

Size matters: commentary on Ofqual's proposals for Guided Learning Hours

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On yet another read of Ofqual's consultation document on GLH I am becoming more disturbed. For me Ofqual is seeking to become inventive, and two elements of these proposals are pure invention.

The key driver of this consultation is to support the Raising the Participation Age (RPL) policy. That makes sense. It's a statutory requirement. Defining GLH hasn't been an exact science to date. So we do need to help with consistency on making GLH judgements.

Why are new terms being introduced?

Ofqual's proposal on Total Qualification Time (TQT), introduces two new additional components, namely Directed Study and Dedicated Assessment. Ofqual says they do 'go beyond what is required in statute' (paragraph 1.6) and suggests that they 'help produce an evidence-based and more complete picture of the size of qualifications'.

On regulating AOs, if a qualification is likely to be taken by a 16 or 17 year old Guided Learning (dropping the 'H') will have to be assigned, also the other elements of TQT would have to be assigned.

If the qualification is not likely to be taken by 16 and 17 year olds assigning Guided Learning will be optional. For me it would seem the market place has become accustomed to seeing GL(H) and there may therefore be some expectation and merit in continuing to include this 'indicator'.

If you want to assign 'credit' to qualifications

If the AO chooses not to assign Guided Learning and Directed Study the option to allocate 'credit' for their qualifications will not be available.

So what is the role of the third element of TQT, Dedicated Assessment? This has to be conducted in a 'controlled environment', for me that rules out the workplace as a place to assess, many workplaces can never be fully be controlled. Assessment must also be invigilated. I wonder if the assessor is also allowed to act as the invigilator? Also does that mean that assessment carried out without invigilation has no value?

Opting in, opting out

So the decisions available to AOs will be to:

- Assign all the elements of TQT if the qualification is suitable for 16 and 17 years olds.
- If you assign Guided Learning, the AO is also expected to assign all the other elements of TQT.
- Assign Guided Learning and Directed Study if a 'credit value' is to be given. But the AO by default will also have to assign Dedicated Assessment.

No hiding places it would seem: the AO chooses to assign all or nothing.

Are the definitions clear?

Yes, possibly for Guided Learning. The new definition does include being taught/instructed and 'the activity of being assessed'. I wonder if we might double count assessment then, if assessment is counted in Dedicated Assessment time and as part of Guided Learning.

I am assuming that all good quality online learning that supplies good instruction is now part of Guided Learning, since the idea of 'real time' is removed from the definition.

Will AOs be able to gather the evidence to support TQT?

There are many references to the need for an evidence base upon which TQT is proven. What that evidence might be or look like is missing, but AO's will need to 'collect and analyse' it. This could suggest more requirement and/or rigour for testing and trialling of new qualifications.

The case for change, are you convinced?

Will TQT and the two new components of Directed Study and Dedicated Assessment 'help' the system and its users? What additional work or steps will AOs need to put in place to obtain valid TQT estimates?

I am cautious if there is no real underpinning requirement to introduce new elements why do that? Am I being overly suspicious in thinking that with more elements to counting learning and assessment it might allow for further fragmentation in allotting funding in the future?

For sure AO's will be regulated on these requirements with the proposal for a new General Condition of Recognition.

Make sure you have your say, if you haven't done so already. Ofqual's consultation closes on 16th October.

If you would like to talk this through and how it might affect you please get in touch, Heather Venis

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