

Ofqual
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The 2009 evaluation of Qualifications and Credit Framework (QCF) regulation

January 2010

Ofqual/10/4644

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Executive summary

Background and context

This is a report on the findings from the first year of a two-year evaluation of the regulation of the Qualifications and Credit Framework (QCF). It is published by the qualifications regulators in England, Wales and Northern Ireland.

We made a commitment to undertake this evaluation when *Regulatory arrangements for the Qualifications and Credit Framework* was published in August 2008. Although these requirements were developed after a period of tests and trials, we wanted to learn from their use in practice. When we confirmed that we had produced a set of regulatory requirements we had confidence in, it was on the basis that they would require careful monitoring and evaluation as they were implemented.

This evaluation is of the regulation of the QCF only. It does not address all aspects of the implementation and delivery of the QCF. In view of the limited length of time that the QCF regulations have been in operation, the amount of evidence available to inform the evaluation was inevitably restricted.

This report on the first year of the evaluation was written in the context of much change in the regulation of qualifications. Statutory changes in each of the three countries will need to be taken into account as we develop our responses in light of the findings of the evaluation. In particular the Apprenticeships, Skills, Children and Learning Act 2009 will establish Ofqual to regulate qualifications in England and vocational qualifications in Northern Ireland. This legislation places a new focus on the regulation of standards through ensuring awarding organisations have the right systems in place to control the quality of their qualifications. Ofqual will have specific powers to intervene where necessary. Changes in Wales will mirror this approach.

Evidence considered and key findings

Our evaluation has been informed by:

- feedback from users of the QCF, in particular those who are subject to regulation
- a review of samples of QCF units and qualifications
- a review of the information we gather from the regulatory processes we have put in place for the QCF.

The key findings from these activities are as follows.

Feedback from users

Overall the survey responses gave a positive picture of how the regulation of the QCF is progressing. Nevertheless, even when organisations express a positive view of the way in which regulation is developing in general, often they also suggest opportunities for improvement and change. There is also a substantial minority of respondents whose comments reflect a less positive view.

Units and qualifications

Four separate activities were carried out as part of this strand of work. The findings are mixed across the different types of analysis undertaken:

- Our scrutiny of a sample of 376 units in the QCF unit databank has identified concerns for us. It is important to note that this sample was taken in May 2009, before any organisations had completed our supplementary recognition requirements. Nonetheless, the findings reveal that approximately 10 per cent of the units in the sample require immediate attention. There are technical issues with a further 30 per cent (approximately) of units.
- For rules of combination, while there are no concerns identified about the standard of the requirements being set, it seems only a small number of qualifications in the QCF from our sample taken in June 2009 include use of the more flexible technical features of the framework. The ability for learners to transfer credit does not yet seem to be maximised.
- Most qualifications for which assessment arrangements were reviewed were found to be compliant with our requirements. Where issues were identified they tended to relate to areas where more investigation was needed and will be carried out, rather than clearly identified problems. This exercise, however, was limited in scope as it focused on qualification specifications and sample assessment materials rather than considering delivery of assessments in practice.

- The available evidence suggests that the requirement for awarding organisations to identify a 'qualification purpose' is being implemented appropriately.

Regulatory processes

Much of the focus in this first year of implementation has been on the recognition of organisations and the accreditation of qualifications meeting regulatory requirements. It is encouraging to note the high volume of recognition and accreditation activity that has been taking place. Analysis of this activity reveals a number of issues that are common to organisations, in particular where organisations require clarification of regulatory requirements. It also reveals a number of suggestions for improvements to our processes and the need for enhanced IT systems to better support our regulation of the QCF.

Analysis and conclusions

The first stage of the evaluation has given us an early impression of the progress made and issues experienced in the first year of the implementation of the regulatory requirements for the QCF. We have conducted an analysis of the findings and set out the key conclusions we have drawn as a result.

Analysis of findings

In many areas the regulation of the QCF is proceeding well. There is a generally positive view from stakeholders about our approach to the regulation of the QCF. There are, however, aspects that are causing concern and we will take immediate action to deal with identified problems. There are other issues that we need to observe and keep under review. This is as is to be expected because the tests and trials of the QCF highlighted a range of issues requiring further examination and others have arisen as a new set of requirements and processes have been implemented.

Our analysis is structured in terms of issues arising with the *Regulatory arrangements*, with units, rules of combination and qualifications, those identified for our processes and overarching concerns.

In relation to the *Regulatory arrangements*:

- Our findings do not indicate a need to make changes to this document at this time.
- We will reflect on the need to consult on possible regulatory changes in the light of both evidence gathered during the second year of the evaluation and the context of the new statutory regulatory framework.

- Where uncertainty remains about aspects of our requirements we will address this through further clarification.

In relation to QCF units and qualifications:

- Where we have identified units that do not comply with regulatory requirements we will ensure that regulated organisations address any shortcomings for which they are responsible.
- We will look in more detail at opportunities provided for learners to transfer credit and at how assessment arrangements in the QCF are being delivered.
- We will publish details of the qualification purposes collected for QCF qualifications.

In relation to our systems and processes:

- We will review our processes to see where we can make them more efficient.
- We will place increased focus on gathering evidence about the delivery of units and qualifications in practice as more organisations and qualifications are recognised in the QCF.
- We acknowledge the concerns expressed about our own regulatory IT systems and we are taking steps to develop new ones. We will involve those we regulate in designing these new systems.

We will also review our expectation that all the vocational qualifications we regulate will be recognised in the QCF by the end of 2010. We will consider this in the light of concerns expressed to us and the current rate of population of the QCF.

Conclusions

In the light of our analysis of the findings we have drawn the following conclusions about how the regulation of the QCF is proceeding, and any actions we need to take:

Conclusion 1: The *Regulatory arrangements* will continue to apply to all organisations that operate within, and the qualifications that are accredited into, the QCF. Further information will be issued where necessary to ensure regulated organisations understand all requirements.

Conclusion 2: We will keep a range of key issues identified through this evaluation under review. This includes the need for additional regulatory requirements for qualifications, including those with 'NVQ' in the title. Any changes to the *Regulatory arrangements* that are considered necessary will be prioritised as part of wider reviews of regulatory requirements.

Conclusion 3: We have published an open letter to address current confusion and misunderstandings about our requirements for 'approval of' qualifications from sector skills councils (SSCs) and support from other organisations. We will also keep regulatory requirements in this area under review.

Conclusion 4: Where we have found units that do not comply with the *Regulatory arrangements* we have acted to ensure significant breaches of compliance are corrected by the organisation responsible for them. We have contacted organisations responsible for such units and corrections will be made according to an agreed timescale determined with individual awarding organisations. Timescales are agreed on a case-by-case basis, considering the specific risks posed in particular cases. Organisations responsible will also be required to correct 'technical' breaches, to a less urgent timescale, again agreed on an individual basis. We will contact these organisations in due course.

Conclusion 5: Where we have found an organisation to have produced units that are not compliant with the *Regulatory arrangements*, we require them to consider the issues found with their units by us and ensure compliance for the rest of their provision.

Conclusion 6: We will undertake further activity to explore the opportunities being given to learners in the QCF to transfer credit between different qualifications and awarding organisations.

Conclusion 7: Further activity in the second year of the QCF evaluation will look at the delivery of, and outcomes from, assessment arrangements in the QCF.

Conclusion 8: Qualification purposes will be published on the National Database of Accredited Qualifications (NDAQ). Further evaluation activity will consider whether this is of value for learners and employers.

Conclusion 9: We will continue to review our own processes with a view to identifying how we can further enhance existing operations.

Conclusion 10: We will place an increased focus in our regulatory activity on reviewing the delivery of units and qualifications in practice as more organisations become recognised to operate in the QCF.

Conclusion 11: We will consider the feedback and issues identified by regulated organisations through this evaluation as the new IT systems are built. We will establish a user group and other consultative measures.

Conclusion 12: We will keep under review our expectation that all vocational qualifications will meet QCF requirements by the end of 2010.

Overall position

This is an interim evaluation of the regulatory requirements and procedures for the QCF. Despite that, it has given us much to consider. Some elements of the picture are positive. The majority of respondents to our survey expressed favourable views about the implementation of our regulatory requirements. There is an upward trend in the number of organisations both seeking recognition and becoming recognised to operate within the QCF. There are large numbers of units being submitted to the databank and qualifications being accredited into the QCF. On balance there is an encouraging emerging picture about the quality of provision in the QCF, particularly in relation to the assessment arrangements used in qualifications.

Some areas are problematic though, especially those we have identified in relation to the quality of a minority of units that require immediate attention. The introduction of the QCF is raising some issues that must be managed and other elements that must be closely monitored. It does not appear to us at this time, however, that any of these present a threat to the overall stability of the system.

Overall there are still some considerable challenges in ensuring that the QCF continues to develop effectively. We have identified some areas of concern for us to address. In particular we will address the deficiencies of our regulatory and IT systems and we will continue to check that those submitting units are developing high-quality products that meet regulatory requirements and take action where they do not. This report and measures we have already put in place, especially in requiring organisations to seek full recognition to operate in the QCF, set out a plan to do so. We have also identified that there are a range of things that we must continue to monitor closely. We will use the second year of the evaluation to explore specific aspects of our regulation in greater depth, with a particular focus on the operation of assessments in practice.

Through building on the progress made to date and taking the actions identified we believe that we have in place an appropriate set of regulatory requirements and processes for the QCF at this time. However, we expect to be in a position to make a full and more informed judgement on the effectiveness of our regulation and consider any changes to it in the context of the reforms currently being made to the way we regulate and after the second year of our evaluation.

1. Introduction

The QCF is regulated by Ofqual, DCELLS and CCEA. This report, on the first year of a two-year project to evaluate the effectiveness of our approach to the regulation of the QCF, is published jointly by us.

1.1 Background

The QCF provides a framework for the development, assessment and award of unit- and credit-based qualifications. It does this by providing a structure within which unit-based qualifications are located and achievements are recognised through the award of credits and qualifications. It allows the level and size of achievements to be easily identified. It also supports the accumulation and transfer of credits between qualifications and awarding organisations. It aims to ensure learners are given the maximum flexibility and range of opportunities to progress and receive recognition for their achievements. The scope of the framework is currently focused on vocational qualifications.

The QCF has developed over a number of years. The feasibility of a qualifications and credit framework was tested and trialled between April 2006 and July 2008. Following successful completion of the trials¹ we confirmed that we would implement a regulatory model for the QCF². The QCF was fully introduced in August 2008 when *Regulatory arrangements for the Qualifications and Credit Framework*³ was published.

The QCF has grown substantially, in terms of both numbers of qualifications in it and numbers of learners engaged on QCF qualifications, from the limited development that occurred during the trials. At the end of the trials there were 432 qualifications in the QCF. Now there are over 2,500. Around the end of the trials, for the year to September 2008, 34,574 learners had achieved QCF qualifications. In contrast the Learning and Skills Council provided public funding in England to support 229,361 enrolments on QCF provision for the 2008/9 academic year..

¹ See advice from Ken Boston, Chief Executive QCA, to David Lammy MP, 30 June 2008, at www.qcda.gov.uk/libraryAssets/media/Ken_Boston_to_David_Lammy_30062008.pdf

² See letter from Kathleen Tattersall, Chair of Ofqual, to David Lammy MP, 9 July 2008, at www.ofqual.gov.uk/files/Le_to_David_Lammy_MP_from_Kathleen_Tattersall_9jul08.pdf

³ See www.ofqual.gov.uk/121.aspx

We set the regulatory requirements for the QCF and monitor and enforce compliance with them. In this context we made a commitment to evaluate the impact of the implementation of the *Regulatory arrangements* when we published them. As we noted in that document:

The qualifications regulators will evaluate regulatory issues that arise in the development of the QCF. In doing so, they will consider the suitability of these arrangements and how well associated regulatory activity and the operation of the QCF are working. They will report publicly on their findings during the implementation of the QCF.

We made this commitment because the QCF saw the introduction of a new set of regulatory requirements and procedures. It is good practice to study their effect in operation. We also recognised the need, as the QCF develops, to take account of the issues raised in the tests and trials, minimise risks and further explore any unresolved issues. Evaluating the implementation of the QCF gives us the opportunity to take account of any issues caused by the fact that the QCF is new or that result from any element of its design. Therefore the scope of this evaluation is the effectiveness of the *Regulatory arrangements* and the mechanisms used to implement them.

The context in which this evaluation is taking place is also important. Legislation to establish Ofqual as a non-ministerial government department reporting to Parliament with responsibility for qualifications regulation in England, with a range of new powers and responsibilities, has recently been given royal assent.⁴ Powers that mirror those being given to Ofqual will, in most cases, be taken by DCELLS in Wales. In Northern Ireland Ofqual will take responsibility for the regulation of all vocational qualifications, and it is intended in time that responsibility for other regulated qualifications will pass from CCEA to the new Education and Skills Authority. In addition this evaluation will need to be considered in the context of a fundamental review of the approach we take to our regulation. In particular Ofqual has recently published a consultation on how it should respond to its new powers and duties.⁵ Some of the conclusions drawn in this report may be implemented or further evaluated through changes made as a result of this activity.

It is also important to note that this evaluation of the QCF is taking place at an early stage in its development. The *Regulatory arrangements* were published in August 2008. We notified recognised organisations in December 2008 that the *Regulatory arrangements* had been fully implemented and that they must now comply with them. Therefore our approach to regulation for the QCF has been in place for a very short period of time. Consequently there is a limited amount of evidence available relating

⁴ See Apprenticeships, Skills, Children and Learning Act at www.opsi.gov.uk/acts/acts2009a

⁵ See www.ofqual.gov.uk/2624.aspx

to how implementation of the *Regulatory arrangements* has progressed in this first year.

This is therefore an interim report and part of an ongoing process of evaluation. The first year of evaluation provides an opportunity to establish a baseline position in relation to the regulation of the QCF. It also allows us to:

- identify any immediate issues that are preventing the QCF from being effectively regulated
- make any necessary changes to our requirements
- establish priorities for further development and investigation.

This will not be the end of the process, however, and we will make further judgements about the effectiveness of our regulation of the QCF. A further report is planned in autumn 2010.

1.2 Evaluative framework

Regulatory arrangements notes that our regulatory framework is designed to:

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

This evaluation aims to assess the extent to which our regulation of the QCF has delivered on these objectives. We have done this by considering the key findings in relation to our requirements and processes for the QCF and relating the findings to these overarching objectives. This has enabled us to develop some detailed conclusions about our regulation of the QCF to date and the actions that we need to take. It has also helped us to make an overall assessment about the effectiveness of our regulatory activities in ensuring our key objectives for the regulation of the QCF are met.

2. Methodology and report structure

2.1 Introduction

The information and evidence required to conduct this evaluation have come from a wide range of sources. This is to fully consider the impact and implications of the approach that has been taken to the regulation of the QCF.

We have grouped the activities we undertook under the following headings:

- feedback from users of the QCF, in particular those who are subject to regulation
- a review of samples of QCF units and qualifications
- a review of the information we gathered from the regulatory processes we have put in place for the QCF.

These three overall headings involved a range of detailed activity, as set out below.

Feedback from users

Those directly affected by the implementation of the QCF were invited to share their views on and experience of its regulation. The main mechanism for this was a survey of 'users'. The survey focused on those subject to regulation, though any informed individual or organisation was welcome to comment. Respondents were given the opportunity to consider key questions about how the QCF is being regulated and to raise their own issues via an online questionnaire. We supplemented this with events to provide the opportunity for focused discussion.

Review of samples of QCF units and qualifications

We undertook analysis of compliance with the *Regulatory arrangements* of:

- a sample of 376 units (taken across organisations, sectors and levels) in the QCF unit databank
- all rules of combination submitted by August 2009 and additional scrutiny of a sample of 30 rules of combination (taken across organisations, sectors and levels)
- a sample of 36 qualification specifications and assessment materials (taken across organisations, sectors and levels) in the QCF to consider the quality of assessment arrangements being developed.

We also undertook an analysis of how the new requirement for specifying a 'qualification purpose' is being used.

Review of information gathered from our regulatory processes

This involved reviewing the information arising from the processes we undertake to regulate the QCF, which are:

- recognition of organisations to operate in the QCF
- accreditation of qualifications in the QCF
- monitoring of organisations, units and qualifications in the QCF.

Analysis of findings

The evidence produced from these three sources was used to analyse the effectiveness of the regulation in the QCF and determine any actions we need to take.

2.2 Report structure

The remainder of the report is structured as follows:

- **Sections 3, 4 and 5** summarise the evidence from the three strands of evaluation activity detailed above.
- **Section 6** presents an analysis of the evidence we gathered and identifies the major issues we found and the conclusions we have drawn.
- **Section 7** draws out overall conclusions from this work.

The report is supported by the following annexes:

- **Annex 1:** Reproduction of the Qualifications and Credit Framework regulation survey questions
- **Annex 2:** Quantitative responses to survey questions.

3. Feedback from ‘users’ of the QCF

3.1 Introduction

One of the key activities we undertook as part of this evaluation was obtaining feedback from those affected by the development of the QCF, in particular those who are subject to our regulatory requirements. We ran a survey between 29 June and 7 August 2009 designed to seek the views of users of the QCF as to how effective they judged the regulation of it to be. The survey was supported by a number of events at which participants were invited to give their comments, which were recorded. Additional comments made at these events but not reported in the survey are included in this analysis.

Overall the survey responses gave a positive picture of how the regulation of the QCF is progressing. Nevertheless, even when organisations express a positive view of the way in which regulation is developing in general, often they also suggest opportunities for improvement and change. There is also a substantial minority of respondents whose comments reflect a less positive view.

Details of the questions we asked are set out in **annex 1**, and a detailed breakdown of the responses to them can be found in **annex 2**. A summary of the responses and the key issues that were raised is set out under the main themes of the survey in this section.

3.2 The Regulatory arrangements for the QCF

Overall 62 per cent of respondents to this section of the survey agreed that the various requirements set out in the *Regulatory arrangements* are suitable, approximately twice as many as those who felt they are not. We asked questions about different sections of the *Regulatory arrangements* and their overall effectiveness. At least 55 per cent of those that responded agreed that each of the individual sections of the document set effective requirements. This positive response was high and consistent across all groups, including awarding organisations and SSCs. However there were a range of comments and questions about the approach we have taken and a majority of respondents that felt there are omissions in the *Regulatory arrangements*. The main issues raised are examined under the sub-headings below.

Further information and guidance

There were a large number of requests for further clarification, guidance and exemplars to make clear the meaning of particular aspects of the *Regulatory arrangements*. Although many respondents felt that the *Regulatory arrangements* were clear and concise in general, a number of issues were raised in this regard. Some felt that unless it was possible to address their concerns through guidance or clarification they would have ongoing concerns with the *Regulatory arrangements*.

Specific issues included:

- confusion about roles and responsibilities, such as requests for clarification about where responsibility lies for ensuring there are not already suitable units in the QCF unit databank before developing new ones
- questions and concerns about restricting units and titling
- questions and concerns about the compatibility of different methods of assessment with the *Regulatory arrangements*, such as approaches that may involve 'compensation' in the assessment process
- questions and concerns about unique learner numbers (ULNs) and learner records.

We also received a range of questions and comments in relation to the provisions for diversity and equality, resulting in a number of requests for guidance in this area.

Issues raised included:

- a feeling from some respondents that it was not clear to them how they are expected to demonstrate their compliance with regulatory requirements
- concerns about our requirements for regulated organisations to collect data in this area
- a concern that requirements are overly bureaucratic and many of the requirements go beyond what some respondents consider is necessary.

NVQs and qualification 'types'

Some respondents raised issues about NVQs in the QCF in relation to all the questions in this part of the survey (and by some organisations in relation to every question in the survey). A range of views were expressed, including:

- Some requested clarity about the position of NVQs in the QCF.
- Some respondents felt that the position of NVQs in the QCF is inappropriate, either because there is no need for them to become part of the QCF because they feel the pre-QCF requirements are working well, or because they believe different requirements are needed to secure their position in the QCF.
- Among those not content with the position of NVQs in the QCF it was sometimes argued that if NVQs were to become part of the QCF this should be with a set of additional regulatory requirements about the way they should be assessed and quality assured.
- Others felt the QCF should not be changed by 'lobbying' to keep the NVQs in their pre-QCF form.
- Some respondents also raised questions and concerns about the position of other groups of qualifications in the QCF, such as graded exams.

Quality assurance

Some of the concerns of those respondents who felt the requirements for NVQs in the QCF are not appropriate related to the way in which such qualifications are assessed and quality assured. This was, however, a specific example of a more widely noted issue. A number of the respondents were concerned that the *Regulatory arrangements* are open to too much interpretation by regulated organisations. They felt more detailed and specific requirements should be specified in some areas. Several respondents felt that this is a particular concern in relation to new organisations seeking to operate in the QCF.

The position of smaller organisations

A number of smaller awarding organisations complained that they felt the *Regulatory arrangements* are not appropriate for them. For example they did not feel that it was reasonable for them to have to put in place and document detailed processes for qualifications development when they do not develop large volumes of qualifications. Some felt there is a lack of funds to support them in the transition to the QCF.

Rules of combination

A range of issues were raised in relation to rules of combination, including:

- concerns that as the databank grows it will become impossible to comprehensively search it for suitable units
- worries about difficulties that may result from making use of shared units in rules of combination, in particular in relation to amendments and extensions to a unit's end date
- a general concern about the perceived bureaucracy and complexity that unit end dates result in.

Requirements in relation to SSCs

The regulatory requirement for SSCs' 'approval of' qualifications was referred to in many responses. The experience of awarding organisations in the effectiveness of SSCs in the 'approval of' qualifications appears very mixed. Specific issues raised by awarding organisations included:

- the fact that different SSCs require different information from them
- the variable time taken by SSCs to make a decision
- in some cases SSCs have 'no interest' or do not have sufficient capacity to approve qualifications
- concerns about conflicts of interest where SSCs are also regulated organisations
- questions about what happens to qualifications for which there is no SSC responsible.

There was particular confusion at the time the survey was published about the fact that a process for the SSC 'approval of' qualifications had yet to be agreed. This is now no longer the case. Awarding organisations in particular were not clear about the information we required to ensure that a SSC has 'approved of' a qualification.

3.3 Regulatory processes

More respondents agreed (48 per cent) that overall our processes are appropriate than did not (26 per cent). This question elicited a high number of 'don't knows'. Around twice the number of awarding organisations and SSCs or sector skills bodies (SSBs) responded positively than negatively.

Of those who responded 53 per cent were in agreement that generally the regulatory processes for the recognition of organisations to operate in the QCF are effective. When asked about whether we have effective procedures for accrediting qualifications in place 45 per cent agreed. It is worth noting that a particularly large number of respondents (39 per cent) said that they 'don't know' if we have put in place effective monitoring procedures.

A range of issues were raised about regulatory processes, and these are explored under the headings below.

Clarity about processes

Some respondents felt there is a need for a greater degree of transparency in our operations and we should be clearer with them about what the requirements of our processes are. For some this would see us taking more of a guiding role, especially in the initial phase of the development of the QCF.

Efficiency

A range of comments were received about the efficiency of our processes, particularly in relation to the recognition of regulated organisations. Concerns included:

- worries that our requirements result in organisations having to re-write procedures for no apparent reason
- us taking too long to respond to their submissions
- our capacity, especially if a 'log-jam' arose from organisations submitting recognition applications or qualifications at the same time.

In relation to this a QCF regulation helpdesk was suggested with contact details for those who can supply answers.

Effectiveness of processes

A range of issues and concerns were expressed about the effectiveness of our processes. These included:

- concerns about the level of scrutiny given to units and qualifications in the QCF
- suggestions that there should be a greater degree of monitoring and scrutiny of individual organisations, units and qualifications
- questions about the suitability of an exclusively 'paper-based' approach
- specific requests for clarification on how we would know whether, for example, awarding organisations have interrogated the databank, how sampling of units and qualifications would take place and the consequences of malpractice.

IT

Many of the respondents noted what they felt are the inadequacies in the IT systems that support the operation of our regulatory processes in the QCF. A range of respondents made a variety of helpful suggestions as to how these could be improved.

In relation to recognition of organisations to operate in the QCF suggestions included moving to a web-based platform, with detailed ideas for document banking. Similarly, in relation to gaining accreditation for qualifications, extensive comments were made relating to the usability of our web-based accreditation (WBA) system and the NDAQ due to difficulties experienced in their use.

3.4 Implementation timescales

A majority (65 per cent) of respondents felt there is insufficient time to populate the QCF with qualifications that are replacements for existing versions by the end of 2010. There was a higher level of agreement between respondents on this question than any other.

A variety of issues were raised in relation to this, including:

- Several respondents noted the fact that providers need a substantial lead-in time to market the courses to learners and employers and to train assessors – therefore creating a much earlier deadline for them to develop their provision by.
- Some felt that while they themselves could respond to the deadline on time, there was more of a question about whether we and others, such as SSCs, have the capacity and capability to respond quickly enough.
- Potential negative implications of the current timeline for development were noted by some respondents, including that all forms of QCF partnership working (such as developing shared units) will be sacrificed as they take longer, and that quality will be compromised, which will impact on public confidence in the QCF.

Appeals for an extension to the deadline were quite widespread. Some respondents felt that contingencies should be put into place to allow qualifications recognised in the National Qualification Framework (NQF) to be recognised under these existing arrangements otherwise it was felt there could be gaps in provision.

3.5 Overall comments

It is important to note that, in contrast to responses to many other questions, respondents were fairly evenly divided as to whether they were happy overall with our approach to regulation. Respondents were more content with appropriateness of the specific requirements and processes that we have put in place for the QCF than they felt overall. Although many of the respondents felt that it is too early in the lifespan of the regulatory framework for the QCF to fully assess its appropriateness and effectiveness, several key themes emerged from the concerns of respondents:

- There was a divide between the respondents who felt that quality assurance is best achieved through us operating at a distance from regulated organisations, requiring them to take responsibility for the quality of their provision but allowing them the opportunity to develop different responses to the regulatory requirements, and those who felt we should take a more prescriptive and interventionist role than we currently do.
- There was also a divide between those who were satisfied with the current regulatory requirements and those who felt that they require more clarification or need to be changed. One example of this issue, noted by a number of respondents to the survey, is the position of NVQs.
- There were many comments made regarding the timeline to populate the QCF with replacements for NQF versions of qualifications, as many felt that there is not enough time or resources for organisations to do the work to the standard required.

Mostly positive feelings were expressed about this process of engagement with people's views on the regulation of the QCF. Stakeholders liked being involved and hoped that such arrangements would continue. We will ensure that organisations are involved in the second year of our evaluation, and are grateful to the 200 organisations and individuals who responded to our survey and to those who attended the events we held.

4. Evidence from QCF provision

4.1 Introduction

This strand of the evaluation work included an analysis of the standard of units, rules of combination and assessment arrangements developed for qualifications. The aim of this activity was to consider, in each case, the compliance with the *Regulatory arrangements* and any issues the *Regulatory arrangements* appeared to have presented to the development of appropriate units and qualifications. Any other issues raised were also noted. We undertook the activity set out in this section either by carrying out sampling or analysing overall figures in relation to the different issues. The aim of all the analysis was to gain a view of the current position across the QCF rather than related to specific organisations, qualifications or sectors. The analysis was conducted on samples of units and qualifications taken in May and June 2009. As a result it does not reflect units and qualifications submitted by organisations that had at that time completed our full recognition requirements.

This section also looks at the requirement to nominate a 'purpose' for qualifications in the QCF and the evidence that it has been possible to gather in relation to this.

4.2 Units

A sample of 376 units, designed to reflect the provision available in the QCF, was selected from the unit databank. The sample chosen included units at every level but with an emphasis on units at Entry level and levels 1, 2 and 3 as these are more numerous in the QCF. The sample also included units submitted by a broad range of unit-submitting organisations and units from across different sector and subject areas. Both units submitted under test and trials arrangements and units submitted since the publication and subsequent implementation of the *Regulatory arrangements* featured in the sample, with some increased emphasis on those submitted more recently as there are a majority of these units. As noted above, none of the units sampled were submitted by organisations that had completed the supplementary recognition process at the time the unit was submitted. The sample featured both shared and restricted units, but the majority of units were shared to reflect the high proportion of shared units in the unit databank.

Two independent organisations evaluated the selected units, following a competitive tendering process that focused on the expertise of the organisations to carry out the work. To ensure consistency of judgements between the two organisations a sub sample of 25 units was evaluated by both organisations and subjected to a process of moderation. We then completed further moderation of the units ourselves, reviewing all units that we were advised required immediate review to ensure that we considered the judgements made to be consistent and correct.

Compliance with the Regulatory arrangements

This analysis revealed that approximately 10 per cent of units require immediate action as a result of identified non-compliance with the *Regulatory arrangements*. Technical issues were identified with around another 30 per cent of units. A full discussion of the differences between the different classifications and the issues found in relation to them is set out in section 6.3, below. The table below provides the average summary of the ratings of units sampled across three compliance classifications.

Table 1: Summary of compliance ratings for QCF units

Compliance score	Classification	Percentage of units ⁶
1	Fully compliant	57
2	Technical issues only	32
3	Immediate review recommended	10

The main issues in the units determined to be non-compliant in relation to the *Regulatory arrangements* (covering categories 2 and 3) are set out below.

Unit titles

The sample considered highlighted unit titles at all levels and across subject/sector areas that fail to meet the requirement to be ‘ . . . clear, concise and reflect the content of the units’. Key issues included:

- discrepancies between unit titles and content
- titles for units that are too broad and do not reflect the specific activities of the content
- titles containing references to the QCF level or the place of units within a specific rule of combination.

Learning outcomes

The learning outcomes (and associated assessment criteria) of each unit form the core of its content and are critical features in determining the quality of a unit. We

⁶ Please note rounding means values do not add up to 100 per cent.

found a variety of compliance issues through this sampling activity, the majority of which relate to the mismatch between learning outcomes and assessment criteria and the clarity with which learning outcomes are expressed. Other issues included learning outcomes that:

- are not written in a coherent style that addresses the learner
- do not clearly address unit content or relate to the level of the unit
- are too detailed and could usefully be sub-divided to ensure clarity
- are too broad, too general or too poorly defined to enable a clear assessment standard to be set.

Assessment criteria

In the main this was the area of unit development that appeared to cause most problems for unit-submitting organisations. Some of the typical issues arising included:

- assessment criteria that did not relate to the learning outcomes or did not clearly indicate what a candidate must be able to do, for example in expressing the quality of outcome expected from learners
- in some cases the number and content of assessment criteria suggests an unmanageable assessment burden
- as for some learning outcomes, some assessment criteria do not appropriately address the learner.

Level

The level of the unit can be difficult to ascertain where learning outcomes and assessment criteria appear to be written at different levels, or are poorly written in the ways described above. In some cases the requirements of the unit are not appropriate for the level of unit chosen, and the level has been incorrectly specified. In others the language of the unit appears to be at too high or too low a level for the level of the unit.

Credit value

In some cases it was noted that credit values appear too low or high in relation to unit content. However it appears that this area of regulatory activity would be supported by additional regulatory activity to consider whether credit values are proving appropriate in practice. The sampling activity also highlighted issues regarding mismatches between credit value and guided learning hours (GLH).

Issues with the Regulatory arrangements

The key issues for the *Regulatory arrangements* seemed to relate to the criteria that deal with the clarity of, relationship between and ability to assess learning outcomes and assessment criteria. Amendments to the regulatory requirements to require more specificity in the quantity and type of evidence expected from a learner could be considered to make them more precise.

Any other issues

The sampling of units undertaken made it clear that the unit format currently in use in the WBA system is far from ideal for the QCF. The different fields of the unit requirements are not presented in a logical sequence (that is the sequence set out in the *Regulatory arrangements*) and include information that is not relevant to the requirements of the QCF. The format does not prevent unit content being inappropriately entered and makes it difficult to read as the learning outcomes do not straightforwardly read across to the assessment criteria.

4.3 Rules of combination

This strand of the evaluation was conducted in two parts. The first stage was to undertake a statistical analysis of all the 1,864 qualifications accredited into the QCF by 1 August 2009. This data was used to produce an overview of the number of qualifications in the QCF that make use of the different design features for rules of combination set out in the *Regulatory arrangements*. A second, detailed review of the rules of combination specified in a sample of 30 qualifications supplemented the outcomes of the overall statistical analysis. This sample was designed to represent the provision available in the QCF while ensuring that some of the qualifications included also make use of the various design features for rules of combination in the QCF to see how they are being used.

The findings presented below refer to the outcomes of the statistical analysis of all qualifications accredited in the QCF and draw upon some examples taken from the review of the sample of qualifications.

Compliance with the Regulatory arrangements

All rules of combination included in qualifications accredited in the QCF have been validated by the 'rules of combination engine' – which checks that rules are valid in relation to the requirements set out in the *Regulatory arrangements* – as part of the accreditation process. This means the focus of this section is on the extent to which the rule of combination reflects the rationale given for a qualification and whether the design features of the QCF are used to provide learners with appropriate opportunities for credit transfer.

As part of the analysis of the sample of rules of combination undertaken we looked at the correlation between the rationale for a qualification and the structure of a rule of combination. Overall we found that there was a good correlation between the level and content of the units specified within the rule of combination and the stated rationale for the qualification. For the purposes of this analysis the rationale for a qualification was inferred from the information provided by awarding organisations as a summary of the qualification, because this is not presented as a distinct requirement within current IT systems.

We also considered the ways in which rules of combination are structured and in particular the opportunities provided to learners for credit transfer. The findings below are grouped under headings that reflect the different flexibilities set out in the *Regulatory arrangements*.

Shared and restricted units

When a unit is submitted to the QCF unit databank it must be designated either as 'shared' or 'restricted'. Shared units can be used by any regulated organisation as part of a rule of combination. Restricted units can only be used by designated organisations, which could be just the organisation that submitted them. Although the majority of units in the QCF unit databank are shared, the status of a unit as shared or otherwise does not give an indication of how these units are actually being used in qualifications.

From looking at the rules of combination included in the sample we found that the use of units in more than one qualification does not necessarily equate to the use of shared units across different unit-submitting and awarding organisations. In the majority of cases units are included in several qualifications within the same suite of qualifications offered by a single awarding organisation. While this does support progression in a limited sense it does not necessarily result in the creation of more widespread opportunities for learners to have their achievement recognised if they wish to progress in a way that is different from that provided for by the awarding organisation in question.

Conversely the opportunities for learner progression are significantly increased where a number of organisations feature the same units, in rules of combination, in a cluster of qualifications in a similar subject/sector area. Interestingly in the sample we found that this approach was often found in groups of qualifications that specify credits from restricted units. In these cases the units are restricted to a group of awarding organisations.

Units linked to multiple qualifications

By interrogating the databank we found that the majority (69 per cent) of 'active' units in the QCF unit databank are included in more than one accredited qualification. Of these units, however, most feature in only two qualifications.

It seems that although the incidence of some of the more technical design features, such as equivalent units and exemptions, is low overall, the principle of a unit-based framework has nevertheless begun to become established. The number of instances of units featuring in two or more rules of combination is significant.

Credits from other units

No qualifications make use of 'credit from other units'. This is largely due to the fact that the WBA system has not supported the facility to specify rules of combination including this feature since early summer 2009.

Credit from equivalent units

Only a very small number of accredited qualifications make use of equivalent units, just 6 out of the 1,864 qualifications looked at.

Pathways and endorsements

A relatively low number of qualifications feature pathways leading to endorsements: just four per cent of all qualifications accredited in the QCF.

Exemptions

The total number of qualifications in the QCF that make use of the exemptions field is also low: only nine per cent of all the qualifications in the QCF.

The majority of the qualifications making use of the exemption field do not use this feature correctly. Information in relation to exemptions is provided in a 'free text' field as part of a qualification proposal. For example in several instances the exemption field was used to reaffirm that the awarding organisation would recognise credits awarded by other awarding organisations, despite the fact that this is required in the QCF in any case. In other instances the exemption field was used to describe arrangements for recognition of prior, un-certificated, learning.

Opportunities for credit transfer in individual qualifications

As part of our analysis of the sample of rules of combination we identified some examples of qualifications at the same level with a similar content and purpose. In such cases it would be reasonable to expect some of these qualifications to incorporate design features in their rules of combination that would lead to increased opportunities for credit accumulation and transfer; for example by including credit from other units or equivalent units. In most instances, however, the rules of combination for these qualifications consisted of a combination of units relating to that qualification only with relatively few opportunities for credit accumulation and transfer between different qualifications.

Nevertheless, many rules of combination provide increased opportunity for credit accumulation and transfer by specifying large groups of optional units from which only relatively few credits are required to achieve the qualification. In some qualifications this type of design is combined with the use of shared units that also feature in other qualifications to enhance opportunities for credit transfer. In other instances these large groups of optional units are also restricted or private, which can serve to limit such opportunities.

Issues in relation to the Regulatory arrangements

This part of the evaluation did not identify any significant issues in relation to the *Regulatory arrangements*. The relatively low occurrence of some design features, however, raises the question of whether it is realistic for qualification developers to use a full range of the different flexibilities in their qualifications, particularly in this relatively early stage in the implementation of the framework.

Another question raised by this evaluation relates to the way in which the rule of combination format is set out in the *Regulatory arrangements*. For example they state that rules of combination 'must' set out the credits from equivalent units and the exemptions that can be claimed for certificated achievement outside the QCF. They are silent on the question of how awarding organisations should approach unforeseen claims for equivalent units and exemptions, and on the mechanisms for updating rules of combination to reflect such developments.

Other issues

One of the major challenges encountered during the project was the format in which qualifications and rules of combination are submitted to the WBA system. The current IT systems supporting the QCF do not allow for rules of combination to be submitted and stored unless they are included as part of a qualification proposal submitted for accreditation. This means that those organisations recognised to submit rules of combination but that are not awarding organisations are not able to submit them directly to the system. Instead they must inform the relevant awarding organisation of the relevant rule. It also means it is difficult to identify instances in which 'shared' rules of combination feature in multiple qualifications offered by different awarding organisations. New regulatory IT systems will resolve this issue, but this does mean that currently our regulatory systems are less easy to use than they should be.

There are also other factors that mean the WBA system does not fully support qualification developers to make use of rules of combination. The key problem is that the solution is not intuitive. Its operation is technical and distant from the way in which users wish to present qualifications. Guidance and support has helped in this area, but not fully resolved this issue. Collecting the data in a complex way also has a negative impact on the way it is presented to learners. Collecting it in a less complicated way would allow a more straightforward presentation. One specific example is that although WBA allows for equivalent units to be specified within a rule of combination it does not easily lend itself to the task of searching for and identifying potential equivalent units. Searching for and comparing units with similar titles and content at or above a given level is a cumbersome and time-consuming process.

In addition the format for capturing and presenting exemption information appears to be a significant reason for the incorrect use of this function and may also partially explain the generally low numbers of qualifications that make use of this feature. Even where the exemption field is used correctly it does not lend itself to a clear presentation of the information. This seems to be an unavoidable result of the 'free text' format in which the information is inputted on the system. The *Regulatory arrangements* also make several references to the requirement for a rule of combination to have a specified rationale. The regulatory processes currently in place to support the implementation of the QCF, however, do not allow the rationale for a rule of combination to be straightforwardly recorded. This makes it harder to gauge how organisations are interpreting and using rules of combination in the QCF.

4.4 Assessment arrangements

This part of the evaluation focused on the assessment arrangements used in 36 qualifications currently accredited in the QCF. As with the unit sample, the qualifications were selected to reflect the provision available on the QCF. Therefore the sample includes qualifications at every level with an emphasis on qualifications at Entry level and levels 1, 2 and 3. The awarding organisations offering the qualifications featured in the sample vary in size according to both their market share and the number of their qualifications accredited on the QCF. The sample also represented a range of sector and subject areas and included qualifications accredited under test and trial arrangements as well as qualifications accredited since the implementation of the *Regulatory arrangements*, with greater emphasis on the latter as they are more numerous. The sample also featured two pairs of qualifications with identical rules of combination to allow comparisons to be drawn about the different assessment arrangements applied by different awarding organisations.

As with the unit sample, the evaluation was undertaken by two independent organisations following a competitive tendering process that focused on the expertise of the organisations to carry out the work. To ensure consistency of judgements between the two organisations a sub sample of three qualifications was evaluated by both organisations in parallel followed by a moderation exercise. We then completed further moderation of some qualifications ourselves, reviewing those identified as having any serious issues to ensure that we considered the judgements made to be consistent and correct.

Compliance with the Regulatory arrangements

About 75 per cent of the qualifications considered were deemed to be meeting the regulatory requirements. Some concerns were identified with the remainder. The majority of these, however, were not serious and tended to relate to the need for more information to be provided for a secure judgement about compliance with regulatory requirements to be made, rather than the identification of specific concerns. Once this information is secured we expect the overall compliance figure to rise. In addition in the majority of cases the need for further information was noted in relation to the way in which the qualification will be delivered, not whether the design of the assessment will generate valid and reliable results if delivered appropriately. The limitations of this activity in determining compliance issues fully, and the need for further activity in this area in any case, is noted below.

In some cases most of the relevant information is contained within one or two guidance documents. These usually take the form of a qualification handbook, which provides the unit details, assessment and other specific information relevant to the qualification, and a centre handbook. The latter normally provides details of the overall practice of the awarding organisation regarding their arrangements for assessment, internal and external moderation and quality assurance, as well as

issues to do with consistency and standardisation of assessment decisions over time and across centres. In such cases the awarding organisation's expectations of centres are clear. In other cases sometimes the information is distributed across various documents and/or on the website. In these particular cases there were concerns that it might be difficult for an individual assessor or internal moderator in a centre to be aware of all of the relevant requirements that the awarding organisation imposes or the support and help that they are able to provide.

The main issues that were found in relation to non-compliance with the *Regulatory arrangements* are set out under the headings below.

Design and development of assessment

The evaluation highlighted some gaps in the guidance from some awarding organisations. A number of awarding organisations provide very little by way of guidance to centres. In some cases we were concerned that there is not enough information to allow those involved in the assessment process to carry out their responsibilities consistently.

Delivery of assessment

The advice provided by awarding organisations about delivering qualifications and the level of support they provide varied greatly. While some are exemplary in the level of detail they use as they set out their expectations for centres about the arrangements for assessment and verification, where concerns were identified only minimal information is specified. For example some of qualifications do not deal fully with the issue of the authenticity of assessment evidence in the documentation provided. Further investigation will be considered on regulatory criterion 5.9 relating to conflict of interest as this is not covered in detail in some awarding organisations' details.

Consistency and standardisation

The evaluation highlighted that when it came to the way in which an awarding organisation ensures consistency and reliability of standards between centres and over time it was sometimes difficult to pinpoint how these parts of the regulatory criteria are being met. This is likely to be because the organisation has established mechanisms for testing this, but the information about how this was achieved was not available in the information provided. Indeed information in this regard is something that organisations supply to us as part of the recognition process. Nonetheless this is something that we may investigate further to understand if there are issues in this regard.

Many of the awarding organisations did not provide information about complaints and appeals procedures in the documentation provided. This was not an area in scope for this activity. The fact that this information did not appear readily available in all cases, however, does present us with an issue to check and monitor further.

Issues with the Regulatory arrangements

The *Regulatory arrangements* specify fewer detailed requirements about the way in which qualifications must be assessed than had been the case previously. The effectiveness of these requirements is an issue that we did not consider in practice in this evaluation. We did, however, identify some issues for investigation through further detailed monitoring to consider the approaches organisations are taking in meeting regulatory requirements. For example the evaluation identified some significant differences between organisations in the level of detail provided about:

- advice and guidance on assessment delivery including the role of assessors and internal verifiers and their qualifications for the role
- the level of support that is provided to centres to ensure that they meet the awarding organisation's requirements and therefore the regulatory requirements
- information on how standardisation processes and procedures ensure consistency of assessment.

4.5 Qualification 'purpose'

The requirement for qualifications accredited in the QCF to have an identified purpose is set out in paragraph 6.3(c) of the *Regulatory arrangements*:

Qualifications proposals submitted for accreditation must identify the purpose of the qualification from a list provided by the qualifications regulators.

To support this requirement a list of qualification purposes was introduced on a pilot basis in February 2009.⁷ This part of the evaluation aimed to consider how this requirement is being implemented. To do this we undertook a statistical analysis of the 1,200 qualifications accredited between February and when the statistical investigation was completed in August.

We looked at the number of qualifications for which a purpose and sub-purpose had been identified. We found that purposes identified for the qualifications accredited under the pilot arrangements were distributed fairly evenly, although a relatively high number of qualifications fell into category B: 'Prepare for further learning or training and/or develop knowledge and/or skills in a subject area'. This suggests that the purposes are fulfilling their function in providing a sufficiently diverse range of categories to allow learners, employers and other users to draw distinctions between different qualifications.

⁷ See *Identifying purposes for qualifications in the QCF*, at www.ofqual.gov.uk/2126.aspx

We found that the information gathered as part of the arrangements for the pilot of qualification purposes can provide a useful tool for analysing and navigating the qualifications accredited on the QCF. The fact in particular that awarding organisations must choose from a predetermined list of purposes means that this information is captured in a standardised format. This allows for regulated qualifications to be analysed and compared effectively. For example the information captured as part of this pilot makes it possible to map qualification purposes against their subject and sector area to produce a comprehensive breakdown of how qualifications are used in different subject and sector areas in the QCF. This type of analysis is not possible in relation to other information about qualifications captured in a 'free text' field as part of the qualification proposal, and therefore is not susceptible to statistical analysis.

The pilot of qualification purposes in the QCF was of a very limited scope. Under these arrangements the information provided at accreditation stage is currently stored on the WBA system and is not shared with any third parties. As part of this evaluation it was therefore not possible to establish whether the data provided could be useful to other users of the QCF. For example learners and providers may wish to use the information so as better to distinguish between qualifications within a particular sector or subject area.

5. Evidence from regulatory requirements and processes

5.1 Introduction

The *Regulatory arrangements* specify the requirements for organisations recognised to develop and submit units, develop rules of combination and assess units and award credits and qualifications. We have in place processes for recognising organisations and accrediting qualifications to ensure organisations meet the standards set out in this document. We also monitor the performance of recognised organisations and the quality of units and qualifications they develop and/or offer to ensure that the requirements and standards set out in the *Regulatory arrangements* are being maintained. This section considers the outcomes of these processes.

It is important to note that there have been changes to our regulatory processes to support the implementation of the QCF. In particular, following the implementation of the *Regulatory arrangements* in December 2008, we introduced updated recognition processes to reflect the new regulatory requirements. A supplementary process was put in place to allow organisations already recognised to operate in the NQF to demonstrate their compliance with the requirements of the *Regulatory arrangements*. The purpose of the supplementary process was to allow those organisations already recognised by us to show that they meet the requirements of the QCF that are new or different from those for which they have already demonstrated they are meeting the standard for through their previous recognition. In addition, in line with our strategic direction in this regard, the process was designed to collect as much information at the recognition stage as possible to limit accreditation requirements for individual qualifications. This means that all awarding organisations are required to complete some new recognition activity to operate in the QCF.

Organisations not previously recognised by us are required to demonstrate they meet all of our requirements and therefore must complete a more extensive process. All organisations, however, are required to show that they meet the same standards.

Organisations with access to the QCF as a result of the requirements put in place for the QCF tests and trials have not had their access to the framework suspended. All organisations, however, must complete the supplementary process to gain full recognition to operate in the QCF. For this reason, as organisations are only now beginning to demonstrate they meet these standards, the effect of this regulatory process is only just being felt.

Qualifications submitted during the test and trials, and those submitted by organisations that have not been through the new QCF recognition requirements, have only been permitted a latest accreditation end date of 31 December 2010. This is designed to ensure any issues resulting from tests and trials are contained. As well as this, no new qualifications will be accredited to the QCF by organisations that have

not been through the new recognition requirements after the end of this year. As awarding organisations become fully recognised into the QCF they are able to submit qualifications with end dates of up to a maximum of five years.

5.2 Evidence from regulatory processes

We have obtained a range of evidence from our new regulatory process. For the reasons set out above, the greatest amount has come from our new recognition process. This section, however, sets out evidence arising from each of our regulatory activities described above: recognition, accreditation and monitoring. To do this we investigated our own processes to identify issues in relation to organisations' compliance with the *Regulatory arrangements* and any issues arising from the implementation of these regulatory requirements. This part of the evaluation presents a summary of the findings from this activity in relation to all the regulatory processes we carry out. It is arranged according to the common themes and issues that emerged from our analysis rather than those that relate specifically to different regulatory processes.

Compliance with the Regulatory arrangements

This part of the evaluation identified a range of issues in relation to regulated organisations demonstrating their compliance with regulatory requirements. The main issues are organised under the headings below.

Submission of units

Issues about the numbers of units in the unit databank that comply with the *Regulatory arrangements* are dealt with elsewhere in this report. However the way in which we expect organisations to demonstrate they are meeting regulatory requirements is considered in this section.

Organisations have to be recognised to submit units to the QCF unit databank. We do not typically conduct scrutiny of units until they feature in qualification proposals made to us. This is because it is not until this stage that units become available and visible to learners. We review a sample of units as part of the process for accrediting qualification proposals. If a unit does not comply with the requirements of the *Regulatory arrangements* we require the owner of the unit to amend it prior to accrediting the qualification. Where a unit-submitting organisation is required to amend a unit it is also asked to ensure that all its other units meet the requirements of the *Regulatory arrangements*. Not all units are scrutinised in detail at this point and it is not possible in general at this time to consider units in the same level of detail as can be accomplished through other types of regulatory activity. This suggests an opportunity for us to consider the circumstances under which we make different regulatory interventions.

Determination of credit values

The QCF recognition process puts significant emphasis on organisations' processes for the design and development of units. Particular attention is given to the procedures in place to ensure that the level and credit value of units is determined accurately and consistently, and to ensure that the quality of each unit is reviewed and signed off prior to submission to the databank.

In several instances organisations applying for recognition have had their applications referred for further work as they were proposing to apply a model for credit rating that relies on a mathematical calculation based on the delivery model for a particular qualification. Instead the determination of the credit value should come from a judgement taken as an integral part of the development process based on a consideration of the learning outcomes, assessment criteria and level of a unit. This serves as an example of where organisations are having difficulty understanding and meeting the requirements of the *Regulatory arrangements*.

Rules of combination

The design specifications for the QCF set out a number of different characteristics that can be used when designing rules of combination. However there is no requirement for any of them to be incorporated in any particular instance. Instead organisations are required to have procedures in place to 'generate maximum opportunity for credit accumulation and transfer and exemption consistent with the rationale for a qualification'. This requirement clearly sets out the parameters for the use of the QCF rule of combination format. Organisations must commit to generating opportunities to transfer credit and to provide evidence of how they will consider this as part of the recognition process. It is only possible, however, to consider how this requirement is being applied in specific cases through other types of regulatory activity.

Diversity and equality

Some organisations appear not to fully understand all the implications of the requirements set out in paragraphs 2.11–2.14 of the *Regulatory arrangements*. It is not uncommon for an organisation to submit a corporate equal opportunities policy in relation to its own staff, without addressing the requirement for it to ensure that it meets the requirements of equalities legislation in relation to its regulated function(s). The requirement in paragraph 2.13 for organisations to consult learners and/or their representatives to identify potential barriers to access to units and qualifications is often overlooked or misunderstood in recognition applications. In addition awarding organisations undertaking the supplementary recognition process do not always demonstrate that they have fully considered the implications of the design specifications for units on their reasonable adjustment policy in relation to the delivery of their assessments.

It is a requirement for the accreditation of individual qualifications that information concerning diversity and equality is supplied. The comment received from awarding organisations is generally 'no barriers identified' and the level of consideration that has been given to the identification of barriers is not always apparent. Collecting diversity and equality information in line with paragraph 2.14 of the arrangements would allow us to consider this issue in more detail.

Expertise, training and guidance

In some instances organisations overlook the need to submit procedures that demonstrate how they ensure that staff and associates with relevant expertise are allocated to undertake appropriate activities as part of their processes for the design, development and delivery of units, qualifications and assessments. The regulatory requirements in relation to training and expertise relate not only to key aspects of the QCF, such as unit writing and determination of credit values, but also to subject and sector expertise and experience in relation to the development of qualifications and assessment.

Design, development and delivery of unit-based assessment

Awarding organisations do not always take into account the full implications of developing and delivering assessment in a unit-based framework. For example some procedures submitted by prospective awarding organisations as part of the recognition process do not clearly identify how the development and delivery of an assessment methodology for particular units or groups of units is undertaken. Neither do they necessarily indicate what procedures are in place to ensure that the chosen assessment method is appropriate to the unit(s) in question and how it is designed and delivered in a way that ensures valid and reliable assessment outcomes.

Issues in relation to the Regulatory arrangements for the QCF

The issues identified in relation to the *Regulatory arrangements* are considered under the headings below.

Flexibility and clarity of requirements

Some of the requirements of the *Regulatory arrangements* give a greater degree of flexibility for awarding organisations in determining how to meet regulatory requirements than those set out in the *Statutory regulations for external qualifications* (2004)⁸. This is designed to give awarding organisations more scope to develop procedures that better suit their needs and reflect more accurately how they operate. It also means that we need to ensure that we develop an agreed understanding of

⁸ See www.ofqual.gov.uk/321.aspx

what awarding organisations are required to demonstrate to meet the requirements, and communicate this effectively internally and externally. Therefore the *Regulatory arrangements* present new challenges to us and our current regulatory processes, particularly in ensuring that all understand the standards and requirements they set.

Qualification and unit end dates

Qualification accreditation end dates create a variety of operational issues, such as requiring qualifications to be reviewed by us when they may not need it, and they place an administrative burden on regulated organisations. They are useful, however, in ensuring that units and qualifications are reviewed and revised at appropriate times. The dates have also proved useful in the development of the QCF by ensuring that provision developed as a result of tests and trials or before organisations have completed new recognition requirements is reviewed.

As the system develops the evidence from our processes suggests we should consider replacing end dates with review dates. Such an approach would also be consistent with us deciding to accredit (and re-accredit) some qualifications and not others under the powers we will have under new legislation. Replacing unit expiry dates with review dates could potentially encourage awarding organisations to make use of rules of combination that specify credit from units owned by other organisations.

6. Analysis

6.1 Introduction

The first stage of the evaluation has given us an early impression of the progress made and issues experienced in the first year of the implementation of the regulatory requirements for the QCF. We have found that in many areas the regulation of the QCF is proceeding well. There are, however, aspects causing concern and we will take immediate action to deal with identified problems. There are other issues that we need to observe and keep under review. This is as is to be expected because, as discussed in the introduction to this evaluation, the tests and trials of the QCF highlighted a range of issues requiring further examination and others have arisen as a new set of requirements and processes have been implemented.

This section sets out our analysis of the outcomes of the evaluation, considers the actions we consider are necessary as a result of specific findings and indicates our priorities for further investigation.

The analysis is set out in terms of:

- issues for the *Regulatory arrangements*
- issues with units, rules of combination and qualifications
- issues identified for our processes
- overarching concerns.

This is to organise an analysis of the findings set out in the preceding sections. These are not necessarily distinct topics, so, for example, issues with units and qualifications may lead to us to consider changing our processes.

In addition this evaluation has uncovered a range of detailed issues and concerns. While this report focuses on those issues that have a significant or widespread impact, or may list examples of a problem rather than every instance of it, there is a range of detailed issues that have been raised in the evaluation that we need to consider. Some of the conclusions that we draw are broad and involve a number of actions. In particular a range of detailed comments and suggestions from those surveyed is being reflected in changes we are making to our processes.

6.2 Regulatory arrangements for the QCF

We gathered a variety of different types of evidence in relation to the *Regulatory arrangements*, from across the different strands of the evaluation. This included direct comments about their effectiveness from those who responded to the survey, evidence from the quality of units and qualifications produced for the QCF and information available from considering the regulatory processes designed to ensure compliance with the *Regulatory arrangements*.

The issues raised have been organised under the headings below.

Explanation and amplification of requirements

Across the strands of the evaluation, particularly in relation to feedback from users, issues, questions and suggestions for changes have arisen in relation to the *Regulatory arrangements*. To some extent this is to be expected both because awarding organisations are in the process of determining how they can meet the new expectations of them in the QCF and because the requirements themselves are new.

A range of concerns relate to whether organisations and individuals have understood our requirements. In other words, sometimes regulated organisations are not always sure what the *Regulatory arrangements* require of them. Sometimes this may be a result of a lack of capacity or understanding in the regulated organisations. For example even organisations that have previously been recognised have found some of the QCF requirements that are new or different from existing ones, such as determining credit values for units, difficult to meet, as noted in section 5. On occasion this results from the need to understand detailed technical requirements set out in the *Regulatory arrangements*, such as the relationship between the design and development of QCF units and the specification of appropriate assessment arrangements. At other times this difficulty results from the fact that the requirements are, in places, purposefully specified so as not to enforce specific expectations about the way in which particular processes must be undertaken but instead allow regulated organisations flexibility about the way in which they meet required standards.

While this is a direct consequence of our decisions about the nature of the regulatory requirements we consider are appropriate for the QCF, it means that we need to communicate clearly what constitutes compliance with the *Regulatory arrangements*. One instance of where this has been found to be necessary was as a result of the number of questions that we have received about titling arrangements. In response to this we have issued a document to clarify our expectations. This had a clear purpose: to provide helpful and transparent confirmation of our position on a range of issues in relation to titling that have emerged subsequent to the implementation of the *Regulatory arrangements*. It does not impose any new or different requirements. This evaluation report sets out the need for a similar approach to be taken in relation

to SSC 'approval of' qualifications, as discussed below, and consideration will be given to where such an approach may be useful in other areas.

Processes or outcomes

Some of the concerns expressed in our survey were about the fact that the way in which the *Regulatory arrangements* are written requires regulated organisations to put in place policies and procedures that must lead to a defined set of outcomes, rather than stating the outcomes separately from the process an organisation must possess. The concern expressed is that the emphasis is placed on procedure rather than outcome. We are clear that this does not in fact affect the standards we expect of individual units and qualifications. The intention of this wording is to reflect our expectation that awarding organisations will put robust systems in place, and that a substantial amount of our activity will focus on ensuring that only organisations suitable to develop and/or deliver units and qualifications are allowed to operate in the QCF.

We may check not only that those systems are in place but also the outcomes of those systems (such as the units and qualifications) at the point of accreditation of qualifications or through monitoring. If we consider that there is sufficient evidence that regulated organisations are not delivering the required standards, as evidenced in their units and qualifications, then we will require them to take action related to the units and qualifications in question and the systems that produced them, as the evidence demands.

Qualification 'type' requirements

One of the features of the *Regulatory arrangements* is that a common set of regulatory requirements applies across all organisations and qualifications recognised in the framework. Although organisations may be recognised to perform different functions in the process of developing and awarding qualifications, all qualifications developed are subject to the same requirements. There are no additional requirements that apply to a subset of qualifications. Outside of the QCF different 'types' of qualification have been established by us through specific regulatory requirements. Such qualification 'type' requirements tend to specify requirements about the way in which qualifications are delivered, assessed and awarded and are set out in regulatory requirements, sometimes in a code of practice.

Following consultation on the QCF requirements we decided not to replicate this approach within the QCF, as we did not believe that such a provision was necessary for the qualifications that were in scope for the QCF at that time. Instead the *Regulatory arrangements* specify the same requirements for all qualifications in the framework. We decided to keep this position under review, both in terms of the qualifications that currently form part of the QCF and whether this position restricts entry to the QCF of other qualifications. This commitment is noted in the *Regulatory arrangements* (see paragraph 1.38). It follows that this issue is being considered by

us in general terms. At this time we believe that a specific instance of where a qualification type could apply requires consideration in this evaluation. This is because this issue has arisen specifically in this evaluation as a result of some of the feedback we have received from users about our requirements. The particular issue raised is in relation to the regulatory requirements that are needed to define the position of 'NVQ' qualifications within the QCF.

Concerns have been expressed from some respondents to the survey on the issue of the place of NVQs in the QCF. A significant minority of respondents felt that the current arrangements for NVQs in the QCF led directly to their feeling a lack of confidence in all aspects of our approach to regulation of the QCF. There was not, however, a consistent agreement among those organisations or individuals about the actions that we should take to address this lack of confidence. Some felt that the existing (NQF) arrangements should be retained and others that the QCF should take better account of the requirements of NVQs, perhaps by incorporating within the *Regulatory arrangements* recently developed SSC-led requirements and creating a qualification type. It should be noted that a number of organisations held a contrary view and many did not comment on this issue.

Provision for use of 'NVQ' in QCF titles is a feature of the *Regulatory arrangements*. Therefore there is a place for NVQ qualifications in the QCF. Current regulations for using the term 'NVQ' in QCF qualifications, set out in *Operating rules for using the term 'NVQ' in a QCF qualification title*⁹, ensure the term is used consistently. Thus in considering any changes that may be required to regulatory requirements in the QCF for NVQs the issue relates to the way in which these qualifications are specified, assessed and quality assured and not about whether these qualifications have a place in the QCF at all. In other words, it is about how and not whether they are recognised and whether requirements to create a qualification type, which therefore go beyond rules about consistent titling, are needed.

We must have a clear basis for determining whether or not to define additional regulatory requirements within the QCF. Our principles for determining whether or not to apply additional regulation include the need for a full consideration of and consultation on the costs and benefits of such an approach and a clear rationale as to why any particular subsets of QCF qualifications require additional regulation. Our position is that we should not develop particular requirements to suit a particular brand. Instead we will develop requirements where it is clear that particular qualifications (or groups of qualifications) warrant it for some reason, particularly if this relates to considerations about quality and standards.

⁹ www.ofqual.gov.uk/1947.aspx

The QCF regulations allow for organisations that develop units to specify that they must be assessed in a particular way. They also require awarding organisations to develop assessment arrangements consistent with any such requirements and the particular purpose and characteristics of individual qualifications. In this context the Alliance of Sector Skills Councils has produced a set of requirements: *Additional requirements for qualifications that use the title NVQ within the QCF*. These requirements specify many of the requirements that those who have expressed concern for the position of NVQs within the QCF wish to see established. We will closely monitor the use of qualifications making use of these requirements, and those that do not but have a similar purpose. If it is established that there are significant and important differences in the standard of qualifications applying these additional requirements and those that do not we will consider whether we need to take action. This could include incorporation into our regulatory requirements of additional regulatory rules to define a qualification type. It may be, though, that this step is not required and we do not believe that there is evidence to suggest this is a necessary step to take at this time.

Consideration will also be given to the appropriateness of the QCF regulations for qualifications other than NVQs that are assessed in different ways. This will help us to understand if there are wider issues relating to qualification types. We will consider developing particular additional requirements for, say, competence-based qualifications, or for the conduct and quality assurance of internal assessment, for example, where the evidence supports such a position. However, we do not see a justification for developing regulations limited to NVQs, or some other brand, where there are other qualifications in the QCF not branded in this way with the same purpose.

SSC approval of qualifications and other forms of support

We define regulatory requirements that ensure we use the advice and experience of acknowledged expert individuals and organisations in carrying out our regulatory functions. For vocational qualifications this includes asking awarding organisations to gain ‘approval of’ their qualifications from SSCs prior to submitting them to the regulated system. This is designed to ensure that all vocational qualifications reflect the needs of employers and give individuals the skills and knowledge they need to progress in their chosen field. There are other requirements for different qualifications, such as those that fall outside the footprint of a SSC, that require awarding organisations to demonstrate the need and support for a new qualification.

Although we do have a formal duty to ‘have regard’ to SSCs’ views¹⁰, the information we seek from them, in the same way as any we request from other expert organisations, is designed to assist in our decisions about whether qualifications should be part of the regulated system. We do not pass any of our regulatory powers to other organisations. We take the final decision about whether a qualification meets the required standards. We may decide not to follow the advice given by a SSC or other expert body.

The regulatory requirements in this area raised comment and concern in response to the survey. The regulatory requirement that vocational qualifications must have the ‘approval of’ a SSC promoted particular debate. Some of the reasons for this appear to result from the delays that were experienced in agreeing an approvals process. In the absence of an agreed procedure it seems that awarding organisations have experienced a variety of different interim procedures from the SSCs. This variability in itself, as well as some examples of poor practice, has created difficulties for them. Given that the process for the ‘approval of’ vocational qualifications was only published in July, and the survey largely took place prior to that, we will need to establish, in our ongoing evaluation, whether these issues continue to be experienced. Therefore we will keep under review the effectiveness of the process for SSC ‘approval of’ qualifications. In the meantime, despite the fact we provided guidance on this last December, confusion and concern continue about what the requirements and expectations in this area actually are. We have released a further open letter to clarify our requirements in this regard.¹¹ This also addresses the

¹⁰ See 26 (2) Education Act 1997 and

www.qcda.gov.uk/libraryAssets/media/David_Lammy_to_Sir_Anthony_Greener_05112007.pdf; see also Apprenticeships, Skills, Children and Learning Act 2009 129 (4) for the provision of new legislation in this regard

¹¹ <http://www.ofqual.gov.uk/2743.aspx>

uncertainty some awarding organisations have expressed as to what we expect for qualifications outside the SSCs' footprints.

Concerns about the potential for conflicts of interest have also been raised, as set out in section 3, especially when SSCs may be recognised to develop units and rules of combination in the QCF. This particular issue is addressed as part of our recognition and monitoring processes for these organisations. In relation to any of these issues, where organisations have concerns that they have not been fairly treated on this or any other ground, awarding organisations can make their case directly to us to seek accreditation for their qualifications.

Considering changes to the Regulatory arrangements

As described above, a range of substantive issues are raised in relation to the *Regulatory arrangements*. In addition, as discussed in section 3, further issues were raised in the survey we ran about some requirements that the *Regulatory arrangements* include. In particular some concerns were raised about those requirements we make for design and delivery of assessment (such as requirements for assessors), diversity and equality, malpractice and unit end dates. Some issues were also raised in relation to regulatory requirements in respect of learner records, although this provision is yet to be fully tested.

Indeed, as a result of these issues, such as those relating to qualification type or SSC approval, some organisations feel that such concerns should result in changes being made to the *Regulatory arrangements*. We believe, however, that this evaluation has not found conclusive evidence of the need to make wide-ranging, potentially destabilising changes to the *Regulatory arrangements* at this time. Given the number of changes that regulated organisations are being expected to make as a result of the introduction of the QCF it is clear to us that stability is particularly important at this point in the development of the QCF. Instead we will issue further guidance and clarification about regulatory requirements where appropriate, as noted above. Areas of concern raised by stakeholders will be kept under review, but the *Regulatory arrangements* will not be changed until after the second year of evaluation has been completed. Any proposed changes will be fully consulted upon and will be considered as part of the programme of work that will take place to implement the Apprenticeships, Skills, Children and Learning Act. This means that if it is determined we need to make any changes to the *Regulatory arrangements*, this will not happen before the beginning of 2011 at the earliest.

The following conclusions have been drawn in relation to this section:

Conclusion 1: The *Regulatory arrangements* will continue to apply to all organisations that operate within, and the qualifications that are accredited into, the QCF. Further information will be issued where necessary to ensure regulated organisations understand all requirements.

Conclusion 2: We will keep a range of key issues identified through this evaluation under review. This includes the need for additional regulatory requirements for qualifications, including those with 'NVQ' in the title. Any changes to the *Regulatory arrangements* that are considered necessary will be prioritised as part of wider reviews of regulatory requirements.

Conclusion 3: We have published an open letter to address current confusion and misunderstandings about our requirements for 'approval of' qualifications from SSCs and support from other organisations. We will also keep their requirements in this area under review.

6.3 QCF units and qualifications

The majority of the evidence in relation to QCF units and qualifications has come from the direct scrutiny of samples we undertook and described in section 4. Evidence about what users observe about the quality of units and qualifications in the QCF and that which has arisen from our own processes is considered where relevant. This section looks at issues for units, rules of combination, assessment arrangements and qualification purpose.

Units in the QCF

As is set out in section 4.2, the evidence from the activity that we have undertaken to review QCF units and qualifications has identified non-compliance with the *Regulatory arrangements* in a proportion of QCF units. This is a cause for concern. It is important, however, to draw a distinction between the 10 per cent of units (approximately) in the QCF databank that require immediate attention and around a further 30 per cent for which the non-compliance is a technical matter and unlikely to have a significant adverse effect on standards or learners. The sample of units was chosen last May and included all those units placed in the QCF databank, including those during the tests and trials. This has meant that some of these units have expired since the sample took place and it is likely that others due to expire will soon be replaced. However, it is important that we consider the action that may be required by us in relation to all units that feature in qualifications currently being undertaken by learners.

The units that give a cause for concern have issues within them that could affect a learner's completion, attainment or achievement and the maintenance of standards. In the other cases, where 'technical' breaches are noted, though the issues identified with units need to be corrected to ensure they are accurately presented and meet all criteria fully, they tend to relate to the format or presentation of a unit, issues around titling, problems with the additional information or small and isolated issues with learning outcomes and assessment criteria. Although this information should be correct, on its own it is unlikely to have a significant impact on learners or standards.

Concern for the quality of units was also a feature of the survey we conducted and so this is an issue that has the potential to affect the confidence of those that use the QCF in the standard of the provision in it. We found these problems are not limited to any particular types of organisation. We have found problems with units submitted by both awarding organisations and unit submitters, those submitting both large and small numbers of units and by experienced and new organisations.

We are taking regulatory action in relation to those units that give us a cause for concern. We have contacted organisations whose units we consider are in need of immediate review. They are required to make the necessary changes to their units in line with an action plan they are required to develop and have approved by us. The organisations will also be required to review and assess the rest of their provision for similar issues, as this sampling process may have picked up recurring issues across the units they have developed. Organisations are required not to submit new qualifications containing units that have been identified as problematic until the error(s) have been corrected. Organisations found to have units that do not comply technically but that have not been rated as high risk will be required to correct them, but to a less urgent timescale.

Where issues have been identified organisations will need to develop a replacement for an existing unit and remove any problematic units from their QCF qualifications. Where organisations are required to make changes to QCF units that are shared and in use by other regulated organisations they are required to notify all users of the issue and the action they will take. We also make it clear to awarding organisations that although the organisation that submitted a unit is responsible and accountable for meeting regulatory requirements, they must be able to develop an appropriate assessment for individual units they plan to assess. If, in their judgement, when using a unit they have not developed they are not able to do this they should not seek to develop a qualification featuring such units and seek accreditation for it. This could be because they do not have the expertise in the form of assessment needed to assess the unit. If, however, it is because they think the unit is not appropriate and cannot be assessed then we want to know so that we can consider appropriate regulatory action. In such cases awarding organisations may choose to develop alternative units to ensure that their responsibility for the quality of the assessments in qualifications they award is not compromised.

Although this is the first regulatory unit sampling that has taken place, evidence from the work that has been carried out by QCDA suggests that the quality of units submitted to the QCF is rising. Between March and September 2009 they found a marked improvement in the quality of the units they considered, with a 16 per cent increase in the number of units that are almost or fully compliant with the *Regulatory arrangements* and a 19 per cent reduction in the number of units that are not compliant with regulatory requirements. This evidence is useful to us as this is the

first unit sampling we have undertaken, so we do not have evidence to consider over time. We will see if a similar trend emerges from our analysis in the future.

In addition one of our main mechanisms for ensuring the quality of QCF provision is recognition to operate in the QCF, as described in section 5, that all organisations developing units for the QCF must obtain. We are allowing organisations a transition period to complete that process. As a result none of the units sampled were submitted by organisations that had completed the supplementary recognition process at the time the unit was submitted. All organisations wishing to operate in the QCF are required to attain this standard, and we have ensured all units in qualifications submitted before this status is attained feature in qualifications that will expire or require re-accreditation over the next year.

Therefore there are already mechanisms in place to ensure that organisations developing units in the QCF meet regulatory requirements and to ensure that a process of quality improvement, which the evidence described above suggests is happening already, continues. However we are not complacent about the effect on learners of units that are not of the required standard featuring in QCF qualifications. That is why we are requiring the responsible organisations to correct the situation immediately for qualifications in which the issues are particularly significant. The improvements we are seeing in unit quality and the processes we are putting in place, discussed above, should ensure that the need to take this action in the future is minimised. To ensure that developments are proceeding as expected and to monitor the quality of QCF units we will conduct ongoing sampling of the units in the QCF unit databank. Where organisations submit non-compliant units following completion of their full recognition to operate in the QCF we will consider appropriate sanctions.

Rules of combination

Issues of non-compliance with QCF regulatory requirements have also been identified as part of the consideration of a sample of rules of combination. These are less serious than those identified for units as they do not relate to the standard of qualifications. This is because there are not major concerns with whether the rules reflect the rationale for a qualification, or set appropriate combinations of units for learners to achieve for particular qualifications.

However, the full range of features of rules of combination in the QCF, in particular the ability to denote 'equivalent' units, specify 'other credit' or determine 'exemptions', are rarely used. This is likely to mean that the ability of learners to accumulate and transfer their achievement between qualifications is less extensive than it might be. In contrast many qualifications do feature units shared across different qualifications and awarding organisations and/or large numbers of optional units. This should support the opportunity for learners to be given the appropriate opportunities to accumulate and transfer credit.

The key mechanisms for learners to transfer their achievements will be through the use of shared units and (especially when units are restricted) through the use of equivalent units and other credit. While the ability for learners to transfer credit does seem to be beginning to manifest itself in shared units that feature in rules of combination, the fact it is rarely happening through other mechanisms indicates a potential cause for concern. It means, for example, that at this time learners are not being given the opportunity to transfer credit achieved through units that are restricted only to the awarding organisation that offers the unit. The *Regulatory arrangements* require that the opportunity for learners to accumulate and transfer credit is maximised (paragraph 4.3 d). The evidence suggests that, while some opportunities are given, this is not consistently happening. As well as this, given that we are currently in a transitional phase and that many learners will be moving from taking qualifications accredited in the NQF to those accredited in the QCF, exemptions represent an important mechanism to ensure that progression pathways and opportunities are maintained in this period. It does appear that this facility is not being used to its full potential extent either.

The regulatory issues identified for rules of combination focus on achieving the wider aims of the QCF, not the basic design or standard of qualifications. It is also clear that the limitations of our IT systems have made the task of identifying and specifying the opportunity for learners to transfer credit harder than it should be. As with the issues identified for units, the impact of the new recognition processes cannot yet be evaluated in this area. All those that complete our recognition processes must provide evidence of their processes in this area and confirm they will maximise the opportunity for learners to transfer credit. We believe that this area requires more investigation. In order to do this we will undertake evaluative activity to consider samples of rules of combination and question recognised organisations where this requirement appears not to be fulfilled.

Assessment arrangements

There is a more positive picture in relation to the assessment arrangements used in units and qualifications. The majority of the qualifications reviewed were found to have assessment arrangements that comply with the *Regulatory arrangements*. The exceptions, which have not raised a significant cause for concern as to the validity and reliability of assessment instruments, will be followed up on an individual basis. The activity undertaken so far, however, has been very much a paper-based exercise. A comprehensive test of whether units and qualifications are being assessed to required standards will come from looking not only at how assessments are designed but also how they are implemented in practice, and if the result is that they are validly and reliably assessing units and maintaining standards. For example, given the nature of assessment for many vocational qualifications, analysis of whether assessors are properly informed, skilled and monitored to ensure valid and reliable judgements is needed. A focus for the second year of evaluation activity will be to consider the assessment arrangements used in QCF units and qualifications in

practice. This will allow us to focus on whether assessments in the QCF are operating effectively and the place such activity should have in our ongoing processes.

We will also consider whether having fewer detailed requirements set out in the *Regulatory arrangements* for qualifications in the QCF may affect the standard of such qualifications. We will consider in detail where any additional requirements may be necessary.

Qualification purpose

As regards qualification purpose in the QCF, the available evaluation evidence suggests that the purpose categories specified do seem to give potential users sufficient information to draw distinctions between qualifications and allow for useful comparison and analysis of different qualifications. Publication of this information was delayed pending this evaluation. Given the findings in this evaluation and to acquire a clearer picture of the usefulness of this feature, we will extend this pilot and expand its scope to allow the information we collect to be shared with third parties. This will allow other users of the QCF to assess the usefulness of the information provided.

Conclusion 4: Where we have found units that do not comply with the *Regulatory arrangements* we have acted to ensure significant breaches of compliance are corrected by the organisation responsible for them. We have contacted organisations responsible for such units and corrections will be made according to an agreed timescale determined with individual awarding organisations. Timescales are agreed on a case-by-case basis, considering the specific risks posed in particular cases. Organisations responsible will also be required to correct 'technical' breaches, to a less urgent timescale, again agreed on an individual basis. We will contact these organisations in due course.

Conclusion 5: Where we have found an organisation to have produced units that are not compliant with the *Regulatory arrangements* we require them to consider the issues found with their units by us and ensure compliance for the rest of their provision.

Conclusion 6: We will undertake further activity to explore the opportunities being given to learners in the QCF to transfer credit between different qualifications and awarding organisations.

Conclusion 7: Further activity in the second year of the QCF evaluation will look at the delivery of, and outcomes from, assessment arrangements in the QCF.

Conclusion 8: Qualification purposes will be published on the NDAQ. Further evaluation activity will consider whether this is of value to learners and employers.

6.4 Regulatory processes

As section 5 makes clear, consideration of our own processes has established issues to consider. It is also evident that other evaluation activities, in particular users' feedback, have also established recommendations for refinements to these processes or actions to take. This section focuses on those issues identified in relation to those processes currently in place for the QCF. As noted, however, Ofqual is currently consulting on changes to the way in which it regulates all qualifications as a result of new legislation. Therefore some of the issues identified through this evaluation will feed into changes implemented across the qualifications regulators as part of this wider activity. Some issues can be considered immediately though.

Review and refinement of processes

As a result of this evaluation we will review our processes to consider the modifications and improvements that can be made. Feedback from the users' survey and our own reviews have identified a range of changes that might be made to processes, in particular in relation to recognition. For example it is currently a predominantly desk-based process and can be time consuming and resource intensive for both us and applicant organisations. Incorporating into the recognition process a greater degree of face-to-face interaction between the two parties could allow a more focused approach to the different areas of the *Regulatory arrangements* than has been possible to date. This could be accompanied by a post-recognition visit from the regulators to look at the implementation of procedures, within a year of an organisation gaining recognition. In addition amongst the other improvements we are looking to make we have already introduced:

- further internal standardisation events and guidance to supplementary recognition reviewers
- an increased number of trained second reviewers from the regulators to ensure we can manage a high volume of applications
- new controls to ensure submissions are not left unattended due to a single point of dependency.

Another issue we will be considering is, given that the QCF does not recognise different types of qualifications associated with different assessment arrangements, the nature of the information awarding organisations seeking recognition should provide to us about their processes for assessment. Some will be seeking to provide a wide variety of different approaches while others may only want to offer one type.

These are examples of the types of issues we are looking at, not the full extent of what we will consider. In addition numerous organisations have experienced the processes we put in place. Although we have feedback from many of these

organisations through our survey, we will take the opportunity to consult with these organisations where we can to consider and implement the improvements we make.

Use of different regulatory processes

The current focus of our activity has been on recognising organisations to operate in the QCF. It is therefore to be expected that much of current regulatory activity has concentrated on reviewing organisations' systems and processes to see if they meet the standards required to operate in the QCF. However, as more organisations attain this standard, it will become necessary to review the effectiveness of the processes that regulated organisations have documented through looking at their operation in practice. This is consistent with our decision to undertake ongoing unit sampling activity. It is also in line with the judgement made in relation to the review of assessment arrangements we undertook, which found that to fully assess the quality of awarding organisations' qualifications an initial review needs to be combined with monitoring activity. We will also look at the accuracy and stability of credit values in the QCF. This is all required to monitor the development of the system, including feeding in to further evaluation, as well as to ensure any risks and issues are identified and managed in a timely manner. It follows therefore that regulatory activity of this nature will increase over the next year.

In addition we will consider where more detailed scrutiny may be given as part of the accreditation process for units and qualifications submitted by those organisations identified as presenting higher risks, maybe because of monitoring activity, such as unit sampling, or because their recognition is recent.

IT systems

To collect the necessary information and to conduct the interactions required to implement our regulatory requirements we have set up a range of mechanisms designed to allow us to carry out the procedures detailed above. As described in this report often these are operated or supported by IT systems. Many contributors to the survey across a range of the questions, as well as our own review of our processes, raised issues, concerns and suggestions for improvement about regulatory IT systems, especially WBA. Action to comprehensively review and replace our IT systems has already started. For that reason this report does not go into this area in extensive detail. Instead this information will be used at the design and development stage of the new system. A working group and other consultative mechanisms will also be established to ensure appropriate input from the main users of the new systems.

We also need to acknowledge that issues with and concerns about the IT system are having an impact on our ability to efficiently regulate the QCF. It is also clear that they are having an effect on the resources that those we regulate have to put in place to operate in the QCF. We will ensure that the new system is developed as swiftly as possible.

Conclusion 9: We will continue to review our own processes with a view to identifying how we can further enhance existing operations.

Conclusion 10: We will place an increased focus in our regulatory activity on reviewing the delivery of units and qualifications in practice as more organisations become recognised to operate in the QCF.

Conclusion 11: We will consider the feedback and issues identified by regulated organisations through this evaluation as the new IT systems are built. We will establish a user group and other consultative measures.

6.5 Overarching issues

We are concerned that when respondents were asked if they agreed with the statement 'There will be sufficient time to populate the QCF with qualifications that are replacements for existing versions by the end of 2010' most felt this was not possible. Only 23 per cent of those responding agreed with this statement while 65 per cent thought there would not be enough time. We will look in detail at the requirements we have made in this area, in particular our expectations about the pace of transfer of qualifications from the NQF to the QCF. In this regard it is worth noting that we have experienced a large increase in the numbers of qualifications put forward for accreditation in recent months. This will involve further communication with those organisations that have expressed concern and a review of qualification numbers progressing to accreditation. However, the concerns that organisations express do not relate only to our policies but also to those of others, such as the UK Commissioner for Employment and Skills (UKCES) and those responsible for determining public funding for learners. We have communicated the detail of these concerns to these organisations.

Conclusion 12: We will keep under review our expectation that all vocational qualifications will meet QCF requirements by the end of 2010.

7. Overall conclusions

7.1 Introduction

We have been clear from the outset of the evaluation process that the effectiveness of our regulation of the QCF should be judged against the criteria that we determined as characterising effective regulation of the QCF, which is set out in the *Regulatory arrangements*. While these criteria were developed prior to new legislation and will be reviewed in the light of new powers and duties that we will possess, they do provide a good basis on which to provide an interim overall consideration of how well the regulation of the QCF is proceeding.

We also use this section of the report to set out our overall judgement about how far the regulatory requirements and processes set for units and qualifications in the QCF are underpinning a high-quality offer to learners and employers. There are five criteria for consideration and progress is set out for each area in turn.

7.2 Meeting the needs of learners

The population of the QCF with units and qualifications has proceeded well over the past year. There were 432 qualifications recognised in the QCF at the end of the tests and trials and there are now over 2,500, with increasing numbers becoming accredited and available to learners. The growth of the QCF has been uneven across sectors and levels and the offer that is available to learners is therefore variable. It will not be until the end of 2010 at the earliest that it will be possible to understand if the QCF supports a full range of units and qualifications that support learners' needs.

Some evidence suggests that the QCF is progressing towards its aim of providing a diverse range of units, qualifications and routes to achievement for learners. A wider range of organisations, including employers, is seeking recognition to operate in the QCF. This provides the potential for the QCF to represent a greater diversity of qualifications provision than was the case previously.

In addition there is some evidence that the flexibilities present in the design of the QCF are beginning to be used in the design of units and qualifications.

It is too early to tell whether the QCF will be representative of a full and diverse range of units and qualifications and if the flexibilities of the framework to provide an extensive range of pathways to qualifications will be fully used. Some areas where more clarity is required need to be further explored to ensure a full range of qualifications are compatible with existing regulatory requirements. Therefore it is essential that we review the development of the QCF to ensure that the potential for the system to meet the needs of learners is realised.

7.3 Maintaining standards and comparability

The QCF presents us with some new challenges for standards and comparability. While it was possible to build on existing requirements and processes to develop an approach to regulation for the QCF we have had to put in place a new set of regulatory requirements and processes for it. As new regulatory requirements are phased in it is difficult, at this time, to discern their full effect. For example at the time at which much of the data for this evaluation was collected and analysed very few organisations had completed our full recognition requirements to operate in the QCF and were still operating under transitional arrangements. While this is inevitable, as the transition of the QCF from a set of test and trial arrangements to a stable, mature regulated system is undertaken, it does make the full effect of our interventions difficult to judge. Our review of QCF provision has identified some issues with current provision and some further areas where there are not concerns at this time but where further investigation is needed. We will take action where we have identified issues for standards, such as with the quality of units in the QCF, and put in place a programme of work to evaluate questions that have been raised at this time.

We do not believe at this time that there is a general risk to the maintenance of standards in the QCF, but there are specific issues to be addressed and ongoing careful monitoring of the system is needed to ensure problems do not develop.

7.4 Promoting public confidence

The survey indicates that the position in relation to public confidence is mixed. While overall a majority of those surveyed agreed that the regulatory requirements and processes were proving effective, there were substantial minorities that did not and a number of comments about how we could improve the effectiveness of our interventions. Many of these are explored in this report and result in specific actions we will take, some of which relate to the provision of more information about regulatory activity as well as changes to our policies and processes. It should be noted that the survey was not directed at the general public but was instead focused on those organisations that are subject to regulation, though a wider range of stakeholders did respond. The reaction of centres, learners and employers will be an area of focus for us during the next year of QCF evaluation. It is to be expected that the effectiveness of our actions, particularly in maintaining standards and ensuring the needs of learners are met, will have a large impact on public confidence.

Seeking the views of those who are directly affected by QCF units and qualifications will be a key part of the ongoing evaluation of the QCF to ensure that a fuller picture of the public confidence in QCF units and qualifications is developed.

7.5 Supporting diversity and equality

The requirements set out in the *Regulatory arrangements* for diversity and equality have caused concern for some of those responding to our survey. These

requirements were developed after widespread consultation and there is no evidence at this time that they should be changed, despite the difficulties some organisations have had with them. One of the new specific regulations, however, is a requirement to collect sufficient data to allow them to monitor and evaluate their compliance with the requirements for diversity and equality and to supply it to us on request. We will use this provision, as well as consultation with the diversity and equality groups set out in the *Regulatory arrangements*, to review the effectiveness of these requirements in practice.

7.6 Ensuring efficiency and value for money

Questions about the efficiency of the market for qualifications within the QCF should not be divorced from the general assessment that we are undertaking on the market for all qualifications in this area at present. The new powers and duties that we will receive in relation to economic regulation ensure that we are developing a comprehensive strategy to look at the efficiency of the market across the full range of qualifications subject to our regulation. The QCF is likely to raise some particular issues that will be considered in this work, such as the fees charged for new QCF qualifications. Nonetheless while these questions are not the focus of this report questions of whether our interventions are proportionate and effective are. The burden that we place on those that we regulate through the implementation of our requirements has been examined in this evaluation. We will look at our requirements and their impact on other organisations to consider where our interventions can be directed more effectively.

7.7 Overall position

This is an interim evaluation of the regulatory requirements and procedures for the QCF. Despite that, it has given us much to consider. Some elements of the picture are positive. An overall number of respondents to our survey expressed favourable views about the implementation of our regulatory requirements. There is an upward trend in the number of organisations both seeking recognition and becoming recognised to operate within the QCF. There are large numbers of units being submitted to the databank and qualifications being accredited into the QCF. On balance there is an encouraging emerging picture about the quality of provision in the QCF, particularly in relation to the assessment arrangements used in qualifications.

Some areas are problematic though, especially those we have identified in relation to the quality of a minority of units that require immediate attention. The introduction of the QCF is raising some issues that must be managed and other elements that must be closely monitored. It does not appear to us at this time, however, that any of these present a threat to the overall stability of the system.

Overall then there are still some considerable challenges in ensuring that the QCF continues to develop effectively. We have identified some areas of concern for us to

address. In particular we will tackle the deficiencies of our regulatory and IT systems and we will continue to check that those submitting units are developing high-quality products that meet regulatory requirements and take action where they do not. This report and measures we have already put in place, especially in requiring organisations to seek full recognition to operate in the QCF, set out a plan to do so. We have also identified that there are a range of things that we must continue to closely monitor. We will use the second year of the evaluation to explore specific aspects of our regulation in greater depth, with a particular focus on the operation of assessments in practice.

Through building on the progress made to date and taking the actions identified we believe that we have in place an appropriate set of regulatory requirements and processes for the QCF at this time. However, we expect to be in a position to make a full and more informed judgement on the effectiveness of our regulation and consider any changes to it in the context of the reforms currently being made to the way we regulate and after the second year of our evaluation.

Annex 1: Reproduction of the Qualifications and Credit Framework regulation survey questions, July 2009

The following is a reproduction of a survey on the QCF that we ran between 29 June and 7 August 2009.

1. Introduction

This survey is conducted by the qualifications regulators in England (Ofqual), Wales (DCELLS) and Northern Ireland (CCEA). It is primarily aimed at those organisations that are subject to regulation by us; however other informed organisations and individuals are very welcome to contribute.

The deadline for completing the questionnaire is Friday 7 August.

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

2. About you and your organisation

In this section you are asked to provide some information about the capacity in which you are completing the questionnaire.

1. Are you responding on behalf of your organisation or as an informed individual? If you are responding on behalf of your organisation please tell us the name of your organisation.

2. Organisation type

3. Have you or your organisation been directly involved with the QCF to date? Please answer Yes or No and provide details of your involvement.

3. The Regulatory arrangements for the QCF

The *Regulatory arrangements* set out the requirements that apply to the organisations that operate within, and the qualifications that are accredited into, the QCF. The *Regulatory arrangements* set the standard that all organisations and qualifications must meet in order to be recognised as part of the QCF.

The *Regulatory arrangements* were published in August 2008 and are divided into six sections. Questions 4–9 relate to the individual sections of the *Regulatory arrangements* and questions 10 and 11 relate to your view of their overall effectiveness. The manner in which we have implemented these requirements is dealt with in the next section.

For each of the following statements please indicate whether you:

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

Please explain your answers using the text boxes provided.

4. The 'Design specifications of the Qualifications and Credit Framework' (section 1) provide an appropriate and effective set of requirements for the QCF.

5. The 'General requirements for all organisations recognised to operate in the Qualifications and Credit Framework' (section 2) provide an appropriate and effective set of requirements for the QCF, including in relation to diversity and equality.

6. The 'Requirements for organisations developing and submitting units to form part of accredited qualifications' (section 3) provide an appropriate and effective set of requirements for the QCF.

7. The 'Requirements for organisations developing rules of combination to form part of accredited qualifications' (section 4) provide an appropriate and effective set of requirements for the QCF.

8. The 'Requirements for awarding organisations' (section 5) provide an appropriate and effective set of requirements for the QCF.

9. The 'Qualifications requirements' (section 6) provide an appropriate and effective set of requirements for the QCF.

10. Overall the *Regulatory arrangements* provide an appropriate and effective set of requirements for the QCF.

11. Do you believe that there are any significant omissions in the requirements set out in the *Regulatory arrangements*? Please answer: Yes, No or Don't know.

4. Regulatory processes

The regulatory processes should ensure that the requirements set out in *Regulatory arrangements* are met and maintained. To do this, we ask organisations that wish to operate in the QCF to demonstrate that they meet the standards set out in *Regulatory arrangements* in order to be recognised for the QCF. We also ask them to show that their individual qualifications meet the requirements for accreditation in the QCF. In addition, we monitor the performance of recognised organisations and the units and qualifications they develop and/or offer to ensure that the requirements and standards set out in *Regulatory arrangements* are being maintained.

The following questions relate only to the **processes** we have put in place to implement the requirements set out in the QCF *Regulatory arrangements*. All questions about the requirements themselves are set out in the previous section.

The following questions consider the recognition, accreditation and monitoring processes described above in more detail. In your explanations, please distinguish, where possible, between the processes the regulators have put in place and the IT systems used to implement them.

For each of the following statements please indicate whether you:

Strongly agree

Agree

Disagree

Strongly disagree

Don't know

Please explain your answer using a text box provided.

12. The qualifications regulators have put in place an appropriate and effective set of regulatory processes for recognising organisations to operate in the QCF.

13. The qualifications regulators have put in place an appropriate and effective set of regulatory processes for accrediting qualifications for the QCF.

14. The qualifications regulators have put in place an appropriate and effective set of regulatory processes for monitoring qualifications and awarding organisations in the QCF.

15. Overall the qualification regulators have put in place an appropriate and effective set of regulatory processes for the QCF.

5. Overall comments

Regulatory arrangements lists the following objectives for the regulation of the QCF:

- Meet the needs of learners
- Maintain standards and comparability
- Promote public confidence
- Support equality and diversity
- Ensure efficiency and value for money.

To what extent do you agree with the following statement?

16. The qualifications regulators have put in place a set of regulatory requirements and processes to implement and monitor them which will support their objectives.

The vision for the QCF is that it will provide learners, learning providers and employers with an inclusive and flexible regulated qualifications framework. In particular:

- it introduces a stable currency for learner achievement across the qualifications system through the award of credit
- learners are given maximum flexibility and range of opportunities to progress and receive recognition for their achievements, including by having appropriate opportunities to transfer achievement between different qualifications and awarding organisations.

To what extent do you agree with the following statement?

17. The qualifications regulators have put in place a set of regulatory requirements and processes to implement and monitor them which will support the vision for the QCF.

To what extent do you agree or disagree with the following statement?

18. Overall the qualifications regulators' approach to the regulation of the QCF is proving effective.

6. Implementation timescales

It is expected that organisations replacing existing qualifications with new QCF versions will complete the process by December 2010. This is because most existing qualifications are not accredited beyond December 2010. To what extent do you agree or disagree with the following statement?

19. There will be sufficient time to populate the QCF with qualifications that are replacements for existing versions by the end of 2010.

7. Overarching comments

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

Annex 2: Responses to survey questions

Note: in the following tables rounding of figures means not all percentages add up to exactly 100.

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

Organisation category	Number	Organisation category	Number
Awarding organisation	69	Government agency	5
SSC/SSB	15	Provider	4
Representative organisations	6	Employers and other interested parties	27
Individual respondent	68	Unknown	6

2. Organisation type specified

Classification	Percentage	Classification	Percentage
Awarding organisation recognised or seeking recognition to operate in the QCF	36	Organisation recognised or seeking recognition to submit units and/or rules of combination	14
No response	8	Other	15.5
Not applicable	26.5	Total	100

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

Answer	Percentage	Answer	Percentage
Yes	60	No answer	7
No	34	Total	100

4. 'Design specifications of the Qualifications and Credit Framework' (section 1) provides an appropriate and effective set of requirements for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	9.3	Strongly agree	5.6
Disagree	26.9	Don't know	9.3
Agree	49.1	Total	100

5. 'General requirements for all organisations recognised to operate in the Qualifications and Credit Framework' (section 2) provides an appropriate and effective set of requirements for the QCF, including in relation to diversity and equality.

Valid	Percentage	Valid	Percentage
Strongly disagree	4.7	Strongly agree	1.9
Disagree	17	Don't know	10.4
Agree	66	Total	100

6. 'Requirements for organisations developing and submitting units to form part of accredited qualifications' (section 3) provides an appropriate and effective set of requirements for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	8.7	Strongly agree	7.7
Disagree	19.2	Don't know	12.5
Agree	51.9	Total	100

7. 'Requirements for organisations developing rules of combination to form part of accredited qualifications' (section 4) provides an appropriate and effective set of requirements for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	6.7	Strongly agree	5.8
Disagree	22.1	Don't know	14.4
Agree	51	Total	100

8. 'Requirements for awarding organisations' (section 5) provides an appropriate and effective set of requirements for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	5.8	Strongly agree	4.9
Disagree	19.4	Don't know	17.5
Agree	52.4	Total	100

9. 'Qualifications requirements' (section 6) provides an appropriate and effective set of requirements for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	7.2	Strongly agree	6.2
Disagree	12.4	Don't know	14.4
Agree	59.8	Total	100

10. Overall the *Regulatory arrangements* provide an appropriate and effective set of requirements for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	5	Strongly agree	4
Disagree	20	Don't know	13
Agree	58	Total	100

11. Do you believe there are any significant omissions in the requirements set out in the *Regulatory arrangements*?

Answer	Percentage	Answer	Percentage
Yes	40	Don't know	27
No	33	Total	100

12. The qualifications regulators have put in place an appropriate and effective set of regulatory processes for recognising organisations to operate in the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	7.3	Strongly agree	2.1
Disagree	21.9	Don't know	17.7
Agree	51	Total	100

13. The qualifications regulators have put in place an appropriate and effective set of regulatory processes for accrediting qualifications in the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	11.3	Strongly agree	4.1
Disagree	16.5	Don't know	26.8
Agree	41.2	Total	100

14. The qualifications regulators have put in place an appropriate and effective set of regulatory processes for monitoring qualifications and awarding organisations in the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	8.5	Strongly agree	3.2
Disagree	17	Don't know	39.4
Agree	31.9	Total	100

15. Overall the qualifications regulators have put in place an appropriate and effective set of regulatory processes for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	12.4	Strongly agree	3.1
Disagree	14.4	Don't know	24.7
Agree	45.4	Total	100

16. The qualifications regulators have put in place a set of regulatory requirements and processes to implement and monitor them that will support their objectives.

Valid	Percentage	Valid	Percentage
Strongly disagree	13.8	Strongly agree	2.1
Disagree	25.5	Don't know	17.0
Agree	41.5	Total	100

17. The qualifications regulators have put in place a set of regulatory requirements and processes to implement and monitor them that will support the vision for the QCF.

Valid	Percentage	Valid	Percentage
Strongly disagree	13.8	Strongly agree	6.4
Disagree	22.3	Don't know	19.1
Agree	38.3	Total	100

18. Overall the qualifications regulators' approach to the regulation of the QCF is proving effective.

Valid	Percentage	Valid	Percentage
Strongly disagree	16.8	Strongly agree	4.2
Disagree	16.8	Don't know	31.6
Agree	30.5	Total	100

19. There will be sufficient time to populate the QCF with qualifications that are replacements for existing versions by the end of 2010.

Valid	Percentage	Valid	Percentage
Strongly disagree	24	Strongly agree	3
Disagree	41	Don't know	12
Agree	20	Total	100

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

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

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First published by The Office of Qualifications and Examinations Regulation in 2010.

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The Office of Qualifications and Examinations Regulation

Spring Place

Coventry Business Park

Herald Avenue

Coventry CV5 6UB

2nd Floor

Glendinning House

6 Murray Street

Belfast BT1 6DN

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346

www.ofqual.gov.uk