

About this publication

Who's it for?

This booklet is for stakeholders who responded to the proposals in *Stakeholder consultation: centre recognition and centre qualification approval* (November 2005 – January 2006).

What's it about?

This booklet contains feedback on the proposals to change the way centres are recognised and approved to deliver accredited qualifications and units.

What's it for?

This booklet should inform stakeholders about the proposed changes to the way centres are recognised and approved to deliver accredited qualifications and units.

Related materials

Stakeholder consultation: centre recognition and centre qualification approval (November 2005 – January 2006) (QCA/05/1856)

For more information:
www.qca.org.uk/15567.html

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Centre Recognition Project

Establishing an environment to meet emerging needs

Stakeholder consultation report

May 2006



Qualifications and Curriculum Authority



Llywodraeth Cynulliad Cymru
Welsh Assembly Government



Rewarding Learning



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Introduction

Stakeholder consultation

The regulatory authorities in England (QCA), Wales (DELLS¹), Northern Ireland (CCEA) and Scotland (SQA) are taking forward the Centre Recognition Project.

The project aims to develop and implement a common process across awarding bodies for recognising centres that are capable of delivering accredited qualifications and units in England, Wales and Northern Ireland, and Scottish Vocational Qualifications in Scotland.

As part of the Centre Recognition Project, the regulatory authorities launched a stakeholder consultation on the proposed changes outlined in the booklet *Stakeholder consultation: centre recognition and centre qualification approval (November 2005 – January 2006)*.

Seminars were held across the UK from November 2005 to January 2006 to help stakeholders understand and discuss the consultation proposals and make an informed response.

Methodology

This research report is based on two sources of information. The first is a consultation document and questionnaire. These were available on the regulatory authorities' websites and were open to all stakeholders to complete.

Hard copies of the consultation document were sent out to stakeholders such as the Association of Learning Providers, the Association of Colleges and the respective groups in Wales, Northern Ireland and Scotland. Other stakeholders were informed of the consultation by newsletter or their association groups. Two reminder emails were sent out on 20 December 2005 and 10 January 2006 to encourage stakeholders to respond.

The web-based consultation attracted 349 completed responses. The table below shows the breakdown of these responses by stakeholder.

Stakeholder type	Number of responses
Employer	16
Awarding body	44
Professional body	9
Learning provider: private training provider	62
Learning provider: further education	56
Learning provider: higher education	2
Learning provider: adult education	15
Learning provider: school	97
Learning provider: other	9
Government body	2
Sector body	10
Representative body	4
Other	23
Total	349

The second source of information is from a series of seven consultation conferences, which took place across the UK in London, Coventry, Manchester, Newcastle, Llandrindod Wells in mid-Wales, Limavady in Northern Ireland and Glasgow. Key stakeholders in each region were invited and approximately 300 delegates attended. Delegates discussed the consultation documentation and notes were made of the discussions.

The quantitative and qualitative data gathered from the consultation were coded and analysed by stakeholder groups using a qualitative analysis software package (Nud*ist). Notes from the discussions held at the conferences were also analysed and summaries of the comments made are included in the relevant sections of this report.

This report provides a full evaluation of the responses.

Comments on the data

It is important to note that not all respondents answered every question. Consequently, the total number of respondents answering each question will be less than the total number of consultation responses received. Similarly, not all respondents provided comments to each question, so the number of comments for each question varies.

For these reasons it is not possible to assign a definite weighting to the comments. Instead, the in-depth analysis of the comments is presented as a summary of the main issues raised.

¹ The newly formed Department for Education, Lifelong Learning and Skills (DELLS) is a department within the Welsh Assembly Government. It incorporates the functions of ACCAC, a former Assembly-sponsored public body.

Issues that emerged from the comments to each question did not naturally separate into the categories 'agree', 'agree with reservations', 'agree with significant reservations' or 'disagree'. Respondents who raised an issue could have ticked any of these response boxes. Some respondents would tick 'agree', yet make quite a negative comment or conversely 'agree with significant reservations' and make a very supportive comment with a small caveat. Other respondents might make a comment but not tick any statement of response.

In terms of stakeholder analysis, again comments did not always break down into coherent classes of stakeholder opinion. However, where issues raised were related to a particular stakeholder group, these comments are attributed to that group.

The diverse nature of the data from the stakeholder meetings meant that it was not always possible to align it with the consultation questions. Meetings varied in content; some discussions covered specific questions in the consultation document, while others covered broader issues. In general, the discussion groups did not cover every question of the consultation. The notes from the stakeholder meetings are presented as a summary of the key issues raised.

Summary of findings

Overall, the findings of the consultation were very positive. In most cases a large majority of respondents indicated that they agreed with the proposals. Levels of outright disagreement were often very low – below 5 per cent for 14 out of the 21 questions where agreement was sought.

To some extent, levels of support varied by stakeholder. Learning providers were generally much more likely to give their wholehearted agreement and to make positive comments about the proposals. On the other hand, awarding bodies in particular, and professional bodies to a lesser extent, were more likely to have reservations.

When the quantitative and qualitative data are taken together, the impression is that the proposals are broadly welcomed but there is work to do on the detail of the proposals before any implementation.

Centre recognition and centre qualification approval requirements

Q1. Please provide your views on the proposals to develop a common centre recognition process that is based on requirements that are adopted by all awarding bodies.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	12 (86)	2 (14)	0 (0)	0 (0)	14 (100)
Awarding body	14 (32)	15 (34)	11 (25)	4 (9)	44 (100)
Professional body	3 (33)	1 (11)	3 (33)	2 (22)	9 (100)
Learning provider: private training provider	36 (78)	9 (20)	1 (2)	0 (0)	46 (100)
Learning provider: further education	42 (75)	13 (23)	1 (2)	0 (0)	56 (100)
Learning provider: higher education	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	10 (83)	2 (17)	0 (0)	0 (0)	12 (100)
Learning provider: school	79 (85)	12 (13)	2 (2)	0 (0)	93 (100)
Learning provider: other	7 (78)	2 (22)	0 (0)	0 (0)	9 (100)
Sector body	7 (70)	3 (30)	0 (0)	0 (0)	10 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	2 (50)	2 (50)	0 (0)	0 (0)	4 (100)
Other	16 (73)	6 (27)	0 (0)	0 (0)	22 (100)
Total	232 (72)	67 (21)	18 (6)	6 (2)	323 (100)

As the table above shows, there was a high level of agreement on this issue. The vast majority of learning providers and employers agreed outright with the proposal. However, awarding bodies were much more likely to have reservations, with two-thirds registering at least some reservations.

The vast majority of comments were positive. Many generally welcomed the proposal, which was thought to be 'long overdue'. Specifically, many comments related to a reduction in time spent on bureaucratic processes. Another common strand of positive comments was that these proposals would promote consistency in how awarding bodies carried out the procedure, leading to improved standards. Some respondents believed that the proposals would allow awarding bodies and learning providers to improve how they worked and what they were able to offer learners.

While most respondents supported the notion of common procedures, a minority expressed reservations. The most frequently cited reservation was about whether agreement of those involved could be achieved, summed up by: 'Excellent providing all bodies concur'. Respondents expressed reservations that a single, common process could capture all the different circumstances (highlighting the wide variety in current practice, size and focus of the awarding bodies, and in the types of centres).

The other main reservations voiced by a minority of respondents referred to how the proposals would work in practice. It was suggested that the proposed two- or three-tier system would be too bureaucratic. A small group of respondents from awarding bodies said that they carry out centre recognition and centre approval as a single procedure and that it did not make sense to separate the two. Other respondents thought that the proposals might distance awarding bodies from their centres, and that centre recognition could become merely a registration process. These reservations were linked to more general comments that the proposals were not detailed enough to make judgements about them.

Feedback from the conferences on Q1

Generally the conference participants supported the idea of a common system and single process. A few groups noted that the proposed requirements were similar to those already in place. However, delegates voiced some reservations about whether a procedure could be standardised across all awarding bodies and quality assurance maintained. In particular, it was thought that small awarding bodies would have to do the most work to adapt to a standardised system and there were concerns about resource implications.

One issue raised was the varying times for which centres are required to keep qualifications data. The draft requirements state at least six years and one recurring reservation was that of providing storage facilities for this length of time.

It was also noted that the external verifier role should be standardised. The delegates emphasised the need for sufficient guidance and support to get the system up and running. There were requests for clarity about the roles sector skills councils (SSCs) and regulatory bodies would play in the process.

There were several calls for a single, UK-wide body that could take responsibility for centre approval, though one group noted that it could be difficult to finance such a body and agree its remit. Delegates in one group felt that centre approval was not the remit of an awarding body, which should focus on qualifications approval.

Several groups queried the definition of a centre. They wanted to know how satellite centres, or centres where only assessment took place, should be treated. They noted how, currently, buildings that are all associated with, for example, one further education college are treated as distinct centres for assessment.

Q2. Please provide your views on the proposal to develop a common centre qualification approval process that is based on requirements that are adopted by all awarding bodies.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	14 (100)	0 (0)	0 (0)	0 (0)	14 (100)
Awarding body	8 (18)	17 (39)	14 (32)	5 (11)	44 (100)
Professional body	2 (25)	1 (13)	3 (38)	2 (25)	8 (100)
Learning provider: private training provider	35 (74)	11 (23)	1 (2)	0 (0)	47 (100)
Learning provider: further education	43 (78)	10 (18)	2 (4)	0 (0)	55 (100)
Learning provider: higher education	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	10 (83)	2 (17)	0 (0)	0 (0)	12 (100)
Learning provider: school	80 (88)	10 (11)	1 (1)	0 (0)	91 (100)
Learning provider: other	8 (80)	1 (10)	0 (0)	1 (10)	10 (100)
Sector body	6 (60)	2 (20)	2 (20)	0 (0)	10 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	1 (25)	3 (75)	0 (0)	0 (0)	4 (100)
Other	16 (73)	5 (23)	1 (5)	0 (0)	22 (100)
Total	227 (71)	62 (19)	24 (7)	8 (3)	321 (100)

The table above shows that the proposals relating to qualification approval were very well received. Learning providers indicated high levels of unqualified agreement but only 18 per cent of awarding bodies responding agreed without reservations, and more than 40 per cent had significant reservations or disagreed.

The majority of the comments simply welcomed the proposal, with the majority of positive comments relating to a perceived reduction in workload and bureaucracy. Learning providers were positive about not having to produce the same information repeatedly to different awarding bodies. The proposed procedure was seen as simpler than the current situation, and standardising it was thought to be a way of ensuring consistency between the approaches of the different awarding bodies. Respondents hoped that the procedure would be concise, clear and straightforward.

A minority of comments raised reservations about the proposal. The majority of these concerned subject/sector-specific requirements. While respondents approved the proposal itself, they were anxious to ensure adequate provision for specific subject-related criteria or 'own-brand' requirements.

Another reservation raised by a minority of respondents was how consistency of approach to the approval process could be ensured across all awarding bodies since respondents thought that awarding bodies currently vary in the rigour they apply to this process.

Related to both the above reservations, the next most commonly raised reservation was that getting awarding bodies to agree common criteria could be problematic. As one (professional body) respondent put it: 'This will depend on all awarding bodies agreeing (or agreeing to compromise)'. Comments in this

group included ensuring the common criteria were general, relevant and simple. A few respondents commented that there was insufficient detail or that some of the detail (in the draft forms in particular) was confusing and that terms and definitions had not been made clear.

A few respondents thought that it was artificial to separate centre recognition and qualification approval because they considered this a single process, and that the proposals would increase bureaucracy. Other points raised by more than one respondent included: the potential impact on awarding bodies should be investigated; it was questionable whether general and vocational qualifications should be treated differently; and ownership of the process should be defined.

Feedback from the conferences on Q2

Where this question was discussed directly, there was general agreement that the qualification approval process should be standardised. There were some concerns that the new procedure would merely replace, not reduce, existing bureaucracy, especially if a separate form was required for each qualification. Some felt the process would be much like the existing one.

Reservations were raised about variations between centres and qualifications, which could be difficult to fit to a common form. It was important to delegates that the process should be clear and guidance provided.

Participants raised reservations about quality assurance. Some delegates from awarding bodies were anxious about accepting the findings of other awarding bodies without doing their own checks. Some acknowledged that they would expect to send in their own staff for specific qualifications.

Q3. Please provide your views on the proposal to develop and adopt agreed sector/subject requirements where required.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	12 (92)	1 (8)	0 (0)	0 (0)	13 (100)
Awarding body	9 (21)	15 (36)	12 (29)	6 (14)	42 (100)
Professional body	1 (14)	1 (14)	3 (43)	2 (29)	7 (100)
Learning provider:					
private training provider	29 (60)	15 (31)	2 (4)	2 (4)	48 (100)
Learning provider: further education	31 (60)	18 (35)	2 (4)	1 (2)	52 (100)
Learning provider: higher education	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	9 (75)	3 (25)	0 (0)	0 (0)	12 (100)
Learning provider: school	70 (83)	11 (13)	2 (2)	1 (1)	84 (100)
Learning provider: other	6 (67)	3 (33)	0 (0)	0 (0)	9 (100)
Sector body	5 (56)	2 (22)	2 (22)	0 (0)	9 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	2 (50)	2 (50)	0 (0)	0 (0)	4 (100)
Other	14 (61)	9 (39)	0 (0)	0 (0)	23 (100)
Total	192 (63)	80 (26)	23 (7)	12 (4)	307 (100)

While the clear majority of respondents were positive about this proposal, the table above shows that the proportion with at least some reservations was somewhat higher than for the first two questions. Schools and employers were amongst those that showed the highest levels of outright agreement. Awarding bodies and professional bodies were highly likely to have at least some reservations and 43 per cent of awarding bodies either had significant reservations or disagreed.

Many of the comments made here were positive. Most of these were from learning providers who considered that recognising specific differences between qualifications was an important aspect of the proposals. Again, reducing bureaucracy, saving time and lessening the workload were seen to be the main advantages of the proposed process, as well as ensuring standardisation and consistency.

Respondents were very supportive of this proposal but a small majority of comments raised reservations. Most of these reservations related to how achievable the proposal would be. Some respondents were reserving judgement, perceiving that there was not enough information available to ascertain how feasible this process would be and that more discussion was needed. Comments expressed the importance of involving all the relevant stakeholders in the process of setting criteria. There was concern that there would be an arbitrary grouping of qualifications into sectors, pointing out that qualifications within a sector could have very different requirements.

A small minority of comments expressed concern about increasing bureaucracy, highlighting the need for clear guidelines and effective monitoring procedures to ensure that these requirements were only introduced where absolutely necessary. Similarly, a few respondents stated that specific requirements should be set by sector rather than by individual awarding body.

Feedback from the conferences on Q3

There was general support for the proposal to develop sector/subject requirements. While this was thought to be important, several groups thought it would be difficult to achieve and monitor. One group said there would need to be clear criteria for the validity of such requirements. It was mentioned that the impact on centres' resources, such as staffing, would need to be monitored.

Q4. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Fifty-two respondents made comments. There was considerable variation in their views and the vast majority made general points rather than suggestions.

Three suggested approaches emerged, each raised by a small number of respondents. The first was that it would be less bureaucratic and more logical to carry out centre recognition and qualification approval as a single process. The second was that there should be either a single body or single awarding body to carry out centre recognition. The third raised an issue about approval for different levels or for offering units only.

Other relevant comments raised by more than one respondent included: there should be an online system and central database; there must be adequate support and guidance; the consultation document does not consider the potential risks attached to the proposals; there will not be substantial benefit from changing the system.

Feedback from the conferences on Q4

Suggestions from the conference groups were as follows.

- Ofsted could carry out centre approval as it already holds much of the relevant information.
- Fento (Further Education National Training Organisation) standards could be used.
- Removing exam-type assessment would simplify the system.

Mutual acceptance of centre recognition and centre qualification approval decisions

Q5. Please provide your views on the proposals that centre recognition and centre qualification approval requirements should only have to be met once by centres with mutual acceptance underpinning future applications.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	9 (64)	4 (29)	1 (7)	0 (0)	14 (100)
Awarding body	12 (27)	15 (33)	12 (27)	6 (13)	45 (100)
Professional body	1 (13)	2 (25)	3 (38)	2 (25)	8 (100)
Learning provider:					
private training provider	35 (75)	11 (23)	1 (2)	0 (0)	47 (100)
Learning provider: further education	41 (77)	10 (19)	2 (4)	0 (0)	53 (100)
Learning provider: higher education	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	9 (90)	1 (10)	0 (0)	0 (0)	10 (100)
Learning provider: school	75 (84)	14 (16)	0 (0)	0 (0)	89 (100)
Learning provider: other	6 (75)	1 (13)	0 (0)	1 (13)	8 (100)
Sector body	4 (40)	4 (40)	2 (20)	0 (0)	10 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	3 (75)	1 (25)	0 (0)	0 (0)	4 (100)
Other	15 (71)	5 (24)	1 (5)	0 (0)	21 (100)
Total	214 (68)	68 (22)	22 (7)	9 (3)	313 (100)

As the table above indicates, there was widespread support for the notion of mutual acceptance of centre recognition and centre approval decisions. Awarding bodies showed lower levels of outright agreement than other stakeholders – a quarter agreed without reservations, while a third had some reservations and a quarter significant reservations.

The majority of comments were positive. Respondents thought that mutual recognition would be beneficial to all concerned and would be a great timesaver for centres in particular. They welcomed the prospect of reducing the bureaucracy involved in replicating the process with each awarding body. Several respondents pointed out that mutual recognition was an essential component if the proposals were to work.

Of the minority of comments expressing reservations, the vast majority related to the fact that situations change over time, and related to qualification approval rather than centre recognition. Examples given included changes in staffing or management structure. Similarly, respondents noted that qualifications and assessment systems can change and awarding bodies need to be sure that centres are able to handle these changes. Comments stressed the importance of regular checks to ensure that standards in centres were maintained and to prevent centres becoming complacent.

Another recurring reservation, raised in a smaller minority of comments, was that it would be difficult to get awarding bodies to accept mutual recognition. This included comments that there would be a lack of consistency in how awarding bodies interpreted the criteria. Several respondents stressed the need for awarding bodies' approval processes to be monitored. A small number of awarding bodies expressed reservations about accountability and liability.

One strand of reservations, again raised in a minority of comments, related to specific requirements for qualifications. A number of respondents from small awarding bodies thought that their vocational or professional qualifications were so specific that they would need to approve all centres themselves. Other respondents thought that further approval would be necessary if centres wanted to offer different levels from those for which they had been initially approved.

A much smaller minority of reservations related to information-sharing and the need for a robust, shared database where records of action plans and sanctions would be available. There were comments suggesting some awarding bodies might not be comfortable with this. Other comments expressed reservations about the cost of creating and administering a database.

Q6. Please provide your views on whether mutual acceptance should be based on the principles described.²

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	10 (71)	3 (21)	1 (7)	0 (0)	14 (100)
Awarding body	12 (29)	10 (24)	15 (36)	5 (12)	42 (100)
Professional body	2 (22)	3 (33)	2 (22)	2 (22)	9 (100)
Learning provider: private training provider	31 (71)	12 (27)	1 (2)	0 (0)	44 (100)
Learning provider: further education	38 (78)	11 (22)	0 (0)	0 (0)	49 (100)
Learning provider: higher education	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	7 (70)	3 (30)	0 (0)	0 (0)	10 (100)
Learning provider: school	71 (86)	11 (13)	1 (1)	0 (0)	83 (100)
Learning provider: other	8 (89)	1 (11)	0 (0)	0 (0)	9 (100)
Sector body	7 (78)	2 (22)	0 (0)	0 (0)	9 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	2 (50)	2 (50)	0 (0)	0 (0)	4 (100)
Other	16 (73)	5 (23)	0 (0)	1 (5)	22 (100)
Total	207 (69)	64 (21)	20 (7)	8 (3)	299 (100)

The table above shows that there was again a high level of agreement with the principles for mutual acceptance. Schools and other learning providers showed particularly high levels of outright support. Over two-thirds of awarding bodies expressed at least some reservations, with over a third having significant reservations.

² Centres will be required to hold and maintain evidence showing their compliance. Awarding bodies reserve the right to ask the centre to provide details of its original/current evidence. Awarding bodies would reserve the right to turn away and not mutually recognise or approve a centre. Awarding bodies will inform the regulatory authorities if they encounter issues relating to the quality or consistency of another awarding body's arrangements. Centres will have the right to raise issues of poor practice by awarding bodies with the regulatory authorities.

In general, respondents making positive comments, most of whom were learning providers, thought that the principles were fair, workable and would raise standards.

A large majority of comments related to reservations about the principles for mutual acceptance. However, most of these were not negative, but related to respondents feeling they needed more detail about how the principles would work in practice. As one awarding body respondent put it: 'The principles are sensible. However, work is needed on the criteria for acceptance in order to comment on whether mutual acceptance would be feasible'. By far the most frequent comment was that the principles needed to be underpinned with appropriate quality control systems that covered awarding bodies' decision-making processes.

A minority of reservations concerned gaining awarding body agreement to mutual acceptance. While there was some scepticism about how consistently awarding bodies would apply the approval criteria, the most negative comments came from vocational awarding bodies and professional bodies. As with Question 5 above, these bodies wanted to stress that they would always need to carry out checks themselves.

A similarly sized minority of comments responded to the statement that awarding bodies would 'reserve the right to turn away and not mutually recognise or approve a centre'. Most comments were from learning providers who were uncomfortable with the idea. There were calls for more clarification of this point and suggestions that enabling awarding bodies to refuse on resource grounds raised issues of equality of access in rural areas.

A slightly smaller minority of comments related to gathering and maintaining a central database of evidence. Comments varied, though it was generally agreed that awarding bodies would need to have access to the evidence. However, respondents wanted more clarity about what the database would hold and how it would be maintained and funded.

A small group of awarding bodies expressed discomfort about the proposal to encourage awarding bodies to inform the regulatory authorities about suspected lack of quality in other awarding bodies' procedures. Comments suggested that this was inappropriate and could be open to abuse.

Two other reservations were raised in a very small minority of comments. First, it was suggested that mutual acceptance at centre recognition level would be less problematic than at qualification approval level. Second, it was suggested the proposals did not clarify how mutual acceptance would work in cases where many different centres existed under the umbrella of a single institution.

Feedback from the conferences on Q5–6

There was general support for the mutual acceptance of centre recognition and qualification approval decisions. Delegates wanted to be sure that the process would be transparent, approval reviewed and centres monitored, regularly (yearly was suggested). They wanted clarification of how this would be done, how records would be held centrally and how they would be notified of changes.

Points raised included the need for clarity in what a centre has been approved to do – in some cases they might just be assessing a qualification, not delivering it. It was thought that awarding bodies would still want to make their own visits to centres.

Q7. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Forty-four respondents made comments. There was considerable variation in these comments. The only suggestion appearing more than once was that there should be an overarching body responsible for centre recognition and/or qualification approval. From those proposing it, suggestions included:

- a body to which centres would apply
- a body that could kite mark 'centres of excellence'
- QCA to produce a manual of 'agreed standards that all awarding bodies accept, sector by sector'
- the 'common approving body' carrying out 'random inspections, while awarding bodies carried out subject inspections of common criteria'.

It was also noted that inspectorates could be responsible for checking criteria related to centre recognition.

One suggested alternative was for regulatory authorities to identify common data and documentary evidence that a centre could produce, maintain and make accessible, perhaps through their website. The respondent felt that this would be easier for the centre and would remove the need for mutual acceptance.

Of the other comments, there were requests for a review period, of say three years. There were requests for more work to be done, for example to pilot the proposals and to ascertain the impact of the proposals on awarding bodies. Some wanted to 'leave things as they are' while another thought maintaining the status quo was 'not viable'.

Feedback from the conferences on Q7

Suggestions from the conference groups included:

- establish a central organisation (possibly of regulatory bodies) to carry out centre recognition and hold the data centrally
- there was no need for a centralised system – more informal links could be used, such as by telephone.

Centre recognition process

Q8. Please provide your views on the proposal that centres seeking recognition for the first time should receive a mandatory centre visit as part of the application process.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	13 (93)	1 (7)	0 (0)	0 (0)	14 (100)
Awarding body	25 (60)	12 (29)	4 (10)	1 (2)	42 (100)
Professional body	4 (57)	2 (29)	1 (14)	0 (0)	7 (100)
Learning provider:					
private training provider	43 (92)	3 (6)	1 (2)	0 (0)	47 (100)
Learning provider: further education	47 (89)	5 (9)	1 (2)	0 (0)	53 (100)
Learning provider: higher education	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	8 (73)	3 (27)	0 (0)	0 (0)	11 (100)
Learning provider: school	69 (78)	15 (17)	2 (2)	2 (2)	88 (100)
Learning provider: other	7 (78)	1 (11)	0 (0)	1 (11)	9 (100)
Sector body	9 (90)	1 (10)	0 (0)	0 (0)	10 (100)
Government department	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Representative body	3 (75)	1 (25)	0 (0)	0 (0)	4 (100)
Other	20 (91)	2 (9)	0 (0)	0 (0)	22 (100)
Total	251 (81)	47 (15)	9 (3)	4 (1)	311 (100)

As the table above shows, there was a very high level of outright support for a mandatory centre visit as part of the centre recognition process. Private training providers and further education colleges tended to agree without reservations. Unqualified support from awarding bodies rose to nearly 60 per cent on this issue.

The vast majority of comments were positive. The centre visit was described as 'vital', 'important' and 'necessary'. Respondents commented that the centre visit was very important for a number of reasons. These included: to check that the centre existed; to establish a relationship with the centre; to provide support and advice; and to enable awarding bodies to check the accuracy of the centre's application.

Although respondents were overwhelmingly positive about this issue, a minority of comments expressed reservations, most of which related to the nature of the visit. Respondents wanted clear criteria, including who would visit, what was to be discussed, what information was required and even how long it would take. There were calls for trained staff to carry out a process monitored by regulatory bodies. There were some queries about which board should do it and speculation that most visits would fall to the larger boards. It was suggested that visits be shared equitably between boards. There were reservations about the costs of the visits, either to the awarding bodies or to centres.

Another reservation raised by about half as many respondents was that existing centres should not be required to undergo a centre recognition visit in the new system.

There was an array of further points raised by more than one respondent, including what the procedure would be for overseas centres, and the cost of

visiting small or remote centres. It was suggested that visits should be based on a risk assessment of the centre or carried out on an ad hoc basis. Two respondents noted that it is not the responsibility of an awarding body to verify the existence of a centre, for example for funding purposes.

Feedback from the conferences on Q8

Delegates generally thought that a mandatory centre visit for new centres was important. However, some still expressed reservations about accepting a decision made by another awarding body and it was clear that they would need to be assured that all awarding bodies were carrying out the procedure to the same standard.

It was suggested that a report of this visit could be held on the central database. Clarity was sought as to whether the awarding body making this visit would be accountable for giving a centre recognition and be responsible for all future monitoring of the centre, in effect 'owning' the centre.

Q9. Please provide your views on the proposal that centre recognition should have no end date.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	5 (38)	7 (54)	1 (8)	0 (0)	13 (100)
Awarding body	17 (39)	14 (32)	5 (11)	8 (18)	44 (100)
Professional body	2 (25)	1 (13)	0 (0)	5 (63)	8 (100)
Learning provider: private training provider	27 (60)	12 (27)	2 (4)	4 (9)	45 (100)
Learning provider: further education	23 (41)	22 (39)	5 (9)	6 (11)	56 (100)
Learning provider: higher education	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	8 (73)	1 (9)	1 (9)	1 (9)	11 (100)
Learning provider: school	54 (61)	24 (27)	6 (7)	5 (6)	89 (100)
Learning provider: other	3 (33)	2 (22)	2 (22)	2 (22)	9 (100)
Sector body	5 (50)	0 (0)	2 (20)	3 (30)	10 (100)
Government department	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Representative body	1 (25)	2 (50)	1 (25)	0 (0)	4 (100)
Other	11 (48)	8 (35)	2 (9)	2 (9)	23 (100)
Total	158 (50)	95 (30)	27 (9)	36 (11)	316 (100)

The table above shows that while there was a high level of agreement with the proposal, the level of outright agreement was lower on this issue than on those considered previously. Private training providers and respondents from adult education and schools were least likely to have reservations. Outright support from awarding bodies was just under 40 per cent and 18 per cent disagreed with the proposal. Employers, who were generally very positive about the proposals overall, tended to have more reservations about this issue than any other.

The vast majority of those with reservations made the point that it is possible to do without an end date as long as centres are visited regularly as part of an effective quality-assurance process.

The most frequent reservation was that conditions in centres change, which might affect their ability to function effectively. Staffing, organisational and physical changes were all mentioned. Another frequently raised issue was that centres might not field candidates every year, perhaps lapsing for a few years. There were questions about how such situations should be handled and some respondents thought that a cut-off point would be necessary.

Around one-fifth of all those responding specifically stated that they wanted an end date, variously referred to as 'review', 'renewal' or 're-approval'. Suggestions included three- or five-yearly reviews, while others did not specify a time limit but felt that a regular review was important to ensure that conditions in the centre remained acceptable. The reasons given were mainly those discussed above.

Feedback from the conferences on Q9

Most groups agreed that centre recognition need not have an end date. However, three groups disagreed and wanted a regular review.

Some reservations were expressed about centres that were inactive for some length of time and it was suggested that a time should be set after which they would have to re-apply for recognition. It was also noted that significant changes to a centre's resources should require a re-visit.

Q10. Please provide your views on the consideration that centres should be asked to reconfirm, on an annual basis, their commitments to comply with the declarations and agreement section of the centre recognition requirements.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	9 (64)	2 (14)	0 (0)	3 (21)	14 (100)
Awarding body	13 (32)	16 (39)	7 (17)	5 (12)	41 (100)
Professional body	2 (22)	2 (22)	1 (11)	4 (44)	9 (100)
Learning provider: private training provider	31 (65)	13 (27)	0 (0)	4 (8)	48 (100)
Learning provider: further education	33 (61)	11 (20)	4 (7)	6 (11)	54 (100)
Learning provider: higher education	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Learning provider: adult education	6 (55)	2 (18)	2 (18)	1 (9)	11 (100)
Learning provider: school	47 (52)	27 (30)	4 (4)	12 (13)	90 (100)
Learning provider: other	5 (56)	2 (22)	0 (0)	2 (22)	9 (100)
Sector body	4 (40)	2 (20)	2 (20)	2 (20)	10 (100)
Government department	0 (0)	2 (100)	0 (0)	0 (0)	2 (100)
Representative body	3 (75)	1 (25)	0 (0)	0 (0)	4 (100)
Other	12 (55)	4 (18)	1 (5)	5 (23)	22 (100)
Total	166 (53)	84 (27)	21 (7)	45 (14)	316 (100)

The table above indicates that there was a high level of agreement with this proposal, although nearly one-third of respondents agreeing had reservations. Outright agreement was lowest for awarding bodies (less than one-third) and professional bodies. Employers, private training providers and further education showed highest levels of unqualified agreement.

Many respondents who made comments were happy with the notion of annual reconfirmation. They felt it was an opportunity to ensure that everything was still in place and many respondents from centres said that it would not be too onerous a task. Some thought it would be a useful opportunity for centres to refresh themselves on their obligations for centre recognition. However, some called for a simple 'rubber-stamping' exercise, while others were adamant that it must be more than just that – requiring evidence to be attached, for example.

In contrast, a clear majority of comments expressed reservations about annual reconfirmation. Schools were the group most likely to have suggested that it was not necessary and likely to add bureaucracy.

The majority of comments expressing reservations stated that the process would be overly bureaucratic. Comments alluded to the process being a paper or a 'tick box' exercise that would not pick up significant changes within the centres and would be a waste of time and money. One frequently occurring comment was that if there were no significant changes, reconfirmation would not be necessary. Another recurring comment was that external verifier visits would provide an adequate mechanism for ensuring that standards were not dropping in centres.

The next three most common reservations were each raised by about a third as many respondents as the one above.

The first was that the annual reconfirmation proposal did not go far enough. There were repeated calls for monitoring or inspection visits to supplement the reconfirmation. A few respondents suggested centres should carry out self-assessments, while others suggested awarding bodies should take a risk-assessment approach to determining whether reconfirmation was necessary.

The second related to wanting more information on the process, such as who would carry it out. There was concern that it could be a very big paper exercise, including chasing centres for responses, and wanted to know whose responsibility it would be to ensure it was completed. There were also calls to clarify the body to which centres would be required to reconfirm. Would it be a central authority or an awarding body?

Finally, a similar number of respondents stated that an annual reconfirmation was too frequent. Preferred alternatives were every two, three or five years.

Feedback from the conferences on Q10

There was general agreement that centres should reconfirm their commitments on an annual basis, though it was thought that the system should be flexible enough for this to happen when needed.

It was pointed out that an external verifier visit could cover this aspect of the monitoring process. It was suggested that the reconfirmation process would fail to reduce bureaucracy and that it should be possible to carry it out electronically.

Q11. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Forty respondents made comments, with almost half indicating that the reconfirmation process could be linked to external verification or, more rarely, inspection. It was suggested either that external verifiers could carry out additional checks, or that their visits alone were sufficient to check compliance.

A smaller number of respondents preferred a more substantial, though less frequent, review process – three years being a preferred option.

Other suggestions included sampling, risk assessment to ascertain which centres should reconfirm, or a graded process with the frequency of reconfirmation varying between centres. Another suggestion was regular 'system verifier' visits. Other respondents proposed a requirement for centres to notify their regulating body when they experienced significant changes.

Feedback from the conferences on Q11

There was one request from delegates to link this process with the existing quality assurance system in Northern Ireland – Improving Quality Raising Standards (IQRS).

Centre qualification approval process

Q12. Please provide your views on the proposal that centres should no longer be required to address the same requirements again in future applications.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	8 (62)	3 (23)	2 (15)	0 (0)	13 (100)
Awarding body	15 (39)	12 (32)	10 (26)	1 (3)	38 (100)
Professional body	2 (22)	2 (22)	2 (22)	3 (33)	9 (100)
Learning provider: private training provider	32 (67)	11 (23)	3 (6)	2 (4)	48 (100)
Learning provider: further education	40 (74)	12 (22)	1 (2)	1 (2)	54 (100)
Learning provider: higher education	1 (50)	0 (0)	1 (50)	0 (0)	2 (100)
Learning provider: adult education	5 (50)	4 (40)	0 (0)	1 (10)	10 (100)
Learning provider: school	73 (81)	13 (14)	1 (1)	3 (3)	90 (100)
Learning provider: other	9 (100)	0 (0)	0 (0)	0 (0)	9 (100)
Sector body	6 (55)	4 (36)	0 (0)	1 (9)	11 (100)
Government department	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Representative body	3 (75)	1 (25)	0 (0)	0 (0)	4 (100)
Other	16 (76)	4 (19)	0 (0)	1 (5)	21 (100)
Total	211 (68)	66 (21)	20 (6)	14 (5)	311 (100)

The table above shows that over two-thirds of respondents agreed to this proposal without reservation and few had significant reservations or disagreed outright. Schools were overwhelmingly in favour. Nearly two-thirds of awarding bodies, and most professional bodies, agreed with reservations.

The clear majority of comments made here were positive. Many respondents said that the proposed process would be simpler, less time-consuming and less bureaucratic. Another observation common among those supporting the proposal was that a one-off process was fine as long as circumstances had not changed in the centre. Respondents noted that when changes occurred centres would need to notify awarding bodies.

A minority of comments raised reservations about the proposed process. The most frequently cited was that changes occur in centres and that some kind of monitoring was necessary. This was the main reservation of awarding bodies. Many of those making this kind of comment felt that external verifier visits could cover the necessary ground. Similarly, some respondents were concerned about centres where no candidates were registered for some time and wanted to know how these would be handled.

A smaller minority of comments, raised by a range of respondents, centred on specific sector/subject requirements. Respondents wanted to stress that these would require awarding bodies to seek further information and sometimes a different approach to monitoring.

A very small minority of comments raised two further reservations. The first called for more clarity about awarding bodies' responsibilities. The second sought an end date or review period for the approvals.

Q13. Please provide your views on the proposal that there is no mandatory visit to support the centre qualification approval process unless there is a specific sector/subject requirement to do so.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	6 (46)	2 (15)	1 (8)	4 (31)	13 (100)
Awarding body	12 (27)	13 (30)	11 (25)	8 (18)	44 (100)
Professional body	2 (20)	2 (20)	2 (20)	4 (40)	10 (100)
Learning provider: private training provider	22 (51)	9 (21)	3 (7)	9 (21)	43 (100)
Learning provider: further education	28 (51)	17 (31)	3 (5)	7 (13)	55 (100)
Learning provider: higher education	1 (33)	1 (33)	1 (33)	0 (0)	3 (100)
Learning provider: adult education	6 (55)	3 (27)	0 (0)	2 (18)	11 (100)
Learning provider: school	49 (56)	22 (25)	4 (5)	12 (14)	87 (100)
Learning provider: other	5 (56)	1 (11)	0 (0)	3 (33)	9 (100)
Sector body	5 (50)	2 (20)	1 (10)	2 (20)	10 (100)
Government department	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Representative body	3 (75)	1 (25)	0 (0)	0 (0)	4 (100)
Other	11 (50)	6 (27)	2 (9)	3 (14)	22 (100)
Total	151 (48)	79 (25)	28 (9)	55 (18)	313 (100)

The table above shows a high level of agreement with the proposal although unqualified support dropped to just under half of all respondents. This is one of the lowest levels of outright agreement in the consultation. In addition, a relatively high number of respondents disagreed outright. A quarter of awarding bodies had significant reservations and 18 per cent disagreed outright.

Of those respondents making positive comments about this proposal, some made generally supportive comments but more added provisos such as 'unless a specific need arises' or 'subject to safeguards'. The general tenor was that as long as the centre had been found to be functioning well, and there were no extenuating circumstances, there should be no need for a visit.

The overwhelming majority of comments expressed reservations about the proposal. The most commonly cited reservation was that the visit was a vital check on standards in the centre and a chance to verify the information given by centres on the application forms. Another large group of respondents thought that a visit was a necessary part of a qualifications approval process. A similarly

sized group thought the visit was valuable to give support and guidance. As one respondent put it: 'I worry this takes away from the support and reassurance that these visits give'.

A minority of comments stressed that the option for a visit should be available although it might not always be necessary. Within this group, about half thought it would be required for some sector- or subject-specific issues. One awarding body spoke for several in saying that there would 'always be a specific requirement'. A small number of awarding bodies spoke of visits depending on the outcome of a risk analysis of a centre.

Q14. Please provide your views on the proposal that there is no end date for a qualification and sector/subject approval.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	7 (50)	4 (29)	1 (7)	2 (14)	14 (100)
Awarding body	11 (27)	12 (29)	4 (10)	14 (34)	41 (100)
Professional body	2 (25)	3 (38)	0 (0)	3 (38)	8 (100)
Learning provider: private training provider	25 (58)	8 (19)	4 (9)	6 (14)	43 (100)
Learning provider: further education	29 (55)	17 (32)	2 (4)	5 (9)	53 (100)
Learning provider: higher education	1 (33)	1 (33)	1 (33)	0 (0)	3 (100)
Learning provider: adult education	8 (67)	2 (17)	1 (8)	1 (8)	12 (100)
Learning provider: school	63 (71)	17 (19)	5 (6)	4 (5)	89 (100)
Learning provider: other	3 (38)	4 (50)	0 (0)	1 (13)	8 (100)
Sector body	4 (36)	3 (27)	1 (9)	3 (27)	11 (100)
Government department	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Representative body	2 (50)	2 (50)	0 (0)	0 (0)	4 (100)
Other	11 (48)	10 (44)	1 (4)	1 (4)	23 (100)
Total	167 (54)	83 (27)	20 (6)	41 (13)	311 (100)

As for Question 13, the level of outright agreement, at 54 per cent, was lower for this question than many of the others in the consultation. A further third of respondents agreed with some degree of reservation. A third of awarding bodies disagreed with the proposal, which was unusually high. Outright support was higher among learning providers, with over two-thirds of respondents from schools and adult education agreeing outright.

A number of comments simply welcomed the proposal. However, the vast majority of comments expanded on this to say that an end date would be unnecessary as long as quality assurance systems provided ongoing monitoring of the relevant evidence.

About half as many comments as in the group above raised reservations about change in centres and qualifications. This included changes that might affect the centre's ability to run approved qualifications. It was also noted that qualifications themselves change and suggested that checks would need to be made to ensure that centres could continue to run new qualifications. Reservations were expressed about circumstances where centres had not run a particular qualification for some time.

A slightly smaller minority of comments simply expressed unease about removing the end date for approvals. There were suggestions of a review every three, five or even 10 years. A few respondents explained that their reservations were based on wanting to maintain standards in centres and some thought that having an end date helped to stop centres from becoming complacent.

A very small minority of comments noted that qualifications change and are replaced, which gives a natural lifespan to qualifications approval.

Some comments imply that some respondents took the question to suggest that qualifications should not have an end date. It is not possible to quantify this misunderstanding.

Q15. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Although 37 respondents commented, several made only general comments. The main recurring suggestion was that there should be a review period, perhaps every three or five years. A few respondents proposed using risk analysis to determine whether centres needed visits. Other suggestions from more than one respondent were: that the qualification visit and centre recognition visit could be combined, and that there should be a standard process for dealing with inactive centres. Other suggestions included sending 'mystery shoppers' to check on a centre's performance, and that the new system should include the level of qualification the centre was approved to offer on the database.

Feedback from the conferences on Q12–15

The conference groups generally expressed agreement with these proposals. One group felt that the principle was good but that it would be unachievable across awarding bodies. A few groups pointed out that qualifications do have an end date and that procedures would need to accommodate the development of new specifications being applied to qualifications. Some centres expressed concern that there would be a reduction in contact with awarding bodies at times when it was needed, for example if sanctions were imposed.

Fees for recognition and approval

Q16. Please provide your views on the proposal that awarding bodies provide a clear breakdown of their fees for centre recognition and centre qualification approval.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	13 (93)	1 (7)	0 (0)	0 (0)	14 (100)
Awarding body	23 (59)	9 (23)	5 (13)	2 (5)	39 (100)
Professional body	4 (57)	3 (43)	0 (0)	0 (0)	7 (100)
Learning provider: private training provider	42 (93)	2 (4)	0 (0)	1 (2)	45 (100)
Learning provider: further education	50 (91)	3 (5)	1 (2)	1 (2)	55 (100)
Learning provider: higher education	2 (67)	1 (33)	0 (0)	0 (0)	3 (100)
Learning provider: adult education	10 (91)	1 (9)	0 (0)	0 (0)	11 (100)
Learning provider: school	78 (88)	7 (8)	2 (2)	2 (2)	89 (100)
Learning provider: other	9 (100)	0 (0)	0 (0)	0 (0)	9 (100)
Sector body	9 (100)	0 (0)	0 (0)	0 (0)	9 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	1 (25)	2 (50)	0 (0)	1 (25)	4 (100)
Other	21 (100)	0 (0)	0 (0)	0 (0)	21 (100)
Total	264 (86)	29 (9)	8 (3)	7 (2)	308 (100)

The table above shows that the vast majority of respondents welcomed the proposal. Awarding bodies, professional bodies and representative bodies tended to have more reservations than other respondents.

The vast majority of comments made were positive. Many comments welcomed the transparency it was thought this measure would bring. Learning providers often noted that awarding bodies offer differing levels of support and said that they would appreciate clarity about what is included in the fees. Many comments stated that this measure would help learning providers to make comparisons between awarding bodies and help them to judge which was offering best value for money.

A minority of comments, mostly from learning providers, suggested that if the process were to be common, there should be a single, standardised fee across all awarding bodies.

A small minority of comments, mostly from awarding bodies, expressed reservations about providing a breakdown of their fees. Several stressed that awarding bodies operate and express costs differently, so it would be difficult to compare them on this basis. Two awarding bodies (and a learning provider) wanted more information on what should be included.

A small minority of comments, again mainly from awarding bodies, articulated reservations that larger boards could attract custom by offering centre recognition and qualification approval at lower costs than smaller boards could manage, and that those that do not charge for centre approval might end up carrying the cost of providing this service, with no guarantee that centres would then do business with them. A few awarding bodies were concerned that there might be accusations of price fixing if they standardised their fees.

A small number of learning providers thought that there should be no charge for these processes and that awarding bodies could absorb the costs though fees related to qualifications.

Q17. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Thirty-three respondents made comments but few made suggestions. Some simply stressed the need for clarity and openness and welcomed guidelines. Some called for a common fee, particularly for centre recognition. The reason given was that if the process is common then so should be the fee. Two suggested that an overarching body should run the whole process. A few other respondents reiterated that there should be no fee.

Feedback from the conferences on Q16–17

Contributors said they would welcome transparency regarding fees charged for centre recognition and centre qualification approval. Two groups felt it would help centres make judgements about which awarding bodies offered best value for money. Another two groups expressed concern that fees would increase. For example, if the awarding body granting centre recognition was responsible for all monitoring visits, it might seek to recoup costs through higher qualification fees.

Awarding body arrangements for post-approval monitoring of centres

Q18. Please provide your views on the proposal that awarding bodies that identify and assign action plans, either under the current arrangements or the proposed common process, are responsible for monitoring centres' compliance against these plans.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	12 (92)	1 (8)	0 (0)	0 (0)	13 (100)
Awarding body	17 (44)	6 (15)	14 (36)	2 (5)	39 (100)
Professional body	2 (25)	3 (38)	2 (25)	1 (13)	8 (100)
Learning provider: private training provider	31 (67)	13 (28)	0 (0)	2 (4)	46 (100)
Learning provider: further education	43 (78)	9 (16)	1 (2)	2 (4)	55 (100)
Learning provider: higher education	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	8 (73)	2 (18)	1 (9)	0 (0)	11 (100)
Learning provider: school	76 (89)	7 (8)	0 (0)	2 (2)	85 (100)
Learning provider: other	7 (78)	2 (22)	0 (0)	0 (0)	9 (100)
Sector body	6 (60)	3 (30)	1 (10)	0 (0)	10 (100)
Government department	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Representative body	2 (67)	1 (33)	0 (0)	0 (0)	3 (100)
Other	19 (90)	2 (10)	0 (0)	0 (0)	21 (100)
Total	226 (74)	50 (16)	19 (6)	9 (3)	304 (100)

The table above shows a very high level of agreement with the proposal overall. Outright agreement was below 50 per cent for awarding bodies, however, and more than a third of awarding bodies had significant reservations.

The majority of respondents who commented agreed that awarding bodies that identify and assign action plans should be responsible for monitoring centres' compliance against these plans. The responses were typified by 'makes sense', 'clarifies accountability' and 'strongly support this proposal'.

Despite the largely supportive comments, a minority of comments, mostly from awarding bodies, raised reservations. The most frequently cited concerned the legal implications of sharing action plans, in terms of data protection and commercial practice. Some comments said that this was an area that required further investigation. One comment suggested that the full implications of the proposal had not been fully explored.

A minority of respondents wanted to know whether action plans would be transferable when a centre moved to another awarding body and how this would work in practice. This was not thought to be clear from the proposals.

Another minority of comments suggested that there might be adverse implications, such as a danger that quality would be sacrificed for cost. Would

awarding bodies avoid taking on centre approval if they would incur the monitoring costs? It was suggested there might be an incentive not to identify action plan items if it incurred monitoring costs. Several awarding bodies raised the issue of their approving a centre that may never use their products; they questioned how they would recoup costs.

Other issues raised by a minority of respondents included suggestions that there are currently too many organisations involved in this process, and that it would be more effectively managed by either a central approval body or QCA. Another group of comments suggested that unless all awarding bodies interpreted the standards consistently, they would have reservations about this proposal. The last group of comments suggested that a centre should not be allowed to gain approval from other awarding bodies until it had met its initial action plan and effectively been signed off by the original approving awarding body.

Q19. Please provide your views on how you think action plan data could and should be shared among awarding bodies.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	10 (91)	1 (9)	0 (0)	0 (0)	11 (100)
Awarding body	5 (14)	11 (30)	16 (43)	5 (14)	37 (100)
Professional body	2 (25)	2 (25)	1 (13)	3 (38)	8 (100)
Learning provider: private training provider	22 (56)	14 (36)	0 (0)	3 (8)	39 (100)
Learning provider: further education	20 (48)	14 (33)	5 (12)	3 (7)	42 (100)
Learning provider: higher education	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	6 (60)	4 (40)	0 (0)	0 (0)	10 (100)
Learning provider: school	51 (86)	6 (10)	2 (3)	0 (0)	59 (100)
Learning provider: other	3 (50)	3 (50)	0 (0)	0 (0)	6 (100)
Sector body	4 (57)	2 (29)	1 (14)	0 (0)	7 (100)
Government department	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Representative body	2 (50)	2 (50)	0 (0)	0 (0)	4 (100)
Other	10 (63)	3 (19)	2 (13)	1 (6)	16 (100)
Total	137 (56)	64 (26)	27 (11)	15 (6)	243 (100)

The table above again shows a high level of agreement, with only 11 per cent having serious reservations and only 6 per cent disagreeing. Schools and employers tended to give unqualified support. However, over half of awarding bodies either had significant reservations or disagreed with the proposal.

The response form was incorrectly worded for this section, seeking levels of agreement rather than the selection of a specific option. However, the response indicated support for some form of mechanism to capture and share action-plan data.

A small minority of some respondents referred directly to the Options table³ given in the stakeholder consultation, and indicated Option 3 (sharing data on the record of the action plan, the details and the status) as their most preferred option, commenting that it was the most comprehensive.

³ The Options table is summarised as follows: Option 1 – share whether or not there is an action plan; Option 2 – share whether or not there is an action plan plus details of the action plan; Option 3 – share whether or not there is an action plan plus details and status of the action plan.

The vast majority of respondents who commented here said that some form of centralised database would be needed to share action-plan data among awarding bodies. While there was strong support for this suggestion generally, there were some conflicting messages from a minority of these comments regarding access to the shared database. One group of comments suggested that only awarding bodies should have access, while another group argued that all interested parties should be able to view the database.

As with Question 18, awarding bodies showed greater reservation than other groups of respondents to this question. Concerns focused on the legality of sharing data, as with the above question, along with the commercial implications. A number of other stakeholders voiced similar concerns.

A minority of respondents expressed reservations over the management of a centralised system. Questions were raised about who would be responsible for the costs of implementing, updating and maintaining the system.

Furthermore, there was some variance of opinion among a minority of respondents as to the level of information that should be shared on the database. Suggestions included sharing all recognition and approvals documents for each centre; only sharing significant problems, with minor actions staying with the approving awarding body; and sharing only relevant sector-specific information.

Q20. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Thirty-eight respondents made comments, but most did not offer any alternative. A few comments suggested that having one awarding body would make things easier, while another respondent suggested that having a central approval body would be more cost effective and consistent.

Feedback from the conferences on Q18–20

Some groups felt that it would be simpler for awarding bodies that identify and assign action plans, either under the current arrangements or the proposed common process, to be responsible for monitoring centres' compliance against these plans. However, there was concern that there would be some confusion about who was responsible for monitoring the action plan; what would happen if the centre did not register candidates with that awarding body; and whether an action plan would remain on the system once it had been signed off.

One group queried who would be accountable if the centre did not meet requirements. There were some concerns about information sharing and who, besides awarding bodies, would have access to the information.

Sanctions for centres

Q21. Please provide your views on the proposal to develop a common sanctions policy for centres.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	11 (85)	1 (8)	1 (8)	0 (0)	13 (100)
Awarding body	22 (54)	17 (41)	2 (5)	0 (0)	41 (100)
Professional body	5 (56)	3 (33)	1 (11)	0 (0)	9 (100)
Learning provider: private training provider	30 (70)	11 (26)	1 (2)	1 (2)	43 (100)
Learning provider: further education	39 (71)	15 (27)	1 (2)	0 (0)	55 (100)
Learning provider: higher education	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Learning provider: adult education	6 (60)	4 (40)	0 (0)	0 (0)	10 (100)
Learning provider: school	72 (85)	8 (9)	3 (4)	2 (2)	85 (100)
Learning provider: other	5 (63)	3 (38)	0 (0)	0 (0)	8 (100)
Sector body	10 (100)	0 (0)	0 (0)	0 (0)	10 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	3 (75)	1 (25)	0 (0)	0 (0)	4 (100)
Other	18 (86)	2 (10)	0 (0)	1 (5)	21 (100)
Total	224 (74)	65 (21)	9 (3)	5 (2)	303 (100)

The statistics show a very high level of agreement with this proposal. Only around a quarter of respondents had reservations and very few had significant reservations. Awarding bodies and professional bodies tended to have more reservations than others but only one professional body and two awarding bodies had significant reservations, and none disagreed.

The majority of respondents who commented welcomed a common sanctions policy, which reflects the 74 per cent of respondents who agreed outright with this proposal. Supportive comments were typically 'fair', 'logical', 'good idea' and 'ensures consistency of standards'. A minority of comments pointed out that a common sanctions policy already exists for National Vocational Qualifications and works well.

There were, however, several recurring concerns from a minority of respondents. The most common was that the application of sanctions must be consistent, with some of the comments suggesting that this was not currently the case. The next most frequently cited warning was the need for a robust appeals process to protect centres' interests.

Another minority of comments argued that care should be taken to prevent learners being directly affected by sanctioning a centre. While a further minority of respondents thought that the current proposals could mean that large centres with failing departments might be permanently in this situation.

There was, additionally, some questions raised by a small minority of respondents regarding the detail of the sanctions policy, including how the application of sanctions would be monitored; concern over the possible consequences of one awarding body withdrawing approval; and questions over

the escalation guidelines. Several respondents suggested that the details of the sanctions policy should be developed in a further consultation.

Of the very small minority of comments expressing disagreement with a common sanctions policy, a few comments maintained that an awarding body should be responsible for verifying its own quality standards.

Q22. Please provide your views on the appropriateness of the six proposed sanctions.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	12 (92)	1 (8)	0 (0)	0 (0)	13 (100)
Awarding body	16 (40)	16 (40)	5 (13)	3 (8)	40 (100)
Professional body	3 (43)	2 (29)	2 (29)	0 (0)	7 (100)
Learning provider: private training provider	20 (49)	16 (39)	5 (12)	0 (0)	41 (100)
Learning provider: further education	31 (61)	19 (37)	0 (0)	1 (2)	51 (100)
Learning provider: higher education	1 (100)	0 (0)	0 (0)	0 (0)	1 (100)
Learning provider: adult education	7 (70)	3 (30)	0 (0)	0 (0)	10 (100)
Learning provider: school	53 (66)	17 (21)	5 (6)	5 (6)	80 (100)
Learning provider: other	5 (63)	2 (25)	1 (13)	0 (0)	8 (100)
Sector body	5 (63)	2 (25)	1 (13)	0 (0)	8 (100)
Government department	1 (100)	0 (0)	0 (0)	0 (0)	1 (100)
Representative body	2 (50)	1 (25)	1 (25)	0 (0)	4 (100)
Other	16 (76)	4 (19)	0 (0)	1 (5)	21 (100)
Total	172 (60)	83 (29)	20 (7)	10 (4)	285 (100)

The table above shows a high level of agreement, with 60 per cent of respondents agreeing outright and only 10 per cent having significant reservations or disagreeing. Awarding bodies, professional bodies and private training providers were least likely to have agreed outright. Just over half of awarding bodies and private training providers agreed with reservations or, more rarely, significant reservations.

The majority of respondents who commented were supportive, with comments typified by 'reasonable', 'seems fair enough' and 'logical'. One group of these comments pointed out that the sanctions were based on common practice.

A minority of supportive comments were best described as giving qualified support: first, reasonable dialogue should be ensured between an awarding body and a centre between each level of sanction; second, there should be consistency in the application of sanctions; third, there should be a built-in mechanism to help centres lift themselves out of sanctions.

The other most commonly cited comment made by a minority of respondents, awarding bodies in particular, was that Sanction 2 (Suspension of candidate certification) should come before Sanction 1 (Suspension of candidate registrations). Similarly, several comments said that Sanction 1 was too harsh and that it might penalise learners as much as providers. As in Question 21, a small minority of respondents thought that further consultation was required.

Another minority of comments suggested that the 'broad reasons for Sanctions 1–5 were vague and need further definition'. Several comments also thought that more information about the reasons was needed to avoid awarding bodies interpreting them too rigidly.

Q23. Please provide your views on the proposed sanctions process.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	8 (73)	3 (27)	0 (0)	0 (0)	11 (100)
Awarding body	13 (35)	17 (46)	4 (11)	3 (8)	37 (100)
Professional body	2 (29)	2 (29)	0 (0)	3 (43)	7 (100)
Learning provider: private training provider	19 (44)	19 (44)	2 (5)	3 (7)	43 (100)
Learning provider: further education	26 (52)	18 (36)	4 (8)	2 (4)	50 (100)
Learning provider: higher education	0 (0)	2 (67)	1 (33)	0 (0)	3 (100)
Learning provider: adult education	5 (56)	3 (33)	1 (11)	0 (0)	9 (100)
Learning provider: school	52 (67)	20 (26)	5 (6)	1 (1)	78 (100)
Learning provider: other	7 (78)	1 (11)	1 (11)	0 (0)	9 (100)
Sector body	3 (38)	4 (50)	1 (13)	0 (0)	8 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	1 (25)	1 (25)	2 (50)	0 (0)	4 (100)
Other	13 (68)	4 (21)	2 (11)	0 (0)	19 (100)
Total	151 (54)	94 (34)	23 (8)	12 (4)	280 (100)

The table above shows that the vast majority of respondents agreed with the proposals for a sanctions process, although over 40 per cent had reservations. Awarding bodies, professional bodies and private training providers showed lowest levels of outright support, but few respondents from these groups had significant reservations.

The majority of respondents who commented were supportive, with comments typified by 'fair', 'reasonable' and 'sensible'. However, a considerable number of reservations were raised, reflecting the 46 per cent of stakeholders who had some degree of reservation or disagreed with this question.

Three main recurring strands of reservation emerged from a minority of comments. First, it was argued that further work on the sanctions process was required. It was generally thought that the process should be underpinned by transparent, workable procedures that were not yet evident. Second, it was maintained that a robust common appeals process must bolster the sanctions policy, and more information on this was requested. Third, questions were raised about whether a sanction would be removed once appropriate action had been taken by a centre to the satisfaction of the awarding body. The process for removing sanctions was also thought to need further clarification.

A wide variety of comments arose from a small minority of respondents. While some comments argued that in a system of mutual recognition it should be automatic for another awarding body to accept a decision over a sanction, others argued that awarding bodies should not be required to impose the same

sanctions as another awarding body. Some comments reiterated the concern expressed in Question 21 that consistency in the application of sanctions should be ensured. Reservations were expressed about the legal implications of the sanctions process, particularly possible litigation against an awarding body that imposed a sanction. Some comments thought that QCA's role in policing the recognition process would be crucial to its success, while others asked what level of sanction against a centre should be shared across the awarding body network.

Q24. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Thirty-nine respondents commented, though few alternatives were proposed. A couple of respondents suggested that a pre-sanction stage should be built into the process. One respondent thought that while inspections have a different focus, a poor report should trigger action, in the form of a regulatory check-up, as a kind of pre-sanction. Another respondent argued that the sharing of evidence between inspectorates and awarding bodies might prove useful in both applying and withdrawing sanctions.

Feedback from the conferences on Q21–24

The groups broadly agreed with the principle of developing a common sanctions policy. Some groups stressed that they needed more information about how the policy would work in practice, including clear criteria and guidance. There was some concern about gaining a common understanding of the policy so that it would be applied consistently. One group wanted to know what would happen if awarding bodies disagreed about how a centre should be sanctioned.

A few groups suggested that Sanction 1 and Sanction 2 in the consultation document should be reversed. Two groups raised an issue about candidate malpractice, which they said was hard to detect but could result in sanctions for a centre.

A number of groups discussed the information-sharing aspect of the policy. One concern was that reporting a sanction on a database could prompt a flood of external verifiers in subjects not connected with the sanction. Some groups wanted to know how long a sanction would last and for how long it would show on the database. There were concerns about who would have access to the information and whether it would be in the public domain. One group asked for detailed information to be included on the database where a sanction was imposed. It was suggested that if a sanction was related to a specific qualification rather than the centre's systems it should be kept between the awarding body and the centre. It was also suggested that the centre and all awarding bodies should be notified when a sanction was lifted.

Two groups were concerned about the cost and maintenance of the proposed database. There was also concern about its reliability, with security and data protection issues raised. One group suggested the database should be merged with the UK Register of Learning Providers database.

Transition arrangements

Q25. Please provide your views on the proposed transition arrangements.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	11 (100)	0 (0)	0 (0)	0 (0)	11 (100)
Awarding body	9 (25)	13 (36)	9 (25)	5 (14)	36 (100)
Professional body	4 (44)	2 (22)	3 (33)	0 (0)	9 (100)
Learning provider:					
private training provider	28 (74)	8 (21)	1 (3)	1 (3)	38 (100)
Learning provider: further education	38 (78)	10 (20)	0 (0)	1 (2)	49 (100)
Learning provider: higher education	1 (100)	0 (0)	0 (0)	0 (0)	1 (100)
Learning provider: adult education	7 (70)	3 (30)	0 (0)	0 (0)	10 (100)
Learning provider: school	69 (84)	11 (13)	1 (1)	1 (1)	82 (100)
Learning provider: other	8 (89)	1 (11)	0 (0)	0 (0)	9 (100)
Sector body	4 (44)	4 (44)	0 (0)	1 (11)	9 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	3 (75)	0 (0)	0 (0)	1 (25)	4 (100)
Other	18 (82)	4 (18)	0 (0)	0 (0)	22 (100)
Total	202 (72)	56 (20)	14 (5)	10 (4)	282 (100)

The table above suggests that most stakeholders found this proposal unproblematic with 72 per cent agreeing outright and few having significant reservations. However, only a quarter of awarding bodies agreed without reservations and a further quarter had significant reservations.

The majority of respondents who commented on this question made supportive comments typified by 'fair', 'logical' and 'smooth transition essential'. Respondents generally thought that centres already recognised by awarding bodies should automatically be transferred to the new system.

A minority of respondents had reservations. Of the most commonly cited reservations, the first was concern over how this proposal would work in practice. It was thought that the transition proposals lacked detail, and that further clarification of the proposal was needed before an informed judgement could be made. Second, it was argued that the transition process relied on a costly and bureaucratic database. It was thought that the workload during the transition phase would be extremely heavy and that this had been underestimated in the proposal. While there were numerous comments about who would bear the cost of the process, the suggestion in the proposal that costs incurred to awarding bodies during the transition phase would be offset by savings later was directly disputed by several awarding bodies.

A small minority of comments called for a clear timeframe for transition. A further small minority of comments thought that it would be necessary for awarding bodies to confirm that a centre did meet the revised criteria during a centre approval visit or a normal monitoring visit.

Q26. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Of the 25 comments made, few alternatives were suggested. One respondent thought that more consideration should be given to the awarding body that was most active in a centre. Another respondent suggested that a centre that had not been active for 12 months should be deemed dormant. Yet another respondent argued that if there were no central database there would be no need for these transition arrangements. Lastly, one respondent suggested that a centre with less than five years' approval with an awarding body should receive a full approval visit.

Feedback from the conferences on Q25–26

There was broad agreement that existing centres should be automatically brought across. However, there was some scepticism about how the proposals would work in practice and several groups stressed that more detailed information was needed.

One group voiced complete disagreement with the proposals, stating that they would not work in practice. Awarding bodies in this group were concerned about being held liable for centres they had not visited very recently. This group proposed that additional checks would be necessary. Another group wondered whether the larger awarding bodies' data would be brought across first. One group suggested that an arbitration system would be needed where a centre was approved by one awarding body but not another. It was suggested that this would be more likely to affect larger centres where several awarding bodies were operating rather than smaller ones. A small awarding body whose centres run short courses raised another issue: it did not think that its centres would meet the minimum requirements of the new system.

A concern raised by some groups was that the data held by different awarding bodies would not be compatible (in an IT sense) or comparable in a broader sense. One group noted that awarding bodies would need to cleanse their own data before sharing it.

Possible implementation arrangements

Q27. Please provide your views on the issue of possibly supporting the proposals with a centralised IT system.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	10 (71)	2 (14)	2 (14)	0 (0)	14 (100)
Awarding body	4 (11)	8 (22)	11 (30)	14 (38)	37 (100)
Professional body	1 (13)	1 (13)	1 (13)	5 (63)	8 (100)
Learning provider:					
private training provider	22 (51)	17 (40)	2 (5)	2 (5)	43 (100)
Learning provider: further education	32 (63)	11 (22)	7 (14)	1 (2)	51 (100)
Learning provider: higher education	1 (50)	1 (50)	0 (0)	0 (0)	2 (100)
Learning provider: adult education	6 (60)	4 (40)	0 (0)	0 (0)	10 (100)
Learning provider: school	64 (76)	15 (18)	4 (5)	1 (1)	84 (100)
Learning provider: other	7 (78)	1 (11)	0 (0)	1 (11)	9 (100)
Sector body	5 (50)	4 (40)	0 (0)	1 (10)	10 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	1 (33)	1 (33)	1 (33)	0 (0)	3 (100)
Other	12 (63)	5 (26)	1 (5)	1 (5)	19 (100)
Total	167 (57)	70 (24)	29 (10)	26 (9)	292 (100)

The table above shows a high level of agreement with this proposal, with only a fifth of respondents having significant reservations or disagreeing. The picture is significantly different for awarding bodies and professional bodies. The majority of professional bodies disagreed with the proposal, as did well over a third of awarding bodies. Another 30 per cent of awarding bodies had significant reservations.

The comments made by respondents were more evenly split than for any other question. Where respondents thought that a centralised IT system was the way forward, it was generally thought that this was the only viable and efficient way to support the common policy and therefore was the logical route to follow. However, a minority of comments made in support of a centralised system carried a general caveat: they supported it as long as the system worked properly; as long as it was future-proofed; and as long as there were sufficient resources for maintaining the system.

The most commonly cited reservation referred to implementing the centralised IT system, as many of the respondents had found other centralised IT systems to be unreliable. Several comments said that there would need to be a back-up system for any IT failure and that implementing the system would need to be well supported, especially technically. Several comments raised questions over the security of data and access to information.

The next most frequently cited concern among this group related to the cost of implementing a centralised IT system, with the general perception that it would be expensive and concerns about who would meet the costs. Several awarding bodies wanted to know what costs they would incur if the centralised system was introduced. Comments maintained that while they might support the proposals in principle, this support would only be forthcoming as long as they did not bear any major additional costs. Some respondents were concerned that extra costs would be ultimately passed on to the learner.

The next most commonly recurring issues related to responsibilities within the centralised system. Questions were raised by respondents: first, who would be responsible for maintaining a centralised IT system? Second, who would own the data? Some concerns were also expressed over the role of regulators and the level of involvement they would have. A few comments thought that the regulators should be distanced from operational matters.

Other doubts raised by a small minority of respondents related to the reliability and compatibility of systems. Respondents wanted to be sure that current software would be compatible with any new proposal. Awarding bodies in particular voiced strong concerns about sharing commercial and other sensitive information, which centres might not want to be made public. A few comments argued that implementation would take too long and be too complex. Lastly, it was thought that there were too many unanswered questions to be able to comment fully on this proposal.

Feedback from the conferences on Q27

Much of the above was echoed in the stakeholder meetings. While there was a general level of agreement to a centralised system, it was tempered by concerns. The main concern was about cost, with participants wanting to know who was going to fund it. Concern was expressed that if awarding bodies and centres were expected to contribute, not all would be able to afford it, particularly small awarding bodies. Questions were again raised over who would be responsible for maintaining the IT system and data. There were some sceptical voices, arguing that while in theory a centralised IT system seemed a good idea, they were not sure it would ever work in practice. Some participants had had negative experiences of such systems. There were, lastly, concerns that commercially sensitive information could be viewed by inappropriate audiences.

Q28. Please provide your views on the issue of possibly supporting the proposals with a decentralised IT system.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	0 (0)	4 (31)	1 (8)	8 (62)	13 (100)
Awarding body	5 (14)	11 (31)	5 (14)	14 (40)	35 (100)
Professional body	1 (17)	2 (33)	2 (33)	1 (17)	6 (100)
Learning provider: private training provider	12 (29)	6 (15)	5 (12)	18 (44)	41 (100)
Learning provider: further education	8 (19)	9 (21)	2 (5)	24 (56)	43 (100)
Learning provider: higher education	0 (0)	1 (100)	0 (0)	0 (0)	1 (100)
Learning provider: adult education	1 (13)	3 (38)	1 (13)	3 (38)	8 (100)
Learning provider: school	19 (27)	10 (14)	5 (7)	37 (52)	71 (100)
Learning provider: other	2 (33)	0 (0)	1 (17)	3 (50)	6 (100)
Sector body	0 (0)	2 (20)	1 (10)	7 (70)	10 (100)
Government department	1 (50)	0 (0)	0 (0)	1 (50)	2 (100)
Representative body	0 (0)	0 (0)	0 (0)	3 (100)	3 (100)
Other	1 (6)	2 (13)	2 (13)	11 (69)	16 (100)
Total	50 (20)	50 (20)	25 (10)	130 (51)	255 (100)

The table above shows that only 20 per cent of respondents agreed outright, which is by far the lowest level of unqualified agreement in the consultation. Furthermore, just over half the respondents disagreed, which is the most emphatic disagreement in the consultation.

The proposal to have a decentralised system produced far fewer comments than that of a centralised system. The majority of comments made argued that there was no benefit to be gained from a decentralised system. It was generally thought that it would be less effective and efficient than the centralised proposal, and that it would not support the common process. While a few comments maintained that a decentralised system could be seen as a viable option in the short term, it was thought that it would be less effective in the longer term.

A small minority of respondents made a range of other comments. It was thought that a decentralised system could be a more viable option that would be quicker and cheaper to implement than a centralised system. Such a system could possibly alleviate stakeholders' concerns about regulatory involvement. It was also thought that the proposed system was the same as we have now, and that if it worked there was no reason to change it.

Another small minority of respondents thought that there was not enough detail about the implementation arrangements to make an informed judgement. Concern was expressed that a decentralised system would result in the loss of quality control and accountability. Lastly, it was argued that the costs of implementing this system were not clear.

Feedback from the conferences on Q28

In line with the consultation responses, Question 28 provoked much less discussion than Question 27. There were only a few voices of support for a decentralised system.

Q29. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Thirty-three respondents commented, but few suggested alternatives. One respondent thought that at least two models should be trialled before the system went live. Several respondents thought that awarding bodies could maintain their own systems, with approvals being uploaded to a centralised system. Another respondent suggested a system hosted by an awarding body, which would offer a read-and-write protocol between awarding body and regulatory authority systems.

Feedback from the conferences on Q29

As in the consultation responses, this question raised very little direct discussion on possible alternatives to Questions 27 and 28.

Several comments argued that more transparency between awarding bodies and centres would avoid the need for a central database. One respondent suggested that communication between awarding bodies could be improved if centre recognition forms included the question: 'Which awarding bodies have you been approved by?' Awarding bodies could then contact each other. The respondent thought that this would bring about mutual recognition in a more organic way. Several suggested that inspectorate reports or an inspectorate database (if one exists) could be used for mutual recognition.

Reviewing post-approval monitoring arrangements

Q30. Please provide your views on the proposal for the regulatory authorities to review the impact of post-approval monitoring arrangements on centres.

Stakeholder type	Agree (%)	Agree with reservations (%)	Agree with significant reservations (%)	Disagree (%)	Total (%)
Employer	9 (82)	2 (18)	0 (0)	0 (0)	11 (100)
Awarding body	9 (25)	19 (53)	7 (19)	1 (3)	36 (100)
Professional body	6 (75)	2 (25)	0 (0)	0 (0)	8 (100)
Learning provider: private training provider	29 (76)	8 (21)	1 (3)	0 (0)	38 (100)
Learning provider: further education	43 (86)	6 (12)	1 (2)	0 (0)	50 (100)
Learning provider: higher education	1 (100)	0 (0)	0 (0)	0 (0)	1 (100)
Learning provider: adult education	7 (70)	3 (30)	0 (0)	0 (0)	10 (100)
Learning provider: school	70 (85)	10 (12)	1 (1)	1 (1)	82 (100)
Learning provider: other	8 (89)	1 (11)	0 (0)	0 (0)	9 (100)
Sector body	6 (67)	2 (22)	1 (11)	0 (0)	9 (100)
Government department	2 (100)	0 (0)	0 (0)	0 (0)	2 (100)
Representative body	2 (50)	2 (50)	0 (0)	0 (0)	4 (100)
Other	18 (86)	1 (5)	1 (5)	1 (5)	21 (100)
Total	210 (75)	56 (20)	12 (4)	3 (1)	281 (100)

These statistics show that this proposal was very well supported, with three-quarters of respondents agreeing outright and very few having significant reservations. There was a much higher proportion of reservation from awarding bodies, with three-quarters expressing some reservations, although very few disagreed with the proposal.

The majority of respondents made supportive comments typified by 'welcome move', 'good idea' and 'anything that reduces the burden – a benefit'.

Three main strands of reservation emerged from the comments made by a minority of respondents. First, it was argued that post-approval monitoring is essential to maintain standards, and care must be taken not to reduce bureaucracy at the expense of quality. Second, another group of comments maintained that monitoring was a source of valued support for centres, and that it was questionable whether centres regarded post-approval monitoring a burden. Lastly, respondents considered the proposals to be too vague to provide any substantive comment about them.

There was a range of other comments by a small minority of respondents, including: subject-specific monitoring must not be abandoned; post-approval monitoring was more complex than the proposals suggested, and therefore much less compatible with a common process; and a realistic timeframe should be allowed to implement any changes.

Q31. Please suggest any other practical alternatives to the above proposals and explain why you think they are feasible and appropriate.

Very few alternatives were suggested, and only 19 respondents made any comment. One idea was to reduce the bureaucratic burden on centres by allowing inspectorates to cover some of the post-approval monitoring criteria, leaving awarding bodies to monitor qualification delivery. This could reduce the number of visits required by awarding bodies. Another respondent proposed a system where awarding bodies rate centres and decide how often a visit needs to be carried out. Lastly, a respondent suggested that an awarding body's external verifiers should create a monitoring and audit strategy for each centre.

Feedback from the conferences on Q30–31

Only six groups addressed this part of the consultation. They supported monitoring activities by the regulatory authorities and welcomed a standardisation of processes. One group called for a definition of post-approval monitoring. Another group thought it was an opportunity to refocus external verifier visits away from auditing systems and towards assessment and supporting centres.

Other comments

Q32. Please provide your views on whether you feel there is a need to implement a common centre recognition and centre qualification approval process across awarding bodies.

The comments overwhelmingly supported the need to implement a common centre recognition and centre qualification approval process across awarding bodies. Typical comments were: 'long overdue', 'essential' and 'standard approach the best way forward'.

A small minority of comments made by awarding bodies were broadly supportive of the proposal, but carried a caveat. Respondents thought there were issues within the consultation that needed to be resolved or required further thought. Lastly, there was a small minority of unsupportive comments where respondents thought that the proposals brought no great benefits to centres and that the system was best left alone. Similarly, several awarding bodies argued that the proposals posed more risks than benefits. Lastly, a few comments maintained that the process was unnecessary.

Feedback from the conferences on Q32

Only six groups made any comments. Generally, delegates wanted to express their support for the project. However, they also thought there was a lot of detail to be sorted out. There was some scepticism as to whether the project would actually work. Delegates called for detailed guidance and support. There was concern about the costs and bureaucracy involved in establishing new procedures.

Q33. Please let us know of any other views that you think the regulatory authorities should consider when taking forward these proposals or regulatory impact analysis.

Three recurring strands emerged from comments made. First, it was thought that that the process needed to be rigorous and applied consistently. Second, respondents noted the need to consider the costs of these proposals carefully. Third, respondents wanted to be sure that the wider picture was being considered (ie the Framework for Achievement and Managing Information Across Partners). Lastly, several comments pointed out that size of centres should be considered when developing the process.

Feedback from the conferences on Q33

Only three groups made any comments. One group said they were strongly in favour of having an external agency that was responsible for centre recognition. The two other groups raised the importance of ensuring standardisation of the procedures across awarding bodies. One group highlighted the need for communication across the awarding bodies, and the open fee policy. This group also wanted more consideration of the impact the proposals would have on centres. Another other group was concerned about the responsibilities for maintaining the database and saw problems relating to data protection and freedom of information, if all data were held centrally. This group favoured an approach where centres maintained their own set of data and made it available on demand.