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## **Regulatory Outcomes and Mapping of Conditions**

Summary of decisions and analysis of responses to our consultation on Qualifications Wales' regulatory outcomes and mapping of Conditions

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# 1. Executive Summary

Between 26 April and 5 July 2017, Qualifications Wales consulted on proposals to introduce regulatory outcomes. This report summarises the responses we received to the consultation on the proposed outcomes and explains the decisions we have taken in light of these responses.

We received 33 responses to the consultation, with the majority of respondents largely in favour of our proposed outcomes, and their role in supporting the understanding of our regulatory aims amongst stakeholders. However, some respondents expressed confusion regarding the role of outcomes in our model of regulation.

The introduction of regulatory outcomes will not act as an additional layer of regulatory requirements for awarding bodies. As such, there will be no additional workload on awarding bodies. It is important to note once more that awarding bodies will not be regulated against these outcomes, and will continue to be subject to our Standard Conditions of Recognition, and other supporting regulatory documents.

The Principal Aims outlined within the Qualifications Wales Act define our purpose and primary objectives. Regulatory outcomes will be used to describe what we want to achieve through our regulatory activities and actions, and as such outline our vision. Our vision is that regulated qualifications in Wales are valued by learners and employers in Wales and internationally. To achieve this, we have established the following regulatory outcomes:

- Regulated qualifications and the qualification system are responsive to changing needs and circumstances, particularly in regard to the long-term benefit of Wales and its students;
- Regulated qualifications in Wales are inclusive and promote equality of opportunity for students;
- Regulated qualifications taken by students in Wales are valid, reliable and awarded to an appropriate standard;
- Appropriate governance is in place to ensure accountability and regulatory compliance;
- Information reasonably required to deliver consistent and quality-assured regulated qualifications is available and accessible;
- Regulation is proportionate, transparent, consistent and targeted, to support a qualification system that is sustainable in the long term.

This report is available in both English and Welsh.

## 2. Background

In February 2016, we launched a project to consider whether a change to our regulatory framework and approach was needed. The findings of the first phase of the project identified a number of drivers for change to better support our regulatory role. Following feedback from awarding bodies and commissioned external research we decided to publish regulatory outcomes (“outcomes”).

These outcomes were intended to be a public statement of what we want to achieve as a regulator. Introducing these outcomes would not lead directly to any changes in our regulatory requirements, and awarding bodies would still be regulated using the various powers set out in our legislation, such as the Standard Conditions of Recognition (“Conditions”).

With our principal aims in mind, our intention, in introducing these outcomes, was to:

- provide publicly transparent outcome statements and thereby promote public confidence;
- communicate what we intend to achieve as a regulator;
- ensure our regulatory activities focus on end outcomes for learners and the qualification system in Wales;
- frame the Conditions to show how they contribute to achieving our regulatory outcomes.

The outcomes were drafted as a representation of the shared goals of Qualifications Wales and awarding bodies.

Our proposed regulatory outcomes were as follows:

1. *Regulated qualifications taken in Wales are trusted and valued by learners, employers and education providers and are recognised throughout the UK and internationally;*
2. *Regulated qualifications and the qualifications system are responsive to changing needs and circumstances, particularly in regard to the matters prescribed in the Qualifications Wales Act;*
3. *Regulated qualifications in Wales are inclusive and promote equity of opportunity for learners;*
4. *Assessments for regulated qualifications taken by learners in Wales are valid and reliable;*

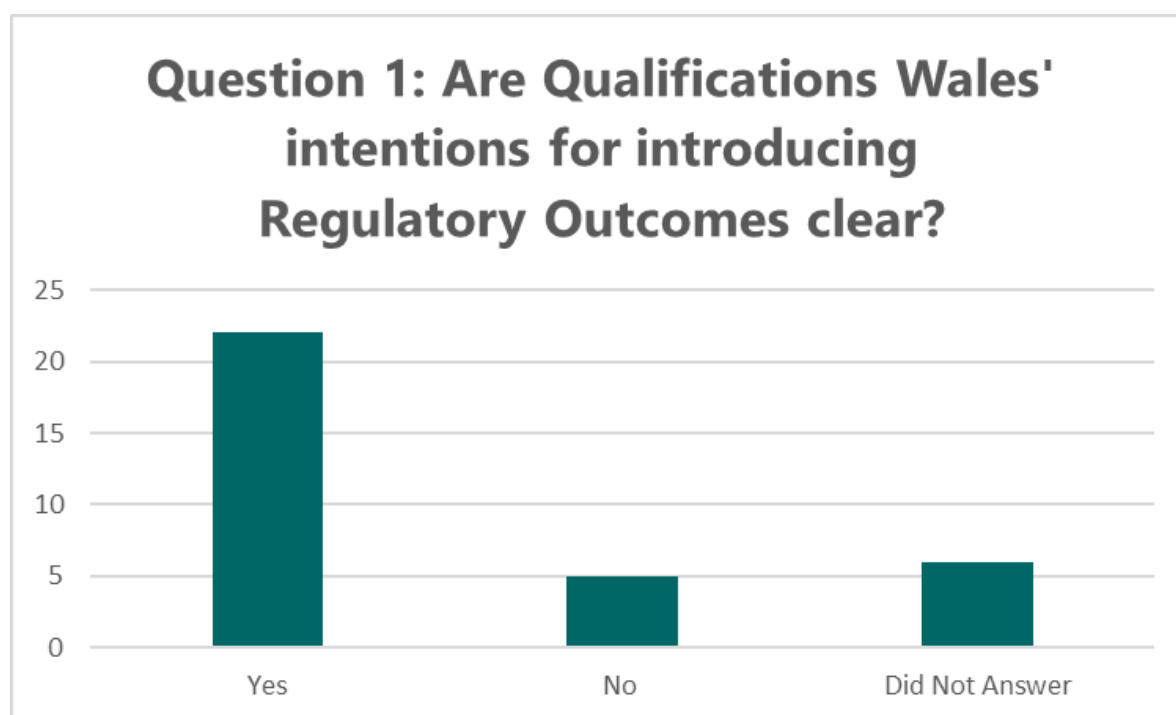
5. *Regulated qualifications are consistently awarded to an appropriate standard;*
6. *Qualifications Wales and awarding bodies have appropriate governance in place to ensure accountability and regulatory compliance;*
7. *The information reasonably required to deliver consistent and quality assured regulated qualifications is available and accessible;*
8. *Regulation is proportionate, transparent, consistent and targeted, to support a long-term sustainable qualifications system.*

### 3. Consultation Responses

In total, 33 respondents completed all, or part of, the online consultation on Regulatory Outcomes and Mapping of Conditions. Of those respondents, 28 represented awarding bodies, four represented sector bodies with one response from a centre. Six responses did not provide any answers to the questions asked as part of the consultation.

In our consultation, we asked:

**Question 1: Are Qualifications Wales' intentions for introducing regulatory outcomes clear?**



#### Yes

Of the respondents who indicated that the intentions for introducing regulatory outcomes were clear, several indicated that articulating clear and succinct regulatory outcomes would support the understanding of the aims of regulation by stakeholders.

One respondent noted that since the Standard Conditions of Recognition<sup>1</sup> were first introduced in 2011, they had expanded regularly. As a result, they felt that there was a need for protection against further proliferation where this was not essential and did not add value to the qualifications awarded.

<sup>1</sup> <http://qualificationswales.org/publications/standard-conditions-of-recognition-march-2017/?lang=en>

Several respondents felt that more information was required in relation to how the outcomes would support a review of the Conditions. In the same manner, those respondents sought reassurance that the introduction of outcomes would not lead to or influence further divergence of regulatory requirements across the UK.

Similarly, some responses encouraged qualifications regulators across the UK to work collaboratively in order to ensure a greater level of consistency in decisions and approaches.

## **No**

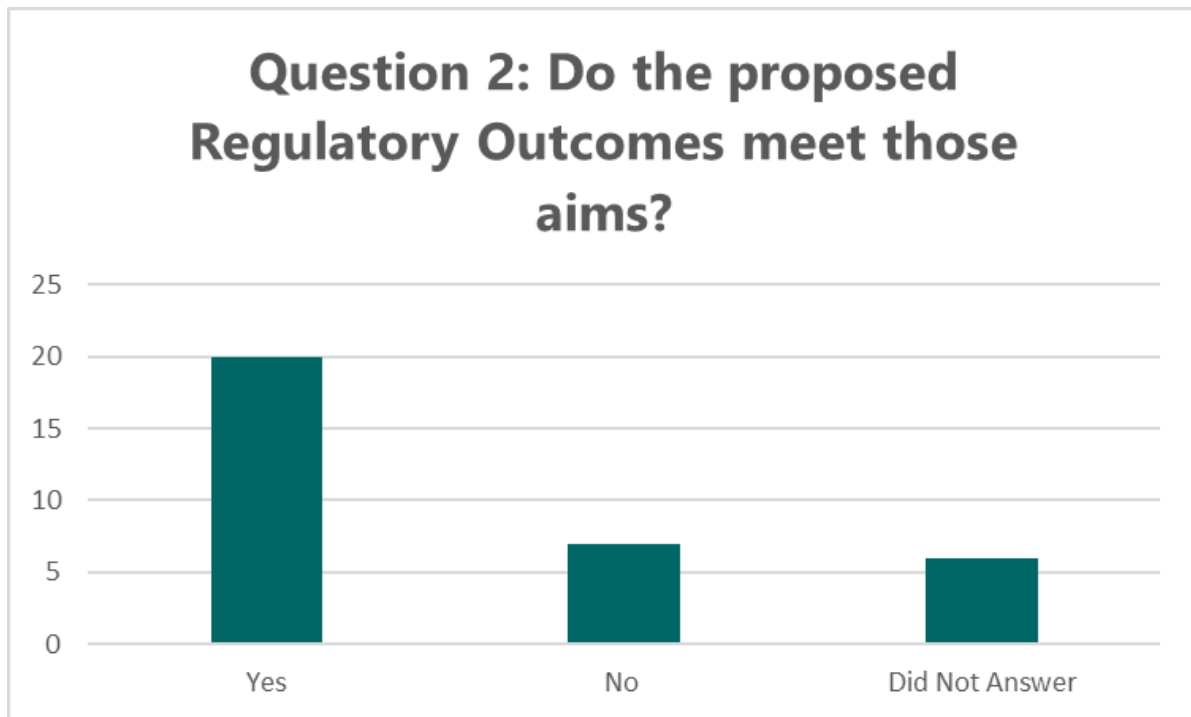
Of the respondents who indicated that there was a lack of clarity for the introduction of outcomes, some felt that there was a lack of clarity regarding the relationship between the proposed regulatory outcomes, the overarching principal aims and the Standard Conditions of Recognition ("Conditions"). While outcomes were deemed as a 'suitable vehicle' for a public statement of Qualifications Wales' regulatory intentions, they queried whether the existing principal aims outlined within the Act already served this purpose, and in that regard whether the introduction of outcomes added value. Furthermore, some were of the opinion that the first outcome could be interpreted as a third principal aim.

Some respondents felt that more clarity was required in terms of the impact, if any, that the outcomes would have on the Conditions and how they would be used in practice. Of these, one respondent noted that their introduction implied an adoption of a similar approach taken by the Scottish Qualifications Authority (SQA), which uses a set of regulatory principles. This respondent considered this a better regulatory approach than the existing Conditions.

In contrast, some respondents felt that the introduction of outcomes would have a limited impact on both awarding bodies and the ability to promote public confidence due to the fact that the Conditions would continue to frame our regulatory requirements, with others noting that the introduction of outcomes could lead to additional workload for awarding bodies operating across the UK.

Additional comments were received regarding the use of sector terminology, and whether this could lead to different interpretations of the outcomes.

**Question 2: Do the proposed regulatory outcomes meet those aims?**

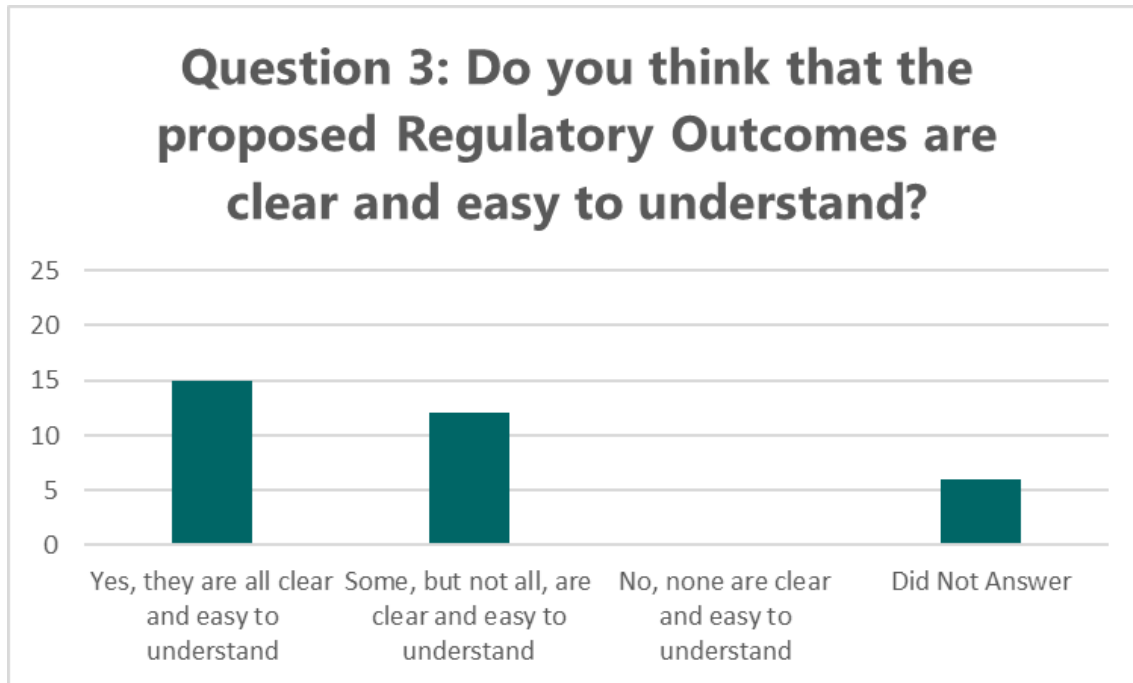


Of those respondents who thought that the introduction of outcomes was clear, one felt that the combination of high level outcomes with detailed process requirements was unhelpful. To this end, they questioned whether outcomes 6 and outcome 7 should be retained, as both were already robustly secured through existing regulation and statutory provisions.

Those respondents who felt that our intentions were unclear reiterated their response to question 1, noting that it was difficult to respond as they did not fully understand the aims of introducing regulatory outcomes.



**Question 3: Do you think that the proposed regulatory outcomes are clear and easy to understand?**



Of those who responded to the consultation, the majority felt that, overall, the outcomes were clear and easy to understand.

However, some respondents felt that the wording of certain outcomes could be construed as subjective, with others of the opinion that additional clarity was required in some cases. It was also not clear to some respondents who the intended audience was: users of qualifications or awarding bodies.

Respondents' comments relating to specific outcomes have been provided below:

**Outcome 1**

- lack of clarity in relation to the use of 'trusted' and 'valued', with potential for different interpretations amongst stakeholders;
- reference to 'the UK and internationally' unclear due to the increase in approved qualifications that are regulated only in Wales. On that basis, some felt that ensuring qualifications are trusted and valued internationally was outside of our remit.

**Outcome 2**

- the use of 'matters prescribed in the Qualifications Wales Act' was considered unclear in isolation. To that end, it was suggested that the outcome includes the aforementioned matters in an appendix or footnote. Alternatively, this

outcome could be redrafted in such a way as to provide a broad understanding, without the need to refer directly to the Act.

- the expression ‘...changing needs and circumstances’ was considered ambiguous, noting that the system itself was responsive, therefore driving changes to qualifications. As a result, it was felt that there was no need to reference ‘regulated qualifications’.

### **Outcome 3**

- it was suggested that the word ‘equality’ would be more appropriate than ‘equity’.
- in light of restricted qualifications, the ability to achieve outcome 3 with regard to learner choice and social mobility in Wales and beyond was questioned.

### **Outcomes 4 and 5**

- duplication was recognised in outcomes 4 and 5, with scope for combining into one comprehensive outcome. One respondent provided a revised version, which reads as follows:

*Assessments for regulated qualifications taken by learners in Wales are valid, reliable and consistently awarded.*

### **Outcome 6**

- one respondent was unclear as to why there was a need to reference awarding bodies having appropriate governance in place, as these were perceived to be Qualifications Wales’ regulatory outcomes. It was felt that this is a product of Qualifications Wales having its own appropriate governance in place to ensure accountability and regulatory compliance.

### **Outcome 7**

- Some respondents felt that this was a difficult outcome to understand if not part of the qualification system, with particular reference to the type of information required. It was suggested that clarity would be provided by articulating that this refers to information provided by Qualifications Wales to enable awarding bodies to perform their functions appropriately.
- the inclusion of ‘resources’ in the outcome would reflect the requirements for awarding bodies to have sufficient physical, technical, human, financial and intangible resources to be able to deliver robust qualifications. Furthermore, it was felt that this would more accurately reflect the conditions mapped to this outcome. A revised version was proposed, which reads as follows:

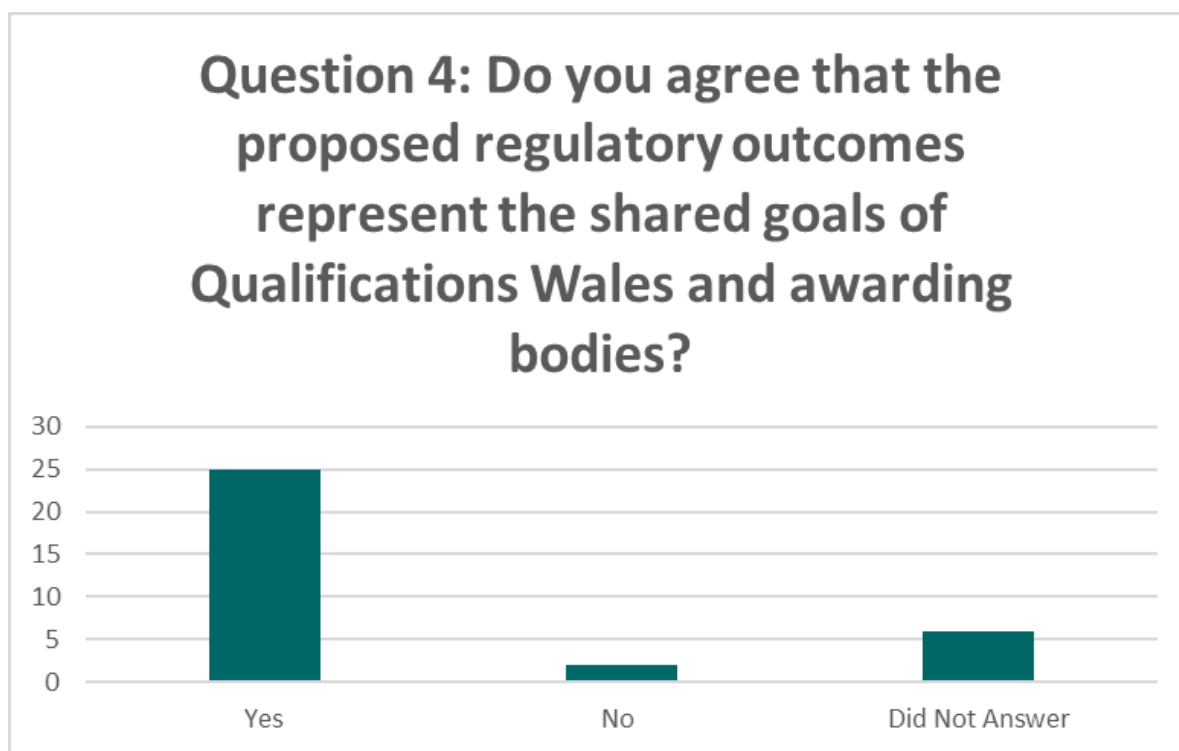
*The information and resources reasonably required to deliver consistent and quality assured regulated qualifications is available and accessible.*

### **Outcome 8**

- one respondent stated that this outcome does not allow for change to support a long-term sustainable qualification system. Hence, a revised version of the outcome was proposed:

*Regulation is proportionate, transparent, consistent, targeted and flexible to adapt to changes to support a long-term sustainable qualifications system.*

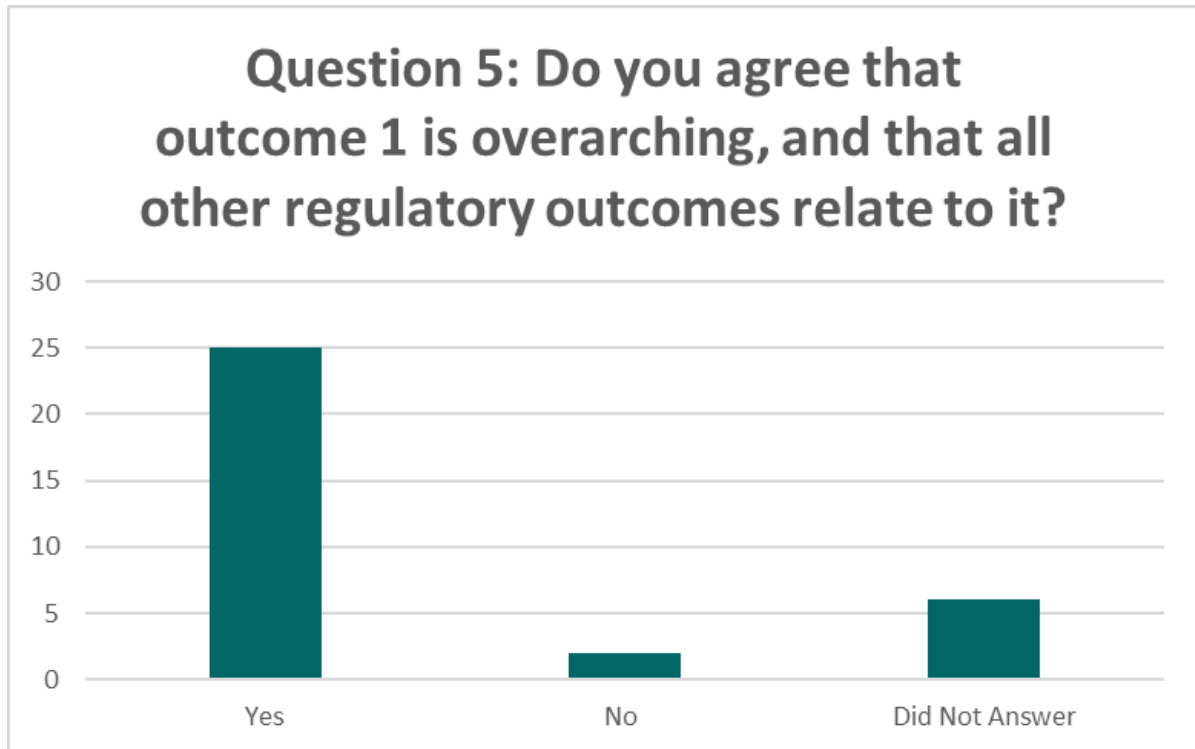
**Question 4: Do you agree that the proposed regulatory outcomes represent the shared goals of Qualifications Wales and Awarding bodies?**



Of the two respondents who disagreed, one felt that there were some outcomes which represented shared goals, notably outcomes 1, 3, 4, 5 and 6. However, the respondent felt that until the outcomes had been clarified, they were unable to state whether the same goals were shared.

One respondent expressed confusion as to why Qualifications Wales and awarding bodies had been conflated together, noting outcome 8 as an example where the focus was very much on how Qualifications Wales carries out its duties.

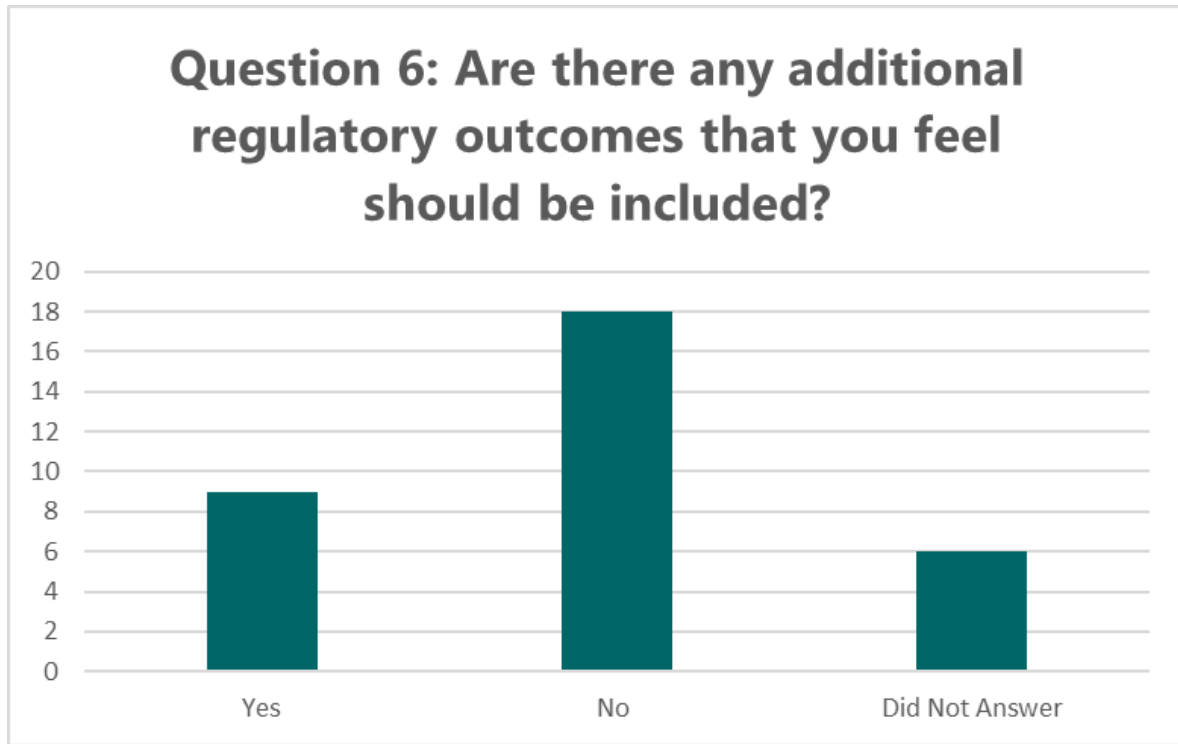
**Question 5: Do you agree that outcome 1 is overarching, and that all other regulatory outcomes relate to it?**



Respondents largely agreed that outcome 1 was overarching, and that other outcomes contribute to its achievement. However, some respondents believed that outcome 1 would better served as an additional principal aim for Qualifications Wales, as opposed to an outcome.

Of those respondents who did not agree, some were of the opinion that the extent to which outcome 1 is overarching and encompasses the scope of all other outcomes was unclear. Moreover, it was felt that an argument could be made that all regulatory outcomes relate to one another; therefore, it was unclear as to why outcome 1 was highlighted in particular. Should outcome 1 continue to be considered overarching, it was suggested that this should be stated explicitly to avoid any confusion.

**Question 6: Are there any additional regulatory outcomes that you feel should be included?**



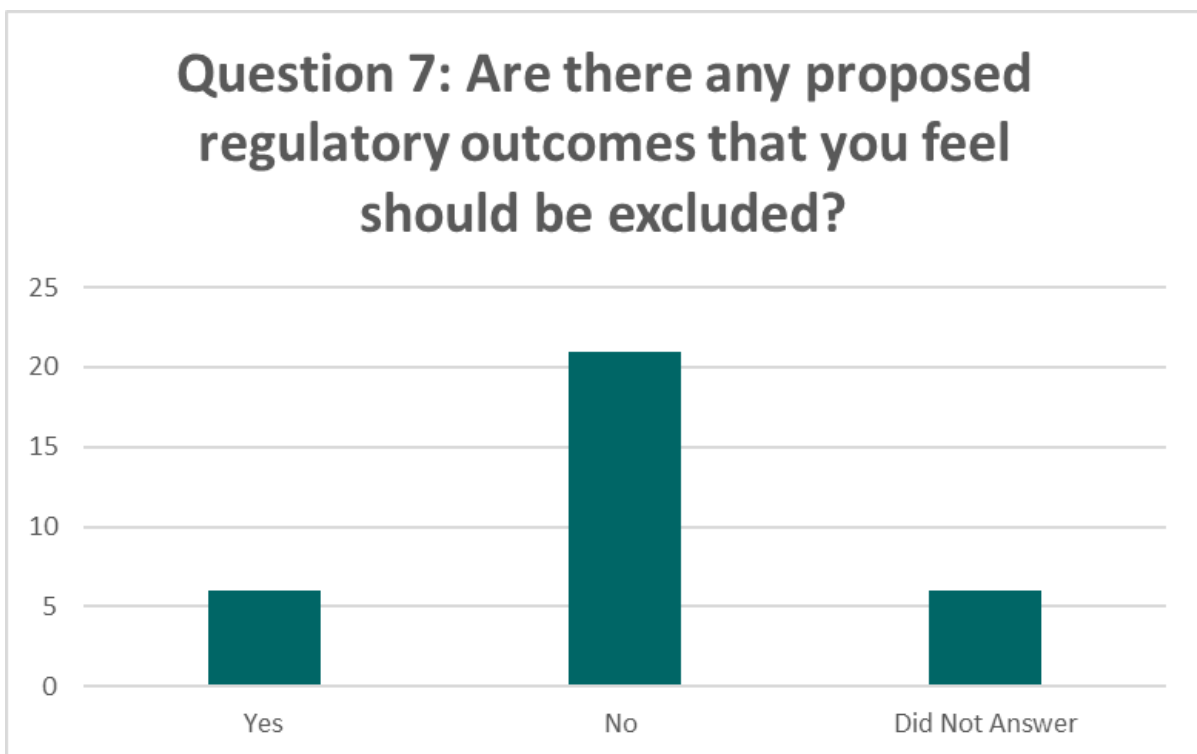
Those who responded to this question made the following comments:

- proposed outcomes make no reference to innovation and a commitment that regulation will not act as a barrier to innovation. It was suggested that this could be reflected in one of the current (or additional) outcomes to show that innovation is a valued part of the qualification landscape. Furthermore, as qualifications were perceived to be increasingly restricted in Wales, it was felt that this would demonstrate the regulator's commitment to not allowing provision to stagnate as competition is removed from parts of the market;
- proposed outcomes make no reference to the purpose of qualifications and progression requirements;
- the need for Qualifications Wales to recognise that some awarding bodies are trying to offer innovative products in a heavily regulated market. Therefore, a need for an outcome which reflects the awarding bodies' responsibility to ensure that products are kept relevant;
- a commitment to offering qualifications and assessment in a format that is appropriate to the subject covered;

- the need for a regulatory outcome specifically relating to the advice, guidance and support that Qualifications Wales provides to awarding bodies to facilitate mutually beneficial business relationships and ensure that regulated qualifications are delivered to a high standard.
- the need for either outcome 5 or 7 to include some reference to time scales. A revised version was proposed, which reads as follows:

*The information reasonably required to deliver consistent and quality assured regulated qualifications is available and accessible within appropriate timescales that allow educational institutions sufficient time to ensure high quality provision.*

**Question 7: Are there any proposed regulatory outcomes that you feel should be excluded?**

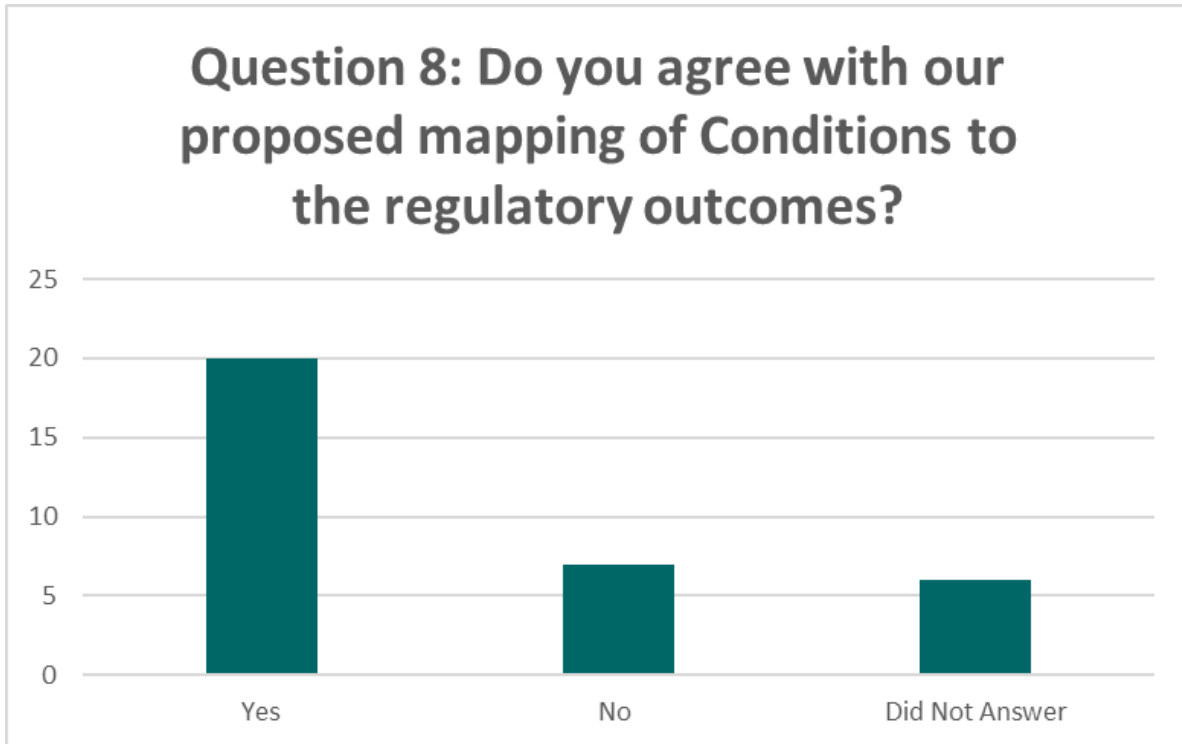


Those who responded to this question made the following suggestions:

- Outcome 1 should be considered as an additional principal aim;
- Duplication was present in outcomes 4 and 5, with scope for combining into one comprehensive outcome;

- Removal of outcomes 6 and 7 due to both being covered through existing regulatory requirements (see Question 2 analysis).

**Question 8: Do you agree with our proposed mapping of Conditions to the regulatory outcomes?**



The respondents generally welcomed the mapping of the Conditions to the outcomes, noting that it could be a useful mechanism for ensuring that new Conditions are necessary, do not duplicate and do not add unnecessary workload.

Respondents agreed with much of our proposed mapping of Conditions to the outcomes. However, some believed certain Conditions could be closely mapped to outcomes, whilst others were more tenuous. Furthermore, errors in relation to the mapping was highlighted, with some Conditions having been mapped twice and others worded incorrectly in the illustration provided.

Acknowledging that Conditions were initially mapped to the most relevant outcome to avoid duplication, some respondents suggested that it may be useful if Conditions were mapped to all applicable outcomes, regardless of their level of relevance. It was felt that this would provide clarity to awarding bodies, and avoid any scenario where a Condition could be seen as applying only to that outcome to which it is assigned. Furthermore, it would provide useful reference to awarding bodies to see where Conditions are connected.

Due to the fact that the number of Conditions to each outcome varies greatly e.g. outcome 3 has four Conditions mapped to it whereas outcome 7 has 19 Conditions, one respondent was unclear whether Qualifications Wales would be placing greater weight on particular outcomes. This respondent also suggested that as the Conditions were already grouped under headings e.g. A, B, C etc., the outcomes should be mapped to each grouping.

One respondent felt that the mapping was not to the required level of detail for awarding bodies, with additional clarification needed on the final outcomes to better inform the view of the mapping. In contrast, another respondent commented that mapping the Conditions was an overly complex process and that its use was not clear.

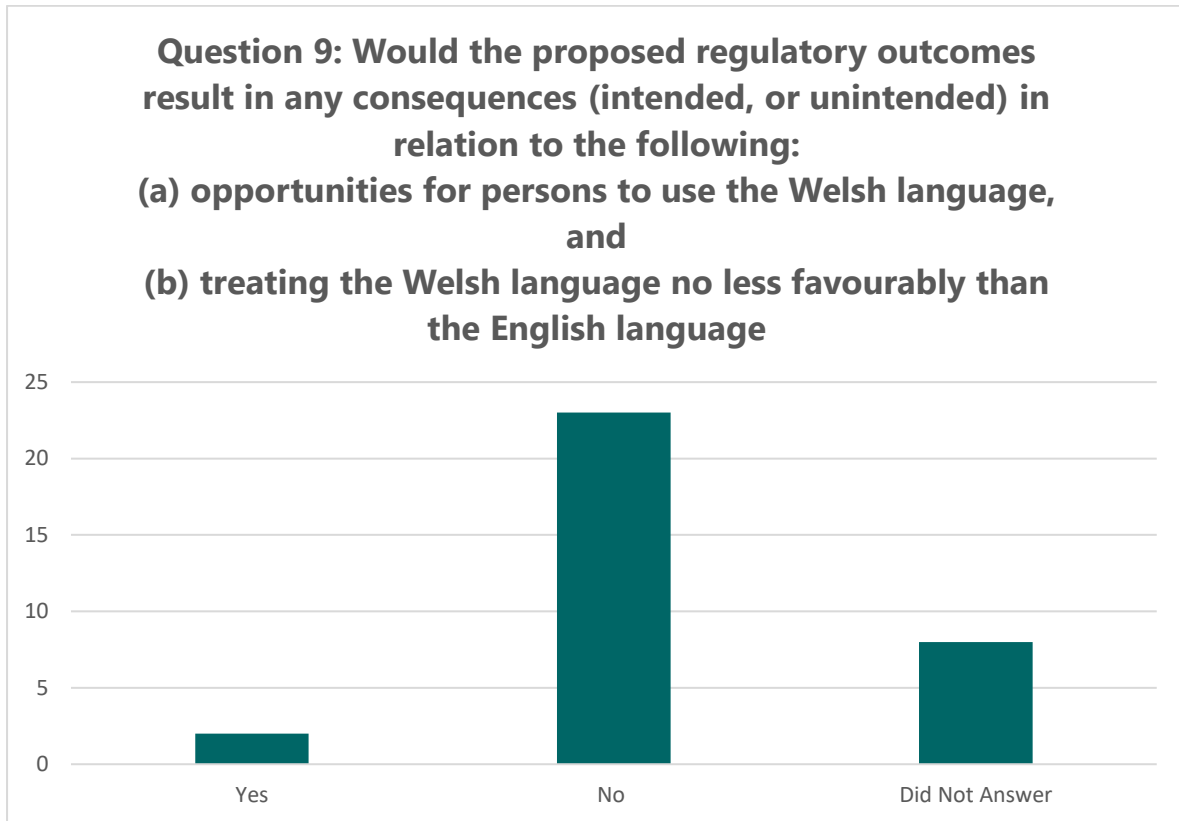
One respondent suggested that if the aim was to move to a similar model to Scotland, then it would be better to have one or the other, with the potential for both outcomes and Conditions existing leading to confusion. Another respondent noted a preference for an outcomes-based system, allowing for greater flexibility and innovation.

In response, the following changes to the mapping of Conditions were proposed:

- A5 could also be mapped to outcome 6;
- A8 could also be mapped to outcomes 5 and 8;
- B3 could also be mapped to outcomes 2 and 8. Particular focus was given to outcome 2 as it focuses on events which have an adverse effect and such events could occur due to changes in circumstances;
- B6 considered better suited to outcome 8 rather than outcome 7;
- E1 could also be mapped to Outcome 2, and was considered essential to be mapped to outcome 4;
- E7 should not be mapped to outcome 8 as it was not considered relevant;
- G5 would be better suited to outcome 4 than outcome 7. It was also suggested that G5 could be mapped to outcome 3;
- I4 should be mapped to outcome 5 as well as 6 and 7. Some suggested that it would more logically sit with outcome 5 rather than outcome 7. The same suggestion was made for I3 and H6;
- H6 was considered better suited to outcome 5 rather than Outcome 7.



**Question 9: Would the proposed regulatory outcomes result in any consequences (intended, or unintended) in relation to the following:  
(a) opportunities for persons to use the Welsh language, and  
(b) treating the Welsh language no less favourably than the English language**

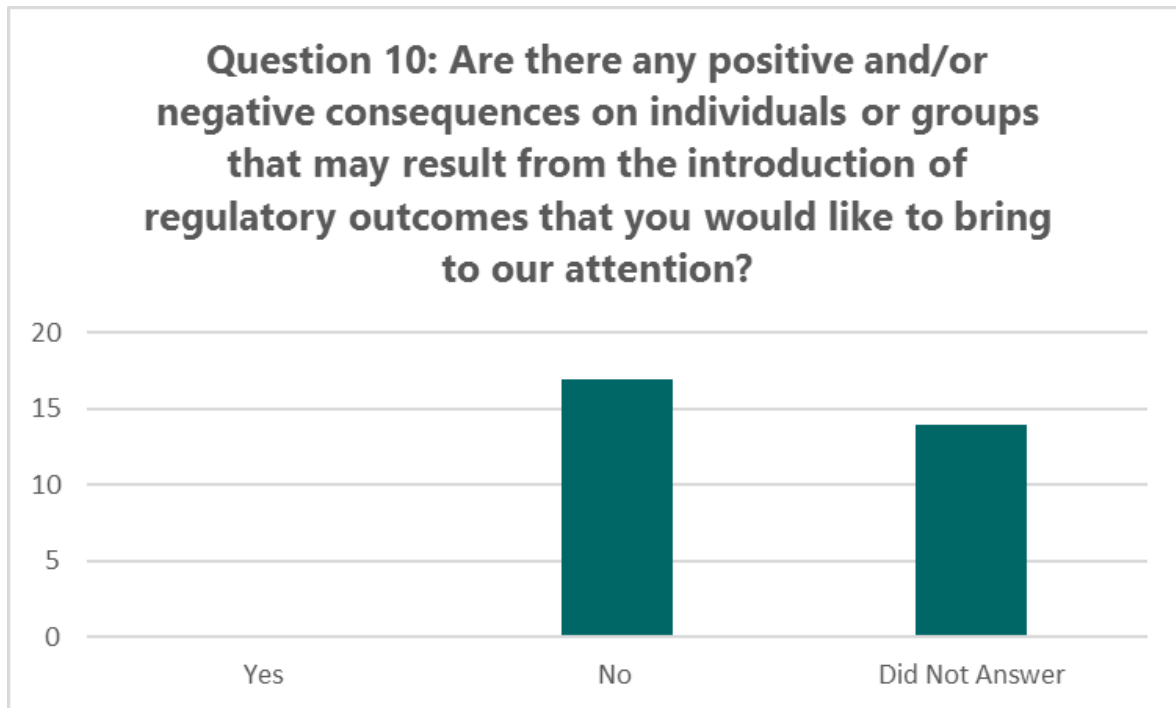


The majority of respondents who answered this question did not feel that the proposed outcomes would have any consequences (intended, or unintended) on the opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the English language.

However, some respondents noted that should Welsh language provision become a prerequisite requirement for offering qualifications and assessments in Wales, awarding bodies based in England may not find it viable to offer their full range of qualifications in Wales.

Furthermore, one respondent was unclear as to whether the expectation was that all relevant materials should be available in Welsh and English. Subsequently, it was noted that should all materials need to be available in Welsh, even where there isn't an identified need, this would significantly increase the workload on awarding bodies.

**Question 10: Are there any positive and/or negative consequences on individuals or groups that may result from the introduction of regulatory outcomes that you would like to bring to our attention?**



No respondents identified any positive and/or negative consequences on individuals or groups that may result from the introduction of regulatory outcomes. However, some respondents reiterated that until further clarification is provided in relation to the role of outcomes, and how they would be evaluated in future, it would be difficult to answer this question with certainty.

#### **Additional comments**

As part of the consultation, respondents were given an opportunity to provide any other comments on the introduction of regulatory outcomes. These additional comments are summarised below:

- Prior knowledge as to the extent in which regulatory outcomes will be used to guide the review of the Conditions would be useful when providing an informed response to consultation;
- If the regulatory outcomes are intended to communicate what Qualifications Wales intends to achieve as a regulator, unclear why at this stage there is no proposal to measure the extent to which the outcomes are being achieved.
- Concerns that these could be introduced as another layer of Conditions to judge awarding bodies in the future;

- Conditions need to be reviewed prior to the introduction of the regulatory outcomes and mapping of the Conditions to determine their clarity, prescriptiveness and effectiveness;
- Concern that publishing the mapping of Conditions to regulatory outcomes with no changes made to the ordering and numbering may not allow a thorough review of the Conditions;
- Qualifications Wales' intention to review the Conditions was welcomed;
- A full list of the Conditions published as part of this process would have been helpful;
- While the outcomes are potentially useful, it was felt that Qualifications Wales should be mindful of creating another layer of regulatory statements and consider the ways in which these will be used in the future;
- Interest expressed as to how Qualifications Wales will operate as a regulator going forward, paying particular attention to the recognition expectations on awarding bodies.

## 4. Summary of proposals and decisions

Respondents to the consultation provided several comments. In many instances, these were about refinements to the wording of our proposed outcomes, to improve their clarity. In addition, respondents requested further clarity on our intentions in introducing regulatory outcomes, and their position within Qualifications Wales' overall regulatory framework.

Although we have not set out every response in this consultation report, we have considered all responses in arriving at our decisions. We set out our responses to the key themes identified as part of the consultation below:

### **The purpose of regulatory outcomes**

Some respondents sought further clarification on our intentions in introducing regulatory outcomes, and the relationship between our principal aims and the outcomes. We would like to reiterate that the introduction of regulatory outcomes will not act as an additional layer of regulatory requirements for awarding bodies. As such, there will be no additional workload on awarding bodies. It is important to note once more that awarding bodies will not be regulated against these outcomes, and will continue to be subject to our Standard Conditions of Recognition, and other supporting regulatory documents.

The Principal Aims outlined within the Qualifications Wales Act define our purpose and primary objectives. Regulatory outcomes will be used to describe what we want to achieve through our regulatory activities and actions, and as such outline our vision. Our vision is that regulated qualifications in Wales are valued by learners and employers in Wales and internationally. To achieve this, we have established regulatory outcomes.

### **Drafting of Regulatory Outcomes**

Some respondents noted their belief that outcome 1 would be better served as an additional principal aim for Qualifications Wales, rather than as an outcome. It is important to note that our two Principal Aims are set out within the Qualifications Wales Act 2015, which defines our purpose and primary objectives. In contrast, our regulatory outcomes will be used to describe what we want to achieve through our regulatory activities and actions, and as such outline our vision. Therefore, we consider the principal aims and regulatory outcomes to be performing different functions.

However, in light of the fact that outcome 1 was largely considered as overarching, with all other outcomes relating to it, we acknowledge that its inclusion as an outcome in itself may lead to confusion. To avoid such confusion, we propose to

draw a clear distinction between our vision statement, and the regulatory outcomes which will contribute to its achievement.

Some respondents were of the opinion that references to 'matters prescribed in the Qualifications Wales Act' in outcome 2 was considered unclear in isolation. To that end, it was suggested that the outcome could include an appendix or footnote to provide this additional information. Alternatively, it was suggested that the outcome could be redrafted to provide a broad understanding, without the need to refer directly to the Act. In response to these comments, we propose to redraft the outcome to provide this broad understanding of the design of the eight matters, which is to ensure that the focus of our work remains the long-term benefit of Wales and its learners.

Some respondents noted that duplication was recognised in outcomes 4 and 5, with scope for combining into one comprehensive outcome. In response, we have revised and merged both into one comprehensive outcome.

### **Mapping of Conditions**

All comments received regarding our proposed mapping of Conditions have been noted and considered. Some comments proposed amendments to the current mapping, whilst others queried the level of detail that should be included within the mapping. Furthermore, some errors were identified in our proposed mapping of Conditions included as part of the consultation. These errors will subsequently be corrected prior to publication.

The principal purpose of mapping the Conditions to the outcomes was to ensure coverage to our regulatory outcomes and the broad relationship with Conditions. It was not intended to form part of regulation. As such we will not be using them for any regulatory purpose.

As outlined in our consultation document, after introducing the regulatory outcomes, we will carry out a review of our Conditions for their clarity, prescriptiveness and effectiveness. This review is due to begin in autumn 2017. Subsequently, we will hold a public consultation on any possible changes to the Conditions with a view to publishing a revised version of the Conditions in Spring 2019, to be effective from September 2019.

In light of the above, we have decided to delay the mapping of Conditions to our regulatory outcomes until the review of Conditions has been completed. This will allow a thorough review to be carried out, whilst also ensuring that our published mapping is reflective of the Conditions which awarding bodies will be subject to post-review. We will therefore revisit the mapping of Conditions to regulatory outcomes following the completion of our review.

### **Potential divergence from other qualifications regulators across the UK**

Some respondents expressed a desire for qualifications regulators across the UK to work collaboratively in order to ensure a greater level of consistency in decisions and approaches.

As noted above, we will carry out a review of our Conditions with the aim of making the Conditions as accessible as possible to awarding bodies while ensuring they enable us as the regulator to execute our regulatory functions. This review was supported by awarding bodies who participated in our Regulatory Strategy Project.

Both Ofqual and CCEA (the regulator of qualifications, examinations and assessments in England and Northern Ireland respectively) will be represented at the meetings with awarding bodies that commence in October as part of the review. Whilst aiming to ensure that any revisions to Conditions are aligned as much as possible, we recognise that this may not be achievable in all circumstances.

### **Regulation to aid awarding body innovation**

Some respondents felt that the outcomes did not adequately reflect the need for innovation, and that this was a valued part of the qualification landscape. To ensure this, one respondent suggested that outcome 8 should be revised accordingly, making reference to regulation being flexible and able to adapt to changes.

We consider that outcome 1, which makes reference to the need for *'regulated qualifications and the qualifications system to be responsive to changing needs and circumstances'*, sufficiently deals with this aspect.

## 5 Next Steps

Following the publication of this report, we will publish our finalised regulatory outcomes.

Our regulatory outcomes will be used to describe what we want to achieve through our regulatory activities and actions, and as such outline our vision. Our vision is that regulated qualifications in Wales are valued by learners and employers in Wales and internationally. To achieve this, we have therefore established the following regulatory outcomes:

- Regulated qualifications and the qualification system are responsive to changing needs and circumstances, particularly in regard to the long-term benefit of Wales and its students;
- Regulated qualifications in Wales are inclusive and promote equality of opportunity for students;
- Regulated qualifications taken by students in Wales are valid, reliable and awarded to an appropriate standard;
- Appropriate governance is in place to ensure accountability and regulatory compliance;
- Information reasonably required to deliver consistent and quality-assured regulated qualifications is available and accessible;
- Regulation is proportionate, transparent, consistent and targeted, to support a qualification system that is sustainable in the long term.

## Further Information:

Enquiries about this document should be directed to:

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## Appendix A: List of organisational consultation respondents

We asked respondents to indicate the capacity in which they were responding as part of their response.

Below we list those respondents that submitted a response to the consultation, and indicated that they were happy for us to publish their details.

- MP Awards
- FIA (Fire Industry Association)
- GQA Qualifications Ltd
- ASCL Cymru
- Highfield Qualifications
- City and Guilds
- Federation of Awarding Bodies (FAB)
- OCR