



Qualifications and
Curriculum Authority

A framework for achievement

Consultation response form

December 2004

This response form accompanies the consultation document *A framework for achievement: recognising qualifications and skills in the 21st century* (QCA/04/1459). The consultation document presents our vision for the new framework. The questions given here are raised in the consultation document. Please refer to the main document for background detail on each question and the issues it raises.

The response form is in two sections:

- part A is general. It has 9 questions about the design, development and use of the new framework
- part B is more detailed. It has 23 questions about the technical aspects of the framework. Some of these questions may require a knowledge of credit systems and qualifications.

Please respond to as many of the questions as you wish. QCA values all responses.

According to equalities legislation, all public services must make sure that their procedures are free from bias and discrimination. QCA is committed to this legislation. When you are thinking about the proposals outlined in the consultation document, please keep in mind that all learners must have fair access to the framework. The specific legislation is the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 1995.

Please send this response form by **28 February 2005** to:

Garry Owens
Qualifications and Curriculum Authority
83 Piccadilly
London W1J 8QA

Electronic copies of the consultation document and this response form are on the QCA website (www.qca.org.uk/ffa/). If you have any queries about the consultation document or response form please email ffa@qca.org.uk.

Thank you for completing the consultation response. To help us analyse the responses, could you please give us some details about you and/or your organisation.

Name: _____ Mrs Libby Steele
Organisation: _____ Royal Society of Chemistry,
Job title: _____ Manager, Professional Education and Development
Address: _____ Burlington House, Piccadilly, London W1J 0BA
Telephone number: _____ 020 7 440 3353
Email address: _____ steelel@rsc.org

Industry:

Employer- or employee-based organisation

Awarding body

Professional body ✓

Learning provider (please specify):

Private training provider

Further education

Higher education

Adult and community learning

Other

Learner

Sector body (eg sector skills council)

Funding body

Education and training organisation (please specify _____)

Other (please specify _____)

Part A: Features and benefits

Response from the Royal Society of Chemistry

The RSC is the largest organisation in Europe for advancing the chemical sciences. Supported by a network of 45,000 members worldwide and an internationally acclaimed publishing business, our activities span education and training, conferences and science policy, and the promotion of the chemical sciences to the public.

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

Strongly agree ? Agree ? ✓ Disagree ? Strongly disagree ?

Comments

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

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

Strongly ?
agree

Agree ?

Disagree ?

Strongly ?
disagree

Comments

If it is demand led will this be based solely on numbers. Some qualifications are of high value but will only be suitable for a small number of candidates i.e. technical Level 5 qualifications such as Analytical Chemistry Level 5 N/SVQ.

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

Strongly ?
agree

Agree ?

Disagree ?

Strongly ?
disagree

Comments

Hopefully yes, but probably not.

- 5 What issues do you think are important to make sure the new framework recognises a diverse range of achievements?

Comments

Extending the range of organisations able to develop and award qualifications may be an issue. Recognition of diverse assessment methods will be essential. Are regulatory authorities fit for purpose for a wider and more diverse range of achievements?

6 Do you agree that the proposals will benefit learners?

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

In theory yes, but in practice debatable.

7 Do you agree that the proposals will benefit employers?

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

Only if they are consulted. Promotion of the opportunities will be essential.

Track record on promotion of vocational qualifications particularly at the higher level is not encouraging.

8 Do you agree that the proposals will benefit providers?

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

Yes, if all the issues raised are implemented successfully. Reducing the bureaucratic burden of Centre approval is to be welcomed.

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

Strongly ?
agree

Agree ?

Disagree ?

Strongly ?
disagree

Comments

Awarding bodies may have many and sometimes conflicting priorities. Whilst trying to enhance the quality of the product this may conflict with the overriding principles of staying in business.

Part B: Structural and operational issues

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

Strongly agree ? ✓ Agree ? Disagree ? Strongly disagree ?

Comments

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

Strongly agree ? Agree ? ✓ Disagree ? Strongly disagree ?

Comments

12 Do you agree level descriptors should determine the level of units?

Strongly agree ? Agree ? ✓ Disagree ? Strongly disagree ?

Comments

13 What issues do the definitions of 'credit' and 'credit value' raise for your organisation?

Comments

How will 10 Learning hours be defined? Is workplace learning included?

Elsewhere, for example in the UK contribution to the Bologna process arguments are presented against time as a measure of credit and for achievement of learning outcomes. UK regulatory bodies (and Government) needs to be consistent.

14 Should:

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

Option ? ✓ Option ? Don't ?
a) b) know

Comments

Otherwise the business interest of awarding bodies will dictate what is made available to the learner rather than what is needed for employment and personal development.

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

Strongly ? Agree ? Disagree ? Strongly ? ✓
agree disagree

Comments

The proposals are unclear and therefore cannot be supported. The network of SSCs is immature, fragmented and they do not enjoy widespread confidence. Science is particularly poorly served.

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

In principle yes, but the variation in quality and processes may in practice not result in the mutual trust required for this process to work. Currency of units and the maintenance of achievement by individuals over time is not addressed.

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

Comments

The requirements of the occupational area have to be paramount.

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

Yes, in principle, but the practical implications are insufficiently clear to go beyond this statement.

There may be a deterrent effect on some organisations from developing and offering units.

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

Recognised by whom? Statutory Bodies and bodies incorporated by Royal Charter are already authorised by the State as awarding bodies and should not be subject to further "recognition processes". Other bodies should be subject to a formal quality assurance process.

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

Strongly agree ? Agree ? ✓ Disagree ? Strongly disagree ?

Comments

With the proviso in 17.

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

Level – agree

Size - needs to be sufficient to satisfy the purpose.

- 22 Do you agree that:
a) assessment arrangements should be regulated through monitoring of awarding body systems?

Strongly ?
agree

Agree ?

Disagree ?

Strongly ?
disagree

Comments

Same answer as for 19.

- b) awarding bodies should be able to determine appropriate assessment arrangements (except where specified by a third party)?

Strongly ?
agree

Agree ?

Disagree ?

Strongly ?
disagree

Comments

The safeguard of 3rd party specification is enclosed.

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

Strongly ?
agree

Agree ?

Disagree ?

Strongly ?
disagree

Comments

Probably. The grade has to suit the purpose of the qualification. In many cases there will be just two grades: competent (pass) and not competent (fail).

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

There is a need to distinguish between qualifications that signify competence to an employer or customer and other forms of award that recognise achievement.

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

Same answer as 19

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

Strongly agree ? Agree ? ✓ Disagree ? Strongly disagree ?

Comments

See also 17.

- 27 Are there other possible risks and benefits to awarding bodies in the new framework that are not identified?

Comments

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

See 19 in relation to recognition of awarding bodies.

There should be an additional requirement upon QCA to promote coherence within the UK and with other European qualification frameworks.

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

Strongly agree ? Agree ? Disagree ? Strongly disagree ?

Comments

See 19 in respect of recognition of awarding bodies.

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

Strongly agree ? Agree ? Disagree ? ✓ Strongly disagree ?

Comments

See answer to 15 in relation to the credibility of these organisations.

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

Strongly agree ? Agree ? ✓ Disagree ? Strongly disagree ?

Comments

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

Strongly agree ? Agree ? ✓ Disagree ? Strongly disagree ?

Comments