be compliant with the relevant Conditions at the time such an application is made)

We proposed that GCSEs, GCEs and Functional Skills Qualifications falling within (1) – (4) above should not be subject to the 30 June 2016 requirement. We explained the reasons for our proposed approach in our 29 September letter.¹

Awarding organisations' views

The views we received are summarised below:

- Requiring awarding organisations to allocate TQT values and update specifications for qualifications that will be withdrawn before the end of 2017 would be disproportionately burdensome for awarding organisations. The

¹ www.gov.uk/government/publications/letter-to-awarding-organisations-rits-permissions

resources would be better directed towards developing replacement qualifications.

- Project and Principal Learning qualifications should not be subject to the June 2016 deadline, because they are based on common, centrally set content, like GCSEs, GCEs and Functional Skills Qualifications.
- Allocating TQT values to qualifications before 30 June 2016 would require significant resources, if awarding organisations had to gather evidence afresh, disregarding the evidence on which previous GLH and credit determinations were made.
- It would be confusing for learners if a GLH value changed during the life of a qualification.
- Extra costs would be incurred if printed versions of the revised specifications had to be made available.
- It would be burdensome and potentially confusing for awarding organisations to remove (QCF) from qualification titles before the end of 2017.

In addition, one awarding organisation asked whether we require or expect (VRQ) to be removed from qualification titles and whether (RQF) can be included in qualification titles.

Our response

Qualifications that an awarding organisation intends to withdraw on or before 31 December 2017

We understand why an awarding organisation that intends to withdraw a qualification might not wish to amend the specification for that qualification, and that qualification users might interpret the issuing of a new specification as an indication that the qualification would continue to be available for the foreseeable future.

As part of its efforts to protect the interests of learners in respect of a qualification it has decided with withdraw, an awarding organisation must prepare and comply with a withdrawal plan. It must give Ofqual reasonable notice of its intention to withdraw the qualification (General Condition of Recognition D7).

Taking these factors into account, we have decided that qualifications that an awarding organisation intends to withdraw on or before 31 December 2017, and to which Conditions E3.2(l), E3.2(m), E3.4, E3.5 and E7.1 to E7.5 would otherwise apply on 30 June 2016, would not be subject to these new conditions if, by 30 June 2016, the awarding organisation:

- has notified Ofqual of its intention to withdraw the qualification and
- has provided clear and accurate information about the withdrawal to Learners, Centres and purchasers of qualifications who are likely to be affected by the withdrawal.

We believe this approach would address concerns that awarding organisations would otherwise have to commit resources to qualifications they intend to withdraw and enable qualification users to understand that the qualification had a limited future.

Principal learning and Project qualifications

As Principal learning and Project qualifications must comply with additional regulatory requirements, we will treat these qualifications in the same way as GCSEs, GCEs and Functional Skills qualifications for the purpose of the timing of the application of conditions E3.2(l), E3.2(m), E3.4, E3.5 and E7.1 to E7.5. These conditions will not therefore apply to Principal learning and Project qualifications until 31 December 2017.

The evidence awarding organisations use to determine TQT and GLH values

We deliberately based the new GLH and TQT requirements on previous ways in which the size of a qualification has been described. An awarding organisation that is confident existing GLH and credit values reflect typical teaching, learning, assessment and supervision times would have a good basis on which to make informed decisions about the GLH and TQT values it should attribute to its qualifications once Conditions E3.2(l), E3.2(m), E3.4, E3.5 and E7.1 to E7.5 apply. Each awarding organisation will have to decide the extent to which its previous approaches to allocating GLH and credit values provide a good basis for determining GLH and TQT in line with the *Total Qualification Time Criteria*. An awarding organisation will have to decide what more it would need to do to enable it to provide a reasoned justification to Ofqual for its determinations and provide supporting evidence, in line with 2.18 of the Criteria document.

We do not believe it would be unduly burdensome for awarding organisations to attribute TQT and GLH values to some qualifications by 30 June 2016, unless existing GLH and credit values were determined without due regard to evidence.

Confusion if a GLH value changes during the life of a qualification

The extent to which learners and other users of qualifications might be confused if a GLH value changes during the life of a qualification will depend on the extent of the change and the clarity of the awarding organisation's communications about the change.

We would be more concerned that learners and others were being misled about the size of a qualification if inappropriate GLH values are currently assigned to a qualification than that people might be confused if misleading information is corrected.

General Condition E7 requires that awarding organisations keep the GLH and TQT values assigned to a qualification under review and revise values as appropriate. We are, therefore, moving to a position in which inappropriate GLH and TQT values will be changed by awarding organisations during the life of a qualification.

The costs of printing specifications

We do not necessarily require that qualification specifications are printed and available in hard copy. General Condition E3 requires that awarding organisations publish qualification specifications. Condition J1.7 says that where an awarding organisation is required by the Conditions to publish a document, that document must be published in a way that is (a) clear to its intended audience; (b) accurate and (c) reasonably accessible (including by way of publication, if available, on the awarding organisation's website).

Removing (QCF) from qualification titles

We did not propose that (QCF) should be removed from certain qualification titles by June 2016. Our guidance on qualification titles states our expectation that QCF should not appear in qualification titles after 31 December 2017. The proposals in our 29 September letter did not change this expectation.

Removal of VRQ from qualification titles and use of RQF

We do not have any Conditions or guidance concerning the use of VRQ or RQF in qualification titles. An awarding organisation must comply with General Condition E2 on Requirements on qualification titling when deciding whether to include or remove such terms from its qualification titles.

Notice

A copy of the notice stating when Conditions E3.2(l), E3.2(m), E3.4, E3.5 and E7.1 to E7.5 come into force, in line with the decisions outlined above, is attached to Annex 2 of this letter. We will publish this notice on our website.

As we said in our letter of 29 September 2015, we will seek assurance next year that awarding organisations are on course to comply with the new Conditions, including where none of an awarding organisation's qualifications are subject to the 30 June 2016 implementation requirement. If we find evidence that GLH values for qualifications not yet subject to the new requirements are giving misleading information about the size of a qualification, on which people are acting, we may consider varying the terms of the notice.