

Response of the National Qualifications Authority of Ireland to the Framework Implementation and Impact Study (FIIS)

May 2010

Introduction

Since the publication of the Framework Implementation and Impact Study in September 2009, significant work has been undertaken by all key stakeholders to advance many of its recommendations. These are outlined in the responses of the Higher Education and Training Awards Council, the Further Education and Training Awards Council, the Irish Universities Association and the National Council for Curriculum and Assessment to the Study.

In framing its response, the Authority took account of the sectoral responses. It is also mindful of the changes in the qualifications environment which have taken place since the Study was completed. The key changes are progress towards amalgamation of the qualifications and quality assurance agencies, economic recession, new demands for skills and for qualifications to meet regulatory and labour market needs, and the introduction of qualifications frameworks across Europe and the globe. Each of these demands greater responsiveness on the part of the qualifications system and, in the Authority's view, impacts on the prioritisation of the Study's recommendations.

Some recommendations, as the Study acknowledges, will best be addressed by Qualifications and Quality Assurance Ireland, the newly amalgamated qualifications and quality assurance bodies. Preparatory work for the new body on the part of all agencies involved is talking into account the Study's recommendations. All of the work underway between the Authority and the awards Councils, FETAC and HETAC is mindful of impending amalgamation.

The Authority's response to the Study's recommendations, outlined below, differentiates between those recommendations in which there is on-going work and in which no additional action is necessary at this stage (Section 1) and those recommendations which are priorities and require specific follow-up action (Section 2). Whilst some of these recommendations will best be addressed by Qualifications and Quality Assurance Ireland, some preparatory work needs to be done in advance.

Section 1: Recommendations in which substantial work has been completed or is underway.

The *centrality of the National Framework of Qualifications* to the work of the newly amalgamated body and a process for reviewing its operation are being addressed in the draft legislation for Qualifications and Quality Assurance Ireland (Recommendations 1 and 2).

The proposed *communications* approach to the Framework (Recommendation 7) which emphasises directness, clarity and a focus on the Framework characteristics of awards informs current and planned actions on the part of the Authority, FETAC, HETAC and with the universities. The NCCA acknowledges that there is a need for a greater effort to communicate the Framework in the schools sector. With regard to the Recommendation (8) to make greater use of the guidance and counselling community in communicating and brokering the Framework, the Authority has established and maintains a close working relationship with it. Qualifax is the principal vehicle for communicating directly with Framework users and learners and developmental work aims to broaden its reach and expand information on, for example, progression opportunities from specific qualifications. The newly amalgamated body will provide new opportunities to address specific communications issues, particularly in relation to access, transfer and progression (Recommendation 9).

The specific issues of *credit* (Recommendation 11) and naming conventions/titling of awards (raised in Recommendations 7, 10, 11) will be addressed in a forum to be convened by the Authority in 2010. Some of the issues are intertwined (e.g. Framework awards in higher education and training are associated with specific volumes) and will be set out in an issues paper for the Forum. HETAC notes that inconsistencies in titling impact on competition. The credit system developed by FETAC and now being implemented is compatible with the European ECVET system. It is suggested that, given the responses of HETAC and the IUA, it would be helpful if FETAC were to clarify, maybe in a short information note, how its system operates and links to ECVET. This would also facilitate discussions on the operation and transfer of credit across all Levels of the Framework. The Authority notes that the articulation of Framework learning outcomes for awards, programmes and modules/units of learning is a necessary first step towards achieving learner mobility and that this can be supported by the operation of credit within and across systems.

The *learning outcomes* approach, the subject of Recommendations 12 and 13, is now more deeply embedded in award specifications and programme design in all sectors of education and training. It is recognised that this requires sustained effort and debate over the long-term. The FETAC Common Awards System is developing a learning outcomes approach across all of further education and training. The Universities Framework Implementation Network handbook on programme design issues and the use and assessment of learning outcomes contributes to progress in this area. The NCCA refers to their incorporation in the development of curricula, courses and units in both the Junior and Senior Cycle. HETAC's new assessment policy, to be implemented by all institutions from the academic year 2010/2011, marks a significant shift to learning outcomes. There is on-going debate in all sectors on learning outcomes, and in the future there is interest in sharing experiences and discussion across the sectors on their use.

The Study and a number of Recommendations (4, 5, 7 and 15) underline the importance of *quality assurance* to the integrity of the Framework and its awards. The specific issue of a developing a common set of quality assurance principles concerning the Framework is addressed in section 2 below. The processes for inclusion of awards in the Framework; for addressing inconsistencies in inclusion and for the alignment of international awards are each backed by rigorous quality assurance. The creation of Qualifications and Quality Assurance Ireland will afford an opportunity to open up cross sectoral debate about quality

and standards associated with qualifications. Linked to this, the Authority, HETAC, FETAC and IUQB are closely engaged in and contribute to quality assurance initiatives and networks at the European and international levels.

Substantial work has been undertaken in each of the areas addressed in Recommendation 4 concerning framework implementation in the *universities and associated colleges*. The vast majority of non-major awards have now been included and the learning outcomes approach is increasingly embedded in qualifications and programme design. The Framework Implementation Network completed a handbook on issues concerning programme design, and the use and assessment of learning outcomes. The current focus of its work is on the Recognition of Prior Learning.

Progress has also been made, under the auspices of a working group convened by the university registrars in determining the appropriate Level at which the award formerly known as the Higher Diploma in Education and the currently designated Post-Graduate Diploma in Education should be included. The technical analysis undertaken by the working group may provide a useful mechanism and inform other approaches to address inconsistencies arising in the process of including similar awards in the Framework (Recommendation 4). As the IUA indicates, these and other areas of work continue to be addressed – including RPL, building learning outcomes into internal institutional academic and quality assurance processes, enhanced communication of the Framework and greater focus on the potential of the Framework to achieve access, transfer and progression.

The *recognition of qualifications* (Recommendation 15) remains a key area of work of the Authority and of the awards Councils. This has many strands – developing the Qualifications Recognition service which deals with individual applications for recognition; referencing the Framework with other national Frameworks (e.g., New Zealand); expanding the possibilities for international sectoral awarding bodies to align their awards with the Framework; supporting at international level the use of qualifications frameworks as a tool for recognition including the use of the European Qualifications Framework and work to include more legacy awards in the Framework. The development of the Internationalisation Register (a responsibility of the Authority since March 2010) will also support the recognition of qualifications.

There has been progress in *aligning public funding* of education and training to the Framework (Recommendation 16). The Authority's approach is to engage in dialogue with funding bodies, in particular, on the interpretation and use of the Framework and the concept of progression by funding agencies. Both the IUA and HETAC point to the necessity for greater coherence between funding policy and access, transfer and progression policies in higher education and training so as to achieve their potential and that of the Framework. Recommendation 17, which calls for a reconsideration of the existing legislative requirement that publicly funded bodies must, in general, have programmes leading to qualifications validated by HETAC or FETAC, is being explored by the Department of Education and Skills in the context of new legislation for Qualifications and Quality Assurance Ireland.

There continues to be pro-active and sustained engagement of all key stakeholders in the *European and international developments* (Recommendation 18) in relation to qualification frameworks. Ireland has been to the forefront in referencing its Framework to both the

Bologna and the European Qualifications Framework. This work feeds back into national policy and to debate on, for example, the use of learning outcomes; the treatment of sectoral frameworks and relationship to EU professional directives. In practice, almost all dimensions of qualifications work now have a broader European dimension e.g. the use of learning outcomes; assessment, permeability between further and higher education and training qualifications; RPL; and quality assurance. All of the key stakeholders encourage wider stakeholder engagement in these developments.

There is general support for *data collection* (Recommendation 19) on the operation and impact of the Framework, in particular on learners. The NCCA, FETAC, HETAC and NQAI are supporting a longitudinal study of school leavers, a follow-up to previous work conducted by the Economic and Social Research Institute in this area, which will provide some evidence for this cohort of learners. In addition, greater use could be made of existing data and the bringing together of the four bodies in Qualifications and Quality Assurance Ireland should facilitate greater coherence and inter-operability between data sets. This would for example allow for improved tracking of learner progression through the Framework. The referencing of the Framework in key national surveys – the QNHS and the (upcoming) Census of Population 2011 - will also provide wider sources of information on qualifications attainment.

Section II: The recommendations discussed below are, in the Authority's view, priorities and which require specific follow-up action

a) *Level 6: re-visit the inclusion of all craft awards at one Level; re-visit the co-location of further and higher education and training awards at Level 6 and the confusion deemed to arise therefrom (Recommendation 3)*

The on-going work in FETAC to develop the Common Awards System (CAS) and the upcoming amalgamation are critical to these questions. In the first instance, the craft awards are to be migrated to the CAS by 2012. This will involve a re-formatting of the awards. In addition, the development of national frameworks in other jurisdictions and their referencing to the European Framework of Qualifications may pose questions about the comparability of distinct craft qualifications and their associated learning outcomes.

The amalgamation of FETAC and HETAC will remove the *raison d'être* for differentiating the award-types at Level 6 as amalgamation will create a single awarding body with responsibility for all Framework Levels. Under the 1999 Qualifications Act, the Authority was required to differentiate between further and higher education and training awards for the purposes of determining which Council would make the award. However, this will not remove all of the issues. Here, as in other jurisdictions, the boundaries of higher and further education and training awards are difficult to establish. Also, there is some evidence that the existing differentiation in award-types at Level 6 is causing confusion.

Follow-up action

While some of the issues involved are best addressed post-amalgamation, the Authority considers that it would be useful to develop an issues paper on both of the Level 6 issues identified above. This will be presented to the newly amalgamated body for its consideration. The Authority will lead the preparation of the paper with inputs from HETAC and FETAC. The purpose of the paper will be to inform future decision-making by setting out the issues and arguments in relation to the location of craft awards and the co-location of further and higher education and training awards at Level 6; the evidence of the use of existing awards; and the international dimension. Other relevant issues may also arise in the process. It is proposed that this work would be carried out by the Framework Executives Group¹ and be completed by the end of 2010.

b) the inclusion of the Leaving Certificate, which is simultaneously a set of programmes and an award with a wide range of achievements, across two Levels.

The key issues identified by the FIIS in relation to this are:

- its inclusion across two Framework levels
- its treatment as a single award even though it has a number of variants
- differentiation in the level of achievement of learners
- limited progression for holders of the Leaving Certificate Applied and the Leaving Certificate Vocational Programme into higher education and training.

As the NCCA notes, these issues were discussed by a working group of the NCCA, Department of Education and Science, FETAC and NQAI. Since then, the linking of public funding of education and training interventions, the use of the Framework in the context of the national skill strategy means that a more precise articulation of an individual's achievement in the Leaving Certificate is increasingly required to access programmes and operate learning pathways. The review of the senior cycle has not advanced as quickly as was anticipated – this influences thinking and possible approaches to inclusion.

The NCCA sets out a number of specific matters that need to be considered in any re-visiting of the inclusion of the Leaving Certificate in the Framework. These include the implications of any change for holders of the award and for future participation in its different programmes. The further development and introduction of components relating to the Framework in the senior cycle is also relevant. In addition, the use by the CAO of Leaving Certificate results to determine entry into higher education and training significantly influences the forms of assessment used. Finally, there is a need to consider the wider implications of advancing the issue and the elaboration of potential solutions in tandem with technical work.

The Authority is of the view that these considerations and the Framework-related nature of on-going work to develop the senior cycle should inform the approach to re-visiting inclusion. It recognises that there is significant and sensitive public investment in the Leaving Certificate and broad stakeholder engagement with it. It notes that the question of

¹ The Framework Executives Group comprises executives of FETAC, HETAC and NQAI. It meets regularly and currently has two sub-groups working on standards and on provider registration.

progression to higher education and training concerns only the Leaving Certificate Applied (LCA), which is now the subject of review by the NCCA. The outcomes of this work will influence the overall question of inclusion of the Leaving Certificate in the Framework.

Follow-up action

The Authority considers that the optimal approach, at this stage in the development and implementation of both the Framework and the senior cycle, is that the executives of the Authority and the NCCA will initially work on a process and a set of ideas to advance the re-examination of the inclusion of the Leaving Certificate in the Framework.

The Authority is also of the view that the re-examination of inclusion of the Leaving Certificate should take into account the outcomes of the review of the Leaving Certificate Applied. The NCCA and the Authority will agree a timeline and the nature of the process for this work.

c) *In relation to Levels 1-6, the urgent need to advance the use of Framework standards, introduce new awards to meet learner and labour market needs and to support progression throughout the Framework (Recommendation 6)*

There are a number of distinct elements to this recommendation. First, in relation to Framework standards, FETAC is now using more explicit Framework references to the knowledge, skill and competence sub-strands in its specifications for major awards. These are being developed in the Common Awards System (CAS).

Second, FETAC has introduced new standards and awards to meet specific labour market needs e.g. driving instructor, gas installation. It also developed new awards at Levels 1 and 2 of the Framework which address, for the first time, learner needs at these Levels (major and minor awards have been developed). These offer a basis for progression to other awards in the Framework.

Also, ten standards setting groups are now operating to develop new standards to meet inter alia labour market needs from Levels 1-6 (March 2010). The NCCA notes that consideration is being given to increasing access to awards other than school awards in school settings and beyond and to the development of new qualifications at Levels 1 and 2.

Third, whilst the development of the CAS itself is expected to assist progression, FETAC has taken specific actions to support progression such as the expansion of the Higher Education and Training Links Scheme (HELTS) and the publication of progression routes associated with crafts. An indicator of progression into higher education and training for FETAC award-holders is the number of FETAC award-holders who present such awards for entry to higher education and training through the CAO. This number has increased from some 2 900 learners in 2001 to some 13 000 in 2010.² It is difficult to ascertain the numbers who are offered places through the CAO on the basis of FETAC awards as offers are made in

² Figures made available by the CAO, May 2010. The figure for overall applicants for 2001 was 63 810 and was some 77 000 in 2010 (May). Note that some applicants may also apply directly to institutions for entry and that Higher Education Institutions may operate entry routes with specific providers.

relation to distinct entry routes and scores (e.g., those with FETAC awards could enter via routes for mature students or specific target groups). However, the CAO applications data does indicate rising expectations about the value of FETAC awards for entry and probably reflects the overall increase over time in the number of entry routes linked to FETAC awards. A second indicator of progression is the number of higher education institutions offering progression on the basis of FETAC awards to specific courses under the HELS. This has increased from 22 in 2001 to 41 in 2010 (FETAC).

FETAC and others acknowledge the urgency of developing the CAS and new awards and the scale of the challenges involved in meeting its target date of 2011 to implement the Common Awards System. Whilst there has been significant progress in the overall development of its awards, there is much to be done to complete the migration of awards to the CAS, to release awards in the CAS to all providers, and to review and develop standards.

Follow up action

The Authority recognises the primary responsibility of FETAC to develop and introduce awards at Levels 1-6. It will continue to support its standards development work in the areas of early childhood education and childcare and its upcoming work in the retail and wholesale sector. The executives of FETAC, HETAC and Authority will continue to develop a greater shared understanding of approaches to setting standards and the issues that arise for amalgamation.

d) active and continuous engagement with the key stakeholders in the labour market on the Framework including communicating its use, including in public sector recruitment, facilitating access to awards and developing standards for the workplace (Recommendation 14)

This recommendation is also linked to the development and availability of awards at Framework levels 1-6 above. There remains a challenge to maintain the relevance and currency of awards, and to develop more effective communication between the world of work and the world of qualifications. These are critical to addressing long-term unemployment, international economic competitiveness and upskilling. The reconfiguration of FAS and shift of responsibilities for training to the Department of Education and Skills will impact on the provision of services and integration of policy e.g., on labour market activation and education and training.

Steps have been taken by the Authority and others in pursuit of this recommendation, such as work to align awards of international and sectoral awarding bodies; the development of standards in newly regulated areas of work including in childcare, and building the capacity of Qualifax to provide and link to relevant information on the labour market. Over time, the referencing of the Framework in the national skills strategy targets and in key CSO statistics means that more data will be available in Framework terms and that the Framework should be more widely known in the labour market. On the other hand, the suspension of public sector recruitment since 2009 has diminished the interest of the main stakeholder bodies in the use of the Framework in recruitment. In some areas, there are significant challenges to identify appropriate industry/labour market representatives and to secure their engagement in developing and using Framework qualifications. The recent proposal for a sectoral skills

framework for the retail and wholesale sector (EGFSN, March 2010) shows the potential that such a framework could play in mediating the NFQ and skills needs for the labour market. International developments will also be important here, including any proposed revision of EU Professional Directives.

Over time, the shift to learning outcomes is expected to facilitate greater communication and the responsiveness of qualifications system to the labour market. There will also be a need to balance the tensions between relevance, currency, quality, development and delivery of qualifications. The upcoming amalgamation has initiated greater dialogue on approaches to standard setting and offers greater potential to develop standards and related processes across the continuum of Framework levels. For example, work is on-going within the Framework Executive Group to identify common aspects of registration in relation to FETAC and HETAC and, where possible to propose a common process which would avoid duplication of activity for providers. This and related work on standards could align the qualifications system better with enterprise and labour market needs and remove unnecessary duplication in the requirements placed on providers who wish to access qualifications at different Framework Levels.

Follow-up action

The Authority recommends that standards setting processes and all aspects of awards development and delivery should be, insofar as is possible, flexible and responsive to labour market needs. The Authority will prioritise this objective in its engagement with standards development in relation to early childhood education and childcare, and in the retail and wholesale sector. The Authority urges the Framework Executives Group to identify and address as a matter of urgency those aspects of existing systems that hinder flexibility and responsiveness and those that support effective interaction with the labour market.

e) *The communication of pathways other than the Leaving Certificate to higher education and training and specific actions in relation to the recognition of prior learning (Recommendations 9 and 10)*

A number of actions have been undertaken to communicate pathways other than the Leaving Certificate into higher education and training (see Section 1). The specific actions proposed in the FIIS for the Recognition of Prior Learning (RPL) are generally welcomed by the sectors. The Authority notes that FETAC has approved some ten providers to offer awards on the basis of RPL and that there is increased interest on the part of policy-makers to explore or develop RPL in the context of labour market activation policies and to meet specific sectoral skills needs (e.g. early childhood and childcare, retail and wholesale). Also, RPL is the focus of the work of the Universities Framework Implementation Network in 2010. This, as the IUA points out, will result in greater levels of awareness of policy and practice and a practically orientated publication to support understanding and practice.

Follow-up action

The Authority executive will develop a strategic options paper on RPL. It will finalise this in the coming months in consultation with stakeholders. This will take account of the recommendations made in the FIIS and those made by the OECD Study Team, 2008.

**f) A single set of quality assurance principles for the Framework
(Recommendation 5)**

The Qualifications Authority together with awarding bodies, institutions and agencies responsible for quality assurance were asked to put in place a single set of quality assurance principles for Framework qualifications and the programmes that lead to them. This is broadly supported by the Authority and in the responses from the sectors. They also draw attention to the broader importance of rigorous quality assurance to underpin the recognition of qualifications and the alignment and inclusion of all awards in the Framework (see Section 1 above).

Follow-up action

The Authority will propose a single set of quality assurance principles for the Framework with the objective of underpinning Framework implementation, transparency and coherence. These will respect the primary responsibilities of awarding bodies and providers for quality assurance. They will take into account the existing IHEQN principles for quality assurance for all providers and agencies in higher education and training, international experience in relation to qualifications frameworks and quality assurance, and the experience of national awarding bodies and providers in integrating the Framework into quality assurance policy and practice. The common set of principles will aim to articulate the points at which the Framework intersects with key areas of qualifications and programmes, including their design, validation, assessment, communication and review.