

Federation of Awarding Bodies – final response to the Ofqual statistical releases consultation, March 2017

Overview of the Federation of Awarding Bodies

The Federation of Awarding Bodies is the trade association for vocational and technical awarding organisations (AOs) with 125 organisations in full membership ranging from large generic AOs to those working in specific occupational areas, including professional bodies.

The majority of Ofqual regulated AOs are also members of the Federation and the data reflected in the Vocational Quarterly and Annual Qualifications Market Report is an important source of data for our members because it reflects the state of the overall market and provides a good indicator of trends and changes in the vocational market. The analysis of the external influences on the market is of particular value. We therefore have an interest in the future arrangements for statistical releases and we welcome the opportunity to comment on the consultation proposals.

This response is submitted on behalf of the Federation's membership following consultation with them and with the Federation's Board of Directors. However, AOs are a diverse community and our members may wish to make their own individual submissions containing their own particular perspectives and emphases, in addition to any comments forwarded to the Federation for inclusion in this overall response.

Further information

Further information and clarification can be obtained from Ailin O'Cathain, Head of Policy, ailin.ocathain@awarding.org.uk, telephone: 02037863171

Consultation Questions

1. Are you aware of the VQ Quarterly statistical release?

Yes No

The Federation is aware of the VQ Quarterly statistical releases and each release is publicised in our weekly Update for members, at the time of release. We find it to be an extremely interesting and useful publication.

2. Are you aware of the Annual Qualifications Market Report?

Yes No

The Federation is aware of the Annual Qualifications Market Report and each report is publicised in our weekly Update for members, at the time of release. We find it to be an extremely interesting and useful publication.

3. **What sections of the VQ Quarterly report are of particular interest to you?**

(Please tick all that apply)

- Key points
- External influences
- Key statistics
- Analysis
- Appendix tables given in the report
- Appendix tables published as spreadsheets
- Accompanying datasets split by country published as spreadsheets
- Other (please specify):

All of the data provided in the current report is useful. The provision of commentary as well as the tables and spreadsheets enables users of the report to either read the just information headlines or analyse the data more forensically, if they so wish. It is useful to provide this choice as, across the range of AOs, the report will be used in different ways, for different purposes.

It is also very useful to have a regular report which is dedicated to vocational qualifications and does not add them into a report which is predominantly related to general qualifications (GQs). Reporting regularly and separately on VQs is an indicator of their importance in the qualification landscape.

At present, the vocational landscape is in a period of significant change with the implementation of the government's Post-16 Skills Plan on the near horizon. This is likely to have an impact on a number of existing VQs and it would therefore be useful to be able to track this impact on a regular basis, in some detail. For that reason, the Federation is not convinced that this is the right time to be thinning out the statistical reporting in this area and we would welcome the continuation of the current reporting style as we move closer to a time of turbulence for VQs. However, we understand that Ofqual must be confident that it is using its resources to best effect and we welcome the opportunity to feed our views into the wider consultation.

4. What statistics included in the VQ Quarterly report are of particular interest to you?

(Please tick all that apply)

- Number of available qualifications by type
- Number of available qualifications by level
- Number of available qualifications by sector subject area
- Number of certificates by type of qualification
- Number of certificates by qualification level
- Number of certificates by sector subject area
- Number of certificates by country (England, Wales, Northern Ireland)
- Qualifications with the highest number of certificates awarded
- Awarding organisations with the highest number of certificates awarded
- Awarding organisations with the highest number of certificates awarded split by country
- Other (please specify):

The data split by country (England, Wales and Northern Ireland) raises an important point in relation to the future of data gathering and reporting in the future, across the regulators. It is not currently

clear what arrangements will be put in place by Qualifications Wales and CCEA Regulation in relation to data (although we know that QW is in the early stages of its data project). This is an area that will benefit from greater clarity in the short term. As this area of work continues to devolve, the Federation would hope that the regulators would continue to have an open dialogue on data collection and reporting to ensure that the regulatory burden placed on AOs is kept to a minimum and that the resulting reports can be used alongside each other in a meaningful way.

5. What sections of the existing Annual Qualifications Market Report are of particular interest to you?

(Please tick all that apply)

- Key points
- Key statistics
- External drivers
- Awarding organisations
- Regulated qualifications
- Certificates awarded for all qualifications
- Certificates awarded in GCSE, AS and A level qualifications and subjects
- Distribution of GCSE, AS and A level qualifications across awarding organisations
- Certificates awarded in qualifications other than GCSE, AS and A level
- Appendix tables given in the report
- Appendix tables published as spreadsheets
- Accompanying dataset published as a spreadsheet
- Other (please specify):

The Federation does not have a remit for GQs and as such, the usefulness of the reporting on GQs in the AQMR is better evaluated by GQ AOs and JCQ.

6. What statistics included in the existing Annual Qualifications Market Report are of particular interest to you?

(Please tick all that apply)

- Trends and statistics about available regulated qualifications
- Trends in the number of qualifications by qualification type
- Trends in the number of certificates – qualifications with low take-up
- Number of certificates awarded broken down by GCSE, AS, A level and other qualifications
- Market share of awarding organisations according to the number of certificates awarded for GCSE, AS and A level
- Number of certificates awarded by awarding organisation broken down by subject for GCSE, AS and A level
- Number of certificates awarded in qualifications other than GCSE, AS and A level broken down by sector subject area
- Number of awarding organisations with qualifications and with certificates awarded in each sector subject area for qualifications other than GCSE, AS and A level
- Number of certificates awarded in each sector subject area for qualifications other than GCSE, AS and A level broken down by level, qualification type
- Other (please specify):

The Federation does not have a remit for GQs and as such, the usefulness of the reporting on GQs in the AQMR is better evaluated by GQ AOs, JCQ and other relevant stakeholders.

Questions 7-11, below are all answered on a scale of 1-5 with 1 being 'not useful at all' and 5 being 'very useful'.

7. To what extent will you find the proposed single, consolidated Annual Qualifications Market Report useful?

5 – very useful.

The Federation believes the report has the potential to be very useful. We would hope that the reporting on GQs and VQs will be balanced and the report will not be overly- GQ focused.

8. To what extent will you find the timing of proposed Annual Qualifications Market Report useful?

5- very useful.

9. To what extent will you find the continued quarterly release of VQ datasets useful?

4- useful.

The Federation welcomes Ofqual's ongoing commitment to producing information on VQs on a quarterly basis.

10. To what extent will you find the proposed introduction of headline VQ trends every quarter useful?

4- useful.

The Federation welcomes Ofqual's ongoing commitment to producing information on VQs on a quarterly basis. We would find the current report more useful but appreciate that there will be regular headline reporting in between the annual publication of the AQMR.

11. To what extent will you find the continued annual release of GQ dataset useful?

The Federation does not have remit for GQs so it would not be appropriate to comment on this question.

12. Please specify any additional content (apart from the content already covered in the VQ Quarterly and the AQMR) which you think should be introduced in the proposed merged report.

The Federation is aware that every piece of data that Ofqual reports needs to be collected from AOs. Every additional data request to AOs potentially places an additional burden on the resources of AOs. Although there are many pieces of data that individual AOs might find useful to have included in future reports (as illustrated in the VQ Quarterly, User Feedback section) we would generally caution against adding to the reporting burden placed on AOs unless there is substantial support for reporting on additional areas.

It would, however, be useful to consider what data is already collected by Ofqual which could be drawn upon to enrich the AQMR. This could include:

- 1- Analysis of the malpractice cases that are reported to Ofqual. Analysis in the AQMR could include overall number, breakdown by type of malpractice etc. This will provide AOs with a useful overview of some of the current and emerging challenges in the market.
- 2- Identification of the number of AOs in the market for the different qualification types and SSA areas. This would enable AOs to identify areas of the market that already well-served by other AOs and areas that may benefit from an additional AO offer.

13. Please specify any content in the existing VQ Quarterly report and AQMR which you think should be removed from the proposed merged report.

The Federation believes that all of the current information provided in the reports is useful.

14. Do you have any other comments or suggestions on the consultation?

The Federation has over 120 full members and we always try to ensure that our consultation responses reflect the views of our members, as far as is possible. To do this, it is essential that we circulate our draft responses for comment by our members. It is therefore extremely helpful when a Word version of the response form is published alongside the on-line response form (as you have done for the more recent consultation on guidance to Condition G4). We can understand that the analysis of responses is much easier for Ofqual when the on-line system is used to submit responses and we are happy to submit our final response in this way. However, it is essential that we have a format that can be used for consulting on our draft response. In addition, many of our members submit their own response to consultations and have a similar requirement to circulate drafts within their own AOs for comment. Where no Word version of the response form is provided, the Federation and a number of our members will all need to cut and paste the questions from the on-line form to develop a Word template that can be used. This requires time and is a potential barrier to responding to a consultation. It may encourage greater response levels if Ofqual generated a Word version that

all potential respondents could use. This is an issue that we have raised in our response to previous consultations and we hope that Ofqual will recognise the importance of this request in relation to lifting some of the burden that responding to regular consultations place on AO resources. This is particularly important were a short timescale is provided for responding (as was the case with this consultation).

15. Do you have any other comments or suggestions on other statistical releases published by Ofqual? The complete suite of Ofqual's published statistics are available on gov.uk.

16. How many of our consultations have you read in the last 12 months?

- 1
- 2
- 3
- 4
- 5
- More than 5

17. We want to write clearly and effectively, putting the reader first. How easy to read did you find this consultation? (This question is answered on a scale of 1-5 with 1 being 'very hard to read' and 5 being 'very easy to read'.)

4, the consultation was easy to read.

18. Do you have any comments or suggestions about the style of writing?

There are some parts of the document that would have benefitted from further explanation to illustrate clearly the point that was being made. In the absence of this information there was a certain lack of clarity in terms of what was being presented. For example:

- Page 4, final sentence states that 'the publication needs to be more relevant and accessible to different user styles given the fast-changing developments in the qualifications landscape and data visualisation.' The Federation fully understands the impending changes in the

landscape but the statement about how this will affect the reporting of statistics is not fully clear in the absence of any exemplification of the impact.

- Page 10, paragraph 1 states that 'we can redeploy our resources to improve our overall suite of official statistics'. It would have been useful to have an indication of the improvements that are being considered and whether the resources that are freed up will be re-focused on the statistical reporting of VQ or GQ analysis. The bias towards reporting on GQ issues is noticeable when the full list of Ofqual statistical reports is viewed.

In addition, this was a useful opportunity to provide some indication of the future reporting of data relating to Wales and Northern Ireland and clarification of the current thinking on this matter would have been welcome.