

Independent Review of Qualifications and Assessment in Scotland

Phase 3 Consultation

20.03.23



About the Open University in Scotland

The Open University in Scotland supports people across Scotland to develop their knowledge, acquire new skills and achieve life-changing qualifications. With over 21,000 students, we are the fourth largest university in Scotland and the largest provider of flexible, part-time study. Our students range from school age to 92, with an average age of 28. Most of our graduates (85%) remain in the location where their study is undertaken, which means their talent and skills benefits local communities.

We offer high-quality distance learning to students, lifelong learners, communities, employees and businesses. We have formal partnerships with 16 regional colleges and collaborate with local authorities, the NHS, social care, the third sector and employers across Scotland. Our innovative national schools programme, Young Applicants in Schools Scheme, helps S6 pupils bridge school to university level study.

We are committed to widening access to higher education building on our founding principle of being open to everyone, regardless of age, income, geography and background. More than 20% of our undergraduates in Scotland join with qualifications below standard university entrance level, almost 19% are resident in the most deprived areas of Scotland, 26% declare a disability and 23% live in remote or rural areas. The majority of our students in Scotland study for free with a part-time fee grant.



Flexible study is core to our offer with 74% of our students working either full-time or part-time fitting study around their professional or personal life at a pace and level that works for them. Our student experience is rated the best in Scotland alongside the University of St Andrews (National Student Survey).

As part of the UK's only four nations university, we are funded to teach students resident in Scotland by the Scottish Funding Council. Almost 200 staff operate from our Edinburgh offices with almost 500 associate lecturers working across the country.

OU research ranks in the top third of UK universities according to The Research Excellence Framework and we are a trusted partner of many leading organisations for teaching and research including the BBC, NASA, and the United Nations. Our free platform, OpenLearn, reaches over 300,000 learners in Scotland.

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Q1. Do you think the three areas described in the SDA offer learners the potential for a broader range of their achievements that are important for their future progression? Is there anything you would like to add or delete? Why?

The Scottish Diploma of Achievement (SDA) could potentially be useful in helping learners reflect on and demonstrate a broad range of achievement. We would be supportive of the model developed for the SDA to include consideration of other credit bearing study opportunities beyond qualifications typically offered in schools, with a mechanism for integrating these wider achievements into college and university admissions processes.

The term 'diploma' implies a qualification so this needs to be carefully considered with a common understanding of the value and usage of the overall diploma and individual credit bearing qualifications within it, both within and beyond the education sector.

As the Personal Pathway/Learning in context elements form two thirds of the diploma we would have concerns about parity of opportunity for all students, due to geographic and socioeconomic factors, and would suggest that this should be a central consideration of any development.

As a sector we should be confident that the development of a Scottish Diploma of Achievement would close rather than widen attainment gaps. There would seem to be the potential for the SDA to highlight deficiency for some pupils unless this is carefully considered at the design stage.



Question 2: What are your views on the proposals for recognising achievements in subjects/curricular areas?

We believe the proposals are unclear about how what is being proposed will make any meaningful difference to learner choice and equal access to opportunities for learners.

The rational for reducing the amount of assessment through examinations and providing more opportunity for continuous assessment seems sound and would seem to be better aligned with assessment practices in HE, which may be beneficial to those students progressing to university.

Increased opportunities for interdisciplinary study are positive, however this does introduce more complexity for schools, teachers, pupils and parents/carers and a more complex system could be more difficult to navigate.

Uniformity of approach to internal versus external assessment needs careful consideration to avoid parity of esteem issues across subject areas. All subject qualifications need to be seen as robust by employers, colleges and universities.



Question 3: What are your views on the proposals for recognising achievements in knowledge and skills in action?

Our main concern here is equality of access and opportunity. It seems clear that some students could be disadvantaged – how will this be addressed sensitively in a way that compensates for differences in access to opportunities and cultural capital?

We also see challenges in the operationalisation of the proposals, which are likely to be resource intensive due to the increasingly person-centred approach which will be necessary for all pupils to feel properly supported.

Question 4: What are your views on the proposals designed to recognise achievements in respect of personal learning?

As above, the concerns re access and equity of experience apply here. The proposals state:

"The way in which this part of the learner profile develops would be subject to discussion with every learner by a member of staff within the education setting they attend also involving parents/carers."

There are strong dependencies here on resource availability within the system and on the ability of parents and carers to engage meaningfully from an informed position.



The proposals are unclear about the relative value of individual components within the SDA - this needs to be clearly expressed and understood, and any primacy of credit bearing aspects expressed. The motivational aspect of academic achievement should not be diluted.

Question 5: What do you think of the idea of introducing a Scottish Diploma of Achievement (SDA)?

In broad terms it would appear than the introduction of an SDA may add value in helping learners identify and reflect on broader achievement, but the structure, operation and intended use require further investigation and development. Careful consideration needs to be given to the status of the SDA as a 'qualification', the balance of emphasis between the 3 areas of achievement, and the seemingly inherent risk of highlighting gaps in the "Learning in Context" and "Personal Pathway" for some learners.

Question 6: If you support this idea, what actions would you take to make this approach work in practice?

We would anticipate widespread support for the principle of recognising broader achievement, however work will need to be undertaken to ensure equity of experience for students and that this does not become a deficiency model for those pupils less well placed to access wider opportunities. Work will also need to be undertaken to ensure values and principles are understood and upheld consistently across the sector and that adequate resourcing is in place to meet the requirements of the changes.



Question 7: What changes to existing practice, if any, would you recommend to support the development of a new qualifications and assessment system?

In considering the scale of the change proposed and the potential far reaching consequences for learners we would suggest the SCQF Framework be at the core of development and the structural integrity of the current qualifications system retained. We would suggest that the proposed change to the approach to qualifications and assessment system cannot happen in isolation, and that that a whole systems approach which at the very least looks closely at the interface with university admissions systems would be necessary. In terms of changes to existing practices this work could seek to drive further progress in contextual admissions policy and practice in the traditional university sector.

Question 8: To promote parity of esteem across all qualifications, academic or technical and professional, should all qualifications at a particular SCQF level have the same name?

No. Not all qualifications at the same SCQF level are the same, so this would not be logical. The question references SCQF level but not the amount of credit (volume of study hours) which often varies significantly across different qualifications at the same level. Having distinct nomenclature for different types of qualification at the same level allows for differentiation, for example between



a single Advanced Higher and an HNC, or between an SVQ at SCQF Level 8 and an HND.

It would also seem unhelpful to create further divergence from the wider UK education system, as this may restrict student mobility and the extent to which Scottish qualifications are recognised across the UK

Do you have any additional comments about the proposed approach to qualifications and assessment set out in this presentation?

The focus of this review appears to be on young people in a school setting, however there is also a stated aim of ensuring learners "present their achievements consistently no matter the educational setting within which they are based", and there is reference to the digital infrastructure that will be developed to support this. If the SDA is successfully developed, what opportunities will there be for adult learners who re-engage with education later in life (including those who did not attain at school) to have achievement recognised in the same way?

Will this digital infrastructure be accessible to adult learners?



