

Consultation on regulating alternative academic and alternative technical qualifications at level 3

A public consultation issued by Ofqual

Comments from ACCA to Ofqual

10 August 2022

Ref: TECH-CDR-2005

About ACCA:

ACCA (the Association of Chartered Certified Accountants) is the global professional body for professional accountants.

ACCA has a thriving community across the UK and Republic of Ireland including **106,000** members and **75,000** future members, who work across a wide range of sectors, regions and business sizes. Our framework includes qualifications ranging from Levels 2 to 7. Through this we strive to uphold the highest professional and ethical values.

We offer everyone everywhere the opportunity to experience a rewarding career in accountancy, finance and management. Our qualifications and learning opportunities develop strategic business leaders, forward-thinking professionals with the financial, business and digital expertise essential for the creation of sustainable organisations and flourishing societies.

Since 1904, being a force for public good has been embedded in our purpose. We believe that accountancy is a cornerstone profession of society and is vital in helping economies, organisations and individuals to grow and prosper. It does this by creating robust trusted financial and business management, combating corruption, ensuring organisations are managed ethically, driving sustainability, and providing rewarding career opportunities.

Further information about ACCA's comments on the matters discussed here can be requested from:

Glenn Collins FCCA
Interim Head of ACCA UK /Head
of Technical and Strategic
Engagement
glenn.collins@accaglobal.com

Joe Fitzsimons
Policy Manager- ACCA EEMA & UK
joe.fitzsimons@accaglobal.com

ACCA



+44 (0)20 7059 5000



info@accaglobal.com



www.accaglobal.com



The Adelphi 1/11 John Adam Street London WC2N 6AU United Kingdom

ACCA RESPONSE

1. To what extent do you agree or disagree with the proposed approach to specifying statutory guidance relating to awarding organisations' approaches to grading and grading scale?

There are potential benefits to simplification of approaches to grading and scales used for qualifications, such as making it easier for students to understand the interpret assessment results and in turn, supporting other stakeholders such as employers with better understanding a student's level of attainment. However, there are a number of risks associated with making changes to grading scales, including the impact such changes would have on the international market and the additional cost associated with adopting new grading approaches and grading scales across qualifications.

While simplification could benefit some stakeholders, this is not an area where employers or students in our network have expressed significant concern across existing approaches. We would welcome further insight such as data from employers or students that demonstrates the need for a change of this kind before it is given further consideration. If awarding organisations are required to provide evidence detailing the reasons they are using a particular grading scale for a particular assessment this also places a significant additional burden and cost.

2. Do you have any comments on the drafting of our proposed Condition (ATQ6) and statutory guidance on specified levels of attainment (grading scales)?

We believe that assessment should be consistent with the grading system and that exemptions must be robust, consistent and fair while taking learning needs into account.

Remote session exams have an example of positive innovation and have been growing in popularity for ACCA. They provide individuals with greater choice as they can choose to undertake an examination in an examination centre or from home via a remote session exam. In addition to giving individuals more choice, they also positively impact the environment, reducing the need for all individuals to travel to an examination centre. The results for those who undertake the exam remotely are consistent with students who take the exam from a traditional examination centre, meaning there is no difference in attainment. Innovation across examination methods must continue to be encouraged to ensure ongoing improvement in the education system.

ACCA



+44 (0)20 7059 5000



info@accaglobal.com

www.accaglobal.com

The Adelphi 1/11 John Adam Street London WC2N 6AU United Kingdom

3. To what extent do you agree or disagree with the proposed approach to setting out, through a bespoke Condition, titling requirements which reflect Department and IfATE expectations for alternative academic and alternative technical qualifications respectively?

The proposed approach to setting out titling requirements through a bespoke condition may present significant complexity for awarding organisations and other key stakeholders such as employers. The terms 'award, certificate and diploma' are an example of where titling works well in the current system, all of which are established in the market with Ofqual guidance in place for their use in relation to the size of a qualification.

There are likely to be existing qualifications at level 3 that would meet the proposed new titling criteria – any requirement to significantly change the name of a qualification that is already in use could cause significant confusion in the marketplace. This would also be incredibly challenging for awarding organisations that operate globally with qualifications delivered across markets. In addition to the risk of confusion, qualifications awarded under a previous title could be devalued following new changes.

The inclusion of the IfATE name in the title of a qualification could lead to a perception amongst students, employers and others that IfATE was, at least in part, responsible for the delivery of a qualification. It could be more appropriate to have the requirement of displaying the IfATE logo on qualification certificates in recognition of their approval.

There is also a risk of confusion for learners and employers if specific changes such as adding a logo are made only at level 3. Our framework includes qualifications ranging from Levels 2 to 7; we believe it's crucial to support individuals and organisations with understanding the entire learning journey available to encourage continuing investment in and commitment to lifelong learning.

4. To what extent do you agree or disagree with our proposal to disapply General Condition E2.1 in respect of alternative academic and alternative technical qualifications?

We disagree with the proposal to disapply General Condition E2.1 on the basis of our comments in response to question three.

We believe promoting greater awareness of what already exists and considering an IfATE 'badge of quality' in some capacity rather than in qualification titles would be a more practical approach and would reduce the risk of confusion in the market about who is responsible for the delivery of the qualification.

5. Do you have any comments on the drafting of our proposed Condition on titling?

Please see comments in response to questions three and four.

6. Do you have any comments on the drafting of proposed Condition ATQ9 (relating to content)?

In order to move towards a more straightforward system that is easier to navigate and in turn more effective, we believe that criteria should apply to all regulated qualifications. Rather than implementing this condition for 'Alternative' qualifications, we would suggest a review of the existing General Conditions of Recognition and consider any changes that may be required for all regulated qualifications. This approach would mean no duplication between the proposed Condition ATQ9 and existing General Conditions of Recognition. This approach would also minimise confusion in the market as there is an established understanding of existing General Conditions of Recognition.

7. Do you have any comments on the drafting of proposed Condition ATQ2 and the requirements relating to assessment strategies for (a) alternative academic qualifications and (b) alternative technical qualifications?

Awarding organisations currently follow Conditions as part of being a recognised body while also paying regard to guidance. However, we are unclear about what is meant by 'requirements' as mentioned in ATQ2.1; we would welcome further clarification as to how where requirements would sit when looking at Conditions or guidance.

10. Do you have any comments on the drafting of proposed Condition ATQ10 (relating to standard setting)?

There may be duplication between ATQ10 and existing General Conditions of Regulation. Please see our comments in response to question six.

13. Do you have any comments on proposed Condition ATQ7 (relating to the withdrawal of approval for public funding)?

Where a qualification is no longer eligible for funding but may continue to be delivered, the title of the qualification would need to change and the qualification would no longer be classified an 'alternative technical qualification' as originally titled. This change in title could cause considerable confusion in the market and could affect the value of qualifications for those who have already achieved them. We believe title changes should be minimised wherever possible

to reduce the risk of confusion for employers and learners, including for qualifications where approval for public funding has been withdrawn.

ACCA



+44 (0)20 7059 5000



info@accaglobal.com



www.accaglobal.com



The Adelphi 1/11 John Adam Street London WC2N 6AU United Kingdom