

# Responding to Entry level qualifications: removing unnecessary regulations

You can respond to this consultation via any of the methods listed on our website at <https://www.gov.uk/government/consultations/entry-level-qualifications-removing-unnecessary-regulations>.

Please **respond by 23:45 on 7 October 2016**.

## Your details

To evaluate responses properly, we need to know who is responding to the consultation and in what capacity. We will therefore only consider your response if you complete the following information section.

We will publish our evaluation of responses. Please note that we may publish all or part of your response unless you tell us (in your answer to the confidentiality question) that you want us to treat your response as confidential. If you tell us you wish your response to be treated as confidential, we will not include your details in any published list of respondents, although we may quote from your response anonymously.

Please answer all questions marked with a star\*

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**Position\* Head of Policy**

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**Would you like us to treat your response as confidential?\***

If you answer yes, we will not include your details in any list of people or organisations that responded to the consultation.

Yes  No

**Is this a personal response or an official response on behalf of your organisation?\***

Personal response (Please answer the question 'If you ticked 'personal views'...')

Official response (Please answer the question 'Type of responding organisation')

**If you ticked 'Personal views' which of the following are you?**

Student

Parent or carer

Teacher (but responding in a personal capacity)

Other, including general public (Please state below)

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**If you ticked “Official response from an organisation/group”, please respond accordingly:**

**Type of responding organisation\***

- Awarding organisation
- Local authority
- School or college (please answer the question below)
- Academy chain
- Private training provider
- University or other higher education institution
- Employer
- Other representative or interest group (please answer the question below)

**School or college type**

- Comprehensive or non-selective academy
  - State selective or selective academy
  - Independent
  - Special school
  - Further education college
  - Sixth form college
  - Other (please state below)
-

**Type of representative group or interest group**

- Group of awarding organisations
- Union
- Employer or business representative group
- Subject association or learned society
- Equality organisation or group
- School, college or teacher representative group
- Other (please state below)

**Trade Association for vocational awarding organisations.**

The Federation of Awarding Bodies is the trade association for vocational awarding bodies with over 130 organisations in membership ranging from large generic awarding bodies to those working in specific occupational areas, including professional bodies. The majority of our members are regulated by Ofqual and a number of them offer Entry Level qualifications to learners in their sectors. We therefore welcome the opportunity to respond to this consultation.

This response is submitted on behalf of the FAB membership following consultation with them and with the Federation's Board of Directors. However, awarding bodies 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.

**Nation\***

- England
- Wales
- Northern Ireland
- Scotland
- Other EU country: \_\_\_\_\_
- Non-EU country: \_\_\_\_\_

**The Federation's members operate in all of the nations listed above.**

**How did you find out about this consultation?**

- Our newsletter or another one of our communications
  - Our website
  - Internet search
  - Other
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**May we contact you for further information?**

- Yes     No

The Federation is always willing to work with Ofqual to discuss regulatory matters and we would be happy to arrange dialogue with a sample of members if this would be of value to Ofqual.

**Questions**

**Question 1.** We propose removing the existing regulations “Criteria for entry level qualifications” as we believe they unreasonably restrict the development of the most appropriate/valid qualifications at entry level. To what extent do you agree or disagree with the proposed change?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Please give reasons for your answer

The Federation welcomes Ofqual’s proposals to remove the additional criteria that apply to entry level qualifications. We agree that these criteria can be a barrier to the development of valid qualifications at entry level. We welcome the proposals to reduce the regulatory burden on awarding organisations and to provide them with the flexibility to develop qualifications that are sufficiently valid and meet the needs of entry-level learners. Any proposal that eases the regulatory burden on our members, whilst still ensuring that learners are protected and provided with high quality, valid qualifications that meet the General Conditions, is welcome.

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**Question 2.** We do not propose to introduce additional regulations for entry level qualifications as we judge the General Conditions of Recognition set out suitable expectations for these qualifications to be valid. To what extent do you agree or disagree with this proposal?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Are there any other options you think we should consider?

The Federation believes that the General Conditions are a comprehensive and lengthy set of requirements. Where there is no need for additional requirements over and above these Conditions, Ofqual is right to take steps to remove them. We believe the requirements for qualifications to be valid is embedded in the Conditions and no further regulatory criteria are required. What is needed is further clarification of Ofqual's view of validity and how it anticipates AOs being able to provide validation evidence for a range of different vocational qualifications effectively. We look forward to further information on this shortly, so that our members can ensure they have the appropriate evidence required to demonstrate the validity of their qualifications.

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**Question 3.** We have not identified any adverse effect to students who share particular protected characteristics. To what extent do you agree or disagree with this?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Are there other impacts we have not considered?

The Federation has no further information to add.

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**Question 4.** Are there any additional steps we could take to mitigate any negative impact resulting from these proposals on persons who share a particular protected characteristic?

- Yes     No

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**Question 5.** Do you have any other comments on the impact of the proposals on students who share a particular protected characteristic?

- Yes     No

The Federation does not believe this proposal will impact on learners with any particular protected characteristics.

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*Responding to Entry level qualifications: removing unnecessary regulations*



**We want to write clearly and effectively, putting the reader first. How easy to read did you find this consultation?**

- Very easy to read
- Easy to read
- Neither hard nor easy to read
- Hard to read
- Very hard to read

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

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

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

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