



Qualifications and
Curriculum Authority

The Framework for Achievement

*Report to the Department for Education and Skills on the outcomes
of the stakeholder consultation*

May 2005

QCA/05/1598

SUPPORTED BY



Preface

This is a report on the outcomes of the recent consultation with stakeholders on the new Framework for Achievement (FfA). The consultation was organised by QCA, working in partnership with the Learning and Skills Council (LSC) and the Sector Skills Development Agency (SSDA).

The consultation sought to take forward our joint programme for reform of the qualifications system in England. Our reform programme derives both from QCA's December 2002 remit for the reform of vocational qualifications, together with LSC and the SSDA, and LSC and QCA's joint remit from the July 2003 White Paper *21st century skills: realising our potential*.

This White Paper proposed that qualifications reform should be underpinned by a unit-based national system of credit and qualifications, and LSC and QCA have a remit to take forward this agenda. The subsequent 2005 White Papers on *14–19 education and skills* and *Skills: getting on in business, getting on at work* cement the Framework for Achievement firmly as the cornerstone of this reform agenda.

It should be emphasised here that our remit for reform relates to 'the qualifications system' in England and not just to the National Qualifications Framework (NQF). This 'qualifications system' encompasses more achievements than just the NQF, and many more than that encompassed by vocational qualifications within the NQF. Indeed this broad concept of the qualifications system is one of the principal reasons why both LSC and QCA are identified as partners in the reform process. It is also why the concept of a Framework for Achievement has been established – to signal the need for the scale of reform of the NQF that our remit from government requires.

All partners in the reform process recognise the potentially radical nature of these reforms and the need to take forward our programme in collaboration with key stakeholders. We also recognise that there will be elements of the reform process that will not be equally well supported by all potential users of the new framework. This report reflects both these aspects of the consultation exercise.

The consultation process was an important and necessary stage in this reform process. Despite the previous publication by LSC and QCA of *Principles for a credit framework for England* (March 2004) and more recently *New thinking for reform* (QCA, July 2004) this consultation marked the first formal opportunity for key stakeholders to respond to both the general principles underpinning the reform process, and to some of the key technical features of the proposed new framework.

Notwithstanding the importance of this stage in the process of reform, it should be emphasised that it is just one stage and there are still many important things to do before the framework can start to deliver on its aims. Within the consultation document itself there are some 30 references to these further stages of reform and the issues we will need to address in taking them forward.

The consultation process has therefore given us the basis for securing some of the key technical features of the new framework. We are already beginning work on establishing these fixed points for the next stage of development. The consultation has also identified, as it was intended to do, those areas of the reform process where there

is still divided opinion on future priorities and where further work needs to be done in collaboration with key stakeholders. The consultation will help to inform this further work.

LSC and QCA are aware from the consultation that many stakeholders are concerned about the apparent speed with which this reform agenda is being taken forward. It is true that expectations are high and the imperatives within the Skills Strategy are driving forward the reform process. We will continue to take forward the reform process energetically, but not at the expense of the security of our current qualifications system, nor against the interests of learners who seek recognition of their achievements within it.

We refer to this here because we are aware from the consultation process that the concept of being 'open for business' in January 2006 – one of our declared intentions in the consultation document – has been interpreted by some as being 'operational' on this date. We recognise that the building of the new framework will take time to accomplish, and it is not (and never has been) our intention to begin the process of making the new framework operational until we are clear that all the elements necessary to guarantee both its stability and its capacity to deliver on its purposes are in place.

Nevertheless, LSC, QCA and SSDA remain convinced that, with considered planning and a timetable for reform that secures the commitment of all stakeholders, we can begin the initial operations of the new framework during 2006.

The consultation process, and the range of comments and suggestions we have received from respondents have been an enormous help to us in taking forward our programme of reform. There is a wealth of interesting views and ideas in the pages of so many of the responses and we intend to take note of many of these as we move to the next stage of the reform process.

The outcomes of the consultation also provide us with the evidence that the general direction of the reform programme is supported by the great majority of our stakeholders, even if some of our initial proposals need to be revisited in the next stage of this programme.

This has been by some way the largest public consultation that LSC, QCA and SSDA have taken forward together. Our thanks go to our colleagues in both organisations for their support in this process, and to the members of the Framework and Credit Advisory Group and its subcommittees for their help in steering us through this stage of the reform process.

Our thanks go most of all to the many people who have taken the time to respond to this consultation exercise and to attend one of the many events held during the consultation process. In so doing, they have helped us to complete this important stage of our programme to build the new Framework for Achievement, as well as preparing us so well for the next stage of the reform process.

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1. Introduction

This report records responses to the formal consultation on the new Framework for Achievement (FfA) conducted by QCA in partnership with LSC and SSDA. The responses are based on a consultation document launched by the secretary of state for education on 29 November 2004. The consultation period closed on 28 February 2005.

The report is based on two sources of information. The first source is the 357 completed responses received during the consultation period. During the same period the three partner organisations conducted a series of consultation events for key stakeholders with an interest in the new framework. These ranged from large open events in each English region to targeted one-to-one meetings with particular organisations and interest groups. These meetings provided the second source of information for the report. Section 2 gives more detail about this consultation process.

The FfA consultation document combined the opportunity to respond in general terms to the principles of reform – previously set out by LSC and QCA in *New thinking for reform* (QCA, 2004) but never subjected to formal consultation – with more detailed questions aimed at taking the reform process a significant stage further in its development. The structure of this report reflects this combination of objectives. The first two substantive sections (4 and 5) record responses to the open questions based on these general principles that underpin the framework. The remaining sections focus on responses to more detailed technical questions about the FfA.

It should be noted that the consultation document was not intended to provide the sole basis for moving to the design stage of the new framework. The report reflects this intention. Although there are a number of points of wide agreement across all stakeholders about aspects of the reform process, there remain a number of outstanding issues to resolve before LSC, QCA and SSDA are in a position to publish the full specifications and procedures for the new framework.

Having said this, the consultation has provided us with a secure baseline on which we can now make further progress on reform. In considering future details of the framework, we now have a secure and well-supported set of principles that can guide us in this next phase of work. We also have some fixed points of detail around which we can construct other elements of the framework. LSC, QCA and SSDA can now put forward proposals for the further development of the FfA that are consistent with these fixed points established through the consultation process.

2. The consultation process

2.1 The process

There were two strands to the consultation process. The first strand consisted of a formal process of written responses, based on the structured questions in the consultation document. The second strand consisted of a range of consultation events held with stakeholders, both in large open meetings and smaller invited groups.

Both strands of the process were based on the stakeholder consultation document. Over 4,500 copies of this document were circulated both through the consultation events themselves and through the networks of contacts of both the sponsors of the consultation and other partners.

The consultation process was launched on 29 November 2004. In accordance with government guidelines on such formal consultations, responses were invited within a 90-day period.

The formal responses to the consultation document were produced within a standard response form that both accompanied the document itself and was available from the QCA website. Both printed and electronic responses were received, together with responses that did not follow the consultation response form.

Both LSC and QCA organised a number of large consultation events during the consultation period. SSDA also organised an event for employers and SSCs as part of the consultation process and the SfB network produced a joint SSC response. In addition, QCA held a number of small meetings with awarding bodies, higher education (HE) organisations and other key stakeholders to discuss particular issues of concern. All these meetings were minuted and the outcomes were fed into the consultation process.

A total of 357 formal responses to the consultation document were received. Of these, 316 were received on the standard response form within the 90-day deadline, and these form the basis of our quantitative analysis of the responses. In addition, 41 responses were received after the formal deadline and/or outside the formal response form. These responses have contributed to this report, but are not included in this quantitative analysis.

Some 70 consultation events of various kinds were held during the consultation period, with over 1,500 people drawn from 1,000 organisations attending meetings in different locations across England. The minutes of each of these meetings were produced within an agreed format that enabled some analysis of this strand of consultation to be undertaken. This was necessarily less structured than the analysis of the returned consultation response forms.

Following the closure of the consultation process, the FfA Project Team began the process of reading all the consultation responses. At the same time copies of all the response documents were sent to QCA's research team, who began a

formal analysis, both quantitative and qualitative, of each response. The FfA Project Team then began the process of producing an initial draft of this report, supported by the analysis from the research team of both strands of the consultation process.

An initial draft of the response was shared with LSC colleagues, as well as with QCA colleagues outside the FfA Project Team. Following feedback, a further draft of the document was then produced and considered more widely within QCA and LSC. Based on feedback, a final draft was produced and presented for approval to both LSC and QCA senior management. The report is now presented formally to the DfES.

2.2 The language of the report

As we suggested in the consultation document, a number of respondents have ignored questions that were not of interest to them. Other responses indicated that there was not sufficient detail in some questions to inform a response. Around 15 per cent of responses were not received on the standard response form.

This means that, for each individual question in the consultation document there were fewer responses than the total number of 357 responses received. We indicate this by reference at times to 'those responding to this question' and in such instances the figures quoted exclude the 'non-responses' to this question.

When referring to 'responses' we mean those standard response forms received where one of the choices (usually four) for an answer to each question has been checked. In a number of instances respondents offered 'comments' where no box was checked. We have noted these in drawing up this report, and have referred repeatedly in the text to 'comments' received.

A full summary of the responses received to the consultation document is included as Appendix A to this report, while Appendix B lists all those organisations that submitted responses, including those that did not use the standard response form.

3. Summary of key outcomes

3.1 Features of the framework

3.1.1 A framework that is simple and easy to understand

- *Do you agree that the proposals will make the framework simpler and easy to understand?*

Over 80 per cent of the responses to this question agreed that the FfA would be simple and easy to understand. Many of the responses emphasised the importance of both the unit format and the credit system in contributing to this simplicity and ease of understanding. There was clear enthusiasm for this aspect of the proposals from those organisations with existing experience of work within a credit system. Where respondents referred to the credit system as 'new', there was less certainty that the framework would be simple and easy to understand.

3.1.2 Flexible and responsive systems for recognising achievement

- *Do you agree that the proposals will create more flexible and responsive systems for recognising achievement?*

There was more consensus on this particular feature of the framework, with over 85 per cent of respondents to this question agreeing or strongly agreeing with this feature of the proposals. Once again, there was evidence that a number of respondents who strongly agreed with this feature did so on the basis of their experience of working within credit systems. The introduction of this feature was seen as essential to the functioning of flexible and responsive systems, but several responses noted this would be a challenge to many awarding bodies.

3.1.3 A framework capable of including the widest possible range of achievements

- *Do you agree that the proposals will make the framework capable of including the widest possible range of achievements?*

Although there was general agreement with this feature of the framework, with almost 80 per cent of responses agreeing or strongly agreeing with the question, there were some respondents in all categories who disagreed with this proposition. There were also comments from respondents in agreement that argued for an even wider range of achievements to be brought into the framework.

Many comments on this question referred to the need to establish a framework that encompassed the achievements of learners from 14 to 90. The development of a separate framework for 14–19 qualifications was seen as

divisive and unnecessary. No responses supported this separation of qualification types by age.

3.1.4 A less bureaucratic framework than the NQF

- *Do you agree that the proposals will make the framework less bureaucratic than the National Qualifications Framework?*

A number of respondents felt that it was too early to make a judgement about this question. Many aspects of the proposals were not sufficiently detailed to formulate a considered response, and much depended on the practical operation of systems within the FfA, rather than the specifications of the framework itself.

Notwithstanding these concerns, over two-thirds of those who did respond to this question thought that the FfA would be less bureaucratic than the NQF. There was support for the general direction of the reforms in reducing the level of regulatory intervention in the operation of awarding body systems, together with a welcoming of the increased freedom within the framework to develop assessment arrangements.

3.2 Benefits of the framework

- *Do you agree that the proposals will benefit learners?*
- *Do you agree that the proposals will benefit employers?*
- *Do you agree that the proposals will benefit providers?*
- *Do you agree that the proposals will benefit awarding bodies?*

In all four of these questions high proportions of respondents did not feel able to select one of the presented options for response. This proportion was either slightly under or slightly over one third for each of these questions. However, among this group were a number of respondents who felt the details of the FfA were not yet sufficiently clear to be able to make an appropriate response to this question.

Of those who did respond to these questions, there were clear majorities in agreement with each of them. There were, however, much more substantial majorities in agreement with the benefits to learners, employers and providers (all over 80 per cent) than to awarding bodies (61 per cent). Among the benefits cited were increased flexibility in meeting individual needs, greater responsiveness to rapidly changing employment needs, and the ability to plan and deliver provision to meet the needs of a wider range of learners.

3.3 Scope of the framework

- *Do you agree that the framework should relate to the other frameworks in the UK and Europe?*

There was almost unanimous support for the proposal that the FfA should align with other frameworks in the UK and Europe, with over 96 per cent of those

who responded to this question in agreement. Nevertheless there was a very clear message from the consultation that, although alignment with similar frameworks in Europe should be a long-term goal, the linking together of relevant frameworks across the UK was an essential prerequisite for making further progress. In particular the need for a joint approach to development of the FfA across England, Wales and Northern Ireland received substantial support from respondents in all categories.

3.4 Units

3.4.1 A standard electronic template for units

- *Do you agree that we should develop a standard electronic template for units?*

This was another area of the consultation on which there was an overwhelming response in favour of our proposal. Many respondents referred to their familiarity with the format proposed and a significant proportion of responses referred to this as an ‘essential’, ‘vital’ or ‘critical’ feature of the framework. Although some responses suggested (minor) amendments to the unit specification, many respondents made the connection between the template suggested and the objective of simplifying the FfA for users.

3.4.2 Level descriptors

- *Do you agree that level descriptors should determine the level of units?*

There was almost unanimous support for the principle that level descriptors should be used to determine the level of all units within the framework. The importance of such descriptors to both the process of consistent unit development, and to communicating a key aspect of the value of achievements to users, were referred to frequently. A number of responses pointed out that the current Northern Ireland Credit Accumulation and Transfer Scheme (NICATS) level descriptors would need some revision in order to make them fit for purpose in the new framework.

3.4.3 The definitions of ‘credit’ and ‘credit value’

- *What issues do the definitions of ‘credit’ and ‘credit value’ raise for your organisation?*

The consultation did not ask questions about the definitions of ‘credit’ and ‘credit value’, but about the implications of the adoption of the definitions set out in the document. We were therefore encouraged by the large number of respondents who answered ‘none’ to this question. A number of responses also expanded on this simple answer by referring to their familiarity with both definitions in their current work.

The responses to this question revealed a general confidence across potential users of the framework that the adoption of the definitions of ‘credit’ and ‘credit

value' set out in the consultation document can be incorporated into the overall development of the FfA without major implications for all types of user.

3.5 The unit databank

3.5.1 Submitting units to the databank

Should:

- a) any organisation be able to submit units, or*
- b) only recognised awarding bodies be able to submit units?*

This was one area of the consultation where the principles of inclusion and simplicity created a clear tension between the two options proposed. The number of respondents preferring option A and the number who indicated option B were evenly balanced, with around 50 per cent of responses for each. Many of the responses reflected this tension in their comments, and a number of responses noted the different merits of both options before indicating a preference for one of them.

Those responses that favoured an 'open' system for placing units in the databank argued that this was necessary in order to ensure that the widest possible range of achievements could be recognised within the framework. There was also a case to be made for spreading the costs of unit development as widely as possible.

Those responses that argued for a more limited approach to the submission of units to the databank based their views on both the manageability of these arrangements and on the regulatory controls that could be exercised over awarding body systems in assuring the quality of units entered into the databank.

3.5.2 The unit databank

- *Do you agree that all units in the databank should be held in stewardship on behalf of all users of the framework?*

This was one of the most contentious questions in the consultation document, with a number of both strong agreements and strong disagreements from the responses. Overall there was a significant majority in favour of this proposal, with over 80 per cent of those responding in favour of this particular feature of the framework. However, this is one question on which the depth of feeling of some respondents, as well as the balance of opinion, needs to be taken into account.

With one exception, all categories of respondent favoured this proposal. Many responses referred to this feature of the framework as 'vital', 'essential', 'critical' or 'crucial' to its success. This view was expressed most strongly by those organisations with some experience of using a unit databank.

Strong views were also expressed against this proposal, particularly by awarding bodies. This is one of the difficult areas of the consultation where a balance needs to be struck between the views of the majority of users of the

framework and those of the organisations most likely to be affected by this particular feature of the framework – awarding bodies.

3.6 Credit accumulation and transfer

3.6.1 Credit transfer between qualifications and awarding bodies

- *Do you agree credits should be transferable between qualifications and awarding bodies within the framework?*

The responses to this question were overwhelmingly supportive from all categories of respondent. The phrase ‘otherwise, what’s the point?’ appeared many times in the comments on this question, together with one of the highest proportions of ‘strong agreement’ (46 per cent) for any of the consultation questions. Responses to this question were positive, even where the comments on the question recognised the challenges that would be faced in making this feature of the framework operational.

Only one response strongly disagreed with this question. If there was any doubt about the centrality of this feature to the future operations of the framework, the consultation has dispelled them.

3.6.2 The development of a credit transcript

- *Do you agree that an electronic credit transcript should be developed?*

There was almost unanimous support for the proposal that we should develop a credit transcript to support the practical operation of a system of credit accumulation and transfer within the FfA. Respondents in all categories were in favour of this, and we received numerous comments that referred to the development of such a transcript as ‘essential’, ‘vital’ or ‘critical’ to the success of the framework. Having emphasised the importance of the credit transcript, many respondents noted the potential time and resources that would need to be devoted to ensuring it was capable of supporting the award, accumulation and transfer of credits within the framework.

3.7 Qualifications

3.7.1 Rules of combination

- *Which features of rules of combination should be included?*

Many people commented on the importance of having a clear and consistent format for rules of combination as an important feature of the framework that would make it simpler to understand for many users. One interesting feature was the number of responses that viewed the development of rules of combination as an important manifestation of partnership in the process of qualification development. The establishing of a shared format for the

representation of rules of combination could provide the basis for involvement of a range of framework users in the process of qualifications design.

3.7.2 Core, optional and elective units

- *Do you agree that rules of combination should be based on core, optional and elective units?*

This was a relatively uncontroversial question and most respondents supported this proposal, with many responses noting that these were familiar concepts. One question that arose from a few responses needs to be clarified. We are not proposing that *all* qualifications should include core, optional and elective units. A qualification may not include any elective units. Some of the negative responses to this question assumed that this was not the case.

3.7.3 Including level and size in qualification titles

- *Do you agree that the level and size of a qualification should be an integral part of the qualification title?*

A significant majority of responses were in favour of introducing these conventions into the titles of qualifications within the framework. Several responses noted that these conventions were already familiar, as several awarding bodies had already adopted them. Many respondents noted the importance of this proposal in bringing about a more accessible and rational framework for users.

A number of responses referred to the need to link the concepts of 'small', 'medium' and 'large' to specific credit values. Other responses pointed out the need to ensure that the size of a diploma was consistent with developments arising from the 14–19 White Paper.

3.8 Occupational qualifications

- *Do you agree that occupational qualifications should be a particular group, with a distinctive brand identity?*

A majority of responses favoured the identification of occupational qualifications as a particular group within the framework. However, a number of responses raised concerns about the potentially divisive nature of establishing a separate brand identity for these qualifications. This might undermine the brand identity of the framework itself, and would need to be considered carefully.

Some responses (to this and other questions) noted the number of features of the new framework that mirrored the most positive aspects of the NVQ structure (eg the unit-based structure of the framework, the clear commitment to criterion-referenced assessment in the award of credit, the sharing of units across awarding bodies). For every response concerned about leaving behind NVQs in the current NQF, there was another response looking forward to the extension of the basic NVQ principles to a much greater number of qualifications in the new framework.

3.9 Developing and accrediting qualifications

3.9.1 Submitting qualifications for accreditation

- *Do you agree that only recognised awarding bodies should be able to submit qualifications for accreditation?*

There was general support for this proposal across the responses to the consultation, with some alternative views from providers, higher education institutions and SSCs. In supporting this proposal, most responses made reference to the need for manageability of the process of accreditation in order to meet the purpose of the new framework – to be clear and straightforward to users. Overall, there was sufficient support for the proposition in this question to enable us to move forward with some confidence on this issue.

3.9.2 Basing qualifications accreditation on rules of combination

- *Do you agree that the accreditation of individual qualifications should be based on submission of proposed rules of combination?*

There was broad support for this proposal across all categories of respondent. This support was based primarily on the recognition that focusing on the rules of combination as the key information to be scrutinised would produce significant benefits in reducing the bureaucracy of accreditation for each individual qualification. The consultation also revealed the need to set out in more detail how rules of combination might be represented within the framework.

3.10 Awarding bodies

3.10.1 Recognition and monitoring of awarding bodies

- *Do you agree with the proposed arrangements for recognition and monitoring of bodies to offer awards within the framework?*

There was widespread support for our proposals for the recognition and monitoring of awarding bodies, with over 90 per cent of all responses to this question in agreement with the proposals, including a majority in favour of the approach in all categories of respondent.

The comments on this question revealed a more circumspect support for the proposed arrangements, with many responses seeking further information about the details for recognition and monitoring of awarding bodies. Nevertheless there was support for the general principle that the transition to the new framework would require different models of operation from awarding bodies and therefore it was appropriate to use new criteria for recognition and monitoring for awarding bodies operating within the FfA.

3.10.2 Other risks and benefits to awarding bodies

- *Are there other possible risks and benefits to awarding bodies in the new framework that we have not identified?*

The benefits that were identified most often in this section were the increased freedom of awarding bodies to operate in a more flexible regulatory environment, and the potential of awarding bodies to increase their range of activities (and therefore their income) in a greatly increased marketplace for awards that the new framework would encompass. These benefits were identified by some awarding bodies, as well as by other categories of respondent.

Although risks were identified in some of the technical specifications of the framework itself (eg the credit system) most responses identified risks in either the operational aspects of the new framework, or in the process of transition to the FfA from the NQF. Other risks to awarding bodies related to the roles and/or capacity of other actors (eg sector bodies, funding bodies) in the development of the new framework.

3.10.3 The roles and responsibilities of awarding bodies

- *Do you agree with the roles and responsibilities of awarding bodies?*

A majority of responses supported the roles and responsibilities of awarding bodies set out in the consultation document, though there was less clear support for these roles and responsibilities than for other features of the framework. Of those who responded to this question, over 80 per cent agreed or strongly agreed with this question.

The majority of those in favour of these roles and responsibilities was slimmest among awarding bodies themselves, with a little over 50 per cent of those awarding bodies responding to this question agreeing or strongly agreeing with them. Comments from awarding bodies showed that more detail is needed on a number of the listed roles and responsibilities before a considered response to the question could be made.

3.11 Assessment and grading

3.11.1 The regulation of assessment arrangements

- *Do you agree that assessment arrangements should be regulated through the monitoring of awarding body systems?*

There was broad support across all responses for the proposal that QCA should regulate the assessment of qualifications through the monitoring of awarding body systems rather than through the requirement that detailed assessment plans be provided for approval with each qualification. The benefit of this approach to avoiding unnecessary bureaucracy within the framework was widely recognised. A number of responses also emphasised the need for robust

monitoring arrangements for the new framework in order to establish mutual trust and confidence between awarding bodies in the conduct of assessment.

3.11.2 Determining assessment arrangements

- *Do you agree that awarding bodies should be able to determine appropriate assessment arrangements (except where specified by a third party)?*

There was widespread support among all respondents for the principle that assessment arrangements should be determined by the awarding body offering the qualification, unless specified by a third party like an SSC. Responses of all kinds recognised the importance of this facility in enabling both awarding bodies and their approved centres to exercise judgement about the deployment of assessment methods that were both manageable by the centre and appropriate to learners.

3.11.3 Grading arrangements

- *Do you agree that grading arrangements should be determined within individual qualifications rather than as a standard feature of the framework itself?*

The great majority of responses supported the proposal that grading arrangements should be a characteristic of individual qualifications rather than a feature of the framework itself. The rationale behind most of these responses was that the framework needed to accommodate both ungraded and graded qualifications, and that the adoption of grading specifications into the framework itself would preclude the inclusion of ungraded qualifications.

Having supported this proposition, a number of responses went on to make the point that QCA had a responsibility to ensure that there was comparability across the grading arrangements of different qualifications. If too many grading arrangements were developed across different qualifications, then this would increase the complexity of the framework for users.

3.12 Roles and responsibilities

3.12.1 The roles and responsibilities of QCA

- *Do you agree with the roles and responsibilities of QCA?*

An overall majority of responses supported the proposed roles and responsibilities of QCA in the new framework, with over 85 per cent of those who responded to this question agreeing or strongly agreeing with the question. However, some responses questioned some of these roles and responsibilities.

Where comments were received on this question, the need for QCA's role to be clearly regulatory in nature was emphasised. Some respondents questioned the role of QCA in promoting the benefits of the framework as inconsistent with its role as a regulator. Others emphasised this particular role as being of crucial

importance to the success of the FfA, and noted that QCA had not always promoted the NQF effectively.

3.12.2 The roles and responsibilities of the Skills for Business (SfB) network

- *Do you agree with the roles and responsibilities of the Skills for Business network in the framework?*

Opinion on this particular question was divided. Although a clear majority of responses were in agreement with this question, a number of comments noted that the SfB network was at an early stage of development and concerns were raised about its capacity to undertake some of the roles and responsibilities identified for it.

A number of responses linked these proposed roles of the SfB network with the development of occupational qualifications. More detail was needed on how the responsibilities of SSCs and SSDA itself might be exercised in relation to the design and development of these qualifications. More consistency was needed as to how the development of sector qualification strategies (SQSs) might shape these qualifications without creating 'separate' frameworks within each sector. However, there was general support across all responses for the important role of the SfB network in promoting the FfA to employers and employer organisations.

3.12.3 The roles and responsibilities of LSC

- *Do you agree with the roles and responsibilities of the Learning and Skills Council in the framework?*

There was an overwhelming and consistent response to this question across all categories of respondent. Although a few responses recognised that the LSC's role included other responsibilities, nearly every comment on this question focused on the LSC's responsibilities for funding provision leading to awards within the framework.

The clear and unanimous message from both the responses to the document and the consultation events was that the revision of the current LSC funding methodology is a critical factor in driving the development of the framework forward and in realising its aims. LSC needed to develop funding arrangements that were consistent with the technical specifications of the framework and supported a more flexible approach both to the provision of learning opportunities and to measuring learner achievement.

3.13 Transition to the new framework

- *Do you agree with the proposals for managing the transition from the National Qualifications Framework to the new framework?*

Most responses welcomed the proposal to base the transition to the new framework from the NQF on pragmatic and manageable timescales. Most comments agreed that a timetable stretching to 2010 (and perhaps beyond)

would be necessary in order to manage such a transition. Having welcomed this overall timetable, a number of responses included concerns that the proposal that the framework should be 'open for business' in January 2006 was overly ambitious and risked creating instabilities in the FfA from the outset. Such warnings came from respondents in all categories, but were particularly emphasised by awarding bodies.

4. Features of the framework

This section of the report is based on responses to the following questions:

- Do you think that the proposals will make the framework simple and easy to understand?
- Do you think that the proposals will create more flexible and responsive systems for recognising achievement?
- Do you think the proposals will make the framework capable of including the widest possible range of achievements?
- Do you think the proposals will make the framework less bureaucratic than the NQF?
- What issues do you think are important to make sure the new framework recognises a diverse range of achievements?

4.1 A framework that is simple and easy to understand

The responses

Over 80 per cent of the responses to this question agreed that the FfA would be simple and easy to understand. Many of the responses emphasised the importance of both the unit format and the credit system in contributing to this simplicity and ease of understanding. There was clear enthusiasm for this aspect of the proposals from those organisations with existing experience of working within a credit system.

'This proposal is stylish and simple. If accepted by all partners it will make the framework very easy to understand.'

Sector Skills Council

The responses overwhelmingly supported the rationale for reform and many respondents made explicit reference to the complexities of the NQF. However, 100 respondents declined to answer this question, some commenting that there was insufficient detail in the consultation document to reach a considered view on this issue.

Where responses referred explicitly to the proposed credit system as 'new', there was less certainty that the framework would be simple and easy to understand. Some responses made a mathematical link between the total number of units that may be available within the framework and the negative impact on its simplicity and ease of understanding.

A few responses focused on the attitude of employers to the new framework. Here opinion was divided between those who thought the levels and credit values of the FfA would make achievements more easily understood by

employers, and those who feared that the newness of concepts of credit to employers would hinder their understanding of the framework.

The pattern of responses

Providers of all kinds were overwhelmingly convinced that the framework would be simpler and easier to understand: 93 of the 100 providers that responded to this question agreed or strongly agreed with this proposition. Many of those who responded referred to their experience of credit systems in support of this view. There were also explicit references to the proposed structure of qualification titles, the credit transcript and the unit databank as important features of the framework that would make it simple and easy to understand.

'We believe that the use of credit to provide a common currency with which to measure, compare and value achievements across the framework will bring significant benefits ... it is the greatest single priority of these reforms.'

National provider of e-learning programmes

Employers were also overwhelmingly in favour of the proposed framework on this issue. Despite the above references to the views of employers voiced by other respondents, 16 of the 17 employers that responded to this question were supportive of the framework as improving simplicity and ease of understanding of the qualifications system for both their organisations and their employees.

Five of six responding sector bodies, HE organisations and other respondents all believed the framework would be simple and easy to understand.

Awarding bodies were less convinced of this feature of the FfA. Of the 40 that responded to this question either disagreed or disagreed strongly with this particular feature of the framework. Two of the key features that providers saw as making the FfA simple and easy to understand – units and credits – were the very ones that some of these awarding bodies saw as adding complexity to the framework.

It was clear from their responses that a number of awarding bodies were comparing the FfA proposals to their own experience of operating within the NQF, rather than to the overall qualifications system (both inside and outside the NQF) that constitutes the object of the reform agenda.

'We do not believe that the current NQF is particularly difficult or confusing. We believe the main problem is that learners and employers do not understand it due to a lack of communication.'

Awarding body

The issues

The responses to this question revealed that, although most potential users of the framework view the proposals as bringing simplicity and ease of understanding to the qualifications system, those awarding bodies unfamiliar with credit systems within the NQF do not share this view. This may represent a

real difference, as well as a possible fear of the unknown. In order to make the 'front end' of the FfA simple and easy to understand for learners, providers, employers and HEIs, we may be introducing some 'back-office' complexities into the working of the new framework that will be a challenge to some awarding bodies.

Another fear expressed in some responses was that, in the name of simplicity, the framework would stifle both learner choice and the competitive differences between different awarding bodies. Both the unit databank and the proposed qualification titling conventions were referred to in this regard. Once again it is interesting to read the entirely opposite perspectives of nearly all providers and a majority of awarding bodies on these features of the framework – one user's simplicity is another user's restrictive practice in some perceptions of our proposals.

There is a clear need for the partners in the framework to involve awarding bodies more in the next phase of development. Some of the fears of awarding bodies, for example about the management of systems for credit accumulation and transfer, need to be addressed as real issues to be resolved through the practical development of the operational systems and infrastructure that will support the framework.

In general, the development of the framework needs to proceed with the confidence of most stakeholders that the end users of the framework will be presented with a simple and easy-to-understand framework for recognising achievement. However, in taking forward the development of the framework, we also need to ensure that the 'back-office systems' that underpin the framework are as simple as possible for users to operate.

4.2. Flexible and responsive systems for recognising achievement

The responses

There was more consensus on this particular feature of the framework, with over 85 per cent of respondents to this question agreeing or strongly agreeing with this feature of the proposals. Once again there was evidence that a number of respondents who strongly agreed with this feature did so on the basis of their experience of working within credit systems.

'...the new proposals have the potential to significantly improve flexibility in the system and in particular make progression seamless...'
National employer body

A number of responses supporting this view of the framework emphasised the importance of the principle of credit accumulation and transfer in realising this ambition. The introduction of this feature was seen as essential to the functioning of flexible and responsive systems, but several responses noted that this would be a challenge to many existing qualifications and awarding bodies.

Some of those responses that disagreed with this proposal questioned the evidence basis for introducing this feature of the FfA. For some respondents there was no evidence either that learners demanded recognition of their achievements through credit rather than through whole qualifications, or that the NQF was failing to respond flexibly and responsively to learner needs. Again, some respondents took the term 'qualifications system' to mean 'qualifications within the NQF' in making these assertions.

One message that came through clearly from all categories of response, and from those both supporting and disagreeing with this proposal, was that the flexibility and responsiveness of systems within the framework would be as dependent on the development of supportive public funding arrangements as on the technical features of the framework itself.

The pattern of responses

As with the pattern of responses above, there was very strong support for this proposal from all categories of respondent except awarding bodies. Providers of all kinds were almost unanimous in their agreement with this proposal, with 99 out of 103 responses agreeing or strongly agreeing with the question. Fifteen out of 17 employers and most other categories of respondent were also supportive. Sector bodies were equally supportive on this particular issue, with 11 of 13 of those responding to this question supporting the proposal.

For providers in particular, the ability to offer programmes within the FfA, based on an assessment of learner needs rather than on the requirement of a whole qualification, was particularly welcome. Employers voiced similar views. Many providers noted that this aspect of the proposed reforms demanded the availability of a suitably flexible and responsive funding methodology.

'What an exciting opportunity!'

National training provider

Opinion among awarding bodies on this issue was evenly divided, with 19 supporting and 19 disagreeing with this proposition. Interestingly, a number of comments from awarding bodies revealed the same concerns across this divide: that the development of flexible and responsive systems for learners would be challenging to some existing awarding body systems.

Thus some awarding bodies implied in their responses that, though they agreed that the framework might be capable of supporting flexible and responsive systems for recognising achievements for learners, such systems might place unreasonable cost burdens on awarding bodies themselves. The most interesting responses to this question were from awarding bodies that agreed with the proposal but nevertheless recognised that it would bring challenges to their current systems.

It was interesting to read the responses from a small number of awarding bodies that disagreed with this question on the grounds that there were no demands from learners, employers or providers for more flexible and responsive systems for recognising achievement. Alongside these responses sits the near unanimous evidence from these constituencies that they wished to see the introduction of such changes.

We were most encouraged by the support of 36 out of 40 of those national organisations and agencies that responded to this question in support of this proposal. Again, a number of these organisations made explicit links between this issue and the public funding of provision leading to awards within the new framework.

The issues

The issue of funding of provision leading to awards within the framework was clearly the most important across all categories of respondent. While some respondents noted the importance of continuing to link funding with whole qualifications in pursuit of strategic goals, many more emphasised the importance of developing a funding methodology linked to both the offer of unit assessment and the achievement of credits within the framework.

A related issue was the need to ensure that achievements within the new framework were linked explicitly to the success measures of government and its agencies in gauging progress towards strategic targets. In particular, the need to express some targets in relation to credit achievement instead of, or in addition to, the achievement of full qualifications in some instances should be built into the supporting arrangements for the new framework.

Another key issue that was raised was the importance both of good-quality information, advice and guidance, as well as effective tutoring and learner support in centres, if learners were to take full advantage of the potential flexibilities in the new framework. Some responses questioned the capacity of some awarding body centres to take full advantage of the opportunities presented by the framework.

4.3. A framework capable of including the widest possible range of achievements

The responses

Although there was general agreement with this feature of the framework, with almost 80 per cent of responses agreeing or strongly agreeing with the question, some respondents in all categories disagreed with this proposition. There were also comments from respondents in agreement that argued for an even wider range of achievements to be brought into the framework.

Many comments on this question referred to the need to establish a framework that encompassed the achievements of learners from 14 to 90. The development of a separate framework for 14–19 qualifications was seen as divisive and unnecessary. No responses supported this separation of qualification types by age.

‘Our experience of working to raise the achievements of 14- to 19-year-olds in the city has shown us that many young people... are not well served by the current NQF.’

Local education authority

A small number of responses, including the response from the SfB network, argued for the development of an 'enabling' framework that would include HE, rather than a regulated framework that would of necessity be more limited in the range of achievements it encompassed. This falls outside our remit for reform, though it will be necessary to ensure that the FfA aligns closely with the Framework for Higher Education Qualifications (FHEQ).

Other responses argued for a more open framework that would include, for example, 'informal learning', community-based learning or 'individual' learning. Although in fact the framework will not include any 'learning' (it is a Framework for Achievement, not a Framework for Learning), we note the range of views on this question arguing strongly for an inclusive range of achievements to be brought within the framework.

The pattern of responses

As with other responses to the features of the framework, providers of all kinds were strongly supportive of this proposal, with 78 out of 86 in agreement. Many of them commented on the positive impact that the FfA would have on drawing together into a single framework achievements from both inside and outside the NQF. Where concerns about inclusion were expressed by providers, the concern voiced most often related to the inclusion of a wide range of achievements at Entry Level within the FfA.

All other categories of respondent returned positive responses to this question, with the exception of awarding bodies. Of 40 responding awarding bodies, 17 disagreed or disagreed strongly with this feature of the framework.

'We warmly welcome the fact that the proposals are so learner-centred.'

Trade union

Some awarding bodies argued that the NQF was sufficiently inclusive of learner achievements and that there was no evidence of demand to include a wider range of achievements within it. Others argued that including a wider range of achievements would undermine the importance of qualifications in the framework. Some awarding bodies supported the principle of widening the range of achievements to be recognised, but doubted whether the technical details of the framework as proposed could deliver on this.

Several awarding bodies linked this response to the issue of unit ownership, arguing that if units were shared between awarding bodies, then many awarding bodies would refuse to place units in the databank and this could lead to a serious contraction of the range of achievements within the framework. We return to this issue in Section 8 of this report.

The issues

There is a need to balance the inclusion of a wide range of achievements within the FfA with consideration of the stability of the framework and the reliability of credits as a representation of learner achievements. Many responses both

agreeing and disagreeing with this question made similar points about the necessity for strong quality assurance systems to underpin awards within the framework, no matter how inclusive it might be.

Although some responses either doubted whether the FfA could realise this goal or did not have sufficient information at this juncture to agree that it would, there was in fact a consensus across responses that agreed with this principle. Providing the specifications of the framework were met, and quality systems leading to awards were robust, then there should be no unnecessary restrictions on the kind of achievements that could be included within the new framework.

There is still work to be done on defining the scope of the framework in relation to 14–19 qualifications. In establishing any limitations on the scope of the framework in this regard, there is a clear desire from all respondents that achievements to be included within the FfA should not be limited either by age or by the nature of provision leading to these achievements.

There is also a clear message from the responses about the need to establish the strongest possible links between the FfA and the FHEQ, and to explore areas in which these two different frameworks can support collaborative developments and clear progression opportunities for learners.

4.4. A less bureaucratic framework than the NQF

The responses

Over 130 respondents felt that it was too early to make a judgement about this question. Many aspects of the proposals were not sufficiently detailed to formulate a considered response, and much depended on the practical operation of systems within the FfA, rather than the specifications of the framework itself.

Notwithstanding these concerns, over two-thirds of those who did respond to this question thought that the FfA would be less bureaucratic than the NQF. There was support for the general direction of the reforms in reducing the level of regulatory intervention in the operation of awarding body systems, together with a welcoming of the increased freedom within the framework to develop assessment arrangements.

‘The framework must recognise diversity in learning opportunities and assessment... It must give scope for more imaginative and progressive assessment practices.’

National learning organisation

Where respondents did not agree with the question, several thought that the development of a more flexible framework would in itself increase bureaucracy. The systems required to register and certificate learners within a credit system would of necessity be more bureaucratic than those where only whole qualifications were offered.

Many respondents who both agreed and disagreed with the question pointed out the need for planning, funding and inspection arrangements to be consistent with the new framework. The introduction of the new framework could increase the level of bureaucracy if different organisations asked for different kinds of information to satisfy themselves that learning leading to awards within the FfA was of good quality and met learner needs.

The pattern of responses

Responses followed a similar pattern to those relating to other features of the framework. Although a majority of respondents in most categories agreed or strongly agreed with the question, 17 of 36 responding awarding bodies either disagreed or strongly disagreed with this proposition.

There was a variety of interpretations of the term 'bureaucratic' in this question. Thus while sector and professional bodies largely focused their comments on the processes of unit and qualifications development and approval, awarding bodies referred both to these processes and to the potential burdens on centres, assessors and their own administrators in the operations of the framework.

For providers, concerns focused more on managing the potential complexity of learner choices, and on meeting both funding and inspection requirements within this more complex system. Of 46 further education (FE) college respondents, 13 voiced concerns on this.

'The core problem has been the rigidity of the NQF.'

FE college

There was also a higher proportion of respondents (132 of 316) who failed to answer this question than the others on the features of the framework. It is clear from many of the comments that accompanied these responses that the proof of the anti-bureaucratic intentions of the reforms will be realised in the practical operation of the systems for recognising achievement within the framework, rather than through its proposed design features.

The issues

There is a need to develop more detailed information and guidance for potential users of the framework in order to illustrate more clearly the gains that might be made in reducing bureaucracy. In producing this information, the effect of the proposed reforms on the delivery of learning leading to awards needs to be considered, as well as the processes of admission of units and accreditation of qualifications.

More guidance is needed on arrangements for learner registration and on the conduct of assessment leading to the award of credit. The simpler these arrangements could be, the better for all users of the framework. The principle of common centre approval could make important inroads into the burden of bureaucracy on awarding body centres, but more detail is needed on how this might operate in practice.

There was widespread agreement that the development of a shared credit transcript would help to reduce the potential bureaucracy of managing a system of credit accumulation and transfer. Responses also noted the need to integrate the transcript with learner records, and the importance of a unique individual identifier for such records. Some respondents were sceptical of the possibility of developing such a transcript in the near future.

Gains in the flexibility of recognising achievements within the FfA may be lost if these require bureaucratic systems for tracking and recording these achievements. There is a need to ensure that funding arrangements, inspection processes and evidence against strategic targets are all being addressed in ways that will limit bureaucratic burdens on framework users.

5. Benefits of the framework

This section of the report is based on responses to the following questions:

- Do you agree that the proposals will benefit learners?
- Do you agree that the proposals will benefit employers?
- Do you agree that the proposals will benefit providers?
- Do you agree that the proposals will benefit awarding bodies?

The responses

There were consistent messages from the consultation on each of these questions about the potential beneficiaries of the reforms, as well as consistent patterns of response to each question across different categories of respondent. We therefore consider these four questions together in this section of the report.

In all four of these questions there were high proportions of respondents who did not feel able to select one of the presented options for response. This proportion was either slightly under or slightly over one third for each of these questions. However, among this group were a number of respondents who felt the details of the FfA were not yet sufficiently clear to be able to make an appropriate response to this question.

Of those that did respond to these questions, there were clear majorities in agreement with each of them. There were, however, much more substantial majorities in agreement with the benefits to learners, employers and providers (all over 80 per cent) than to awarding bodies (61 per cent). Among the benefits cited were: increased flexibility in meeting individual needs; greater responsiveness to rapidly changing employment needs; and the ability to plan and deliver provision to meet the needs of a wider range of learners.

‘The potential benefits to learners are enormous, providing operational issues can be reconciled.’

Awarding body

Where respondents saw fewer benefits to these groups, they expressed fears that: both learners and employers would find the new framework more complex to understand and to navigate through; providers would find it more complex and more expensive to guide learners to appropriate choices within the framework; and awarding bodies would lose competitive advantages and incur substantial additional costs in operating within the new framework.

The pattern of responses

It was interesting to note the differences in the responses of different types of organisation to these questions. Again, the overall pattern of responses across different categories was broadly similar across all four questions.

Some responses were either entirely positive or entirely negative in relation to the benefits of the proposals. In other words they either agreed or disagreed with all four questions. Of more interest were those patterns that were not so uniform across all four questions.

So, for example, although 58 per cent of awarding bodies felt that the proposals would not benefit them, only 40 per cent of awarding bodies felt that the reforms would not benefit learners. This is an interesting difference within an overall process of reform that 'places the learner at the centre of everything we do'.

Another interesting comparison was that, while only 57 per cent of awarding bodies felt the reforms would benefit employers, over 80 per cent of employers felt the reforms would be of benefit to them.

'...a framework built on individual units and clusters is the best way to enable individuals and employers to develop training schemes that are able to equip individuals for their work needs.'

National learning organisation

A similar, though less pronounced difference is discernible in the comparison of responses from awarding bodies and providers. While a minority of awarding bodies thought the reforms would benefit providers, almost 90 per cent of providers believed that they themselves would benefit from the reforms. However, less than 70 per cent of these same providers believed that awarding bodies would also benefit.

'We believe the proposals will benefit providers who are ready to rise to the challenge of increased flexibility and learner-centred provision.'

National provider

The pattern of responses therefore reveals some interesting perceptual differences of the relative benefits of the proposed reforms to the different potential users of the framework. Some of these reveal distinct discrepancies in the perceived benefits of these reforms across different categories of respondent. However, there is a general acceptance across all categories that, despite potential disadvantages to other users of the framework (particularly awarding bodies), the FfA will be of benefit to learners.

The issues

There is clearly more work to be done in clarifying some of the intentions of the new framework, and in producing more detailed proposals on some of its design features and operational systems, so that potential users can make more informed judgements about whether or not the proposed reforms will be of benefit to them.

We also need to ensure that key stakeholders are involved in the process of development of some of these design features and operational systems, in order to establish a shared interest in the potential benefits of the reform process to all potential users of the framework.

Many responses also noted that the benefits of the proposed reforms could not be realised in isolation from other changes. In particular, the importance of a funding infrastructure that supports the design features of the FfA and the operation of a credit system within it will be of great importance in ensuring that the benefits of the framework are realised for all potential users.

A similar connection was noted between the potential benefits of the framework and the need for an effective IT infrastructure to support it. In particular, a shared system for both learner records and credits achieved by learners would be essential to the realisation of these benefits.

In all of the above, the long-term nature of the potential benefits of the FfA was referred to by a number of respondents. It would take some time for the benefits of the new framework to become apparent to learners, and perhaps longer still before awarding bodies began to see benefits in the proposed changes. This long-term perspective would be essential in developing any future measures against which to judge the benefits of the FfA to users.

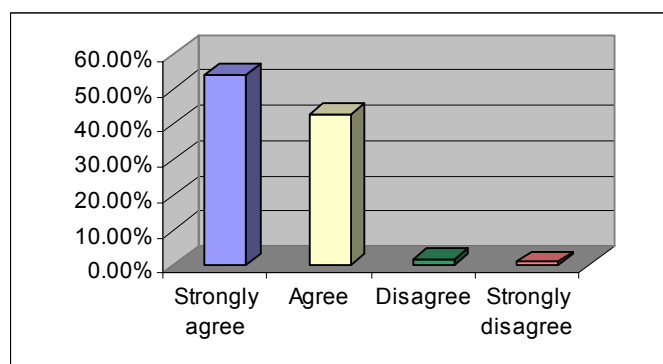
6. Scope of the framework

This section of the report is based on responses to the following question:

- Do you agree that the framework should relate to the other frameworks in the UK and Europe?

The responses

There was almost unanimous support for the proposal that the FfA should align with other frameworks in the UK and Europe, with over 96 per cent of those that responded to this question in agreement. There was a very clear message from the consultation that, although alignment with similar frameworks in Europe should be a long-term goal, the linking together of relevant frameworks across the UK was an essential prerequisite for making further progress. In particular, the need for a joint approach to development of the FfA across England, Wales and Northern Ireland received substantial support from respondents in all categories.



The pattern of responses

There was little difference in the pattern of responses from all categories of respondent to the consultation. A similar message was recorded across the range of consultation meetings and events held by both QCA and LSC. We may move forward on this particular issue in the confidence that all stakeholders in the framework will support the development of the closest possible links between the FfA and other frameworks.

'The FfA represents a once-in-a-generation opportunity to develop a qualifications system fit for the 21st century.'

National learning organisation

Key themes

Many respondents noted that, if the FfA is to replace the NQF over time, then its scope will need to extend to Wales and Northern Ireland, as well as to England. In particular, awarding bodies emphasised that it would be neither reasonable nor practical to operate three different sets of processes for the delivery of awards in England, Wales and Northern Ireland.

A number of respondents wished to see a UK-wide framework established that also included Scotland. Others recognised the difficulties in doing this, given the different legal and regulatory context within which the Scottish Credit and Qualifications Framework (SCQF) has developed. Nevertheless, it should be possible to agree that credits and qualifications achieved within the SCQF would be transferable with those in the FfA, and many respondents suggested that this should be a clear objective of the reforms.

Many responses emphasised the importance of developing the FfA as a single framework relevant to all ages and all types of achievement across England, Wales and Northern Ireland. In particular, many providers noted that their offer to learners was not subdivided by age, and that the development of a separate framework for 14–19 year-olds was not helpful to them. The FfA should be a single framework in which all types of achievement from 14 to 90 could be recognised and represented.

Some respondents also used this section of the consultation document to make the case for a framework that also encompassed HE. Others saw this as a longer-term ambition that was not achievable within the current time frame for reform. Many respondents noted the need for clear progression routes from the FfA into the FHEQ.

SSCs and awarding bodies emphasised the importance of mutual recognition and credit transfer between the FfA and FHEQ at higher levels of achievement. We were particularly encouraged by the positive and inventive responses we received on these issues from both individual higher education institutions (HEIs) and representative HE bodies. One interesting suggestion in this respect was that HEIs might also make use of the proposed unit databank.

A number of respondents referred explicitly to the Copenhagen Agreement and to the work currently proceeding on European credit transfer agreements in vocational education and training, and to the development of a European qualifications framework. These were recognised as important structures, and the FfA would need to develop consistently with them. Several responses noted that the FfA proposals, if implemented, would provide a leading-edge model for similar developments across Europe.

7. Units

This section of the report is based on responses to the following questions:

- Do you agree that units should follow a standard electronic template?
- Do you agree that level descriptors should determine the level of units?
- What issues do the definitions of 'credit' and 'credit value' raise for your organisation?

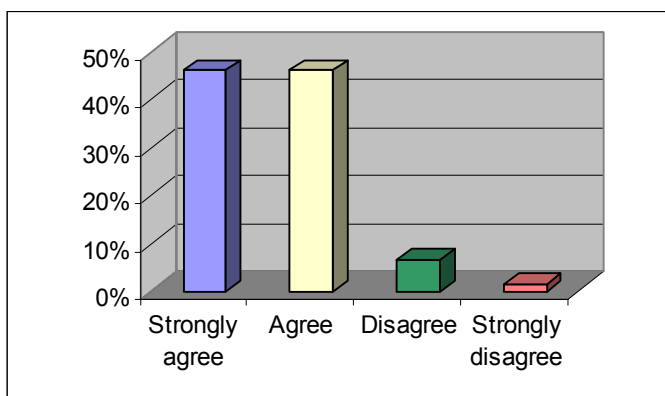
7.1. A standard electronic template for units

The responses

This was another area of the consultation on which there was an overwhelming response in favour of the proposal. Many respondents referred to their familiarity with the format proposed and a significant proportion of responses referred to this as an 'essential', 'vital' or 'critical' feature of the framework. Many respondents made the connection between the suggested template and the objective of simplifying the FfA for users. Some responses suggested (minor) amendments to the unit specification.

The definition for a unit is 'a clear and explicit set of learning outcomes and assessment criteria, having a title, credit value and level'.

There was some confusion among a minority of responses about the distinction between 'unit specification' and 'unit template'. The intention is that the unit specifications (title, learning outcomes, etc) should be structured into an electronic format (the template) within which the content of all units will be developed.



The pattern of responses

Although seven awarding bodies suggested that the electronic template was not a necessary development, a significant majority of awarding bodies favoured this

proposal, and there was near unanimous support from all other categories of respondent.

Many respondents referred to the importance of a standard unit template in providing a basis for the development of consistent and stable representations of the credit value and level of units within the FfA. A number of awarding bodies emphasised that the template could provide a basis, but not a sufficient guarantee, of these stable and consistent credit values. They stated that it would also be important to establish consistent processes through which units were developed and credit values and levels were determined.

'The use of units will allow broader access to achievement.'

National learning organisation

Only a small minority of responses made explicit the connection between the unit template and the proposed credit transcript for the FfA. Interestingly, it was SSCs and employers that referred most to the importance of this connection. It would be essential for employers to 'interrogate' the credits awarded to learners, to be able to see full details of the units through which these credits had been achieved.

Key themes

Based on the responses to this question, we anticipate that those organisations engaged in the process of unit development will be able to use the proposed unit template. The majority of respondents seem confident that the template can be a useful format for representing learner achievements.

Some respondents asked whether we would seek to regulate unit titles within the framework. This issue is clearly linked to the use of units within the unit databank and is addressed more fully in a section 8 of this report. Others pointed out the necessity to produce guidance on 'titling conventions', to aid ease of understanding and consistency. These must be part of any future guidance on developing units for use within the framework.

It is clear from a number of responses that 'learning outcome' is a familiar concept across the range of potential users of the framework. Work needs to be done on reassuring some potential users that occupational competences can be represented as 'learning outcomes'. We are confident that both conceptual understanding of, and practical experience in developing, coherent sets of learning outcomes are sufficient to sustain the development of these outcomes within the unit template.

A learning outcome is defined as a statement of what a learner can be expected to know, understand or do. As occupational competence is expressed in terms of what someone must be able to do, such competence forms a type of learning outcome.

Some similar issues were raised in relation to the 'assessment criteria' specification. Some awarding bodies will need time to consider the implications of separating out assessment criteria from other assessment-related information that may currently be integrated within the unit format in use for some or all of their awards.

There is also a need to consult with potential users of the FfA on a suitable format for unit codes.

7.2. Level descriptors

The responses

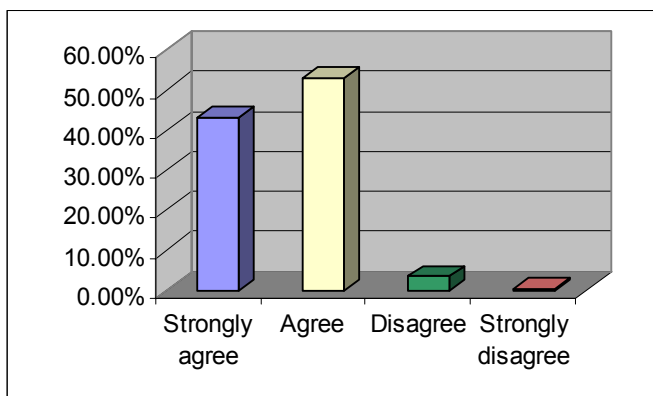
There was almost unanimous support for the principle that level descriptors should be used to determine the level of all units within the framework. The importance of such descriptors to the process of consistent unit development, and to understanding the value of achievements, were referred to within a number of responses.

The levels of the credits required for the achievement of the qualification would determine its level, and the rules of combination for a qualification would need to be stated in a way that would make the representation of qualification level clear and unambiguous. Several respondents noted this as a positive aspect of the principle that qualifications were to be 'built up' from units within the FfA.

'A main benefit will be the assessment of transferable skills...at the same level across awarding bodies and qualifications.'

Adult and community learning network

Although the principle that units should be based on level descriptors was generally supported across all categories of response, a number of responses pointed out that the current Northern Ireland Credit Accumulation and Transfer Scheme (NICATS) level descriptors would need some development in order to make them fit for purpose in the new framework. This reflects the consultation document's proposal that the NICATS descriptors should be adapted for use within the FfA, and we received some useful suggestions from respondents about how we might do this.



The pattern of responses

Although many providers declared themselves satisfied with the NICATS descriptors, others suggested that these descriptors should be reviewed, with some requests to consider again level 3/level 4, to ensure they were genuinely appropriate to all types of achievement. Those respondents thought that this could be done quickly within the format already established by NICATS. Some responses, including a number of SSCs, suggested that the basic descriptors might be supplemented by 'sector-specific guidance' to assist the process of unit development.

We received suggestions from some HE respondents that the development of the new framework provided the opportunity to bring together level descriptors at the higher levels of the FfA with those of credit systems operating within the FHEQ.

Some providers also raised the possibility that it may be necessary to establish a concept of 'pre-entry' to the framework, ie to allow that some achievements could be described in terms of learning outcomes but did not lend themselves to consistent and comparable measures of achievement that could lead to the award of credit.

Key themes

The responses provide a solid confirmation of our proposals that the NICATS descriptors should be reviewed and these revised descriptors should form the basis for all unit levels within the FfA. Clearly, this process of revision would need to be located within the overall context of developments across England, Wales and Northern Ireland. The process of review would need to consider the alignment of the higher levels of the framework with those of the FHEQ and would also need to reflect the range of potential users of the framework.

Having said this, many responses pointed out that there is considerable experience of using level descriptors in the process of unit development, and this experience should be built on in any process of review and revision.

The possibility of producing supplementary guidance within sectors to support the development of consistent unit levels may be a useful development. Such additional information would reflect the approach of some HEIs to the development of units in particular subjects or disciplines within the broader level descriptors that form the basis of HE credit systems.

Clearly, all the above issues would need to be addressed within the overall context of establishing guidelines and models of good practice within the FfA.

7.3. The definitions of 'credit' and 'credit value'

The responses

The consultation did not ask questions about the definitions of 'credit' and 'credit value', but about the implications of adopting the definitions set out in the document. We were encouraged by the large number of responses that answered 'none' to this question. A number of responses also expanded on this simple response by referring to their familiarity with both definitions in their current work.

A credit is defined as an award made to a learner in recognition of the quality-assured achievement of designated outcomes at a particular level. Credit value is defined as the number of credits that may be awarded to a learner for the successful achievement of the learning outcomes of a unit.

Some organisations suggested alternative definitions of 'credit' and 'credit value' in their responses to this question. Although it is not our intention to revisit these definitions, these responses gave some interesting insights into concerns about aspects of implementing the credit system proposed within the FfA.

The responses to this question revealed a general confidence across potential users of the framework that the adoption of the definitions of 'credit' and 'credit value' set out in the consultation document can be incorporated into the overall development of the FfA without major implications for any type of user.

The patterns of response

It was interesting to note the broad confidence of all types of provider in adopting these definitions within the framework. Clearly, providers have an experience of using such definitions outside the context of the NQF, and are very familiar with the credit systems that they support. A number of responses from providers made explicit references to their experiences of using Open College Network accreditation systems for a number of years, and this has clearly led to confidence in using such definitions.

It was also noticeable that HE respondents were also comfortable with these definitions, as they reflect very closely the familiar definitions used in HE. Other types of respondent that, in general, saw no negative implications to these definitions were employers, trade unions, voluntary sector organisations and respondents from outside England.

'Credits put learners in control of their learning achievements and the purposes to which they are put.'

University

Some awarding bodies saw negative implications in the adoption of these definitions, though those awarding bodies with direct experience of using these definitions were those with least concerns about them. Some sector bodies and also some professional associations voiced a concern that the definitions of 'credit' and 'credit value' are not relevant to work-based learning, and that the development of credit as a currency of achievement might undermine the perceived value of existing qualifications.

Key themes

There is clearly an issue for us to address in familiarising some respondents with the practical application of the definitions of 'credit' and 'credit value' in all parts of the post-school sector over the past two decades. The mistaken assumption that the credit system is based on a notion of 'time serving' and is only relevant to classroom-based activity still seems to inform the views of some respondents, despite the practical application of such systems to work-based learning, e-learning, community-based learning and many similar types of 'non-classroom-based' provision over many years.

Another issue raised by a number of respondents that are familiar with credit systems is that the particular definition of 'credit value' proposed for the FfA is largely untried and untested in the UK. Most responses that referred to this issue noted that they were familiar with a credit system that used a 30-hour, rather than a 10-hour, basis for defining credit values. There were some useful suggestions about how the implementation of this smaller basis for credit values might be implemented within the FfA in order to minimise the risk to stability in the credit system and to ensure a smooth transition to this 10-hour basis for determining credit values.

The importance of providing both further information and advice to organisations involved in the process of determining the credit values of units was mentioned in a number of responses. Others suggested that some explicit capacity-building activities should be undertaken with awarding bodies and their partners in order to prepare them to implement these definitions effectively within the process of unit development.

8. The unit databank

This section of the report is based on responses to the following questions. Should:

- a) any organisation be able to submit units, or
- b) only recognised awarding bodies be able to submit units?
- Do you agree that all units in the databank should be held in stewardship on behalf of all users of the framework?

8.1. Submitting units to the databank

The responses

This was one area of the consultation where the principles of inclusion and simplicity created a clear tension between the two options proposed. The number of respondents preferring option A and the number who indicated option B were evenly balanced with around 50 per cent of responses for each. Many of the responses reflected this tension in their comments, and a number of responses noted the different merits of both options before indicating a preference for one of them.

Those responses that favoured an 'open' system for placing units in the databank argued that this was necessary in order to ensure that the widest possible range of achievements could be recognised within the framework. There was also a case to be made for spreading the costs of unit development as widely as possible.

Those responses that argued for a more limited approach to the submission of units to the databank based their views on both the manageability of these arrangements and on the regulatory controls that could be exercised over awarding body systems in assuring the quality of units entered into the databank.

There was a general acceptance of the need to avoid bureaucratic arrangements for the admission of units to the databank. Many respondents noted that the control of admission of units through an 'approvals panel' or similar mechanism would create unacceptable bureaucracy within the new framework, and would reproduce one of the least desirable features of the original NQF.

Many respondents also pointed out that the processes of submitting and developing units were separate. It would be both feasible and desirable to develop units through collaborative partnerships, even if the body submitting the units to the databank was a recognised awarding body.

The pattern of responses

As might have been expected, awarding bodies were unanimously in favour of the second of these two options. A number of awarding bodies emphasised their commitment to collaborative processes of unit development, and saw the facility to enter units into the databank as an important service to offer to potential partners in the development process.

An alternative position was taken by most SSCs. It was clear from some of the responses that sector bodies saw themselves as the organisations that would develop units and that therefore it was logical that they should also submit them to the databank. There was also some confusion about the relationship between units in the framework and National Occupational Standards (NOS).

Within the FfA the term 'unit' is used exclusively to describe the building blocks of qualifications. National Occupational Standards may be organised into clusters but these clusters are not designated as 'units'.

Some professional bodies also argued for a role in the process of submitting units to the databank. Of course a number of these bodies may also be awarding bodies in the FfA, but others argued for this role in their capacity as professional bodies only. Other professional bodies recognised the possibility of working in partnership with awarding bodies to submit units to the databank where development had been led by a professional body.

Although some providers argued for the first of these two options, a majority of providers preferred the second option. A number of providers were confident that they could be involved in the process of unit development through their relationship with an awarding body. Others viewed the process of developing and submitting units to the databank as outside the scope of their involvement with the framework.

Most employers and other organisations also preferred this second option. This was especially the case for organisations with a national remit.

One interesting group of responses came from higher education institutions and higher education (HE) organisations. It was suggested that HE institutions might be approved to enter units into the databank. SSCs also pointed out that some units based on NOS would be offered through HE institutions within the FHEQ rather than awarding bodies within the FfA.

Key themes

It would seem possible to accommodate the concerns of most respondents through a system that guaranteed collaborative approaches to unit development, together with appropriate regulatory controls over the admission of units to the databank.

The establishing of a 'unit approval' panel or similar structure is not supported. The gains to be made through a less bureaucratic approach to the development of the databank are seen to outweigh the potential restrictions on those organisations able to submit units to the bank.

The need for a standard unit template was seen as a necessary prerequisite to the establishing of this process of unit submission. However, it was not

sufficient in itself. More detailed guidance was needed in order to ensure that all organisations were able to submit units of good quality to the databank.

The process of submission will require interoperability with the IT systems of submitting organisations. The use of a standard electronic template will support the process of placing units in the databank without undue complication.

Where units were developed that were linked to national occupational standards, there was a clear need for sector bodies to establish arrangements with awarding bodies to ensure that units demonstrated a sufficient connection to these standards. SQSs provide the context within which this collaboration could take place.

Although collaboration in developing units within an SQS would be an important process, it was not the only way in which units might be developed and placed in the databank. It would be feasible for a single awarding body working with a single partner (for example a large employer) to develop units that could also be placed in the databank.

The potential of the databank to be used beyond the boundaries of the framework also needs to be considered. In particular, there is a need to explore the potential benefits of using the databank to support the development of units that might be used within the FHEQ. This is an issue that needs careful further consideration before we agree any further development.

The proposed process would require organisations to enter into the databank units that made a distinctive contribution to the framework. Although collaborative approaches to unit development will be encouraged, there is not an assumption that the databank will be based on the principle that there is only one possible representation of achievement in each subject or sector through the unit format.

In this context it will be important to agree procedures for guarding against the unnecessary proliferation of units within the databank. This issue is considered in more detail in section 8.2 of this report.

8.2. The unit databank

The responses

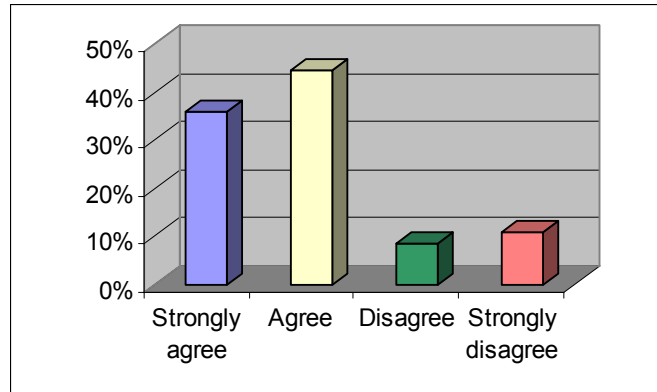
This was one of the most contentious questions in the consultation document, with both strong agreements and strong disagreements from the responses. Overall, a significant majority were in favour of this proposal, with over 80 per cent of those responding in favour of this particular feature. However, this is one question on which the depth of feeling of some respondents, as well as the balance of opinion, needs to be taken into account.

With one exception, all categories of respondent favoured this proposal. Many responses referred to this feature of the framework as 'vital', 'essential', 'critical' or 'crucial' to its success. This view was expressed most strongly by those organisations with some experience of using a unit databank.

'Without central stewardship of the databank, the FfA will be fragmentary and become unusable.'

Awarding body

Strong views were also expressed against this proposal, particularly by awarding bodies. This is one of the difficult areas of the consultation, where a balance needs to be struck between the views of the majority of users of the framework and those of the organisations most likely to be affected by this particular feature of the framework – awarding bodies.



The pattern of responses

Enthusiasm for a shared unit databank was most evident among provider responses, with 100 per cent of colleges, adult learning and private training providers who responded in favour of this proposal, as were over 90 per cent of employers. Many providers commented positively on their experiences of shared unit databanks operated through local OCNs.

Sector bodies were also in favour of this proposal, with seven of the nine that responded in favour of this proposal. Again a number of SSCs emphasised the sharing of units between awarding bodies as a positive feature of NVQs.

Professional bodies were more evenly divided, with seven in favour of the proposal and five opposed. Other national organisations, including trade unions and inspectorates, were enthusiastic about this particular proposal.

Opinion among awarding bodies was less favourable. Only 16 of the 40 awarding bodies that responded supported this proposal, with 16 strong disagreements among those 24 that opposed it. According to one awarding body, 'the idea that awarding bodies will simply give up the ownership of their units in order to populate the FfA is neither realistic nor feasible. However, the one awarding body that had any experience of setting up and maintaining a national unit databank was strongly in favour of this proposal.

On this issue we received some of the lengthiest and most detailed comments, particularly from awarding bodies. A number of awarding bodies made considered and closely argued cases against the proposal that units should be shared between all users of the framework. There were also some

misconceptions about the concept of 'shared stewardship' of units offered to learners.

The concept of 'sharing' units within the databank relates solely to the process through which the databank is populated with units. There is no suggestion in the consultation proposals that units should be shared in any way once they are located within the rules of combination of a particular qualification. In this context the awarding body accredited to offer the qualification will be wholly responsible for all assessment and certification based on this unit.

Key themes

Some respondents who argued in favour of a shared unit databank, including several awarding bodies, were concerned that failure to share units would result in a huge proliferation of units as each individual awarding body sought to develop its own particular unit to be slightly different from others in a similar subject or vocational area.

Many of the arguments in favour of sharing units through the databank came consistently from those organisations familiar with the operation of credit accumulation and transfer systems. Several respondents were convinced that our proposals for credit transfer would not work without the sharing of units through a databank. The value of the databank in helping to establish stable credit values was emphasised in several responses.

In comparison to the above comments, a number of awarding bodies pointed out that the sharing of all units through a databank would be a threat to their competitive position in the marketplaces and would challenge the intellectual copyright they had invested in the development of the units that made up their qualifications.

'Legal ownership of units is a major problem here... It is unlikely that an awarding body would wish to invest in the development of units which could subsequently be taken up by another awarding body'

Awarding body

Other awarding bodies warned that the sharing of units would lead to a gradual loss of innovation and creativity within the framework. There would be no incentives for awarding bodies to take risks in new areas of development because they could not protect the commercial return on their investment in such development.

A further argument put forward against this proposal was that it ran counter to the intention to include the widest possible range of achievements. We were warned that employers would not wish to develop units for the databank if they were not able to prevent them being used by potential competitors, and that therefore large areas of employer-based training would continue to lead to certification outside the framework.

A more pragmatic argument was that the sharing of units would create a far more complex set of arrangements for updating and revision of units over time.

Sharing units, it was argued, would increase costs across the system as a whole, and may significantly extend review and updating periods.

The responses seem to present a stark choice for making progress. On the one hand we have the evidence from the consultation of substantial enthusiasm of the great majority of users of the framework for this proposal. On the other we have the very serious concerns of a number of key organisations on whose support the framework will rely for implementation in the coming years.

Clearly, this is one issue on which further discussion will be needed with key stakeholders before proceeding to develop a unit databank to support the framework.

The question of 'stewardship' of the databank is different from the question of ownership of the individual units within it. It is not QCA's intention that it should be the sole owner of the unit databank, nor that the units in it should somehow be 'nationalised'. All partners remain committed to the principle that the databank itself should be a collective resource, irrespective of the ownership of individual units within it. Further work needs to be done on an appropriate model of 'stewardship' for the databank.

9. Credit accumulation and transfer

This section of the report is based on responses to the following questions:

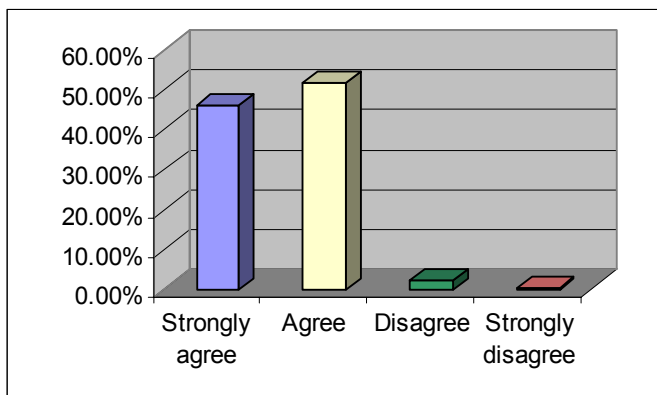
- Do you agree credits should be transferable between qualifications and awarding bodies within the framework?
- Do you agree that an electronic credit transcript should be developed?

9.1. Credit transfer between qualifications and awarding bodies

The responses

The responses to this question were overwhelmingly supportive from all categories of respondent. The phrase 'otherwise, what's the point' appeared many times in the comments on this question, together with one of the highest proportions of 'strong agreement' (46 per cent) for any of the consultation questions. Responses to this question were positive, even where the comments on the question recognised the challenges that would be faced in making this feature of the framework operational.

Only one response strongly disagreed with this question. If there was any doubt about the centrality of this feature to the future operations of the framework, the consultation has dispelled them.



The pattern of responses

Many providers identified the principle of credit transfer as essential to the effective planning of flexible and responsive offers to learners. Interestingly, a number of providers highlighted the need for such a facility in a future where they continued to work with a number of awarding bodies. The implication that credit transfer was an important feature of diversity in a future framework came through clearly in many responses.

Employers and employer bodies were also clearly in favour of credit transfer. Several of these responses linked credit transfer to future employee mobility, a feature also highlighted as important by trade union respondents. HE organisations were also strongly in favour of this principle and we received some interesting suggestions from these responses about some of the implications of managing credit transfer in practice.

We were encouraged by the positive responses of sector bodies to this particular proposal. A number of these responses were based on positive experiences of developing NVQ units that could be shared between different qualifications. Others saw the principle of credit transfer as an important tool for engaging in cross-sectoral arrangements with 'neighbouring' sectors. Standards-setting bodies with explicit cross-sectoral responsibilities were most enthusiastic about the implementation of this particular proposal.

Many awarding bodies view credit transfer as a challenge to their existing practices. However, we were greatly encouraged by the number of respondents in this category who saw this challenge as a positive one, even where concerns were raised about the profound impact credit transfer might have on current quality assurance mechanisms, data tracking systems and business models.

Key themes

A number of questions were raised in consultation responses, particularly from awarding bodies, about how credit transfer arrangements between awarding bodies would operate in practice. A number of these were linked to the development of an electronic credit transcript and are considered below.

The principle of credit transfer is a general principle that will underpin all qualifications within the framework. In practice credit transfer will operate within the framework through rules of combination. Credits may only be transferred between qualifications and awarding bodies where the rules of combination for the 'receiving' qualification permit the transfer of such credits.

In considering arrangements for credit transfer between qualifications, we were reminded by some respondents not to lose sight of the importance of learners building up patterns of credit achievement outside the structure of any particular qualification. Some learners may make active and productive use of the framework without ever seeking to transfer credits between qualifications.

Several responses highlighted the importance of SQSs in setting down the parameters of any credit transfer arrangements between qualifications in their sector. Again it is assumed that some guidance on this might form part of future SQSs and that the rules of combination for occupational qualifications would be a useful tool to support the development of credit transfer arrangements that were fit for purpose within any given sector.

Some responses from awarding bodies and SSCs highlighted the potential technical difficulties that might arise in implementing credit transfer arrangements if an SSC required a particular assessment regime for a qualification that in some way prevented credit transfer from qualifications with different assessment arrangements.

A number of responses raised the potentially complex issue of grading in relation to credit transfer. Further work will need to be done to ensure that credit transfer becomes

a real opportunity for learners to move between qualifications, rather than a technical facility denied in practice through the requirements of grading over and above the achievement of credit. Several SSCs had strong views on this issue, with a desire to see credits recognised as the real currency of achievement within the FfA, rather than qualification grades.

9.2. The development of a credit transcript

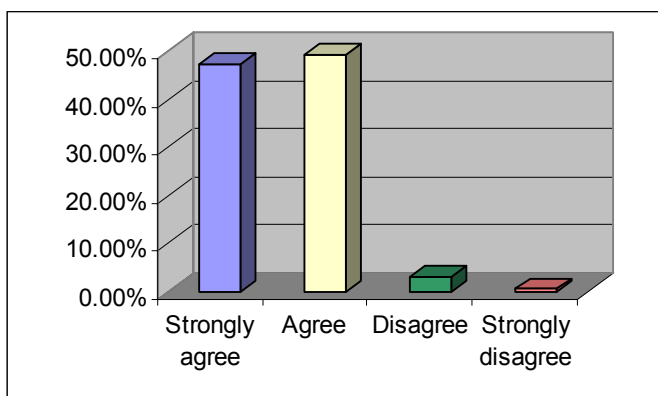
The responses

There was almost unanimous support for the proposal that we should develop a credit transcript to support the practical operation of a system of credit accumulation and transfer within the FfA. Respondents in all categories were in favour of this, and we received numerous comments that referred to the development of such a transcript as 'essential', 'vital' or 'critical' to the success of the framework.

'...the credit transcript should be developed as a matter of urgency.'
Sector Skills Council

Many responses made an explicit connection between the development of a credit transcript and the use of a unique learner identifier. There were many comments, the majority of them pessimistic, about how long it might take to reach an agreement on a 'unique learner number', and much speculation about how such a number might be generated. Conversely, we were encouraged by the number of references to use of credit transcripts (either paper-based or electronic) by those involved with OCNs or with HEIs.

One of the strongest messages that came from the responses to this particular question was the potential high risk to the implementation of the FfA proposals if such a tool is not available to users, and the potential time and expense required to build a reliable, accessible and secure transcript to which all users had appropriate access. We take these messages seriously and recognise the need to address them in our next steps in developing the FfA.



The pattern of responses

The proposal for the development of a credit transcript shared by all users of the framework received wide support from all categories of respondent. Those respondents with a particular interest in the needs of learners wanted an assurance that transcripts would be owned and controlled by learners themselves.

HE responses reminded us that there are particular constraints on the development of credit transcripts in HE imposed by European agreements and we would need to have regard to these in future consideration of credit transfer arrangements involving HEIs.

Both awarding bodies and providers pointed out in their responses the importance of developing the proposed credit transcript to be consistent with the emerging transcript of achievement that may underpin 14–19 diplomas. To miss the opportunity to establish a single transcript linked to a unique personal identifier would be most unfortunate at this stage of development of both reform agendas.

<p>‘The key to credibility will be the active use of the credit transcript at transition points.’ FE college</p>

There was unanimous support for the development of such a transcript among sector bodies, together with concerns that it must be operable across England, Wales and Northern Ireland at least, and Scotland too if possible. SSCs were also concerned that information in the transcript (if not the transcript itself) should be usable by HEIs.

Awarding bodies raised the most serious concerns on this question. In particular, these focused on the timescale for development of the transcript and the potential costs to awarding bodies in developing their own systems to interoperate with it. This second concern was particularly acute among smaller awarding bodies. Nevertheless, 39 out of 42 awarding body responses to this question were in favour of this development.

Key themes

LSC and QCA are aware of the necessity to take forward the development of the credit transcript as a priority within the FfA. The concerns about the timescales necessary for development are understood, together with the need to build into these timescales the time for awarding bodies and other key partners to test out the secure and efficient interoperability of their own systems with this credit transcript.

The importance of linking the credit transcript with the development of future 14–19 diplomas is also recognised. As future diplomas are to be developed within the specifications of the FfA, the proposed credit transcript would need to become integrated into this broader concept of a transcript of achievement.

The transcript will also need to be linked in to both the information held about learner registration and the unit databank. We received some interesting suggestions from awarding bodies about how the process of registration might operate within the framework, on what learners might register, and who might hold that information. There were several warnings about the potential complexities of data protection laws that would need to be considered in developing links between learner records and a central credit transcript.

Several respondents also raised issues about ownership of the ‘transcript system’ (rather than individual transcripts). Although QCA might be instrumental in the design

and commissioning of the transcript, it would not necessarily be best regulatory practice if the transcript system were 'owned' by QCA. A number of responses reminded us of the poor track record of government agencies in developing new software systems. Although the key technical issue with the credit transcript will be secure interoperability with other systems, rather than functionality and capacity within the central system, the warnings from respondents are noted and are in accordance with QCA's own view of its future role as a regulator.

10. Qualifications

This section of the report is based on responses to the following questions:

- Which features of rules of combination should be included?
- Do you agree that rules of combination should be based on core, optional and elective units?
- Do you agree that the level and size of qualifications should be an integral part of the qualification title?

10.1. Rules of combination

The responses

Many responses asked for further information on rules of combination before commenting on this question. Having said this, the things that people did wish to see followed a similar pattern, though some were more detailed in their suggestions than others. Many people commented on the importance of having a clear and consistent format for rules of combination as an important feature of the framework that would make it simpler to understand for many users.

'We strongly support the concept of a unit-based, credit-weighted qualifications framework ... in which units combine as core, option and electives according to rules to create fit-for-purpose qualifications.'

Awarding body

One interesting feature was the number of responses that viewed the development of rules of combination as an important manifestation of partnership in the process of qualification development.

The pattern of responses

Awarding bodies offered most comments on the format and content of rules of combination. Many of them suggested rules related to particular unit combinations. Where awarding bodies were used to working with credit systems, they offered detailed examples of rules of combination based on the achievement of credits.

SSCs also commented in some detail on this question, though the focus of concern for many of them was to ensure appropriate coverage of national occupational standards within qualifications designed within the context of an SQS. Many respondents shared the assumption that SSCs should be involved in some way in the development of rules of combination for occupational qualifications.

Providers and awarding bodies were keen to emphasise that other sources of advice and guidance on the development of rules of combination would be appropriate outside occupational qualifications. Whatever particular groups of qualifications might be

identified within the framework, collaboration with potential users of these qualifications would be important in developing responsive rules of combination.

Key themes

The main issues raised in the consultation responses were the need for a greater understanding of how the credit system could be used to develop rules of combination, and the importance of standardising the format within which rules of combination are established and presented to learners.

In addition, several respondents raised the issue of grading in relation to rules of combination. Some felt grading arrangements would make rules of combination much less accessible to learners, and should be presented separately for those qualifications for which they were relevant. Others suggested that grading arrangements had to be part of the rules of combination for graded qualifications, and that QCA should attempt to make these arrangements as clear and as consistent as possible. (This issue is considered further in Section 14 on assessment and grading.)

A few respondents (mainly SSCs and professional associations) wanted to see assessment methodology prescribed through the rules of combination. The responses to the question on assessment methods in Section 14 of this report suggest that this would be the view of a small minority of potential users of the framework.

10.2. Core, optional and 'elective' units

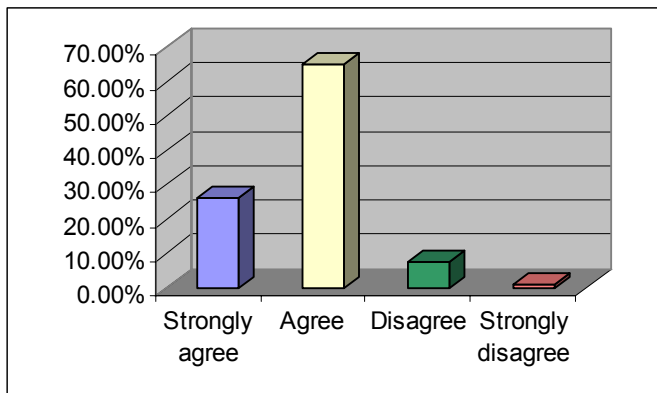
The responses

This was a relatively uncontroversial question and most respondents supported this proposal, with many responses noting that these were familiar concepts.

One question that arose needs to be clarified. We are not proposing that *all* qualifications should include core, optional and elective units. A qualification may not include any elective units or indeed any optional units. Some of the negative responses to this question assumed that this was not the case.

Some responses were not enthusiastic about the term 'elective'. However, the term 'additional' units, which a few respondents suggested as an alternative, would not be appropriate to describe units within rules of combination. Others emphasised the need to define more clearly the concept of 'core' and suggested 'mandatory' as an alternative term.

There was an assumption across all types of respondent that SSCs would have a key role to play in determining both core and optional units within occupational qualifications.



The pattern of responses

There were few significant differences between different types of respondent in relation to this question. Both providers and awarding bodies noted the potential flexibility afforded by the concept of 'elective' units. The principle that a core unit in one qualification might be an optional unit in another, etc, seemed to cause few problems as a potential design feature.

Several SSCs questioned the value of 'elective' units. Others noted the potential value of elective units in helping to build interconnections with 'neighbouring' sectors.

Several responses noted the importance of elective units in fulfilling the intention of the framework to be inclusive. In particular, providers with experience of working within credit systems recognised the value of this feature of the FfA.

Key themes

Few serious issues were raised in relation to this particular question. Most of these centred on the place of 'elective' units in qualifications, and on the processes through which these different types of unit might be identified within a qualification.

The terms 'core' and 'optional' would need to be defined more precisely in future guidance on rules of combination. There is also a need to continue to explore alternatives to the term 'elective'.

The concept of an elective unit is one that is included within the rules of combination of a qualification but (unlike optional units) is not named in these rules. All elective units must be drawn from the unit databank. Elective units are not 'additional' in that they form part of the achievement requirements for the qualification.

There may be a case for developing further guidance on the balance of 'elective' units within different groups of qualification. This guidance may set broad parameters for the use of such units (perhaps taking account of qualifications of different sizes and at different levels).

10.3. Including level and size in qualification titles

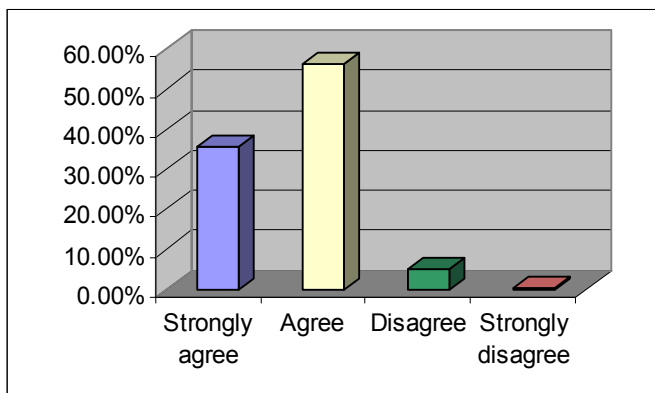
The responses

A significant majority of responses were in favour of introducing these conventions into the titles of qualifications, with 200 of 212 respondents supporting this proposal. Several responses noted that these conventions were already familiar, as several awarding bodies had already adopted them. Many respondents noted the importance of this proposal in bringing about a more accessible and rational framework for users.

A few responses pointed out the different uses of the terms 'certificate' and 'diploma' in HE and suggested that these different uses might cause problems for users. A few responses also suggested an alternative model for identifying size, with two sizes (certificate and diploma) rather than three (award, certificate and diploma). It was suggested that the term 'Award' might cause confusion with the more generic use of the term to describe all credits and qualifications within the framework.

A number of responses referred to the need to link the concepts of 'small', 'medium' and 'large' to specific credit values. Other responses pointed out the need to ensure that the size of a diploma was consistent with developments arising from the 14–19 White Paper.

It should be noted that nearly all the comments on this question related to the use of terminology to identify the size of a qualification. There was near unanimous agreement that qualification titles should include level as an integral feature.



The pattern of responses

There was little discernible difference in the pattern of responses from different types of organisation. Thirty-five out of 40 awarding bodies were in favour of the proposals (though most negative responses were also received from awarding bodies). The basis of most objections from awarding bodies suggested that there should be no control over qualification titles, and that existing terms were sufficiently well understood.

Providers and employers were both strongly in favour of introducing this convention for qualification titles. Interestingly, although the different uses of the terms 'certificate' and 'diploma' in HE were noted by several respondents, only one of 12 HE organisations themselves referred to this difference as a problem.

All 10 SSCs responding to this question declared themselves in favour of these proposals, as did trade unions and bodies representing the interests of learners.

Key themes

There is a clear need to establish definitions of the size of qualifications in relation to their credit value. These definitions may be different at different levels of the framework. The need to ensure consistency with 14–19 reforms in the use of the term 'diploma' is accepted. Key stakeholders will need to be involved in these discussions.

If we are to make the most of the potential of these terms to help clearer understanding of the framework, then we need to ensure that there are clear and logical relationships between qualifications of different sizes within related suites of qualification titles.

11. Occupational qualifications

This section of the report is based on responses to the following question:

- Do you agree that occupational qualifications should be a particular group within the framework, with a distinctive brand identity?

The responses

We should first acknowledge the difficulty some respondents experienced in answering this particular question. This was because the consultation document brought together what had originally been two questions into a single question. This made it impossible in the 'boxed' answer to the question to indicate support for the identification of occupational qualifications as a group but opposition to developing a brand identity for such a group.

A number of responses also indicated the difficulty of responding to such a question without more details of how an occupational qualification was to be defined. Although the consultation document did include a definition of an occupational qualification, it also used the term 'sector-based' qualification without defining this term clearly in the text. Some responses pointed out the implication that 'sector-based' might be seen as another group, with a different brand identity.

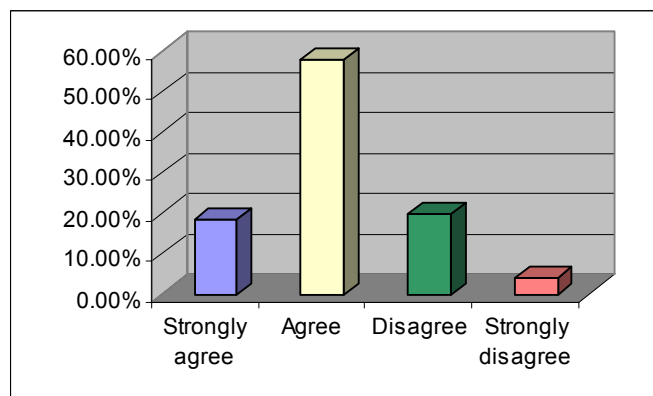
We accept that, for both the above reasons, the conclusions we draw from the consultation process about the establishing of 'occupational qualifications' as a distinct group within the FfA, and the development of a brand identity for such a group, need to be treated circumspectly.

Several responses also linked this question (usefully) to responses in relation to the role of the Skills for Business network in developing the framework. It was pointed out that the newness of some SSCs, the absence in many sectors of a Sector Skills Agreement, and the variety of different approaches to the development of SQSs made it very difficult to be clear about the role of occupational qualifications within the new framework.

Despite these concerns, the great majority of respondents clearly felt that they had sufficient information on which to make a response to this question. Many respondents were able to indicate their position clearly on both aspects of this question through their comments. Over 75 per cent of responses were in favour of this proposal.

A number of responses (to this and other questions) noted the number of features of the new framework that mirrored the most positive aspects of the NVQ structure (eg the unit-based structure of the framework, the clear commitment to criterion-referenced assessment in the award of credit, the sharing of units across awarding bodies). For every response concerned about

leaving behind NVQs in the current NQF there was another response looking forward to the extension of the basic NVQ principles to a much greater number of qualifications in the new framework.



The pattern of responses

There was a complex pattern of responses to this particular question, with divided views in each category of respondent.

One might have expected SSCs and other sector bodies to be in favour of the identification of occupational qualifications, and indeed eight out of nine responses from this group favoured these approaches. However, several respondents from this group were not in favour of a distinct brand identity for such a group. Their rationale was that the connection to NOS in itself was sufficient to assure the relevance of these qualifications to employer and sector needs, and that separate branding may create unnecessary divisions between these qualifications and others within the framework.

There was a similar division within sector bodies on the issue of retaining the term 'NVQ' as a brand identity. Some SSCs made the point that the NVQ brand was well established in their sector and it would therefore be counter-productive to change something that employers now recognised positively. Other SSCs made the opposite point, that the establishing of a new brand of qualifications with a broader purpose than NVQs, but still linked clearly to national occupational standards, would give their sector an opportunity to establish a distinctive group of qualifications that would be both more inclusive and more respected than the NVQ brand.

Among awarding bodies there was a more even balance on these issues, with 21 of 35 responses in favour, though these were also the group of respondents with most responses in the 'not enough detail to decide' category. Again, of those that were in favour of this distinctive identification, a small number argued against a separate brand identity, for reasons similar to those put forward by sector bodies.

Among those awarding bodies that referred directly to the NVQ brand, opinion was evenly balanced, with arguments put forward similar to those advanced by SSCs. Although one might have predicted a split between 'NVQ' and 'non-NVQ' awarding bodies on this issue, it was interesting to read the arguments of

several NVQ awarding bodies (large and small) in favour of using the term 'occupational qualifications' in preference to 'NVQs'. These awarding bodies saw opportunities to re-establish the credibility of qualifications based on occupational standards within the new framework in a way that was more responsive to the needs of employers and would enable the new brand to become more widely accepted.

'The take-up of NVQs in the industry has been minimal due to the suffocating bureaucracy associated with them.'

Employer organisation

Among employers and employer organisations that responded there was strong support for the development of occupational qualifications, but again some questioned the value of a separate brand identity for these qualifications.

It was among providers and organisations representing providers where a significant minority against the separate identification of occupational qualifications as a distinct brand was evident. Although a sizeable proportion saw benefits in identifying the connection between occupational standards and qualifications in some way within the new framework, this was seen as a 'back-room' connection, rather than a publicly represented distinction. Where providers expressed a particular view in relation to the use of the term 'NVQ' to describe these relationships, this view was often negative.

The views of 'other' respondents, including HE organisations, trade unions, and other national bodies divided in a similar way to those of providers. The value of identifying connections between occupational standards and qualifications was recognised, but some of these were wary of establishing a distinct brand for these qualifications, and a majority of those that expressed a view were against using the term 'NVQ' to indicate this connection.

Key themes

There is a clear need during the next phase of development of the framework to define more clearly what is meant by the term 'occupational' qualification. There is also a need to identify any other groups of qualifications within the framework that may be similarly identified and/or branded. The principle of grouping qualifications by a shared purpose needs to inform these definitions.

Inextricably linked to this is the need to establish clear guidelines about the respective roles and responsibilities of SSCs, awarding bodies and QCA itself in the process of developing qualifications linked to national occupational standards. Clearly, such processes need to be located within the general development of SQSs. We need to ensure that, if occupational qualifications are to be separately identified within the FfA, the process by which they are identified is consistent across all sectors and all awarding bodies.

There is some concern from respondents about the potentially divisive nature of identifying a particular group of qualifications as being somehow different from other qualifications within the framework. Although the linking of some qualifications in the framework to national occupational standards was recognised as a generally positive feature of the proposals, there was much

less enthusiasm for the representation of this relationship through a distinctive brand.

This issue clearly has an impact on the time frames within which decisions need to be made. As several responses noted, it should be possible to make progress on establishing the basic operational principles of the FfA as an initial priority, and then return at a subsequent date to the criteria under which particular groups of qualifications might be developed within the framework. By this later date SSCs themselves, Sector Skills Agreements and SQSs would all be at a more advanced stage of development and might therefore better inform the criteria for inclusion of any occupational qualifications within the framework.

The transition from current NVQs in the NQF to new qualifications in the FfA needs to be considered. Even those responses most critical of NVQs allowed that they had established themselves in some sectors and/or employment roles. Where this is the case, there is a need to support the smooth transition from the NQF to the FfA in partnership with both SSCs and awarding bodies.

There is also a need to consider the issue of brand identity for occupational qualifications in relation to the emerging brand identity of the FfA itself. There was criticism from a number of responses (not just in relation to this question) of the previous failure of QCA and others to actively promote the benefits of the NQF to potential users. In any event it would seem sensible to move forward on the question of occupational qualifications as a distinctive group before then considering the need for a separate brand identity.

A number of responses also referred to the need to identify 14–19 diplomas as another distinct group of qualifications within the framework. The White Paper *Skills: Getting on in business, getting on at work* (March 2005) provides the basis for moving forward on this particular issue.

12. Developing and accrediting qualifications

This section of the report is based on responses to the following questions:

- Do you agree that only recognised awarding bodies should be able to submit qualifications for accreditation?
- Do you agree that the accreditation of individual qualifications should be based on submission of proposed rules of combination?

12.1. Submitting qualifications for accreditation

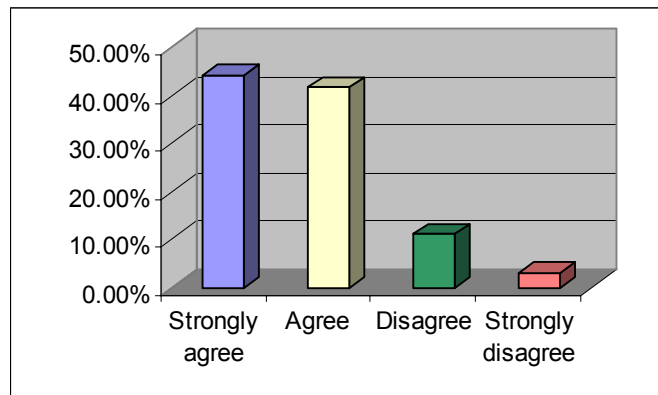
The responses

There was general support for this proposal across the responses to the consultation, with some alternative views from providers, HEIs and SSCs. In supporting this proposal, most responses made reference to the need for manageability of the process of accreditation in order to make the purpose of the new framework clear and straightforward to users.

A number of responses also referred to issues of quality and bureaucracy in supporting this proposal. It was recognised that awarding bodies would be clearly subject to the regulatory responsibilities of QCA, whereas other bodies would not. Some respondents were concerned that the integrity of qualifications within the FfA would be compromised if organisations outside the regulatory remit of QCA were able to submit qualifications for accreditation. Others were concerned that the development of criteria and procedures for other bodies to submit qualifications for accreditation would necessitate a heavy bureaucratic intervention in order to assure the quality of such awards.

There were some interesting suggestions about how other organisations might be involved in the process of qualifications development, as well as awarding bodies. A distinction needs to be made (as some responses did) between the process of development and the process of accreditation of qualifications. Collaborative development is to be encouraged, but there is no necessary contradiction between this and the responsibility of one particular partner in such developments (the awarding body) to take sole responsibility for the accreditation process.

Overall, there was sufficient support for the proposition in this question to enable us to move forward with some confidence on this issue, with 82 per cent of respondents in favour.



The pattern of responses

As might be expected, there was a unanimous view from awarding bodies in support of this proposition. The arguments of manageability, quality and avoiding bureaucracy were all convincingly deployed in support of this proposal. To their credit, a number of awarding bodies pointed out that the criteria for recognition were not 'closed' and therefore the desire to extend the scope of the FfA to include a wider range of achievements might be realised through recognising new bodies to make awards within the framework.

This desire to address the issues of flexibility and responsiveness lay behind the responses from a minority of providers that suggested many other organisations (eg employers, voluntary organisations and providers themselves) might submit qualifications for accreditation within the FfA. Some responses attempted to balance responsibilities, by suggesting that a range of organisations might submit qualifications for accreditation, but responsibility for awarding qualifications should continue to rest with awarding bodies.

A small number of employers and other organisations suggested similar alternatives to those put forward by providers, but the great majority of respondents in these categories supported the proposed role for awarding bodies, based on similar arguments to those deployed by awarding bodies themselves.

Eight out of nine SSCs also supported this majority viewpoint within the overall responses. However, four out of 12 professional bodies suggested that they might also be approved to submit qualifications for accreditation.

Another interesting view on this point came from some HEIs and HE organisations. Some HE respondents suggested that HEIs themselves might wish to become approved as awarding bodies within the framework. Others suggested that HEIs might, under certain conditions, be able to submit qualifications for accreditation within the FfA even though they had not gone through the same process of recognition as other awarding bodies. The basis of these proposals was that HEIs were themselves subject to shared and explicit quality assurance procedures which, though different from those of awarding bodies regulated by QCA, might nevertheless be considered to be 'of equivalent rigour' in the process of qualifications accreditation.

Key themes

There is a sufficient consensus among all respondents to provide the basis for moving ahead on the proposition that, as a general principle, only recognised awarding bodies should be permitted to submit qualifications for accreditation within the FfA.

As some responses noted, streamlining the process of accreditation for qualifications (with the admission of units to the databank being separated from this process) together with a focus on the rules of combination for the qualification, meant that the overall regulation of awards within the framework depended on several other processes, not just the accreditation of qualifications.

This separation of processes, though helpful in reducing the bureaucracy of regulation, would actually make the accreditation process more complex and more risky if bodies were permitted to submit qualifications for accreditation without being subject to the regulatory remit of QCA in these other related processes within the framework.

There is also an interesting issue to consider here about the balance between a 'demand-led' approach to qualifications development through commercial organisations and the 'public good' perspective of SSCs in relation to the general needs of the workforce in their sector. There may be times when these two perspectives cannot be reconciled.

The possibility that higher education institutions might also be permitted to submit qualifications for accreditation within the FfA is also interesting. Of course, if a higher education institution met all the criteria for recognition as an awarding body regulated by QCA, then this would not be problematic. The possibility that such recognition might be conferred through an alternative process, governed by higher education institutions' relationship with Quality Assurance Agency (QAA), that was deemed to be equally rigorous to that of QCA, may open up many interesting opportunities for recognising achievement at the higher levels of the new framework. Clearly, the funding issues involved in such a decision would need to be considered.

Notwithstanding the case made by some providers that they too might be permitted to submit qualifications for accreditation within the FfA (as well as other related activities, such as submitting units to the databank and awarding credits), such arrangements would constitute a major challenge to current regulatory arrangements relating to corporate governance and the independence of assessment judgements.

12.2. Basing qualifications accreditation on rules of combination

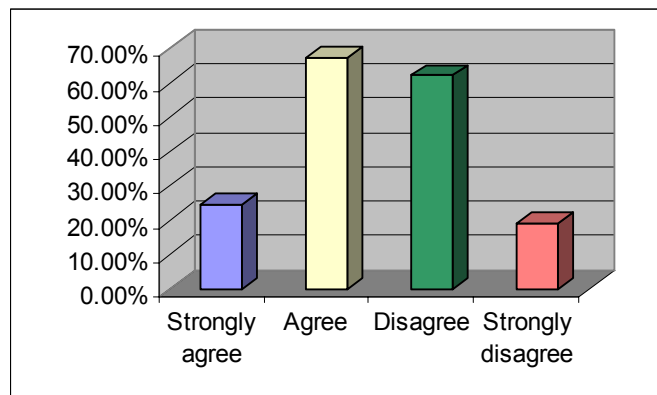
The responses

There was broad support for this proposal across all categories of respondent, with 192 of 209 responses in favour. This support was based on the recognition that focusing on the rules of combination as the key information to be

scrutinised would produce significant benefits in reducing the bureaucracy of accreditation for each individual qualification.

Clearly, this question was closely related to the question in Section 10 on rules of combination. A small number of respondents felt unable to answer this question because they did not have sufficient information about the detail of these rules of combination. Other respondents sought an interpretation of the term 'based on' and speculated as to what other information might also be required in such submissions.

Most respondents who commented on this question welcomed the proposal that details of the assessment arrangements for individual qualifications would not need to be submitted for accreditation, unless an SSC or other third party required such details to be accredited. This facility, plus the separation of the process of admitting units to the databank from the accreditation of qualifications, was clearly recognised by many respondents as a less bureaucratic approach to the accreditation of qualifications.



The pattern of responses

Clearly, awarding bodies were the respondents with most interest in this particular question. Although a clear majority of them were in favour of this proposal, a number felt unable to comment in detail because of the lack of information about what was to be included in rules of combination, and what other information might also be required.

Some SSCs were concerned that awarding bodies might be able to submit rules of combination for accreditation of occupational qualifications without the approval or endorsement of the relevant SSC. Others made the link with references to SQSs in the section on 'Roles and responsibilities of the SfB network' (see also Section 15 of this report) and were satisfied that they would have appropriate influence over rules of combination for occupational qualifications in their sector. In some instances SSCs assumed that all rules of combination would be predetermined within the SQS for that sector.

For all other categories of respondent there was support for the proposal, a recognition of the potential benefits of such an approach in reducing bureaucracy, and very few additional comments on how the process might operate.

Key themes

Clearly, we need to produce more detail on the proposed format for rules of combination within the FfA in order for some awarding bodies to be able to engage more actively with this particular feature of the framework.

In addition, we need to produce proposals for consideration about what additional information will be required to be submitted alongside rules of combination for the accreditation of qualifications. This would need to be minimal, in order to maintain the benefits of the process, and some responses made suggestions as to what this additional information might be.

The need to develop a clearer relationship between some rules of combination and SQSs is referred to above in Section 10 of this report. However, we also need to establish a simple process through which SSCs can be assured that all rules of combination submitted as part of occupational qualifications for accreditation do indeed conform to the relevant SQS.

It will also be necessary for QCA to develop some explicit criteria against which rules of combination will be accredited. Although some of these are technical criteria (for example assurances against duplication and the barring of particular combinations), others will be more open to interpretation (for example responsiveness to individual needs, opportunities for credit transfer).

One approach to the process of qualifications accreditation based on rules of combination might be to build up flexibility over time. Thus an initial set of rules might be accredited that enabled a smooth transition from current qualification specifications within the NQF to new ones within the FfA. At the point of review of such qualifications, more flexible rules of combination might be accredited. Thus the potential of the FfA to support credit accumulation and transfer between qualifications and awarding bodies might not begin to be realised until a 'second generation' of rules of combination had been established.

13. Awarding bodies

This section of the report is based on responses to the following questions:

- Do you agree with the proposed arrangements for recognition and monitoring of bodies to offer awards within the framework?
- Are there other possible risks and benefits to awarding bodies that we have not identified?
- Do you agree with the proposed roles and responsibilities of awarding bodies?

13.1 Recognition and monitoring of awarding bodies

The responses

There was widespread support for our proposals for the recognition and monitoring of awarding bodies, with over 90 per cent of all responses to this question in agreement, including a majority in favour of the approach to be taken in all categories of respondent.

The comments on this question revealed a more circumspect support for the proposed arrangements, with many responses seeking further information about the details for recognition and monitoring of awarding bodies. Nevertheless there was support for the general principle that the transition to the new framework would require different models of operation from awarding bodies and therefore it was appropriate to use new criteria for recognition and monitoring for awarding bodies operating within the FfA.

The pattern of responses

We were particularly pleased that the views of awarding bodies mirrored those of respondents as a whole: 38 of 41 awarding bodies responding to this question were positive about this feature of the framework. Understandably it was awarding bodies that also asked most questions about the details of these arrangements, with a small number reserving their position until further information was published on both the criteria and procedures for recognition and monitoring.

Providers and employers were both overwhelmingly in favour of the proposals, with a number of them noting the benefits to flexibility within the framework of a shift towards monitoring of awarding body quality assurance arrangements rather than accreditation of individual qualifications.

The proposals were supported by six out of nine sector bodies and by nearly all the national organisations that responded to the consultation. A number of responses recognised that the principle behind these proposals was in line with the general development of quality systems across the post-school sector.

Key themes

One issue raised by a number of responses was the need to balance robust criteria for recognition and monitoring of awarding body performance with non-bureaucratic procedures for applying these criteria. Different respondents emphasised both sides of this balance.

This was also true of awarding body responses. While many awarding bodies were concerned that the process of recognition to operate within the FfA might be time-consuming and bureaucratic, others emphasised the need for robust criteria for recognition as an important basis for mutual trust between awarding bodies, an essential prerequisite for the effective functioning of a credit system.

A number of awarding bodies stressed the importance of continuity from recognition procedures within the NQF. There was concern that the existing experiences of awarding bodies operating within the NQF might not be valued within a new recognition process.

Some responses emphasised that shifting the balance of regulatory intervention from the accreditation of individual qualifications towards the monitoring of awarding body quality assurance systems would entail a shift of resources and skills within QCA itself. QCA would need to ensure it had the capacity to conduct effective monitoring before shifting to this changed model of regulation.

13.2 Other risks and benefits to awarding bodies

The responses

Given the nature of this question, it is not possible to produce a quantitative summary of responses. This was also a question on which, understandably, a number of respondents declined to comment as not being within their expertise or experience to answer.

Of those who did respond to this question, there was a clear emphasis on additional risks rather than additional benefits. Unsurprisingly it was awarding bodies themselves that identified most of these risks, and these are considered in more detail below.

'Risks include the possibility that the framework imposes a rigidity that reduces the ability of awarding bodies to respond to a dynamic marketplace.'

Awarding body

The benefits that were identified most often in this section were the increased freedom of awarding bodies to operate in a more flexible regulatory environment, and the potential of awarding bodies to increase their range of activities (and therefore their income) in a greatly increased marketplace for awards that the new framework would encompass. These benefits were

identified by some awarding bodies, as well as by other categories of respondent.

The pattern of responses

Many respondents identified additional risks to awarding bodies in the new framework. Most risks were identified by awarding bodies themselves.

'Awarding body activities need to be learner driven.'
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Awarding body

Although risks were identified in some of the technical specifications of the framework itself (eg the credit system), most responses identified risks in either the operational aspects of the new framework, or in the process of transition to the FfA from the NQF. Other risks to awarding bodies related to the roles and/or capacity of other actors (eg sector bodies, funding bodies) in the development of the new framework.

Key themes

The risk most often mentioned by awarding bodies was the loss of control over intellectual property rights that would be involved in the establishing of the proposed shared unit databank. Some referred to the commercial costs of this, others to the threat to particular areas of their existing provision.

Other respondents referred to the potential costs of redeveloping qualifications to meet the unit-based requirements of the FfA. This is an issue where it appears some awarding bodies are more confident than others that existing qualifications can be easily transformed to meet the unit specifications of the FfA.

There are also risks to awarding bodies in managing the award, accumulation and transfer of credits within the new framework. A number of respondents referred to the critical role of the credit transcript in supporting this feature of the FfA, and the risk to all users (but particularly to awarding bodies) if this were not available to support the credit system. Several responses referred explicitly to the importance of a unique learner identifier in this regard, and the risks of delay in developing a credit transcript if such a facility were not available.

A number of awarding bodies also identified the important link with the review of LSC funding in introducing the new framework. Without a changed funding methodology there were risks that much of the time and resources spent on developing credit-based qualifications would not produce the necessary returns in terms of increased use of the framework by learners and employers, and increased rates of success within the credit system.

Some responses noted that the consultation process had been conducted in the absence of a published Regulatory Impact Assessment (RIA). It will indeed be necessary to produce an RIA in the future to before proceeding with the implementation of the proposals to establish the FfA. However, as the consultation process in itself was not intended to provide the sole basis for moving forward to implementation, the advice to the partners in the consultation

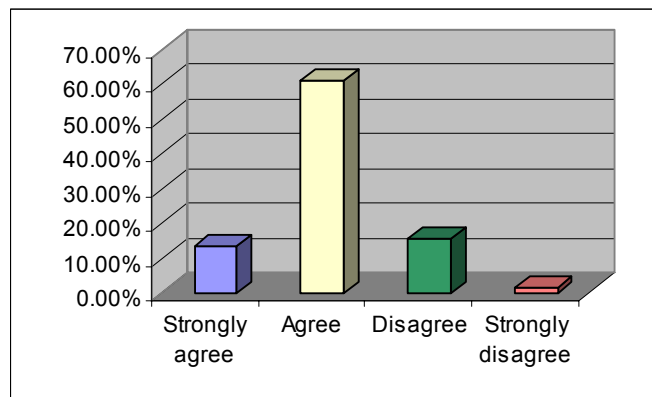
exercise was that the publication of an RIA at this stage of the process of developing the new framework would be premature.

13.3 The roles and responsibilities of awarding bodies

The responses

A majority of responses supported the roles and responsibilities of awarding bodies set out in the consultation document, though there was less clear support for these roles and responsibilities than for other features of the framework. Of those that responded to this question, over 80 per cent agreed or strongly agreed with this question.

As with other questions on roles and responsibilities, a number of respondents felt the information presented was too limited on which to make a considered response to the question. Others stated they lacked the expertise in this particular area to respond. Having noted this, a majority among all categories of respondent to this question supported these proposals.



The pattern of responses

Twenty-two of 41 awarding bodies responding to this question agreed or strongly agreed with the proposed roles. Comments from other awarding bodies showed that more detail is needed on a number of the listed roles and responsibilities before a considered response to the question could be made.

In all other categories of respondent there were small numbers of those in disagreement with these roles and responsibilities. Sector bodies were generally supportive of these proposals, though again some wanted more detail before committing to a response.

Providers of all kinds were overwhelmingly in agreement with these roles and responsibilities, as were almost 90 per cent of employers, and almost all the national bodies that responded to this question.

Key themes

Once again the issue of unit ownership was the one that awarding bodies referred to most consistently in questioning the roles and responsibilities set out in this section of the consultation document. Comments from a number of awarding bodies suggested that the other identified roles, though needing more detail, were not unduly problematic.

Several responses referred to the need for more consideration of issues around learner registration and record keeping. There were questions about what is meant by the term 'gatekeeper to the whole FfA' in some awarding body responses, and an emphasis on the importance of shared protocols and procedures for registering learners.

There was general support for the principle of common centre approval, but this was one issue on which many respondents sought more detail. Some awarding bodies were sceptical of the extent to which a single process of centre approval could recognise the capability to assess towards all types of qualification. Others argued that the development of shared requirements for centre approval should result in more freedom for individual awarding bodies to determine the processes for such approval.

Although a small number of responses questioned the principle of mutual recognition in relation to the credits awarded by other awarding bodies, most awarding bodies accepted this as a necessary feature of the credit system that would operate within the framework. Again, there is a need to produce more detail in the near future on how this system will operate.

14. Assessment and grading

This section of the report is based on responses to the following questions:

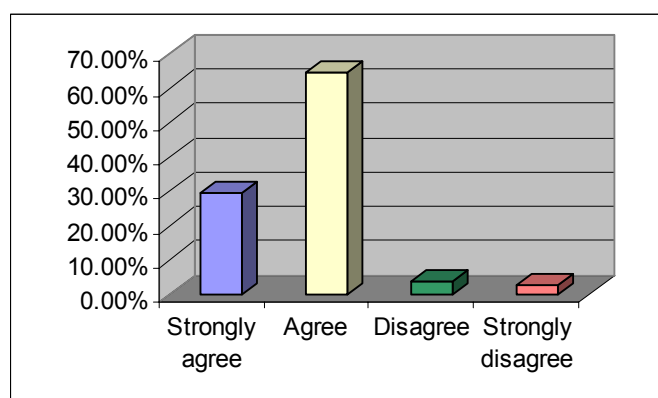
- Do you agree that assessment arrangements should be regulated through monitoring of awarding body systems?
- Do you agree that awarding bodies should be able to determine appropriate assessment arrangements (except where specified by a third party)?
- Do you agree that grading arrangements should be determined within individual qualifications rather than as a standard feature of the framework itself?

14.1 The regulation of assessment arrangements

The responses

There was broad support across all responses for the proposal that QCA should regulate the assessment of qualifications through the monitoring of awarding body systems rather than through the requirement that detailed assessment plans be provided for approval with each qualification. The benefit of this approach to avoiding unnecessary bureaucracy within the framework was widely recognised, with 94 per cent of respondents supporting this proposal.

A small number of respondents felt unable to comment in detail on this proposal because there was insufficient detail in the document as to how this monitoring of awarding body systems was to be undertaken, and what evidence awarding bodies might have to produce about their assessment systems.



The pattern of responses

Although 26 of 28 awarding bodies welcomed this approach to the quality assurance of assessment, one awarding body expressed concern about the consistency of assessment judgements across different awarding bodies if such

a proposal were implemented. This concern was based on an assumption that other awarding bodies may not be as rigorous in their approaches to assessment as the responding awarding body.

All responding SSCs supported this approach, some assuming that the specification of the assessment arrangements for occupational qualifications would be set out in some detail by the SSC, and would be applied by all awarding bodies offering that qualification. This may indeed be the case, though the question still remains as to whether these would be submitted for accreditation or whether the monitoring of awarding body systems would seek to scrutinise the application of such assessment requirements by awarding bodies.

A small number of professional bodies also expressed concern that unless the detailed assessment arrangements for each qualification were to be approved, there may be a 'slippage' in assessment standards and a consequent threat to the integrity of the profession itself.

For most other categories of respondent there were few comments on this proposal. As the question focused very much on the relationship between awarding bodies and regulator, this was to be expected.

Key themes

QCA recognises the potential impact of this proposal on the quality of assessment judgements on the consistent representation of learner achievement. As these judgements are critical to the stability of the credit as a currency of achievement, this particular feature of the FfA needs to be implemented with some care. There will be a need for QCA and awarding bodies to work together to establish appropriate systems for monitoring the consistency of assessment judgements across the framework that can support mutual confidence between all framework users without being unnecessarily bureaucratic.

There is a related concern here that QCA does not currently have in place sufficiently robust arrangements for monitoring of awarding body systems to be assured of the quality of assessment on all qualifications. The capacity of the organisation to undertake this role, and the skills of staff in conducting such activities consistently and effectively, need to be developed.

Similarly, the criteria against which such monitoring would take place need to be agreed, together with protocols on sampling of evidence from awarding bodies. The establishing of a shared process for centre approval should help to support these monitoring arrangements. Common centre approval should enable QCA and awarding bodies to work together to develop guidance to centres on both consistent approaches to assessment and to the production of useful evidence of these approaches for monitoring purposes.

14.2 Determining assessment arrangements

The responses

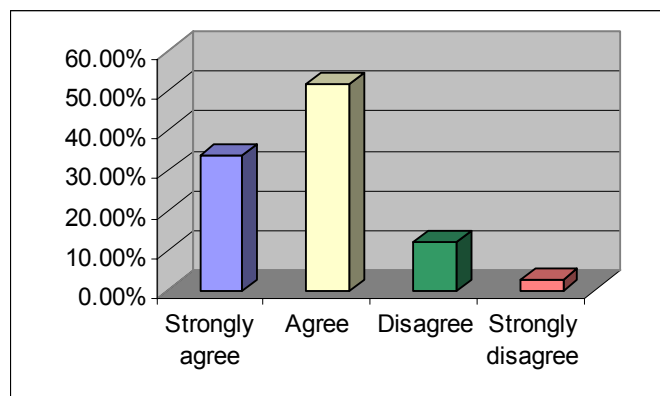
There was widespread support among all respondents for the principle that assessment arrangements should be determined by the awarding body offering the qualification, unless specified by a third party like an SSC, with 85 per cent of responses in favour.

A small number of respondents expressed a concern that unless the assessment methodology and evidence requirements for each unit were predetermined and common across all qualifications and awarding bodies, it would not be possible to make comparable judgements about learner achievements on these units. However, those respondents with experience of working with credit systems did not share this concern.

All responses recognised the importance of this in enabling both awarding bodies and their approved centres to exercise judgement about the use of assessment methods that were both manageable by the centre and appropriate to learners.

Some respondents referred to the opportunities offered by electronic assessment methods and the potential for e-assessment to provide an explicit quality assurance 'counterweight' to the devolving of decisions about assessment methods to awarding bodies.

A number of responses recognised the importance of the unit specification to supporting this proposal. The assessment criteria in each unit would enable reasonable judgements to be made as to whether the assessment arrangements used by the awarding body were valid and reliable in relation to the outcomes of the unit.



The pattern of responses

The pattern of responses mirrored in many respects the responses to the previous question. Again, some awarding bodies expressed concern about the possibility that some awarding bodies would develop 'easier' assessment methods than others and that therefore centres would register learners with

competitor awarding bodies rather than those awarding bodies that were (of course) more concerned with standards of assessment.

Although some SSCs also had similar concerns, these were offset in most instances by the proposal that, in some cases, SSCs might determine assessment methods for particular qualifications to meet sector regulatory requirements. Other SSCs expressed themselves happy with this arrangement in principle, and sought only to give strategic guidance on the assessment of occupational qualifications through the SQS for their sector.

A number of providers, as well as other respondents, noted the potential problems that might arise for credit transfer between qualifications if the assessment methodology for a particular qualification precluded the transfer of credits from another qualification on the same units that had been assessed through different methods. Most providers welcomed this proposal and the impetus to flexibility and responsiveness that it represented.

Key themes

In order to ensure that there is comparability of assessment outcomes across awarding bodies and qualifications within the proposed arrangements, it will be necessary to ensure that the assessment criteria of individual units are clear, robust and capable of being used to make judgements about the validity of particular assessment methods and evidence requirements. More work needs to be done on developing QCA guidance on assessment and producing the capacity to ensure that good quality units are developed and submitted to the databank.

As some respondents noted, the development of clear and robust assessment criteria will in many instances constrain the range of assessment methods that may be deployed to support valid and reliable judgements about learner achievement. The freedom of awarding bodies to determine assessment methods must be balanced against the need to ensure valid and reliable assessment against unit specifications.

Within this context the development of e-assessment opportunities would add to the consistency of assessment judgements across the framework. The unit structure lends itself well to the design and delivery of e-assessment (where such forms of assessment are valid). There is scope here for QCA and awarding bodies to work more closely together on the development of the regulation of e-assessment that support the purposes of the FfA and provided clear incentives for the development of e-assessment opportunities as the framework develops.

Although SSCs would be able to determine the overall assessment arrangements for occupational qualifications, this power could still be exercised without unnecessary prescription. If an SSC were to determine the detailed assessment arrangements for a qualification, then learners may well be precluded from counting credits towards that qualification, even though they have been assessed to appropriate standards by another awarding body. However, where health and safety, public liability and personal safety issues are involved, the specification of assessment methods for some components of a qualification may need to be allowed within the framework.

14.3 Grading arrangements

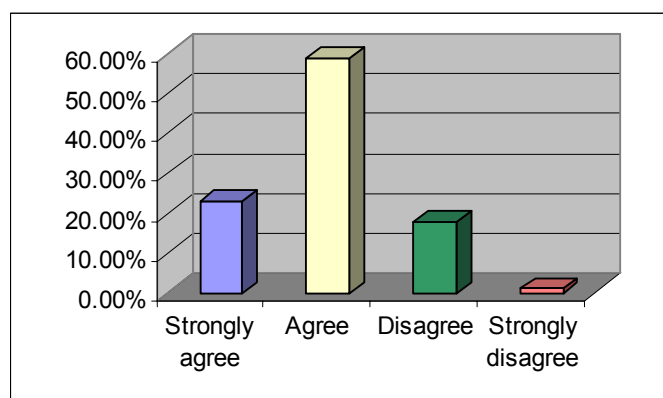
The responses

Over 81 per cent of responses supported the proposal that grading arrangements should be a characteristic of individual qualifications rather than a feature of the framework itself. The rationale for this was that the framework needed to accommodate both ungraded and graded qualifications, and that the adoption of grading specifications into the framework itself would preclude the inclusion of ungraded qualifications.

Having supported this proposition, a number of responses went on to make the point that QCA had a responsibility to ensure that there was comparability across the grading arrangements of different qualifications. If too many grading arrangements were developed across different qualifications, then this would increase the complexity of the framework for users.

Other respondents suggested that grading might be limited to particular groups of qualifications with a particular purpose. So, for example, if progression to HE was one of the aims of a qualification, then a rationale for grading could be established. It would be difficult to construct a rationale for the grading of Entry level qualifications and QCA might use its regulatory powers to prevent this.

A number of responses highlighted the potential tensions between a credit system based on criterion-referenced achievement and the differentiation of individual achievements through a grading system. Care would be needed to develop the particular features of the FfA in such a way as to limit these tensions.



The pattern of responses

Once again, 35 of 42 awarding bodies were in favour of such a proposal. Some awarding bodies noted the importance of consistency across such grading arrangements. Others were concerned that the development of 'idiosyncratic' grading criteria by different awarding bodies might be used deliberately to

prevent credit transfer into such qualifications and therefore 'seal' them against the perceived 'intrusion' of credit achievements from other awarding bodies.

Some providers shared this fear, though it was clear that many providers were unused to offering graded qualifications and were therefore disinterested in the detail of this issue. Some providers suggested it would be important to ensure that any grading criteria for qualifications were able to accommodate the development of the new diplomas announced in the recent 14–19 White Paper.

SSCs unanimously supported this proposal and were keen to ensure that the framework retained the facility to include qualifications in which assessment was based on the demonstration of occupational competence rather than through individual differentiation of achievement through grading.

Some professional bodies sought to influence grading arrangements in order to ensure that they were consistent with existing criteria for admission into various forms of membership of the profession. Others took a similar position to those of SSCs in supporting the continued development of competence-based assessment for occupational qualifications.

Some of the most interesting responses to these questions were received from HEIs and HE organisations. Here there were stronger views about the benefits of developing a more consistent approach to grading within different qualifications, especially those designed to lead to entry to HE. The importance of linking qualification grades with the UCAS tariff was mentioned by more than one HE respondent, as well as in a small number of other responses.

Key themes

Although the general proposition that grading arrangements should be a feature of individual qualifications rather than the framework itself, there is a need for QCA to consider how its intention to ensure consistency between different grading systems might best be realised.

Grading systems need to be developed that do not undermine the operation of the system of credit accumulation and transfer within the framework. There will inevitably be some tensions between criterion-referenced and differentiated systems of recognising achievement within the framework, and it will be necessary to establish practical working models of grading arrangements that balance these different approaches.

The proposals that grading systems need both to be capable of accommodating 14–19 diplomas and linking with the UCAS tariff system also need to be considered further.

15. Roles and responsibilities

This section of the report is based on responses to the following questions:

- Do you agree with the roles and responsibilities of QCA?
- Do you agree with the roles and responsibilities of the Skills for Business network in the framework?
- Do you agree with the roles and responsibilities of the Learning and Skills Council in the framework?

15.1 The roles and responsibilities of QCA

The responses

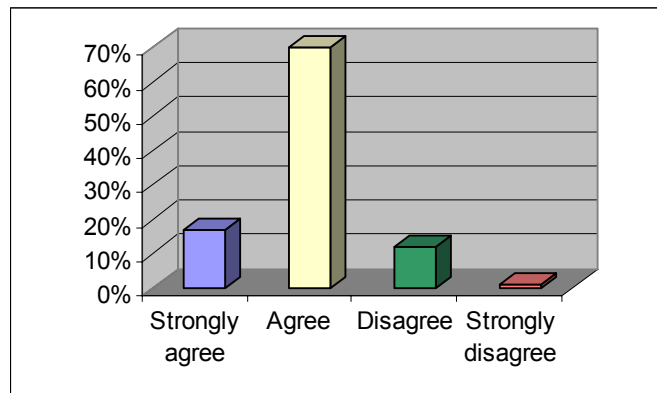
An overall majority of responses supported the proposed roles and responsibilities of QCA, with over 85 per cent of those who responded to this question agreeing or strongly agreeing with the question. However, some responses questioned some of these roles and responsibilities.

A number of respondents felt unable to answer this particular question, or wanted to know more details behind some of the roles and responsibilities before committing to an answer to this question.

Where comments were received on this question, the need for QCA's role to be clearly regulatory in nature was emphasised. Some respondents questioned the role of QCA in promoting the benefits of the framework as inconsistent with its role as a regulator. Others emphasised this particular role as being of crucial importance to the success of the FfA, and noted that QCA had not always promoted the NQF effectively.

Similar concerns were raised in relation to both the unit databank and the credit transcript.

Having noted this, it is also true that the consultation document focuses on those roles and responsibilities that QCA might exercise differently within the FfA from the way it operates in relation to the NQF. It became clear from some of the consultation events that we may have emphasised more strongly in this section of the document the continuity of many of QCA's roles from the NQF to the FfA.



The pattern of responses

The most detailed comments on this question were received from awarding bodies. A number of these responses raised concerns over both the need for more detail on how these roles and responsibilities were to be exercised, and over how appropriate it was for QCA to play some of these roles or undertake some of these proposed responsibilities. Eighteen of 42 awarding body responses questioned the proposed role of QCA.

In general there was a concern that QCA's role in the new framework should be clearly regulatory. Where roles and responsibilities were proposed that might compromise this clarity of role, then these should either be exercised by other bodies, or should be shared with other key stakeholders with an interest in the success of the framework. A number of awarding bodies also sought assurances that some of QCA's roles and responsibilities within the NQF would also be exercised within the FfA.

Where providers and other organisations offered comments on the roles and responsibilities of QCA, there was a clear message that these should be exercised to protect and support the interests of learners. A number of respondents drew parallels with the roles of regulators in other industries, where the protection of the interests of individual consumers was clearly paramount.

There was also a clear message from providers of all types, and from a number of national organisations, that QCA needed to exercise its regulatory responsibilities explicitly to promote the public interests of users of the framework, rather than to protect the commercial interests of awarding bodies. There was also a clear message from these respondents that QCA needed to be proactive in promoting the framework to all users and potential users.

Eight out of 10 SSC respondents were supportive of the proposed roles and responsibilities, but wished to see more explicit reference to the role of QCA in supporting the development of SQSs and occupational qualifications, and in promoting the benefits of the FfA to employers.

Some professional bodies were concerned that QCA's role might place restrictions on their freedom to act in the interests of their profession. Concerns on both the unit databank and the credit transfer system were mentioned in this

respect. Like many awarding bodies, they sought assurances that, in developing the detail of how these roles and responsibilities were to be exercised, QCA did not impose undue regulatory restrictions on the exercise of their own professional role.

Key themes

There is a clear view that the framework should be regulated, and that the exercise of regulatory powers will be necessary in order to ensure that the interests of learners within the FfA are appropriately protected and extended. QCA needs to establish a clearly regulatory remit in keeping with the best practice of other regulators in both the UK and elsewhere.

As QCA proposes to exercise these powers within its current statutory remit, there are clearly implications for how QCA's role will relate to those of its partner regulatory authorities in Wales and Northern Ireland. Respondents were very clear that it would not be acceptable to have three different regulatory remits for the three jurisdictions.

There are also clear messages in the responses to the consultation about the need for organisations other than QCA to take on some of the proposed roles in supporting the FfA. For example, it would not be appropriate for QCA to exercise exclusive ownership over the unit databank. QCA should explore with key stakeholders how the collective interests of users of the FfA might be shared in a way that clearly separates them from its regulatory responsibilities.

In particular, QCA needs to consider an appropriate method for promoting the overall benefits of the framework that does not appear to favour the interests of individual users or individual awards within it. More detail is needed as to how its regulatory responsibilities are to be implemented and how these might differ (or not) from current practice within the NQF.

15.2 The roles and responsibilities of the SfB network

The responses

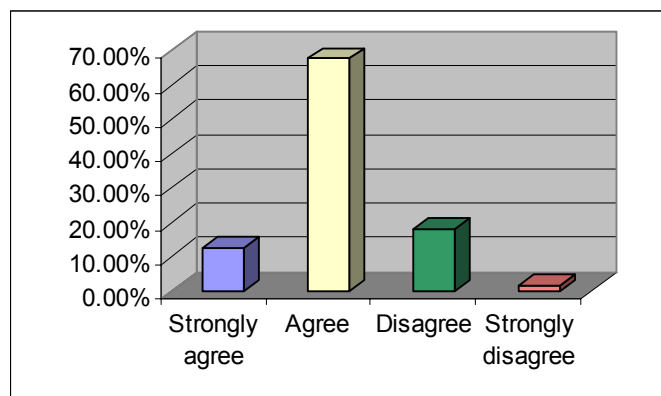
Opinion on this particular question was divided. Although a clear majority of responses were in agreement with this question, a number of comments noted that the SfB network is at different stages of development and concerns were raised about its capacity to undertake some of the roles and responsibilities identified for it.

As with the previous question, a number of respondents wanted more detail on how the proposed roles and responsibilities might be exercised in the development of the framework. It was pointed out that the document described some of the general responsibilities of the SfB network, rather than how it might interact with the FfA.

A number of responses linked these proposed roles of the SfB network with the development of occupational qualifications. More detail was needed on how the responsibilities of SSCs and SSSA itself might be exercised in relation to the

design and development of these qualifications. More consistency was needed as to how the development of SQSs might shape these qualifications without creating 'separate' frameworks within each sector.

There was general support across all responses for the important role of the SfB network in promoting the FfA to employers and employer organisations.



The pattern of responses

It was clear from the responses that different SSCs interpreted the exercise of their roles and responsibilities in relation to the framework in different ways. Some saw the development of an SQS as a clearly strategic document. Others set out a much more detailed set of intentions for their role in designing and developing both units and qualifications within the FfA.

Responses from awarding bodies were marginally in disagreement with this question, with 18 of 37 in favour of the described roles and responsibilities. Comments from awarding bodies revealed concerns about the potential restrictions on their responsiveness to individual and employer needs that might result from the involvement of SSCs in the development of individual units and qualifications. Although awarding bodies in general recognised the important role sector bodies played in the development of occupational standards, a number of respondents emphasised the need for flexibility in designing qualifications linked to occupational standards.

Again this concern was linked to the lack of detail about the potential scope of 'occupational qualifications' and the role of the SfB in determining this scope. It was the view of most awarding bodies that occupational qualifications should be clearly specified within the FfA and that the role of SSCs should not extend to other qualifications within the framework.

A number of professional bodies also expressed concerns over the undue influence of SSCs in the design and development of units and qualifications outside the 'core' of occupational qualifications in their individual sectors. Other professional bodies proposed to exercise some of the roles of SSCs in the design of qualifications in sectors without an SSC.

Providers' views were generally positive about the proposed role of the SfB network, though many of them did not comment in detail on this question. In

general, although the importance of SSCs in developing occupational standards was noted, providers were concerned that the exercise of SSCs' responsibilities in relation to occupational qualifications should not restrict the flexibility and responsiveness of the framework in meeting the needs of both employers and learners.

Employers voiced similar views to providers. Many wished to exercise some influence over the design and delivery of awards within the framework without necessarily exercising this influence through the SfB network. Several employers, and other organisations, pointed out that if the framework were to be 'demand-led' as intended, then employers needed direct input into the development of particular awards within the framework, in addition to their collective influence over occupational qualifications that would be mediated through the SfB network.

Key themes

There is a clear need for more clarity in determining how the interests of the SfB network might be exercised in relation to the design and development of units and qualifications within the framework. In particular there is a need to ensure an appropriate balance of responsibilities between sector bodies and other stakeholders in the development of SQSs.

There is also a need to define more clearly how 'occupational qualifications' are to be defined and the extent of SSC involvement in the design and development of these qualifications. Similarly, more detail is needed on the role of the SfB network in the development of units based on occupational standards.

In this respect the format of NOS will need to be reviewed by SSCs as an early priority in ensuring that new occupational standards are fit for purpose in supporting the development of units within the FfA. We are aware that work on the review of these standards is already under way in some sectors.

Although some of these details will vary on a sector-by-sector basis there is a need to establish some common approaches on these issues in order to prevent the development of separate approaches to the design and development of units and qualifications within individual sectors. The SfB network needs to approach the development of these approaches with other stakeholders as a collective priority.

There is also a need to take account of the developing nature of the SfB network at this juncture, and of the capacity of some individual SSCs to support the development of units and qualifications in their sector. Given the need to develop SQSs within the context of Skills Agreements, and the early stage of development of these Agreements in some sectors, there is a clear need to factor these issues into the overall timescale for development of the framework.

In taking forward the development of the framework, we also need to consider the possible role of SSCs as 'developers of last resort' in areas where the commercial interests of awarding bodies preclude the development of units or qualifications in specialist areas.

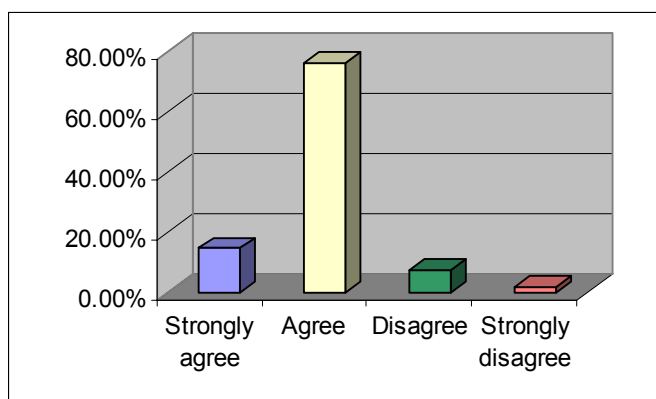
15.3 The roles and responsibilities of LSC

The responses

There was an overwhelming and consistent response to this question across all categories of respondent, with over 90 per cent in favour of the proposed roles. Although a few responses recognised that the LSC's role included other responsibilities, nearly every comment on this question focused on the LSC's responsibilities for funding provision leading to awards within the framework.

The clear and unanimous message from both the responses to the document and the consultation events was that the revision of the current LSC funding methodology is a critical factor in driving forward the development of the framework and in realising its aims. LSC needed to develop funding arrangements that were consistent with the technical specifications of the framework and supported a more flexible approach both to the provision of learning opportunities and to measuring learner achievement.

Although a number of responses were critical of the lack of information on the LSC's future intentions in this section, most comments recognised that the timetable for LSC's consultation on its 'Agenda for change' programme meant that it was not possible to produce firm proposals on funding at this stage of the development of the framework.



The pattern of responses

Although this was one of the questions that drew the most comments from providers, these comments reflected the views of all other categories of response to the consultation.

In particular, providers pointed out the necessity to fund provision leading to individual units within the FfA rather than leading (solely) to whole qualifications. It would also be necessary to recognise the award of credit as a success measure in its own right. A number of responses noted the potential benefits of establishing credit values for units in developing approaches to funding based on the relative size of achievements within the framework.

Although awarding bodies raised similar points, some awarding body responses also referred to the importance of integrating data about learner registrations and certification with LSC requirements in order to prevent unnecessary duplication of data collection requirements for centres within the FfA.

Some SSCs and other respondents expressed concern that a future LSC funding methodology linked exclusively to units and credits might undervalue the achievement of whole qualifications and lead to a failure of the framework to meet some of the broader objectives of the Skills Strategy.

Some SSCs, together with other organisations, suggested that in order for the framework to succeed in its objectives, a standardised funding methodology should be established across England, Wales and Northern Ireland.

Key themes

The clear issue arising from nearly all comments on this question was the need to ensure that future LSC funding requirements supported both the structure of the new framework and the provision leading to awards within it. In particular, respondents commented that there was a need to use the consistent specifications of both units and credit values within the FfA to link funding arrangements explicitly to these specifications.

Any funding system should support the award of credit where recognised as a valid measure of success. If funding were to be linked to the credit values of units and award of credit, then it would be necessary to establish quality assurance arrangements to underpin these features of the framework.

Although it would be important to recognise the value of individual credit achievements within the FfA, it would also be necessary to recognise the value of achievement of some qualifications. Any future funding methodology would need to take account of the more sensitive measures of achievement presented by credit-based qualifications.

Another issue to be considered is the relationship of the framework to eligibility for LSC funding in a context of minimal real growth in the total funds available to support provision. As several responses noted, if the FfA is to include awards achieved through a wider range of achievement, then some safeguards need to be built into a future funding methodology, to ensure the public purse continues to be deployed to support strategic public priorities.

There are also issues related to data management and the measuring of success that need to be addressed in developing the framework. We need to ensure that the requirements on providers to produce data on learning activity, learner success and progression are generated simply and easily through the structures of the new framework, and are not an additional data requirement on centres.

16. Transition to the new framework

This section of the report is based on responses to the following question:

- Do you agree with the proposals for managing the transition from the NQF to the new framework?

The responses

Most responses welcomed the proposal to base the transition to the new framework from the NQF on pragmatic and manageable timescales. Most comments agreed that a timetable stretching to 2010 (and perhaps beyond) would be necessary in order to manage such a transition.

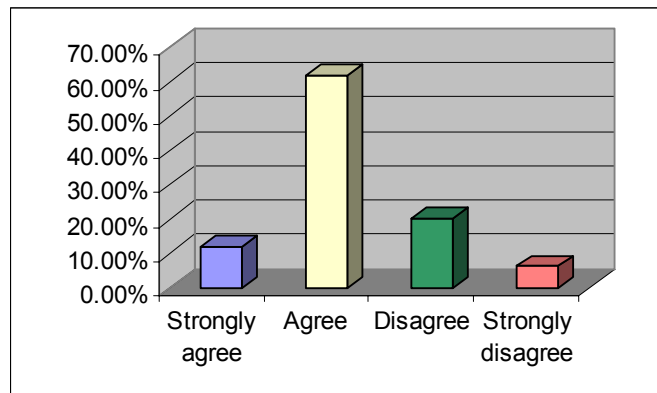
Over a third of respondents made no definitive answer to this question. They said there is a need for more detail on these proposals, and in particular on what is meant by the term 'open for business'.

Having welcomed this overall timetable, a number of responses included concerns that the proposal that the framework should be 'open for business' in January 2006 was overly ambitious and risked creating instabilities in the FfA from the outset. Such warnings came from respondents in all categories, but were particularly emphasised by awarding bodies.

The term 'open for business' clearly has a number of interpretations. It should be emphasised that there is no intention that the FfA should become fully operational from this date, nor that the process of accreditation within the NQF would necessarily be discontinued from this date.

A strong case was made by many respondents for a review of the arrangements for transition, to ensure that there was sufficient time to test out and trial some of the more challenging features of the new framework so that it was firmly established before beginning the process of transition from the NQF.

A number of responses also suggested that the transition to the new framework should be more tightly planned in the first instance. It would be important to build the framework over time on the basis of choices made by users of the FfA that accorded with their own priorities for development.



The pattern of responses

As we note above, the strongest objections to the proposals for transition came from awarding bodies, with 19 of 36 disagreeing or strongly disagreeing with the proposal. However, several awarding bodies were keen to begin the process of developing submissions for the framework as soon as possible.

Five out of nine SSCs who responded to this question also queried the timetable for transition. Inadequate time for testing and trialling new approaches were mentioned, as well as the capacity of some awarding bodies and SSCs to manage the transitional arrangements without unnecessary additional costs.

A small number of SSCs argued that some qualifications should be transferred directly to the FfA without change. However, most SSCs and all other categories of respondent recognised the need to establish new qualifications within the FfA based on a common set of technical specifications that were not present in qualifications in the NQF

Some awarding bodies and some SSCs also doubted the practical capacity of QCA to carry through the transitional arrangements in order to 'open' the framework for business in January 2006. The experiences of previous reforms (eg Curriculum 2000) were mentioned as a warning against a too-hurried timetable for transition. In the views of some respondents it would simply not be possible to get to January 2006 from the current scale of undecided features of the framework represented through the consultation document.

Other categories of respondent were less pessimistic about the timetable for transition. A clear majority of providers were in favour of the proposals for transition, though even here there were warnings from enthusiastic supporters of the proposals against moving too quickly. Where providers supported the timetable for transition, they did so on the basis of their familiarity with current credit systems, perhaps underestimating the need for changes in these existing systems in order to become operational within the FfA.

Key themes

Although there is general support for the process of transition from the NQF to the FfA, there are clear concerns about the timetable for this transition and about the capacity of all partners in the reform process to sustain the initial

period of rapid development to ensure that the framework is 'open for business' in January 2006.

Several critical dependencies for the transition process are identified that need to be in place before the framework can begin to function effectively. Each one needs to be considered in taking forward the transition process.

The first of these dependencies to be considered is the relationship with developments in Wales and Northern Ireland. There is clear support for a remit for joint development across the three jurisdictions in order for the framework to become firmly established. This would entail some delays while the currently separate processes of consultation in Wales and Northern Ireland continue, and while ministerial briefs are coordinated to establish such a joint remit for transition.

A second dependency is the development of a funding methodology within all three jurisdictions that can support the key features of the framework. Key to this will be the conclusion of the consultation process on LSC's 'Agenda for change' programme. There is a need to ensure that the timescales for implementation of the FfA are consistent with the development of a new funding methodology.

Another important aspect of the transition process is the development of the necessary IT infrastructure to support the functioning of the credit system. In particular the development of an electronic credit transcript will, as a number of responses noted, place considerable pressure on the proposed timescale for transition. There is a need to give key stakeholders sufficient lead-in time to ensure their own IT systems can interoperate with the credit transcript.

It should be noted that the credit transcript will become critical to the functioning of the framework when the first credits are awarded to learners. A number of stages in the process of building the new framework need to be taken forward before these first credits are awarded. Much work on the transition to the FfA can be taken forward before the credit transcript is launched.

We also recognise the need to link the planning of transition to the FfA with the process of developing Sector Skills Agreements and SQSs. Again, it will be possible to make progress on the development of occupational qualifications in some sectors before others, but the need to ensure a smooth transition from the NQF in some sectors might mean different timetables for development of qualifications to meet the framework requirements.

All these factors need to be considered in setting a timetable for transition to the new framework. Although a timetable for ceasing the accreditation of new qualifications within the NQF will be necessary to agree at an early stage of the transition process, this clearly cannot be done until the critical dependencies outlined above are known and the timetable for their implementation is secured.

Appendix A: Quantitative data analysis

Q1 Do you agree that the proposals will make the framework simpler and easy to understand?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	5 2.9%	11 65.0%	1 8.9%	0 0.0%	17
Awarding body	7 17.5%	11 27.5%	18 45.0%	4 10.0%	40
Professional body	1 7.1%	9 64.3%	4 28.6%	0 0.0%	14
Private learning provider	7 35.0%	13 65.0%	0 0.0%	0 0.0%	20
Further education learning provider	15 25.4%	41 69.5%	2 3.4%	1 1.7%	59
Higher education learning provider	2 13.3%	9 60.0%	3 20.0%	1 6.7%	15
Adult education learning provider	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Other learning provider	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
SSC	2 33.3%	3 50.0%	0 0.0%	1 16.7%	6
Funding body	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Education and training	1 9.1%	10 90.9%	0 0.0%	0 0.0%	11
Other	3 11.5%	16 61.5%	7 26.9%	0 0.0%	26
Total	46 23.1%	128 59.3%	35 16.2%	7 3.2%	216 100.0%

Q2 Do you agree that the proposals will create more flexible and responsive systems for recognising achievement?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	6 35.3%	9 52.9%	2 11.8%	0 0.0%	17

Awarding body	8 21.1%	11 28.9%	16 42.1%	3 7.9%	38
Professional body	2 18.2%	8 72.7%	1 9.1%	0 0.0%	11
Private learning provider	9 40.9%	12 54.5%	1 4.5%	0 0.0%	22
Further education learning provider	22 36.1%	38 62.3%	1 1.6%	0 0.0%	61
Higher education learning provider	4 28.6%	8 57.1%	2 14.3%	0 0.0%	14
Adult education learning provider	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Other learning provider	3 100.0%	0 0.0%	0 0.0%	0 0.0%	3
SSC	1 7.7%	10 76.9%	2 15.4%	0 0.0%	13
Funding body	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Education and training	3 30.0%	7 70.0%	0 0.0%	0 0.0%	10
Other	6 22.2%	17 63.0%	4 14.8%	0 0.0%	27
Total	66 29.7%	124 55.9%	29 13.1%	3 1.4%	222 100.0%

Q3 Do you agree that the proposals will make the framework capable of including the widest possible range of achievements?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3 17.6%	10 58.8%	3 17.6%	1 5.9%	17
Awarding body	7 17.5%	10 25.0%	13 32.5%	10 25.0%	40
Professional body	1 9.1%	7 63.6%	3 27.3%	0 0.0%	11
Private learning provider	4 18.2%	15 68.2%	2 9.1%	1 4.5%	22
Further education learning provider	12 24.0%	36 72.0%	2 4.0%	0 0.0%	50
Higher	2	10	2	0	14

education learning provider	14.3%	71.4%	14.3%	0.0%	
Adult education learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Other learning provider	1 50.0%	0 0.0%	1 50.0%	0 0.0%	2
SSC	0 0.0%	5 71.4%	1 14.3%	1 14.3%	7
Funding body	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Education and training	3 33.3%	5 55.6%	1 11.1%	0 0.0%	9
Other	4 16.0%	16 64.0%	4 16.0%	1 4.0%	25
Total	39 19.3%	117 57.9%	32 15.8%	14 6.9%	202 100.0%

Q4 Do you agree that the proposals will make the framework less bureaucratic than the National Qualifications Framework?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	4 25.0%	8 50.0%	1 6.3%	3 18.8%	16
Awarding body	5 13.9%	12 33.3%	6 16.7%	13 36.1%	36
Professional body	0 0.0%	6 54.5%	5 45.5%	0 0.0%	11
Private learning provider	4 21.1%	12 63.2%	2 10.5%	1 5.3%	19
Further education learning provider	6 13.0%	27 58.7%	10 21.7%	3 6.5%	46
Higher education learning provider	1 10.0%	4 40.0%	5 50.0%	0 0.0%	10
Adult education learning provider	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Other learning provider	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
SSC	0 0.0%	1 20.0%	4 80.0%	0 0.0%	5

Funding body	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Education and training	2 22.2%	5 55.6%	2 22.2%	0 0.0%	9
Other	3 12.5%	16 66.7%	5 20.8%	0 0.0%	24
Total	27 14.7%	97 52.7%	40 21.7%	20 10.9%	184 100.0%

Q6 Do you agree that the proposals will benefit learners?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	7 50.0%	5 37.5%	1 7.1%	1 7.1%	14
Awarding body	9 26.5%	11 32.4%	10 29.4%	4 11.8%	34
Professional body	2 18.2%	8 72.7%	1 9.1%	0 0.0%	11
Private learning provider	8 40.0%	12 60.0%	0 0.0%	0 0.0%	20
Further education learning provider	26 51.0%	23 45.1%	2 3.9%	0 0.0%	51
Higher education learning provider	4 33.3%	5 41.7%	1 8.3%	2 16.7%	12
Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Other learning provider	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
SSC	0 0.0%	6 75.0%	2 25.0%	0 0.0%	8
Funding body	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
Education and training	4 44.4%	5 55.6%	0 0.0%	0 0.0%	9
Other	6 24.0%	17 68.0%	2 8.0%	0 0.0%	25
Total	70 36.3%	97 50.3%	19 9.8%	7 3.6%	193 100.0%

Q7 Do you agree that the proposals will benefit employers?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
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Employer	4 25.0%	9 56.3%	2 12.5%	1 6.3%	16
Awarding body	5 12.8%	16 41.0%	13 33.3%	5 12.8%	39
Professional body	2 18.2%	5 45.5%	4 36.4%	0 0.0%	11
Private learning provider	7 35.0%	13 65.0%	0 0.0%	0 0.0%	20
Further education learning provider	18 37.5%	28 58.3%	1 2.1%	1 2.1%	48
Higher education learning provider	4 33.3%	5 41.7%	3 25.0%	0 0.0%	12
Adult education learning provider	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Other learning provider	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
SSC	1 11.1%	8 88.9%	0 0.0%	0 0.0%	9
Funding body	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Education and training	1 12.5%	7 87.5%	0 0.0%	0 0.0%	8
Other	6 24.0%	17 68.0%	2 8.0%	0 0.0%	25
Total	51 26.0%	113 57.7%	25 12.8%	7 3.6%	196 100.0%

Q8 Do you agree that the proposals with benefit providers?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3 18.8%	10 62.5%	3 18.8%	0 0.0%	16
Awarding body	7 17.9%	19 48.7%	12 30.8%	1 2.6%	39
Professional body	1 9.1%	7 63.6%	3 27.3%	0 0.0%	11
Private learning provider	5 25.0%	14 70.0%	1 5.0%	0 0.0%	20
Further education learning provider	13 28.3%	30 65.2%	1 2.2%	2 4.3%	46

Higher education learning provider	2 13.3%	8 53.3%	3 20.0%	2 13.3%	15
Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Other learning provider	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
SSC	0 0.0%	6 100.0%	0 0.0%	0 0.0%	6
Funding body	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Education and training	3 33.3%	5 55.6%	1 11.1%	0 0.0%	9
Other	4 18.2%	17 77.3%	1 4.5%	0 0.0%	12
Total	40 20.8%	122 63.5%	25 13.0%	5 2.6%	192 100.0%

Q9 Do you agree that the proposals will benefit awarding bodies?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	4 33.3%	5 41.7%	2 16.6%	1 8.3%	12
Awarding body	5 12.2%	8 19.5%	12 29.3%	16 39.0%	41
Professional body	2 18.2%	4 36.4%	4 36.4%	1 9.1%	11
Private learning provider	4 21.1%	12 63.2%	3 15.8%	0 0.0%	19
Further education learning provider	3 6.8%	29 65.9%	11 25.0%	1 2.3%	44
Higher education learning provider	1 8.3%	7 58.3%	2 16.7%	2 16.7%	12
Adult education learning provider	0 0.0%	1 100.0%	0 0.0%	0 0.0%	1
Other learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
SSC	0 0.0%	4 57.1%	3 42.9%	0 0.0%	7

Funding body	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Education and training	1 14.3%	3 42.9%	2 28.6%	1 14.3%	7
Other	1 5.0%	10 50.0%	8 40.0%	1 5.0%	20
Total	21 11.7%	88 49.2%	47 26.3%	23 12.8%	179 100.0%

Q10 Do you agree that the framework should align with the other frameworks in the UK and Europe?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	10 62.5%	6 37.5%	0 0.0%	0 0.0%	16
Awarding body	22 51.2%	20 46.5%	1 2.3%	0 0.0%	43
Professional body	6 50.0%	5 41.7%	0 0.0%	1 8.3%	12
Private learning provider	8 38.1%	13 61.9%	0 0.0%	0 0.0%	21
Further education learning provider	29 60.4%	18 37.5%	0 0.0%	1 2.1%	48
Higher education learning provider	6 33.3%	8 44.4%	3 16.7%	1 5.6%	18
Adult education learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2 50.0%
Other learning provider	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
SSC	8 88.9%	1 11.1%	0 0.0%	0 0.0%	9
Funding body	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
Education and training	6 66.7%	3 33.3%	0 0.0%	0 0.0%	9
Other	13 48.1%	14 51.9%	0 0.0%	0 0.0%	27
Total	113 54.1%	89 42.6%	4 1.9%	3 1.4%	209 100.0%

Q11 Do you agree units should follow a standard electronic template?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	8 50.0%	5 31.3%	2 12.5%	1 6.3%	16
Awarding body	11 27.5%	22 55.0%	5 12.5%	2 5.0%	40
Professional body	3 23.1%	10 76.9%	0 0.0%	0 0.0%	13
Private learning provider	9 42.9%	12 57.1%	0 0.0%	0 0.0%	21
Further education learning provider	31 60.8%	19 37.3%	1 2.0%	0 0.0%	51
Higher education learning provider	5 38.5%	5 38.5%	3 23.1%	0 0.0%	13
Adult education learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Other learning provider	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
SSC	6 75.0%	2 25.0%	0 0.0%	0 0.0%	8
Funding body	2 66.7%	0 0.0%	1 33.3%	0 0.0%	3
Education and training	6 75.0%	2 25.0%	0 0.0%	0 0.0%	8
Other	9 36.0%	15 60.0%	1 4.0%	0 0.0%	25
Total	93 46.0%	93 46.0%	13 6.4%	3 1.5%	202 100.0%

Q12 Do you agree that level descriptors should determine the level of units?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	6 37.5%	9 56.3%	1 6.3%	0 0.0%	16
Awarding body	18 41.9%	23 53.5%	2 4.7%	0 0.0%	43
Professional body	3 23.1%	9 69.2%	1 7.7%	0 0.0%	13
Private learning provider	7 35.0%	13 65.0%	0 0.0%	0 0.0%	20

Further education learning provider	27 51.9%	24 46.2%	1 1.9%	0 0.0%	52
Higher education learning provider	7 50.0%	6 42.9%	0 0.0%	1 7.1%	14
Adult education learning provider	1 25.0%	3 75.0%	0 0.0%	0 0.0%	4
Other learning provider	1 100.0%	0 0.0%	0 0.0%	0 0.0%	1
SSC	2 22.2%	7 77.8%	0 0.0%	0 0.0%	9
Funding body	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
Education and training	5 55.6%	4 44.4%	0 0.0%	0 0.0%	9
Other	10 43.5%	11 47.8%	2 8.7%	0 0.0%	23
Total	89 43.2%	109 52.9%	7 3.4%	1 0.5%	206 100.0%

Q15 Do you agree that all units in the databank should be held in stewardship on behalf of all users of the framework?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	6 37.5%	9 56.3%	0 0.0%	1 6.3%	16
Awarding body	7 17.5%	9 22.5%	8 20.0%	16 40.0%	40
Professional body	2 16.7%	5 41.7%	2 16.7%	3 25.0%	12
Private learning provider	9 42.9%	12 57.1%	0 0.0%	0 0.0%	21
Further education learning provider	26 52.0%	24 48.0%	0 0.0%	0 0.0%	50
Higher education learning provider	4 33.3%	3 25.0%	3 25.0%	2 16.7%	12
Adult education learning provider	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3

Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	1 11.1%	6 66.7%	2 22.2%	0 0.0%	9
Funding body	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
Education and training	5 62.5%	3 37.5%	0 0.0%	0 0.0%	8
Other	7 28.0%	16 64.0%	2 8.0%	0 0.0%	25
Total	72 36.0%	89 44.5%	17 8.5%	22 11.0%	200 100.0%

Q16 Do you agree credits should be transferable between qualifications and awarding bodies within the framework?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	8 50.0%	8 50.0%	0 0.0%	0 0.0%	16
Awarding body	11 28.2%	26 66.7%	2 5.1%	0 0.0%	39
Professional body	3 25.0%	7 58.3%	1 8.3%	1 8.3%	12
Private learning provider	9 45.0%	11 55.0%	0 0.0%	0 0.0%	20
Further education learning provider	29 60.4%	19 39.6%	0 0.0%	0 0.0%	48
Higher education learning provider	4 36.4%	6 54.5%	1 9.1%	0 0.0%	11
Adult education learning provider	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
Other learning provider	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
SSC	3 37.5%	5 62.5%	0 0.0%	0 0.0%	8
Funding body	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
Education and training	6 75.0%	2 25.0%	0 0.0%	0 0.0%	8
Other	10 40.0%	15 60.0%	0 0.0%	0 0.0%	25
Total	89	100	4	1	194

	45.9%	51.5%	2.1%	0.5%	100.0%
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Q18 Do you agree that an electronic credit transcript system should be developed?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	6 35.3%	9 52.9%	2 11.8%	0 0.0%	17
Awarding body	12 28.6%	27 64.3%	2 4.8%	1 2.4%	42
Professional body	5 41.7%	6 50.0%	1 8.3%	0 0.0%	12
Private learning provider	8 38.1%	13 61.9%	0 0.0%	0 0.0%	21
Further education learning provider	30 60.0%	20 40.0%	0 0.0%	0 0.0%	50
Higher education learning provider	6 50.0%	5 41.7%	1 8.3%	0 0.0%	12
Adult education learning provider	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	2 33.3%	4 66.7%	0 0.0%	0 0.0%	6
Funding body	2 100.0%	0 0.0%	0 0.0%	0 0.0%	2
Education and training	7 77.8%	2 22.2%	0 0.0%	0 0.0%	9
Other	15 60.0%	10 40.0%	0 0.0%	0 0.0%	25
Total	95 47.3%	99 49.3%	6 3.0%	1 0.5%	201 100.0%

Q19 Do you agree that only recognised awarding bodies should be able to submit qualifications for approval?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	6 40.0%	7 46.7%	2 13.3%	0 0.0%	15
Awarding body	33 76.7%	8 18.6%	1 2.3%	1 2.3%	43
Professional	5	3	2	2	12

body	41.7%	25.0%	16.7%	16.7%	
Private learning provider	7 33.3%	8 38.1%	5 23.8%	1 4.8%	21
Further education learning provider	17 33.3%	27 52.9%	6 11.8%	1 2.0%	51
Higher education learning provider	5 41.7%	5 41.7%	2 16.7%	0 0.0%	12
Adult education learning provider	0 0.0%	1 50.0%	1 50.0%	0 0.0%	2
Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	5 62.5%	2 25.0%	1 12.1%	0 0.0%	8
Funding body	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Education and training	3 37.5%	3 37.5%	1 12.5%	1 12.5%	8
Other	6 26.1%	16 70.0%	1 4.3%	0 0.0%	23
Total	88 44.2%	83 41.7%	22 11.1%	6 3.0%	199 100.0%

Q20 Do you agree that rule of combination should be based on core, optional and elective units?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	4 26.7%	11 73.3%	0 0.0%	0 0.0%	15
Awarding body	5 12.2%	28 68.3%	7 17.1%	1 2.4%	41
Professional body	3 25.0%	8 66.7%	1 8.3%	0 0.0%	12
Private learning provider	9 47.4%	10 52.6%	0 0.0%	0 0.0%	19
Further education learning provider	13 26.0%	34 68.0%	3 4.8%	0 0.0%	50
Higher education learning provider	3 23.1%	9 69.2%	0 0.0%	1 7.7%	13

Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	2 22.2%	5 55.6%	2 22.2%	0 0.0%	9
Funding body	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Education and training	4 50.0%	4 50.0%	0 0.0%	0 0.0%	8
Other	7 29.2%	15 62.5%	2 8.3%	0 0.0%	24
Total	52 26.3%	129 65.2%	15 7.6%	2 1.0%	198

Q21 Do you agree that the level and size of qualifications should be an integral part of the qualification title?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3 18.8%	12 75.0%	1 6.3%	0 0.0%	16
Awarding body	13 32.5%	22 55.0%	4 10.0%	1 2.5%	40
Professional body	6 50.0%	5 41.7%	1 8.3%	0 0.0%	12
Private learning provider	7 33.3%	12 57.1%	2 3.4%	0 0.0%	21
Further education learning provider	27 45.8%	30 50.8%	2 3.4%	0 0.0%	59
Higher education learning provider	5 41.7%	6 50.0%	1 8.3%	0 0.0%	12
Adult education learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	0 0.0%	10 100.0%	0 0.0%	0 0.0%	10
Funding body	2 66.7%	1 33.3%	0 0.0%	0 0.0%	3
Education	4	7	0	0	11

and training	36.4%	63.6%	0.0%	0.0%	
Other	7 29.2%	17 70.8%	0 0.0%	0 0.0%	24
Total	76 35.8%	124 58.5%	11 5.2%	1 0.5%	212 100.0%

Q22a Do you agree that assessment arrangements should be regulated through monitoring of awarding body systems?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	1 8.3%	9 75.0%	2 16.7%	0 0.0%	12
Awarding body	9 32.1%	17 60.7%	1 3.6%	1 3.6%	28
Professional body	0 0.0%	12 100.0%	0 0.0%	0 0.0%	12
Private learning provider	6 30.0%	12 60.0%	2 10.0%	0 0.0%	20
Further education learning provider	17 38.6%	24 54.5%	1 2.3%	2 4.5%	44
Higher education learning provider	4 40.0%	5 50.0%	0 0.0%	1 10.0%	10
Adult education learning provider	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Other learning provider	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0
SSC	1 12.5%	7 87.5%	0 0.0%	0 0.0%	8
Funding body	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0
Education and training	4 50.0%	4 50.0%	0 0.0%	0 0.0%	8
Other	5 26.3%	14 73.7%	0 0.0%	0 0.0%	19
Total	48 29.3%	106 64.6%	6 3.7%	4 2.4%	164 100.0%

Q22b Do you agree that awarding bodies should be able to determine appropriate assessment arrangements (except where specified by a third party)?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3	4	0	0	7

	42.9%	57.1%	0.0%	0.0%	
Awarding body	15 55.6%	12 44.4%	0 0.0%	0 0.0%	27
Professional body	3 30.0%	5 50.0%	2 20.0%	0 0.0%	10
Private learning Provider	5 27.8%	9 50.0%	3 16.7%	1 5.6%	18
Further education learning provider	10 24.4%	25 61.0%	5 12.2%	1 2.4%	41
Higher education learning provider	3 33.3%	3 33.3%	1 11.1%	2 22.2%	9
Adult education learning provider	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Other learning provider	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0
SSC	0 0.0%	4 57.1%	3 42.9%	0 0.0%	7
Funding body	0 0.0%	0 0.0%	0 0.0%	0 0.0%	0
Education and training	4 57.1%	2 28.6%	1 14.3%	0 0.0%	7
Other	6 30.0%	11 55.0%	3 15.0%	0 0.0%	20
Total	50 33.6%	77 51.7%	18 12.1%	4 2.7%	149 100.0%

Q23 Do you agree that grading arrangements should be determined within individual qualifications rather than as a standard feature of the framework itself?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3 18.8%	10 62.5%	2 12.5%	1 6.3%	16
Awarding body	8 19.0%	27 64.3%	7 16.7%	0 0.0%	42
Professional body	2 18.2%	8 72.7%	1 9.1%	0 0.0%	11
Private learning provider	7 35.0%	10 50.0%	3 15.0%	0 0.0%	20
Further education learning	13 24.5%	26 49.1%	13 24.5%	1 1.9%	53

provider					
Higher education learning provider	5 41.7%	7 58.3%	0 0.0%	0 0.0%	12
Adult education learning provider	0 0.0%	2 50.0%	2 50.0%	0 0.0%	4
Other learning provider	1 50.0%	0 0.0%	1 50.0%	0 0.0%	2
SSC	3 23.1%	10 76.9%	0 0.0%	0 0.0%	13
Funding body	0 0.0%	2 66.7%	1 33.3%	0 0.0%	3
Education and training	3 27.3%	7 63.6%	1 9.1%	0 0.0%	11
Other	3 13.0%	14 60.9%	6 26.1%	0 0.0%	23
Total	48 22.9%	123 58.6%	37 17.6%	2 1.0%	210 100.0%

Q24 Do you agree that occupational qualifications should be a particular group, with a distinctive brand identity?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	6 35.3%	9 52.9%	1 5.9%	1 5.9%	17
Awarding body	6 17.1%	15 42.9%	14 40.0%	0 0.0%	35
Professional body	4 36.4%	5 45.5%	1 9.1%	1 9.1%	11
Private learning provider	4 19.0%	14 66.7%	2 9.5%	1 4.8%	21
Further education learning provider	6 10.9%	38 69.1%	11 20.0%	0 0.0%	55
Higher education learning provider	2 15.4%	8 61.5%	3 23.1%	0 0.0%	13
Adult education learning provider	0 0.0%	1 33.3%	2 66.7%	0 0.0%	3
Other learning provider	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2

SSC	6 66.7%	2 22.2%	1 11.1%	0 0.0%	9
Funding body	1 50.0%	0 0.0%	0 0.0%	1 50.0%	2
Education and training	0 0.0%	6 60.0%	1 10.0%	3 30.0%	10
Other	2 9.5%	15 71.4%	3 14.3%	1 4.8%	21
Total	37 18.6%	115 57.8%	39 19.6%	8 4.0%	199 100.0%

Q25 Do you agree with the proposed arrangements for recognition and monitoring of bodies to offer awards within the framework?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3 17.6%	14 82.4%	0 0.0%	0 0.0%	17
Awarding body	6 15.0%	31 77.5%	2 5.0%	1 2.5%	40
Professional body	2 16.7%	8 66.7%	2 16.7%	0 0.0%	12
Private learning provider	4 20.0%	16 80.0%	0 0.0%	0 0.0%	20
Further education learning provider	14 29.2%	30 62.5%	3 6.3%	1 2.1%	48
Higher education learning provider	1 10.0%	7 70.0%	1 10.0%	1 10.0%	10
Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Other learning provider	0 0.0%	1 100.0%	0 0.0%	0 0.0%	1
SSC	2 22.2%	4 44.4%	1 11.1%	2 22.2%	9
Funding body	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Education and training	3 30.0%	7 70.0%	0 0.0%	0 0.0%	10
Other	1 4.5%	17 77.3%	4 18.2%	0 0.0%	22
Total	36 18.6%	140 72.2%	13 6.7%	5 2.6%	194 100.0%

Q26 Do you agree that the accreditation of individual qualifications should be based on submission of proposed rules of combination?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	1 5.9%	15 88.2%	1 5.9%	0 0.0%	17
Awarding body	8 19.5%	30 73.2%	2 4.9%	1 2.4%	41
Professional body	2 18.2%	7 63.6%	2 18.2%	0 0.0%	11
Private learning provider	4 22.2%	14 77.8%	0 0.0%	0 0.0%	18
Further education learning provider	17 29.8%	39 68.4%	1 1.8%	0 0.0%	57
Higher education learning provider	4 30.8%	5 38.5%	2 15.4%	2 15.4%	13
Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Other learning provider	1 50.0%	0 0.0%	1 50.0%	0 0.0%	2
SSC	6 50.0%	5 41.7%	1 8.3%	0 0.0%	12
Funding body	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Education and training	4 44.4%	5 55.6%	0 0.0%	0 0.0%	9
Other	3 12.5%	17 70.8%	3 12.5%	1 4.2%	24
Total	51 24.4%	141 67.4%	13 6.2%	4 1.9%	209 100.0%

Q28 Do you agree with the roles and responsibilities of QCA?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3 18.8%	12 75.0%	1 6.3%	0 0.0%	16
Awarding body	2 4.8%	22 52.4%	16 38.1%	2 4.8%	42
Professional body	1 10.0%	7 70.0%	2 20.0%	0 0.0%	10
Private learning	6 28.6%	15 71.4%	0 0.0%	0 0.0%	21

provider					
Further education learning provider	13 22.8%	44 77.2%	0 0.0%	0 0.0%	57
Higher education learning provider	1 9.1%	7 63.6%	3 27.3%	0 0.0%	11
Adult education learning provider	1 33.3%	2 66.7%	0 0.0%	0 0.0%	3
Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	0 0.0%	8 80.0%	2 20.0%	0 0.0%	10
Funding body	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Education and training	3 30.0%	7 70.0%	0 0.0%	0 0.0%	10
Other	3 13.6%	18 81.8%	1 4.5%	0 0.0%	22
Total	35 17.0%	144 70.0%	25 12.1%	2 1.0%	206 100.0%

Q29 Do you agree with the roles and responsibilities of awarding bodies?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	2 12.5%	12 75.0%	2 12.5%	0 0.0%	16
Awarding body	2 4.9%	20 48.8%	17 41.5%	2 4.9%	41
Professional body	1 8.3%	10 83.3%	1 8.3%	0 0.0%	12
Private learning provider	6 28.6%	13 61.9%	1 4.8%	1 4.8%	21
Further education learning provider	12 21.1%	40 70.2%	5 8.8%	0 0.0%	57
Higher education learning provider	2 22.2%	5 55.6%	2 22.2%	0 0.0%	9
Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3

Other learning provider	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
SSC	0 0.0%	10 90.9%	1 9.1%	0 0.0%	11
Funding body	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Education and training	1 11.1%	8 88.9%	0 0.0%	0 0.0%	9
Other	1 4.5%	18 81.8%	3 13.6%	0 0.0%	22
Total	27 13.2%	143 69.8%	32 15.6%	3 1.5%	205 100.0%

Q30 Do you agree with the roles and responsibilities of the Skills for Business network in the framework?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	5 35.7%	7 50.0%	2 14.3%	0 0.0%	14
Awarding body	1 2.7%	17 45.9%	18 48.6%	1 2.7%	37
Professional body	1 8.3%	8 66.7%	3 25.0%	0 0.0%	12
Private learning provider	4 19.0%	16 76.2%	1 4.8%	0 0.0%	21
Further education learning provider	7 13.7%	38 74.5%	5 9.8%	1 2.0%	51
Higher education learning provider	1 12.5%	7 87.5%	0 0.0%	0 0.0%	8
Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Other learning provider	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
SSC	3 30.0%	6 60.0%	1 10.0%	0 0.0%	10
Funding body	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Education and training	0 0.0%	5 83.3%	1 16.7%	0 0.0%	7
Other	1 4.5%	18 81.8%	3 13.6%	1 4.5%	22
Total	24	128	34	3	189

	12.7%	67.7%	18.0%	1.6%	100.0%
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Q31 Do you agree with the roles and responsibilities of the Learning and Skills Council in the framework?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	3 21.4%	11 78.6%	0 0.0%	0 0.0%	14
Awarding body	3 7.3%	29 70.7%	8 19.5%	1 2.4%	41
Professional body	1 8.3%	11 91.7%	0 0.0%	0 0.0%	12
Private learning provider	3 15.0%	16 80.0%	1 5.0%	0 0.0%	20
Further education learning provider	7 15.2%	36 78.3%	1 2.2%	2 4.3%	46
Higher education learning provider	1 12.5%	6 75%	1 12.5%	0 0.0%	8
Adult education learning provider	0 0.0%	3 100.0%	0 0.0%	0 0.0%	3
Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	1 11.1%	6 66.7%	2 22.2%	0 0.0%	9
Funding body	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
Education and training	3 42.9%	4 57.1%	0 0.0%	0 0.0%	7
Other	3 14.3%	17 81.0%	1 4.8%	0 0.0%	21
Total	27 14.6%	141 76.2%	14 7.6%	3 1.6%	185 100.0%

Q32 Do you agree with the proposals for managing the transition from the National Qualifications Framework to the new framework?

	Strongly agree	Agree	Disagree	Strongly disagree	Total responding to question
Employer	1 7.7%	9 69.1%	3 23.1%	0 0.0%	13
Awarding body	6 16.7%	11 30.6%	13 36.1%	6 16.7%	36
Professional	2	8	1	1	12

body	16.7%	66.7%	8.3%	8.3%	
Private learning provider	4 20.0%	15 75.0%	1 5.0%	0 0.0%	20
Further education learning provider	4 8.7%	34 73.9%	8 17.4%	0 0.0%	46
Higher education learning provider	1 10.0%	6 60.0%	1 10.0%	2 20.0%	10
Adult education learning provider	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Other learning provider	1 50.0%	1 50.0%	0 0.0%	0 0.0%	2
SSC	0 0.0%	4 44.4%	4 44.4%	1 11.1%	9
Funding body	0 0.0%	2 100.0%	0 0.0%	0 0.0%	2
Education and training	0 0.0%	7 100.0%	0 0.0%	0 0.0%	7
Other	2 10.5%	11 57.9%	5 26.3%	1 5.3%	19
Total	21 11.8%	110 61.8%	36 20.2%	11 6.2%	178 100.0%

