Response to the
Ofqual consultation on lifting the accreditation requirement

August 2014
Introduction to our submission

This submission represents the collective views of the Northern Ireland (NI) Further Education (FE) sector (six regional colleges) in response to the Ofqual consultation on lifting the accreditation requirement. Colleges Northern Ireland would have a role similar to that of Colleges Scotland, Colleges Wales and the AoC. The time limit for this consultation did not enable us to consult with all curriculum staff across the six regional colleges.

Overview of the further education sector in NI

Colleges Northern Ireland is the representative body for NI’s six regional FE Colleges which between them offer provision to over 90,000 learners and 156,000 enrolments per year (approximately 22% full time versus 78% part time enrolments). The six Colleges which make up the sector are as follows:

- Belfast Metropolitan College
- Northern Regional College
- North West Regional College
- Southern Regional College
- South Eastern Regional College
- South West College.

The Colleges have a £260 million turnover and operate across 40 campuses and over 400 community outreach centres. The largest college is Belfast Metropolitan College with 34,000 enrolments and a £56 million turnover. Over the past ten years we have seen £340m of investment in modern college estate.

FE Colleges are the main providers of vocational and technical education and training in NI, and the sector plays a central role in raising levels of literacy and numeracy, and in up-skilling and re-skilling the population through a broad range of courses leading to qualifications, particularly at Levels 2 and 3 with progression routes to higher education, training and employment\(^1\). The nature of College provision is diverse and broad based ranging from A Levels and GCSEs to BTECs, HNCs, HNDs, Foundation Degrees, Degrees, apprenticeships and other specific training programmes.

FE provides a valuable and critical platform for all its learners, regardless of at what point they begin their journey. Over one fifth of all FE learners came from the most deprived wards in NI highlighting the fact that FE is making a concerted effort to target the most socially and economically disadvantaged. To summarise the FE offering, the sector in NI boosts:

- 6 regional Colleges
- 1 is a member of the 157 Group (BMC), 1 is a member of the Gazelle Group (SWC) and 5 have won various Beacon Awards
- 4,100 expert lecturers
- A 89% retention rate (varying from 85% at Entry / Level 1 and to 95% at HE level)
- A 87% achievement rate (varying from 87% at Level 3 and below to 91% at HE level)
- Providing learning to over 90,000 students across 157,000 enrolments annually
- 30% of enrolments at Level 3 and above
- £260m turnover
- £340m investment over the past ten years in modern college estate and facilities
- 70% of learners going into employment on completing their course
- 45% of learners from the most deprived wards in NI
- Operating across 40 campuses and 400 community outreach centres
- Accounting for 18% of all the Higher Education students in Northern Ireland
- Exceeding in skills competitions – nationally and internationally. NI continues to ‘punch above it’s weight’ in skills competitions. The FE colleges are central to this success. For example, 30% of the UK Worldskills Squad in Germany 2013 were from NI.

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\(^1\) In 2012/2013 – 23% of enrolments were at Entry Level / Level 1, 47% at Level 2, 22% at Level 3 and 7% at Level 4 and above.
Responding to the consultation

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.

About you*

Your details:

<table>
<thead>
<tr>
<th>Name</th>
<th>Karen Lennon</th>
</tr>
</thead>
<tbody>
<tr>
<td>Position</td>
<td>Policy and Public Affairs Manager</td>
</tr>
<tr>
<td>Name of organisation</td>
<td>Colleges Northern Ireland</td>
</tr>
<tr>
<td>or group (if applicable):</td>
<td></td>
</tr>
<tr>
<td>Address</td>
<td>Stockmans Way, Belfast, BT9 7ET</td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:Karen.lennon@collegesni.ac.uk">Karen.lennon@collegesni.ac.uk</a></td>
</tr>
<tr>
<td>Telephone number</td>
<td>07850 927526</td>
</tr>
</tbody>
</table>

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            ( X) No

Are the views you express on this consultation an official response from the organisation you represent or your personal views?*

( ) Personal views

( X) Official response from an organisation/group (please complete the type of responding organisation tick list)
If you ticked “Personal views”, which of the following are you?

( ) Student

( ) Parent/carer

( ) Teacher (but not responding on behalf of a school or college)

( ) Other (including general public) (please state capacity) _____________________

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

**Type of responding organisation***

( ) Awarding organisation

( ) Local authority

( ) School/college (please complete the next question)

( ) Academy chain

( ) Private training provider

( ) University or other higher education institution

( ) Employer

( X) Other representative group/interest group

( ) Other representative group/interest group (please skip to type of representative group/interest group)

**School/college type**

( ) Comprehensive/non-selective academy

( ) State selective/selective academy

( ) Independent

( ) Special school

( ) Further education college

( ) Sixth form college

( ) None of the above (please state what) ______________________________
Type of representative group/interest group

( ) Group of awarding organisations

( ) Union

( ) Employer/business representative group

( ) Subject association/learned society

( ) Equality organisation/group

( ) School/college or teacher representative group

( ) None of the above (please specify) ________________________________

Nation *

( ) England

( ) Wales

( ) Scotland

( ) Northern Ireland

( ) Other EU country (please state which) ____________________________

( ) Non-EU country (please state which) ____________________________

How did you find out about this consultation?

( ) Our newsletter or another of our communications

( ) Via internet search

( ) From our website

( ) From another organisation (please state below)

( ) Other (please state) __________ Email from NI Ofqual representative

______________________________________________________________

May we contact you for more information?

( X) Yes

( ) No

*Denotes mandatory fields
Questions

Question 1:
Ofqual should remove the requirement that every regulated qualification must be accredited by Ofqual before it can be awarded.

What is your view of this statement?

Strongly agree  ( X )  
Agree  ( )  
Disagree  ( )  
Strongly disagree  ( )  
No opinion  ( )  

Question 2:
Ofqual should impose an accreditation requirement for GCSE, AS and A level qualifications.

What is your view of this statement?

Strongly agree  ( X )  
Agree  ( )  
Disagree  ( )  
Strongly disagree  ( )  
No opinion  ( )  

Do you have any comments or suggestions about this proposal?

___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________

Question 3:
Should Ofqual impose an accreditation requirement for any other qualification or description of qualifications? If so, which qualification(s) and why?

No
Proposed regulatory framework to support our approach

Question 4:

Condition E6 (as quoted below) is appropriate to confirm our requirement that all regulated qualifications must appear on the Register of Regulated Qualifications.

Condition E6

E6.1 An awarding organisation must not make available a regulated qualification unless it has first submitted that qualification to the Register.

E6.2 An awarding organisation must ensure that its submission of a qualification to the Register:

(a) is in a form that may be published by Ofqual and revised from time to time
(b) includes the number of hours of guided learning that the awarding organisation has assigned to the qualification [we anticipate that this aspect will change after we consult on guided learning hours]
(c) contains only accurate information
(d) contains all information about the qualification that is requested on the form.

What is your view of this statement?

Strongly agree ( X )
Agree ( )
Disagree ( )
Strongly disagree ( )
No opinion ( )

Do you have any comments or suggestions about our proposed Condition E6?

In relation to Point B above – it will be important to set out a clear definition of ‘guided learning hours’.
Question 5:
We provide statutory Guidance for a number of Conditions which sets out examples of compliance with specific Conditions. Awarding organisations are required to have due regard to this statutory Guidance.

Would you welcome statutory Guidance from Ofqual about Condition E6?
Yes (x)
No ( )

If yes, on what aspects?
As per earlier comment – clear guidance on a definition of Guided Learning Hours.

Question 6:
The draft accreditation criterion (quoted below) is appropriate to allow us to decide, where an accreditation requirement applies, whether we should accredit a new qualification:

An awarding organisation must demonstrate to Ofqual’s satisfaction that it is capable of complying, on an on-going basis, with all of the General Conditions of Recognition that apply in respect of the qualification for which it is seeking accreditation, including all relevant Qualification Level Conditions and Subject Level Conditions.

What is your view of this statement?
Strongly agree ( )
Agree (X)
Disagree ( )
Strongly disagree ( )
No opinion ( )

Do you have any comments or suggestions about our proposed Accreditation Criterion?
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
___________________________________________________________________
Question 7:
Are there any specific positive or negative impacts on people who share particular protected characteristics\(^2\) that we should consider in relation to these proposals?

Yes ( )
No (X )

If yes, what are they and how could any negative impacts be avoided or reduced?
___________________________________________________________________  
___________________________________________________________________  
___________________________________________________________________  
___________________________________________________________________  
___________________________________________________________________  
___________________________________________________________________

Question 8:
Are there any positive or negative regulatory impacts we should consider in relation to these proposals?

Yes ( )
No (X )

If yes, what are they and how could any negative impacts be avoided, reduced or managed?
___________________________________________________________________  
___________________________________________________________________  
___________________________________________________________________  
___________________________________________________________________  
___________________________________________________________________