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ofqual

Consultation outcome

Analysis of responses: Regulating level 2 and below qualifications supporting

progression to higher levels of study

Updated 13 July 2023

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Background

The Department for Education (DfE) is conducting a review of post-16 qualifications at level 2 and below (L2B). The aim of the review, as set out in DfE's consultation response, is to:

> " …ensure that all qualifications available within the new landscape are high quality and have a clear purpose, giving students the knowledge and skills to achieve positive outcomes, whether they are progressing to further study, on to an apprenticeship, traineeship or supported internship, or into employment."

Ofqual's approach to regulating these qualifications has been designed to strengthen our regulation of them. It will work in conjunction with the funding approvals process being put in place by DfE. Ofqual will provide feedback to DfE as part of that funding approval process and DfE will decide which qualifications are eligible for public funding.

Ofqual consulted upon its proposals for the regulation of level 2 and below qualifications supporting progression to further study (now called Progression Qualifications) between March and May 2023.

The aim of the consultation was to provide an opportunity for interested groups to comment on the way in which Ofqual proposes to regulate these qualifications, ahead of the consultation on the draft conditions, requirements and guidance through which they will be regulated.

Summary

This [consultation on the proposed regulatory arrangements for Entry level, Level 1 and Level 2 qualifications supporting progression to higher levels of study](#) ran from 16 March to 25 May 2023.

These qualifications are now to be called:

- Level 2 Technical Progression Qualifications (formerly Level 2 technical qualifications supporting progression to level 3 technical qualifications that are not delivered as part of a T Level programme)
- Level 2 Academic Progression Qualifications (formerly Level 2 qualifications supporting progression to level 3 alternative academic qualifications)
- Level 1 Progression Qualifications (formerly Level 1 qualifications supporting progression to higher level technical qualifications)
- Entry level Progression Qualifications (formerly Entry level qualifications supporting progression to level 1 pre-technical qualifications)

Respondents were generally supportive of the proposals in the consultation. There was support for Ofqual's proposals:

- to require awarding organisations to develop, follow, and keep under review an assessment strategy
- to require awarding organisations to have regard to guidance specified by Ofqual in relation to grading
- to require awarding organisations, following a review by Ofqual of a qualification in scope of this consultation, to comply with any requirements, and have regard to any guidance, specified to it by Ofqual in relation to the qualification

There was some support for the following proposal, but with a slightly higher level of disagreement:

- to require awarding organisations to inform Ofqual if approval for funding was withdrawn from one of their qualifications

Approach to analysis

The consultation included 26 questions (including equality and regulatory impact questions) and was [published on Ofqual's website](). Respondents could complete the questions using the online consultation platform or email their responses to Ofqual.

Respondents to this consultation were self-selecting, and therefore the sample of those that chose to participate cannot be considered as representative of any group. Efforts were made to engage as many interested parties as possible by holding stakeholder events, as well as posting information on the Ofqual website and Portal for awarding organisations.

The responses to the consultation questions set out in this document are presented in the order they were asked. For all the questions, Ofqual presented background contextual information followed by proposals. The questions asked respondents to indicate their level of agreement or disagreement with the proposal and presented an opportunity to provide additional comment. Respondents were not required to answer all the questions.

Who responded?

Ofqual received 21 written responses to the consultation. Two responses were in the form of letters sent to Ofqual's public enquiry mailbox. The rest of the responses were received via the Citizenspace consultation platform. Eighteen responses were official responses from the following organisations:

- 12 responses from awarding organisations
- 4 responses from other representative or interest groups
- 1 response from a further education college
- 1 response from a special school

Ofqual also received 3 personal responses, all from individuals working in further education colleges.

All the respondents are based in England.

Detailed analysis

Part 1: Level 2 Technical and Academic Progression Qualifications - general purposes

The proposed general purposes for Level 2 Technical Progression Qualifications were:

- Purpose 1: The qualification will provide students with a breadth of knowledge, skills and understanding that prepares them for study in level 3 technical qualifications that are not delivered as part of a T Level programme
- Purpose 2: The qualification will demonstrate students' ability to apply their knowledge, skills and understanding in relevant practical contexts
- Purpose 3: The qualification will support an engaging programme of learning that enables and motivates students who are preparing for progression to level 3 technical study
- Purpose 4: The qualification will provide evidence of attainment that could be used in combination with other information to inform decisions about a student's readiness to progress on to higher level study in the relevant occupational pathway
- Purpose 5: The qualification will provide reliable evidence to differentiate between students' attainment in relation to the knowledge, understanding and skills assessed as part of the qualification

The proposed general purposes for Level 2 Academic Progression Qualifications were:

- Purpose 1: The qualification will provide students with a breadth of knowledge, skills and understanding that prepares them for level 3 alternative academic qualifications
- Purpose 2: The qualification will demonstrate students' understanding of theoretical content and ability to apply it in a range of relevant contexts
- Purpose 3: The qualification will support an engaging programme of learning that enables and motivates students who are preparing for progression to level 3 academic study
- Purpose 4: The qualification will provide evidence of attainment that could be used in combination with other information to inform decisions about a student's readiness to progress on to higher level study in the relevant subject area
- Purpose 5: The qualification will provide reliable evidence to differentiate between students' attainment in relation to the knowledge, understanding and skills assessed as part of the qualification

> **Question 1**
>
> To what extent do you agree or disagree with the proposal for Ofqual to include a set of general purposes in its regulatory framework for level 2 technical qualifications supporting progression to level 3 technical qualifications that are not delivered as part of a T Level programme?

Option	Total
Strongly agree	0
Agree	11
Neither agree nor disagree	3
Disagree	4
Strongly disagree	3
Not Answered	0

There were 21 responses to this question. Eleven respondents agreed with the proposal to introduce general purposes for these qualifications, while 4 disagreed, 3 strongly disagreed, and 3 neither agreed nor disagreed.

Six of the respondents that agreed with the proposal chose not to provide comments, as did one respondent that disagreed. All other respondents provided comments.

One respondent that agreed with the proposal, an awarding organisation, noted the alignment of these proposed purposes with those for level 3 technical qualifications. Another respondent, also an awarding organisation, noted the alignment of these proposed purposes with those previously

proposed for level 2 qualifications designed to support progression to T Levels, and with the ministerial steer given on these qualifications.

One respondent that agreed with the proposal, an awarding organisation, agreed with the prioritisation of the purposes.

The respondents that disagreed or strongly disagreed were from awarding organisations, further education colleges and representative bodies.

Three respondents disagreed with the proposed general purposes on the basis that there are too many and that a smaller number would suffice. One respondent suggested that some of the general purposes could be presented as qualification design principles instead.

One respondent that disagreed with the proposal did so on the basis of a potential overlap with the assessment strategy requirements and the unnecessary work that could be created by having both general purposes and assessment strategy requirements. This represented a misunderstanding of the roles of general purposes and assessment strategies.

One respondent commented on trade association and sector skills body involvement in the qualification development and approval process.

> **Question 2**
>
> Do you have any comments on the proposed set of general purposes for level 2 technical qualifications supporting progression to level 3 technical qualifications that are not delivered as part of a T Level programme?

Option	Total
Strongly agree	0
Agree	11
Neither agree nor disagree	3
Disagree	4
Strongly disagree	3
Not Answered	0

There were 21 responses to this question. Fifteen respondents answered 'yes', while 6 answered 'no', although one of those respondents also chose to provide a comment. This means that 16 comments were received in total.

Five respondents made comments suggesting these qualifications needed to provide a balance of

knowledge and skills, although they did not expand on what this meant. However, another respondent, an awarding organisation, asked whether it would be possible to develop knowledge-only qualifications against the general purposes.

Five respondents referred to the need for these qualifications to engage students. Two of these respondents did so in relation to students with developmental and support needs, suggesting these qualifications would need to be engaging for this group of students. One suggested that without sufficient levels of engagement, students could lose interest in their studies. Another mentioned the importance of learning through practical application to engage students.

Two respondents reiterated their view that there were too many general purposes and that a smaller number would suffice. Another respondent referred back to their response to question 1, in which they also suggested there were too many purposes.

One respondent noted the alignment of the general purposes to those for level 3 technical occupation qualifications.

One respondent commented on the potential unintended consequence of a proliferation of qualifications in this part of the landscape. They suggested that having separate sets of purpose statements for each group of qualifications in scope of this consultation could lead to proliferation of qualifications where a single qualification would meet the needs of all users.

One respondent suggested that there should be consistent labelling of sets of purposes across different groups of qualifications, noting that the proposed general purposes for level 2 qualifications supporting progression to a T Level are labelled A-E.

One respondent referred back to their response to question 1, where they commented on the role of trade association and sector skills body involvement in the qualification development and approval process.

Question 3

To what extent do you agree or disagree that, where it is not possible to fully meet all of the general purposes specified for these level 2 qualifications supporting progression to level 3 technical qualifications that are not delivered as part of a T Level programme, awarding organisations should prioritise them in the order (1 to 5) in which they are specified? Please provide any comments.

Option	Total
Strongly agree	0
Agree	11
Neither agree nor disagree	3
Disagree	4

Strongly disagree	3
Not Answered	0

There were 21 responses to this question. One respondent strongly agreed with the proposal, while 12 agreed, 5 disagreed, one strongly disagreed, and 2 neither agreed nor disagreed. Sixteen respondents chose to provide comments, while 5, all of whom agreed with the proposal, chose not to do so.

The respondent that strongly agreed with the proposal did so on the basis that it would provide awarding organisations with flexibility to make trade-offs between conflicting purposes. A respondent that agreed with the proposal also did so on this basis, agreeing with the suggestion in the consultation that there could be tension between Purposes 3 and 5.

Where respondents disagreed with the proposal, they generally did so on the basis that having a rank order may be too inflexible and that other solutions would be better. Two respondents suggested that there should be one primary purpose, Purpose 1. One respondent suggested that awarding organisations could use a 'tick box' approach to show which purposes they have met. Another respondent suggested that the rank order could influence awarding organisations' assessment choices, rather than choosing assessment methods which are appropriate for users of the qualifications. One respondent referred back to their response to question 1, in which they said that need for 5 purposes should be reconsidered, and questioned how Ofqual could measure how awarding organisations would meet the purposes given the degree of flexibility that will be allowed.

Three respondents suggested a reordering of the purposes. One respondent, that strongly disagreed with the proposal overall, suggested Purpose 3 should be placed as the purpose with top priority. One respondent, that agreed with the proposal overall, suggested that, for qualifications which are intended to prepare students for work-based learning, Purpose 2 should be placed as the purpose with top priority. Another respondent that agreed with the proposal overall suggested that some qualifications in this part of the landscape may need a different ordering of the purposes, although they did not provide any examples.

One respondent that agreed with the proposal did so as it was consistent with the regulation of other qualifications in this part of the post-16 qualifications landscape.

Both respondents that neither agreed nor disagreed with the proposal provided comments. One suggested that Purposes 1 and 2 should be retained and prioritised in that order, and that Purposes 3 to 5 should be viewed as leading to desirable outcomes for all qualifications. The other commented on funding of qualifications, which was outside of the scope of this consultation.

Question 4

To what extent do you agree or disagree with the proposal for Ofqual to include a set of general purposes in its regulatory framework for level 2 qualifications supporting progression to level 3 alternative academic qualifications?

Option	Total
Strongly agree	2
Agree	9
Neither agree nor disagree	3
Disagree	2
Strongly disagree	3
Not Answered	2

There were 19 responses to this question, with 2 respondents choosing not to answer the question. Two respondents strongly agreed with the proposal to introduce general purposes for these qualifications, while 9 agreed, 2 disagreed, 3 strongly disagreed, and 3 neither agreed nor disagreed.

Eleven respondents provided additional comments to explain their responses. Of these, one strongly agreed with the proposal, 4 agreed, one disagreed, 2 strongly disagreed, 2 neither agreed nor disagreed and one respondent did not answer to what extent they agreed or disagreed.

The respondent that strongly agreed with the proposal, a personal respondent, did so on the basis that it will ensure qualifications in this part of the landscape are of a consistent academic rigour and that students will not be able to opt for qualifications on the basis that they will provide an easier progression route. However, one respondent that agreed with the proposal outlined their concern that qualifications should not become overly academic.

One awarding organisation, that agreed with the proposal, stated that it already provided purpose statements for its qualifications. Two other respondents who agreed with the proposal, both awarding organisations, noted similarities to other sets of purpose statements, with one referring to level 3 Alternative Academic Qualifications and the other referring to level 2 qualifications supporting progression to T Levels.

One respondent who agreed with the proposal repeated the concern they had outlined previously that having separate sets of purpose statements for each group of qualifications in scope of this consultation could lead to proliferation of qualifications where a single qualification would meet the needs of all users.

The respondent who disagreed with the proposal did so on the basis that the inclusion of the general purposes felt 'complicated' and that Purposes 1 and 2 should be sufficient for these qualifications. One respondent, who neither agreed nor disagreed, also felt that 5 purposes was too many. On a similar note, both respondents who strongly disagreed, did so on the basis that qualifications at level 2 need to have a broad overall purpose.

One respondent commented on Purpose 2, suggesting that it should be reworded so that it covers demonstration of students' understanding of theoretical and practical content and their ability to

apply it in a range of relevant contexts. The respondent referred specifically to how sports and performing arts qualifications are assessed.

The other respondent who neither agreed nor disagreed with the purposes said that employability skills should be built into qualifications to meet the needs of those who cannot progress to level 3 study.

> **Question 5**
>
> Do you have any comments on the proposed set of general purposes for level 2 qualifications supporting progression to level 3 alternative academic qualifications?

Option	Total
Yes	15
No	5
Not Answered	1

There were 20 responses to this question. Fifteen respondents answered 'yes', five answered 'no' and one chose not to respond. One respondent who answered 'no' provided a comment, meaning that a total of 16 respondents provided comments on the proposed general purposes.

Six respondents referred to the need for qualifications to include an element of practical application of knowledge, with one referring specifically to how qualifications in sport, art and design and performing arts subjects are assessed and another to creative and performing arts.

Five respondents referred to progression routes. Of these, a personal respondent from a private training provider sought flexibility in the progression routes from these qualifications. One awarding organisation noted that the general purposes should reference the practical application of skills developed through the qualification, as was proposed for the other Progression Qualifications. One awarding organisation suggested that qualifications should provide a range of progression routes, including to training and further education. One respondent, an awarding body or exam board, referred to progression to qualifications such as Access to Higher Education which are outside of the scope of the government's post-16 reforms. A trade association referred to its own approvals scheme for qualifications as supporting employers to select students for jobs and apprenticeships.

Two awarding organisation respondents suggested amendments to Purpose 2. One sought the addition of the word 'practical' to meet the needs of creative and performing arts subjects, as mentioned above, while the other suggested wording should be included which reflected the fact these qualifications will provide opportunities for students to develop their theoretical understanding of the subject area as well as to demonstrate it.

One awarding organisation suggested that the 5 proposed general purposes would provide clarity across the sector and encourage parity of qualification design across awarding organisations.

Another awarding organisation questioned how these qualifications would differ in practice from existing level 2 Technical Awards in offering an alternative to GCSEs.

One respondent, an awarding body or exam board, referred back to their response to question 1, in which they suggested the proposed qualification purposes should not be necessary and questioned how Ofqual could measure how awarding organisations would meet the purposes, given the degree of flexibility that would be allowed.

One awarding organisation sought clarity on sector subject areas outside of the current scope of these qualifications, giving the example of animal care.

> **Question 6**
>
> To what extent do you agree or disagree that, where it is not possible to fully meet all of the general purposes specified for these qualifications supporting progression to level 3 alternative academic qualifications, awarding organisations should prioritise them in the order (1 to 5) in which they are specified? Please provide any comments.

Option	Total
Strongly agree	0
Agree	12
Neither agree nor disagree	4
Disagree	4
Strongly disagree	0
Not Answered	1

There were 20 responses to this question, with one respondent choosing not to answer this question. Twelve respondents agreed with the priority order proposed for the general purposes, 4 disagreed, and 4 neither agreed nor disagreed. A total of 14 respondents provided comments.

Of the 12 respondents who agreed with the proposal, 7 chose to provide comments. Two respondents, an awarding body or exam board and a school or college, made general comments on the need for qualifications to be 'balanced', although they did not expand on what they meant by this. One respondent noted the flexibility this proposal will give awarding organisations to make trade-offs in design decisions where needed, and one suggested there should be the possibility for exceptions to be made where needed. However, another respondent said that flexibility could lead to variations in grading scales between qualifications provided by different awarding organisations, which could make it difficult for students to progress between qualifications. The respondent noted this was the overarching principle of these qualifications.

Three respondents who agreed with the proposal made specific comments relating to the prioritisation of the general purposes. One said Purpose 5 should be the lowest priority and one agreed Purposes 1 and 2 should be top priority.

All 4 respondents who disagreed with the proposed approach, one local authority and three exam boards or awarding bodies, chose to provide additional comments. Of these, 2 repeated points made in their answers to previous questions. One awarding organisation suggested that awarding organisations could produce assessments aligned to the order of priority of the purposes rather than determining the most appropriate assessment for users of the qualification. A representative body suggested a 'tick box' approach to record which purposes an awarding organisation has met.

Of the other 2 respondents who disagreed with the proposed approach, one referred back to their answer to question 1, in which they suggested only Purposes 1 and 2 were necessary, while the other suggested that engagement should be accorded the top priority.

Three of the 4 respondents who neither agreed nor disagreed with the proposed approach chose to provide comments. Of these, one suggested Purpose 5 should be higher up the ranking order, while another suggested Purposes 1 and 2 should be the only purposes used for these qualifications, and that Purposes 3 to 5 set out desirable outcomes for all qualifications. The other respondent who neither agreed nor disagreed said it would be best to keep options open without expanding on what this meant.

> **Question 7**
>
> To what extent do you agree or disagree with the proposal to disapply General Conditions E1.1 and E1.2 in respect of both of these groups of level 2 qualifications? Please provide any comments.

Option	Total
Strongly agree	1
Agree	15
Neither agree nor disagree	2
Disagree	3
Strongly disagree	0
Not Answered	0

There were 21 responses to this question. Of these, one strongly agreed with the proposal, 15 agreed, 3 disagreed, and 2 neither agreed nor disagreed.

Respondents were invited to provide comments to explain their answers. The respondent that

strongly agreed with the proposal chose not to do so, and 5 of the 15 who agreed with the proposal provided comments. All 3 respondents that disagreed, and both respondents who neither agreed nor disagreed with the proposal also provided comments. This means that a total of 10 respondents provided comments.

Of the 5 who agreed and provided comments, 2 suggested that disapplying General Conditions E1.1 and E1.2 would ensure there was no duplication, while another agreed that the proposed purposes would remove the need for those General Conditions to apply to these qualifications. One of the respondents who agreed did so on the basis of alignment with disapplication of these conditions for level 3 alternative academic qualifications. The other respondent who agreed, a representative body, caveated its agreement that the purposes for these qualifications would need to be reworded to be more concise prior to the disapplication of the relevant General Conditions.

One respondent who disagreed with the proposal, a personal respondent, suggested that disapplying the General Conditions would "water the rules down". An awarding organisation that disagreed did so on the basis that the proposed flexibility in the purposes set out for these qualifications would be unmanageable. Another respondent suggested that the purposes for these qualifications do not sufficiently cover preparing students for employment and supporting a role in the workplace, as General Condition E1.2 outlines.

Where respondents neither agreed nor disagreed with the proposal, a private training provider made a general comment about qualification breadth, while an awarding organisation pointed out that Conditions E1.1 and E1.2 refer to a qualification objective whereas the consultation sets out proposed purposes.

Part 2: Level 1 and Entry level Progression Qualifications - general purposes

The proposed general purposes for Level 1 Progression Qualifications were:

- Purpose 1: The qualification will provide students with a breadth of knowledge, skills and understanding that prepares them for level 2 technical qualifications
- Purpose 2: The qualification will demonstrate students' ability to apply knowledge, skills and understanding in relevant practical contexts
- Purpose 3: The qualification will support an engaging programme of learning that enables and motivates students who are considering progressing to level 2 technical study
- Purpose 4: The qualification will provide evidence of attainment that could be used in combination with other information to inform decisions about a student's readiness to progress on to higher level study in the relevant occupational pathway

The proposed general purposes for Entry level Progression Qualifications were:

- Purpose 1: The qualification will support an engaging course of learning that motivates and (re-) engages students, who are considering progressing to level 1 study
- Purpose 2: The qualification will provide students with a breadth of knowledge, skills and understanding that prepares them for relevant level 1 qualifications

Purpose 3: The qualification will demonstrate students' ability to apply knowledge, skills and understanding in relevant practical contexts

- Purpose 4: The qualification will provide evidence of attainment that could be used in combination with other information to inform decisions about a student's readiness to progress on to level 1 pre-technical study

Question 8

To what extent do you agree or disagree with the proposal for Ofqual to include a set of general purposes in its regulatory framework for level 1 qualifications supporting progression to higher level technical qualifications?

Option	Total
Strongly agree	2
Agree	9
Neither agree nor disagree	4
Disagree	5
Strongly disagree	0
Not Answered	1

There were 21 responses to this question. Two respondents strongly agreed with the proposal, 9 respondents agreed, 5 disagreed, 4 neither agreed nor disagreed, and one did not answer the question but did provide comments. Thirteen respondents provided comments.

Of the respondents that strongly agreed with the proposal, a personal respondent, suggested it would ensure some standardisation and consistency without specifying to what they were referring. The other respondent, a special school, did not provide any additional comments.

Four of the 9 respondents that agreed with the proposal, all of them awarding organisations, provided comments. One provided a general comment in support of the proposal. One suggested that having a set of purposes for these qualifications would improve their credibility and ensure consistency of approach, while another suggested that purposes would make clear the reason for the qualifications being reformed. One noted the flexibility given to awarding organisations to manage any trade-offs between purposes.

Four of the 5 respondents that disagreed with the proposal provided comments. One referred back to their response to question 1, in which they suggested only Purposes 1 and 2 were necessary. One suggested that if level 1 qualifications were placed within occupational routes, it could present barriers to flexible outcomes for students who took qualifications at this level, with particular reference to students with special educational needs and disabilities (SEND).

The other 2 respondents that disagreed with the proposed approach, both suggested that some of the purposes were not needed. An awarding organisation referred to Purpose 1 as being the main purpose and the others as being design principles. While a representative body referred to Purposes 1 and 2 being sufficient to cover the rest of the purposes.

> **Question 9**
>
> Do you have any comments on the proposed set of general purposes for level 1 qualifications supporting progression to higher level technical qualifications?

Option	Total
Yes	12
No	8
Not Answered	1

There were 20 responses to this question. Twelve respondents answered 'yes', 8 answered 'no' and one did not answer. However, one respondent that answered 'no' provided comment, as did the respondent that did not answer the question. This means that 14 respondents provided comments.

Three respondents suggested that these qualifications should be able to lead to destinations other than further study, such as work.

Three respondents referred specifically to students with SEND. Of these, one respondent suggested that Personal, Social and Employability (PSE) development would need to be an integral part of a study programme at this level for students with SEND. Another respondent suggested that students with SEND could be disadvantaged by having rigid qualification purposes when they may not be able to progress to level 2 study.

One respondent referred to adults with English as a second language, suggesting the continued development of literacy skills would need to be integral to a study programme. One respondent referred to the likely diverse cohort that will take these qualifications, without listing specific groups of students, and suggested there should be some generic performance descriptors for each level of qualification under consultation.

Two respondents made comments about the number of purposes. An awarding organisation suggested that Purpose 1 would be sufficient, with the others given as design principles, while a representative body suggested that 2 well-worded purposes would be sufficient. The representative body also called for further detail on the status of GCSE overlap and of performing arts qualifications.

Where respondents made comments about particular purposes, one suggested that Purpose 3 will

be key, given those who take these qualifications are likely to be at the start of their learning journey. Another respondent suggested that although they agreed with the purposes as set out in the consultation, Purposes 1 and 4 had a degree of similarity.

Two respondents questioned what progression pathways would be available to those students taking creative arts and sports subjects. One of these, a representative body, also raised the question of what options would be available for students who might want to progress in art and design subjects.

A representative body suggested that in subjects where students often start their post-16 learning journey at level 1, further clarity will be needed on how the progression pathway will work and what will differentiate a level 1 pre-technical qualification from a level 2 technical qualification.

One respondent, a representative body, said that it was difficult to comment on this proposal as there was no clear definition of 'pre-technical'.

> **Question 10**
>
> To what extent do you agree or disagree that, where it is not possible to fully meet all of the general purposes specified for these qualifications, awarding organisations should prioritise them in the order in which they are specified, where 1 is the highest priority? Please provide any comments.

Option	Total
Strongly agree	0
Agree	12
Neither agree nor disagree	3
Disagree	5
Strongly disagree	1
Not Answered	0

There were 21 responses to this question. Of these, 12 agreed with the proposal, 5 disagreed, one strongly disagreed, and 3 neither agreed nor disagreed. Fourteen respondents provided comments.

Eight of the respondents who agreed with the proposal chose to provide comments, while 4 did not. Three of the respondents who agreed with the proposal referred to specific purposes. One suggested that Purposes 1 and 2 are key priorities at lower levels of study, with another suggesting that qualifications that are designed to prepare students for work-based learning should have Purpose 2 as their main purpose. One respondent agreed that Purpose 4 should be the lowest priority for these qualifications.

Three respondents that agreed with the proposal referred to the value of flexibility in qualification design to awarding organisations, with one of these referring to the wide range of students who will take these qualifications. Only one of the 3 respondents that neither agreed nor disagreed with the proposal provided comment, which also referred to the value of flexibility.

Three respondents that agreed with the proposal referred to the skills and knowledge these qualifications will be designed to cover, with 2 referring to the need for qualifications to provide opportunities for practical application of knowledge and one saying they did not want the qualifications to be too academic.

All 5 respondents that disagreed with the proposal provided comments. Two of these respondents said that Purposes 1 and 2 would be sufficient for these qualifications. Another 2 respondents disagreed with ranking the purposes as proposed in the consultation, with one saying there should be no rank order and another saying that Purpose 1 should be the top priority but that prioritising the others in rank order could be contrived. The respondent that strongly disagreed with the proposal suggested putting Purpose 3 as the top priority, so that the purposes would be ordered 3,1, 2, and 4.

Two respondents that disagreed with the proposal suggested that the rank order could influence awarding organisations' assessment choices, rather than choosing assessment methods which are appropriate for users of the qualifications. Another respondent, an awarding organisation, suggested that additional purposes could be added to benefit students with SEND, such as purposes relating to employability and transferable skills.

Question 11

To what extent do you agree or disagree with the proposal for Ofqual to include a set of general purposes in its regulatory framework for entry level qualifications supporting progression to level 1 pre-technical qualifications?

Option	Total
Strongly agree	2
Agree	9
Neither agree nor disagree	4
Disagree	5
Strongly disagree	0
Not Answered	1

There were 20 responses to this question. Of these, 2 strongly agreed with the proposal, 9 agreed,

5 disagreed, and 4 neither agreed nor disagreed. The respondent that did not answer the question provided comments. Fourteen respondents provided comments in total.

Of the 2 respondents who strongly agreed with the proposal, a personal respondent provided comments, stating that the purposes as outlined recognise the importance of engagement in these qualifications.

Five of the 9 respondents that agreed with the proposal provided comments. Two of these respondents, a further education college and an awarding organisation, suggested that these qualifications may be taken by students who do not progress to the next qualification, with one referring to students with SEND. The other referred to students for whom the qualifications may be suitable in terms of their development, even if they do not intend to or cannot progress to study at level 1.

One respondent who agreed, an awarding organisation, noted that the purposes align with those for level 2 Technical Occupation Qualifications. Another said that the purposes will allow awarding organisations and providers to identify how these qualifications will potentially support Entry level qualifications.

Four of the 5 respondents that disagreed with the proposal were awarding organisations, with the fifth being an awarding organisation representative body. Four respondents that disagreed with the proposal provided comments. Two of these respondents suggested Purposes 1 and 2 would be sufficient, with the others given as design principles. One respondent said that Purpose 1 was the main purpose, whereas the other purposes could be provided as qualification design principles. Two respondents that disagreed with the proposal referred to overlap between the purposes and assessment strategy requirements.

Three of the 4 respondents who neither agreed nor disagreed with the proposal gave additional comments. A private training provider raised the issue of flexibility without giving specifics. One respondent said they were unable to comment as there was no clear definition of 'pre-technical'. One suggested that work-based learning should be included in the purposes for these qualifications.

> **Question 12**
>
> Do you have any comments on the proposed set of general purposes for level 1 pre-technical qualifications supporting progression to higher level technical qualifications?

Option	Total
Yes	13
No	8
Not Answered	0

There were 21 responses to this question. Thirteen respondents answered 'yes' and 8 answered 'no'. One respondent who answered 'no' provided a comment, meaning there were 14 comments on the proposal in total.

Four respondents referred in their comments to the importance of student engagement – one further education college, one awarding body or exam board, one representative body and one who identified as 'other'. The representative body suggested that engagement should be a top priority for all qualifications. The 'other' respondent added that the qualifications should not present barriers to those wishing to progress to a range of qualifications at higher levels.

Four respondents referred to specific proposed purposes in their comments. Of these, two respondents suggested that Purposes 1 and 2 would be sufficient for these qualifications. One respondent said that Purpose 1 should be the main purpose, with the others given as qualification design principles. One respondent said that Purposes 2 and 3 could be combined.

One respondent, a representative body, referred to the need for Purpose 2 for alternative academic purposes to be reworded. This respondent also referred to qualifications overlapping with GCSEs, and to performing arts graded qualifications which are out of scope of this consultation.

Two respondents, one further education college and one awarding body or exam board, mentioned students with SEND in their comments. One said that preparation for adulthood and life skills should be included in the general purposes to meet these students' needs. The other suggested that the purposes as proposed did not reflect the needs of the cohort that would take these qualifications, a significant sub-set of which are expected to be students with SEND.

One respondent asked whether it would be possible to develop knowledge-only qualifications against the purposes.

One respondent commented that the proposal seemed sensible.

> **Question 13**
>
> To what extent do you agree or disagree that, where it is not possible to fully meet all of the general purposes specified for level 1 pre-technical qualifications supporting progression to higher level technical qualifications, awarding organisations should prioritise them in the order in which they are specified, where 1 is the highest priority? Please provide any comments.

Option	Total
Strongly agree	1
Agree	10
Neither agree nor disagree	3
Disagree	6

Strongly disagree	0
Not Answered	1

There were 20 responses to this question. One respondent strongly agreed with the proposal, 10 agreed, 6 disagreed, and 3 neither agreed nor disagreed. One respondent did not answer the question but did provide a comment. Thirteen respondents provided comments.

The respondent that strongly agreed with the proposal, a local authority, chose not to provide a comment. Five of the 10 respondents who agreed provided comments. One of these referred to their answer to question 9, in which they suggested due to the diverse cohort that would be expected to take these qualifications there should be some generic performance descriptors for each level of qualification under consultation.

Two respondents that agreed with the proposal referred to the need for these qualifications to provide a balance of skills, knowledge and behaviours and to be practical in nature. One of these comments came from a school or college and one from an awarding body or exam board. Another agreed that providing evidence of student attainment should be the lowest priority for these qualifications. One respondent that agreed with the proposal suggested that the proposal would provide flexibility for awarding organisations to make trade-offs between conflicting purposes.

Five of the 6 respondents that disagreed with the proposal provided comments. One suggested that Purposes 1 and 2 should have equivalent importance, while another suggested that these should be the only 2 purposes used for these qualifications.

Two respondents that disagreed, both awarding bodies or exam boards, suggested that qualifications could be amended to fit with the purposes. One of these suggested that the purposes could undermine the intention of the assessment strategy.

One respondent that disagreed with the proposal, an awarding organisation, said that Purpose 1 should be the priority but should not be compulsory as some students may not require additional motivation, giving the example of students with SEND who may view a qualification as a "means to an end". Another said that, in some circumstances, it could be more valid for students to demonstrate their application of knowledge, skills and understanding than for a qualification to support them in an engaging course of study.

Two of the 3 respondents that neither agreed nor disagreed with the proposal provided comments. One suggested flexibility is important without giving any context, while another said awarding organisations should be given the opportunity to justify their choice of priorities in qualification design.

The respondent that did not answer the question but provided a comment, an awarding organisation, referred to their answer to question 1. In that answer, they questioned the need for 4 purposes and the need to disapply General Conditions E1.1 and E1.2.

Question 14

To what extent do you agree or disagree with the proposal to disapply General Conditions E1.1

> and E1.2 in respect of these entry level and level 1 qualifications? Please provide any comments.

Option	Total
Strongly agree	0
Agree	15
Neither agree nor disagree	4
Disagree	2
Strongly disagree	0
Not Answered	0

There were 21 responses to this question. Fifteen agreed with the proposal, 2 disagreed, and 4 neither agreed nor disagreed. Eight respondents provided comments.

Four of the 15 respondents that agreed with the proposal provided comments. Three of these were awarding organisations and the other a representative body. One of these respondents caveated their agreement by stating that while they agreed with the proposal to disapply E1.1, they firmly disagreed with the proposal to disapply E1.2 due to the considerable potential to leave gaps in accessible provision. Another caveated their agreement stating that the purposes would need to be reworded to be more concise prior to disapplication. The other 2 respondents that agreed said the proposed general purposes would remove the need for the General Conditions, with one noting the alignment with the disapplication of these conditions for level 3 reformed qualifications and the proposal for other level 2 qualifications.

Both respondents that disagreed with the proposal provided comments. One supported the disapplication of E1.1 but felt that the proposed purposes did not cover preparing students for employment and supporting a role in the workplace as set out in E1.2. The other disagreed on the basis they felt that the number of proposed purposes seemed unnecessary and unmanageable.

Two of the 4 respondents that neither agreed nor disagreed with the proposal provided comments. Both referred to the need for qualifications to have objectives as set out in General Conditions E1.1 and E1.2. One believed the flexibility in qualification design granted by the purposes would be beneficial for qualifications at this level, while the other felt the proposed purposes underpinned the objectives set out under E1.2.

Part 3: Assessment and grading

Question 15

To what extent do you agree or disagree with the proposal for Ofqual to issue statutory guidance for the grading scales used in the qualifications in scope of this consultation? Please respond for each qualification group.

15a. Level 2 Technical Progression Qualifications

Option	Total
Strongly agree	1
Agree	14
Neither agree nor disagree	2
Disagree	1
Strongly disagree	2
Not Answered	1

There were 20 responses to this question. One strongly agreed with the proposal, 14 agreed, one disagreed, 2 strongly disagreed, and 2 neither agreed nor disagreed. One respondent did not answer the question but provided a comment.

15b. Level 2 Academic Progression Qualifications

Option	Total
Strongly agree	2
Agree	12
Neither agree nor disagree	2
Disagree	1
Strongly disagree	2
Not Answered	2

There were 19 responses to this question. Two strongly agreed with the proposal, 12 agreed, one disagreed, 2 strongly disagreed, and 2 neither agreed nor disagreed. One respondent did not answer the question but provided a comment.

15c. Level 1 Progression Qualifications

Option	Total
Strongly agree	1
Agree	11
Neither agree nor disagree	3
Disagree	2
Strongly disagree	3
Not Answered	1

There were 20 responses to this question. One strongly agreed with the proposal, 11 agreed, 2 disagreed, 3 strongly disagreed, and 3 neither agreed nor disagreed. One respondent did not answer the question but provided a comment.

15d. Entry level Progression Qualifications

Option	Total
Strongly agree	2
Agree	10
Neither agree nor disagree	3
Disagree	2
Strongly disagree	3
Not Answered	1

There were 20 responses to this question. Two strongly agreed with the proposal, 10 agreed, 2 disagreed, 3 strongly disagreed, and 3 neither agreed nor disagreed. One respondent did not answer the question but provided a comment.

Question 15 comments

Thirteen respondents provided comments. The respondent that strongly agreed with the proposal suggested that students want to know how well they have done, but they did not want to see too much emphasis being placed on the outcomes.

Four respondents that agreed with the proposal provided comments. Three said that the introduction of statutory guidance would ensure comparability or parity across awarding organisations providing these qualifications. Another said they could not see how the proposal under consideration differed from what was included in the General Conditions.

Both respondents that disagreed with the proposal provided comments. One respondent stated in their comment that they agreed with the proposal for Ofqual to issue statutory guidance for grading for Level 2 Technical and Academic Progression Qualifications, but that they disagreed for Level 1 and Entry level Progression Qualifications. The other respondent, an awarding body or exam board, said it was unclear how the proposal differed from the General Conditions, suggesting it could potentially create barriers for students, and said that it was unclear why grading guidance was needed at level 2 and below when it was not introduced at level 3.

Two respondents that strongly disagreed with the proposal provided comments. One, an awarding organisation, said it supported grading guidance for level 2 qualifications but that pre-technical qualifications required a greater degree of flexibility. Another, a representative body, said that it was unclear what the guidance would address that was not already covered within the General Conditions and that as grading guidance was not introduced for level 3 qualifications there would be issues with parity if it was introduced at level 2 and below.

One respondent, a representative body that did not answer the question but provided comments, said there should be a consistent grading scale for these qualifications using Pass, Merit and Distinction. They noted that for GCSE and A levels there are consistent grading scales, and suggested the same should apply for alternative academic and alternative technical qualifications.

> **Question 16**
>
> To what extent do you agree or disagree with the proposed principles and considerations to determine the grading scales for the qualifications in scope of this consultation? Please respond for each qualification group and provide any comments.

16a. Level 2 Technical Progression Qualifications

Option	Total
Strongly agree	3
Agree	10
Neither agree nor disagree	4
Disagree	1
Strongly disagree	0
Not Answered	3

There were 18 responses to this question. Three respondents strongly agreed with the proposal, 10 agreed, one disagreed, and 4 neither agreed nor disagreed. Three respondents did not answer the question.

16b. Level 2 Academic Progression Qualifications

Option	Total
Strongly agree	3
Agree	9
Neither agree nor disagree	4
Disagree	1
Strongly disagree	0
Not Answered	4

There were 17 responses to this question. Three respondents strongly agreed with the proposal, 9 agreed, one disagreed, and 4 neither agreed nor disagreed. Four respondents did not answer the question.

16c. Level 1 Progression Qualifications

Option	Total
Strongly agree	2
Agree	9
Neither agree nor disagree	4
Disagree	2
Strongly disagree	1
Not Answered	3

There were 18 responses to this question. Two respondents strongly agreed with the proposal, 9 agreed, 2 disagreed, one strongly disagreed, and 4 neither agreed nor disagreed. Three respondents did not answer the question.

16d. Entry level Progression Qualifications

Option	Total
Strongly agree	2
Agree	9
Neither agree nor disagree	4
Disagree	2
Strongly disagree	1
Not Answered	3

There were 18 responses to this question. Two respondents strongly agreed with the proposal, 9 agreed, 2 disagreed, one strongly disagreed, and 4 neither agreed nor disagreed. Three respondents did not answer the question.

Question 16 comments

Thirteen respondents provided comments.

Three respondents that agreed with the proposal provided comments. One said the same assessment strategy should be used across all level 2 and below qualifications. One said guidance is needed for consistency. One said that there needs to be greater alignment in grading approaches for the level 2 groups of qualifications so that there is a better degree of comparability between qualifications.

Two respondents that disagreed with the proposal provided comments. One said there was not enough information to give a view on the proposal. One disagreed on the basis that these qualifications are often taken by students with SEND.

The respondent that strongly disagreed provided a comment. They said that grading guidance would be appropriate for level 2 qualifications but not for pre-technical qualifications as greater flexibility would be required for these qualifications.

Two respondents provided comments only. One was unclear whether the proposals would cover existing qualifications or only qualifications approved following implementation. The other said a Pass, Merit, Distinction grading scale, which was proposed for T Level Transition qualifications, should be used for all level 2 and below qualifications to provide consistency.

Part 4: Assessment strategy requirements, Ofqual review and withdrawal of funding

Question 17

To what extent do you agree or disagree with the proposal to require awarding organisations to develop, follow, and keep under review an assessment strategy? Please provide any comments.

Option	Total
Strongly agree	3
Agree	15
Neither agree nor disagree	3
Disagree	0
Strongly disagree	0
Not Answered	0

There were 21 responses to this question. Three respondents strongly agreed with the proposal, 15 agreed, and 3 neither agreed nor disagreed. Twelve respondents provided comments.

Four respondents referred to the increase in burden this requirement would place on awarding organisations, one of whom agreed with the proposal and 3 neither agreed nor disagreed. All 4 of these respondents were awarding organisations.

Four respondents referred to assessment strategies as being part of current practice. Three of these respondents agreed with the proposal and one strongly agreed. One of these respondents requested additional information on the extent to which a standard format for assessment strategies could be used.

Two respondents, both awarding organisations, sought additional clarity on the review process. One also asked what Ofqual's feedback on each assessment strategy would look like.

One respondent suggested assessment strategies were less necessary for level 2 and below qualifications than for those at level 3, while another suggested that assessment strategies should not be required at all for level 1 and below qualifications, in line with the approach Ofqual has taken to level 1 qualifications that are prerequisites to employment. Both these respondents were awarding organisations, and both neither agreed nor disagreed with the overall proposal.

Question 18

Do you have any views on the areas proposed to be included in the assessment strategy requirements?

Option	Total
Yes	9
No	11
Not Answered	1

There were 20 responses to this question. Nine respondents answered 'yes', 11 answered 'no' and one respondent did not answer. Nine respondents provided comments.

Two respondents referred to Reasonable Adjustment and adaptations to assessments, while another mentioned accessibility by design being regarded as an essential element of an assessment strategy.

Two respondents referred to the potential for assessment strategy documents to become 'bloated' and to the potential for disproportionate regulation.

One respondent said the areas listed seemed comprehensive, while another said they seemed reasonable and were similar to those covered by assessment strategy requirements for other similar qualifications.

One respondent, an awarding organisation, asked for clarification on the time periods designated for periodic review of any assessment strategy. They also questioned whether there may be a tiered approach to review, with new qualifications having a different assessment strategy review period to qualifications which are more established.

One respondent, an awarding organisation, said that it would be useful to have a single section covering moderation or Centre Assessment Standards Scrutiny (CASS) for centre-marked assessments, rather than having this information spread across several sections of the assessment strategy.

One respondent suggested including other areas to ensure consistency across the United Kingdom, suggesting the use of expert witness, and real work environment and simulation parameters, as areas to consider.

Question 19

To what extent do you agree or disagree with the proposal to require awarding organisations, following a review by Ofqual, to comply with any requirements, and have regard to any guidance, specified to it by Ofqual in relation to the qualification? Please provide any comments.

Option	Total

Strongly agree	3
Agree	12
Neither agree nor disagree	4
Disagree	1
Strongly disagree	0
Not Answered	1

There were 20 responses to this question. Three respondents strongly agreed with the proposal, 12 agreed, one disagreed, and 4 neither agreed nor disagreed. One respondent did not answer the question.

Seven respondents provided comments. A respondent that strongly agreed did so on the basis that if organisations do not comply with Ofqual's requirements, they should not be providing qualifications.

Two respondents, that agreed with the proposal, referred to additional burden that would be created by this proposal; one mentioned the burden on Ofqual and one mentioned the burden on awarding organisations. Both of these respondents were awarding organisations.

One respondent that agreed, an awarding organisation, queried how the process would work alongside DfE's funding approvals process. Another respondent who agreed suggested that awarding organisations should be able to appeal against Ofqual requirements where they could cause problems for providers or students.

The respondent that disagreed with the proposal did so on the basis that trade associations and sector skill bodies have been excluded from the approvals process.

One respondent that neither agreed nor disagreed with the proposal said it would be disproportionate to apply the review proposal to level 1 and Entry level qualifications based on the risk posed by these qualifications.

> **Question 20**
>
> To what extent do you agree or disagree with the proposal to require awarding organisations to notify Ofqual when a qualification ceases to be approved for public funding, and to comply with any additional requirements that Ofqual specifies as a result? Please provide any comments.

Option	Total
Strongly agree	4

Agree	4
Neither agree nor disagree	5
Disagree	6
Strongly disagree	2
Not Answered	0

There were 21 responses to this question. Four respondents strongly agreed with the proposal, 4 agreed, 6 disagreed, 2 strongly disagreed, and 5 neither agreed nor disagreed. Fourteen respondents provided comments.

One respondent that strongly agreed with the proposal, a private training provider, commented that many students could be disadvantaged without specifying the context. One respondent that agreed with the proposal, a representative body, agreed on the basis of the importance of protecting student interests.

Six respondents that disagreed with the proposal, and two that strongly disagreed, provided comments. All of these respondents suggested DfE should provide the information to Ofqual without requiring awarding organisations to do it themselves. Two of these respondents, both awarding organisations, suggested that the proposal would introduce potential for unintended errors.

Four respondents that neither agreed nor disagreed with the proposal provided comments. Two, both awarding organisations, referred to the prospect of DfE notifying Ofqual directly of any withdrawal of public funding. One respondent suggested that this was something Ofqual ought to have oversight of as well as awarding organisations. One respondent requested clarification on what type of public funding the requirement would cover, citing public funding through combined authorities.

Equalities impact assessment

Question 21

Are there any other potential equalities impacts (positive or negative) on students who share a particular protected characteristic arising from our proposals that Ofqual should consider? Where possible, please separate your answer by protected characteristic.

Option	Total
Yes	10

No	11
Not Answered	0

There were 21 responses to this question. Ten respondents answered 'yes' and 11 answered 'no'. Two respondents who answered 'no' chose to provide comments. In total, 12 respondents provided comments.

Respondents were asked to separate their answers by protected characteristic and most respondents did so.

Nine responses referred specifically to students with SEND. Of these, 4 referred to the high proportion of students who take these qualifications being students with SEND. Three referred to students with SEND without providing additional context or information.

One respondent said that the design of assessments should be explicit in including alternative assessment methods for students with SEND and asked for clarity on the adaptations to be provided for those students.

One respondent suggested there would be a positive impact on students with SEND as they would have additional progression routes open to them in the new qualification landscape.

One respondent referred to the general negative impact of DfE funding decisions on students with SEND.

One respondent referred to race and socioeconomic disadvantage, citing the equalities impact assessment previously published by DfE. They said that it was not possible to identify which ethnic groups would more likely be affected by the proposals, and that the most disadvantaged students would be more than twice as likely to be affected by the proposals than the least disadvantaged. Another respondent also referred to students with financial disadvantages.

Two respondents referred to the potential impact on vulnerable students without clarifying what they meant by this. These respondents said that the limited number of proposed qualifications at Entry level supporting progression to level 1 pre-technical qualifications would create a gap in the market for these students.

One respondent referred to the purpose statements proposed for these qualifications, suggesting that neither students nor training providers should be penalised if the progression outcome does not match the specified purpose of a qualification.

Question 22

Are there any additional steps that Ofqual could take to mitigate any potential negative impacts, resulting from the proposals, on students who share a particular protected characteristic?

Option	Total
Yes	6
No	11
Not Answered	4

There were 17 responses to this question. Six respondents answered, 'yes' and 11 answered 'no'. Two respondents who did not answer the question provided comments. In total, 8 respondents provided comments.

Three respondents suggested that Ofqual could undertake additional work with the Further Education (FE) sector or with colleges.

One respondent said that assessment design should be explicit in including alternative assessment methods for students with SEND and that there should be clarity on adaptations provided for those students. Another said the reduction in the number of qualifications arising from post-16 qualifications reform would have a negative impact on students with SEND as those were the predominant group taking level 2 and below qualifications.

One respondent suggested mitigations would become obvious in time but could not think of any now. Another could not identify any mitigations but outlined concerns regarding the capacity of awarding organisations to implement the required changes to qualifications in the timescales given, suggesting that there would be a negative impact on all provision and on all students as a result.

Regulatory impact assessment

Question 23

Are there any regulatory impacts that have not been identified arising from the proposals? If yes, what are the impacts and are there any additional steps that could be taken to minimise the regulatory impact of the proposals?

Option	Total
Yes	6
No	13
Not Answered	2

There were 19 responses to this question. Six respondents answered 'yes' and 13 answered 'no'. Two respondents did not answer the question. Eight respondents provided comments.

Three respondents identified potential regulatory impacts that they felt Ofqual had not considered in the consultation. Two of those respondents identified mitigations for those identified impacts.

One respondent referred to the additional administrative burden on awarding organisations, especially smaller businesses and new entrants. As a mitigation, they suggested that Ofqual should have additional resources to review all organisations quickly and fairly. They also suggested the possibility of providing support for organisations to help them to prepare qualifications in the review process.

One respondent referred to the issue of awarding organisations reporting withdrawal of public funding to Ofqual. They suggested as a mitigation that the responsibility should lie with DfE instead.

One respondent said that the requirement for awarding organisations to produce an assessment strategy might lead to Ofqual focusing its review on the quality of explanation given by awarding organisations, rather than on the substance of their assessment approaches. They did not suggest a potential mitigation.

One respondent recommended that Ofqual maintain parity between the requirements issued for level 3 qualifications and those issued for Technical Awards to minimise the burden on awarding organisations. Another respondent suggested the regulatory impacts did not arise from Ofqual's proposals but from the likely reduction in the number of funded qualifications.

> **Question 24**
>
> Are there any costs, savings or other benefits associated with the proposals which have not been identified? Please provide estimated figures where possible.

Option	Total
Yes	5
No	12
Not Answered	4

There were 17 responses to this question. Five respondents answered 'yes' and 12 answered 'no'. Four respondents did not answer the question. One respondent who answered 'no' provided comments. In total, 6 respondents provided comments.

No respondents identified potential savings or other benefits. None provided estimated figures, with two respondents explicitly stating it was too early to quantify the cost impact of the proposals.

Three respondents referred to the cost impact on further education colleges. Of these, one, a

personal respondent from a further education college, referred to staff training and recruitment, and adaptations to resources. They also flagged the cost impact on colleges providing level 3 qualifications. Another awarding organisation, referred to various costs identified in areas including assessment, quality assurance, technology, and teaching and learning materials. The third of these respondents who also referred to further education colleges, a body representing further education colleges, did not give specific examples of the costs they would incur.

One respondent referred to the cost to awarding organisations of using external consultants to support with the proposed approvals process. Another flagged the cost of producing and maintaining assessment strategies.

One respondent said that there were implications for marketing and careers information, advice and guidance, without offering specific examples of the costs related to these.

One respondent said that there was the potential for awarding organisations to increase their fees and said it would be important these costs were not passed on to providers.

> **Question 25**
>
> Is there any additional information that Ofqual should consider when evaluating the costs and benefits of the proposals?

Option	Total
Yes	3
No	14
Not Answered	4

There were 17 responses to this question. Three respondents answered 'yes' and 14 answered 'no'. Four respondents did not answer the question. There were 3 comments provided in total.

Two respondents referred to providers in their comments. One said Ofqual should be aware of additional costs arising for providers from the proposed regulatory approach, and this respondent suggested Ofqual should also be aware of additional costs faced by students, for example fee-paying adults. Another said Ofqual should ensure providers' views and concerns were considered without expanding on what they meant by this.

One respondent commented on the lack of a role for trade associations and sector skills bodies in the qualifications design and approvals process.

> **Question 26**
>
> Do you have any comments on the impact of the proposals on innovation by awarding

> organisations?

Option	Total
Yes	8
No	12
Not Answered	1

There were 20 responses to this question. Eight respondents answered 'yes' and 12 answered 'no'. One respondent did not answer the question but did provide a comment. In total, there were 9 comments.

Two respondents referred to awarding organisations using available time and personnel resources to respond to consultations and to implement changes. They suggested that this will impact the ability of awarding organisations to futureproof qualifications as there is no time to look at emerging technologies and how these can be used in assessment.

One respondent suggested that the tension between Purposes 3 and 5, for level 2 qualifications supporting progression to level 3 technical qualifications that are not delivered as part of a T Level programme, may place limits on innovation.

One respondent referred to the lead time for the qualifications review and approvals process, particularly the outcomes of reviews where revisions are required by Ofqual.

One respondent questioned whether smaller awarding organisations will have the capacity to innovate within the proposed regulatory framework.

Five respondents referred to wider government policies, for example public funding withdrawal and reducing the number of qualifications, which were outside of the scope of this consultation.

Annex A: List of organisational respondents

When completing the consultation questionnaire, respondents were asked to indicate whether they were responding as an individual or on behalf of an organisation. These are the organisations that submitted a non-confidential response:

- Association of Colleges
- Ascentis
- ASCL
- City & Guilds
- Exceptional Ideas Ltd

- Federation of Awarding Bodies
- Gateway Qualifications Ltd
- IMI
- iPET Network
- Lantra
- NCG
- NOCN Group
- OCR
- Pearson Education
- Training Qualifications UK
- UAL Awarding Body
- UK Fashion and Textile Association (UKFT)

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