

National Qualifications
Authority of Ireland



Údarás Náisiúnta
Cáilíochtaí na hÉireann

**Report on the Workshop on the
inclusion of professional awards in the
national framework of qualifications,
Dublin, 11 February 2003**

March 2003

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Report on the workshop on the inclusion of professional awards in the national framework of qualifications

11 February 2003

Introduction

The workshop was chaired by Mr. Seán Ó Foghlú, chief executive of the Authority. He outlined the purpose and the structure of the workshop. The aim was to review the submissions received on the inclusion of professional awards in the national framework of qualifications, to discuss issues arising and possible approaches to inclusion. The workshop focused on professional awards alone. A further workshop to address the issue of inclusion of international awards is to be held at a later date.

The format of the workshop involved participants being updated on the developments and work to date of the Authority, followed by a review of the submissions. This was followed by a perspective on developments in the United Kingdom in including professional awards in qualification frameworks. The presentations were followed by parallel sessions on issues relevant to statutory and non-statutory professional bodies. Participants had the opportunity to discuss and debate the issues. Each session had a chairperson and rapporteur. After these sessions reports were made back to the overall group based on the issues raised. This was followed by a general discussion.

Update on the Development of the National Framework of Qualifications

(presentation by Dr. Anna Murphy, Director of Framework Development, National Qualifications Authority of Ireland)

The Qualifications (Education and Training) Act, 1999 came into full force in June 2001. Its main aims are to establish and develop standards of knowledge, skill and competence; promote the quality of further and higher education and training; provide a system for co-ordinating and comparing awards and promote access, transfer and progression for learners. It focuses on learning outcomes which are described in terms of knowledge, skill and competence.

The new structural arrangements in the Act provide for the establishment of the National Qualifications Authority of Ireland and two awarding bodies – the Further Education and Training Awards Council (FETAC) and the Higher Education and Training Awards Council (HETAC).

Role of the Authority and the awards Councils

The key role of the Authority is to establish and maintain a framework of qualifications; to establish and promote the maintenance of standards of awards of FETAC and HETAC and to promote and facilitate access, transfer and progression.

There are separate but interdependent roles for the Awards Councils and the Qualifications Authority under the Act. The role of the Awards Councils is to develop policies and criteria for the making of further/higher education and training awards and the validation of programmes of further/higher education and training and to implement such policies. In this context, it was noted that the Authority is not an awarding body: it does not provide or fund education or training and is not a support agency for providers of education and training programmes.

There is a strong rationale for separating the role of the Authority from that of the awards Councils in the Act. This reflects the role of the Authority to concern itself, as appropriate, with all awards made in the State, for example, the awards of the Dublin Institute of Technology, the universities and the Department of Education and Science in addition to the awards made by the Councils. The Authority has a the key policy development role in setting out the cultural change that is implied in the implementation of the Act and in the development of the framework of qualifications, in leading such change and in ensuring that it is implemented.

Framework Development

In moving towards the establishment of the national framework of qualifications, the Authority has completed a number of phases of work. It published an overall Discussion Document in November 2001 and invited submissions on it. Over 80 public submissions were received in response to this document and this led to the public forum, held in Dublin Castle, in February 2002. This was followed by the publication of initial policies and criteria for the development of the framework in April 2002. Further policies and criteria for the framework were published in October 2002. Determinations on the number of levels in the framework – it will have 10 levels - and indicators for each these levels were also published by the Authority in October 2002.

As part of the process of developing the framework, the Authority also prepared a research paper on the comparison of international frameworks (June 2002). Also, following initial consultations, it published a discussion document on the inclusion of professional and international awards (May 2002). This was accompanied by a request for responses and submissions. In parallel, work on the

employment perspective is underway. This includes the publication of a report of focus group discussions on the issue in January 2003.

A priority for the Authority has been to consult and build consensus among the stakeholders on the development of the framework. (All the documents listed above and submissions received are publicly available on the Authority's website (www.nqai.ie.) This process involved, for example, the establishment of a Consultative Group, comprising representatives of the major stakeholders, an Employment Perspective Group, a Technical Advisory Group on Credit and an on-going series of bilateral meetings with stakeholders.

What is the National Framework of Qualifications?

The national framework of qualifications is a new development and is not just an amalgam of existing awards and systems. It is “a framework for the development, recognition and award of qualifications in the State, based on standards of knowledge, skill or competence to be acquired by learners” (Qualifications Act, 1999). In its policies and criteria (April 2002), the Authority further defined this to be “the single, nationally and internationally accepted entity, through which all learning achievements may be measured and related to each other in a coherent way and which defines the relationship between all education and training awards”.

The framework embodies a vision for learning which recognises all learning activity undertaken throughout life, with the aim of improving knowledge, skills and competences within a personal, civic, social and/or employment-related perspective.

There are many benefits associated with the national framework of qualifications. It focuses primarily on learner needs. It promotes the setting of standards for awards in a coherent and transparent way and promotes the quality of both programmes and awards. The framework will create a coherent and understandable system for co-ordinating and comparing awards. In addition, it will facilitate international comparisons between awards. By broadening the possibilities for recognising learning, the framework will facilitate lifelong learning. In addition, it will also facilitate access, transfer and progression.

Key elements of the framework

In terms of the inclusion of awards, the national framework sets the overall standards of awards of the Further Education and Training Awards Council, the Higher Education and Training Awards Council and the Dublin Institute of Technology. It will also accommodate the awards of the Department of

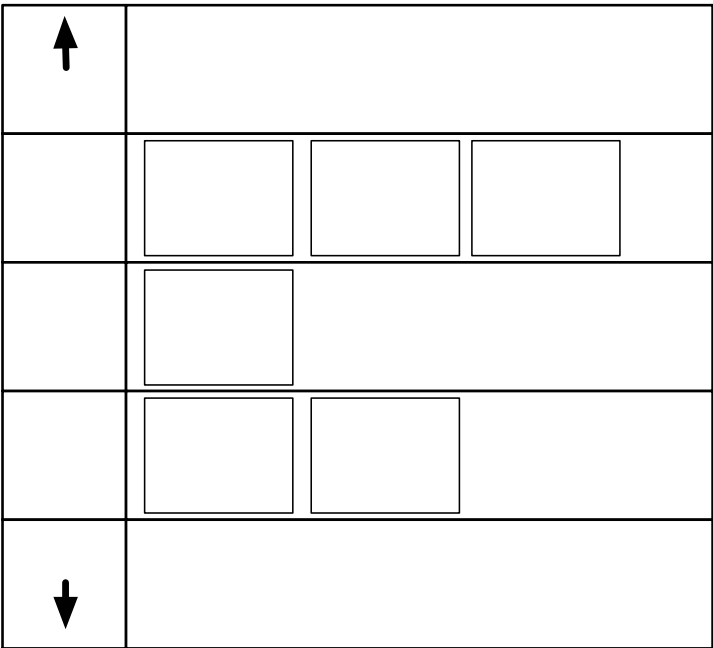
Education and Science and the Universities. The aim is that the framework will include other professional and international awards made in the State.

The framework will comprise 10 levels. These levels are a series of sequential steps. Each level sets out a range of standards of knowledge, skill and competence to be acquired by learners. Levels are not in themselves standards but indicators of a range of standards. They can be described in an ordered sequence. Level indicators are set out in the Grid of level indicators (which was determined by the Authority in October 2002 and is available on its website). The indicators are the principal element of the framework in terms of indicating overall standards associated with awards to be made at each level.

Award-types will be developed for each level in the framework. They will reflect a mix of standards of knowledge, skill and competence which is independent of any specific field of learning. Level indicators enable award-types to be matched to a level on an overall, best-fit, basis rather than by conformity to a defined set of required standards. For each award-type, a wide range of named awards will be developed by the Awards Councils and other awarding bodies.

It is the responsibility of the Authority to develop level indicators and award-type descriptors. It is the responsibility of the awarding bodies to develop named awards. However the overall standards of named awards will be set by the award-type descriptors. The structure of the framework is illustrated below:

Diagram 1: Structure of the framework



The following box indicates the emerging set of initial award-types for each level in the framework and is based on the outcome of consultations to date. The Authority is expected to determine the initial award-types in the coming weeks.

Box 1: Emerging Initial Award-Types

Levels 1 and 2	FETAC award-type/s*
Level 3	FETAC award-type/s and Department of Education and Science junior cycle awards
Levels 4 and 5	FETAC award-type/s and Department of Education and Science senior cycle awards
Level 6	FETAC and HETAC/Dublin Institute of Technology award-types
Level 7	Single award-type
Level 8	Honours Bachelors Degree and Higher/Graduate Diploma
Level 9	Masters Degree and Postgraduate Diploma
Level 10	Doctoral Degree
* Note that the titles for these award-types have not been determined	

The aim is to have the same award-types at levels 7-10 for HETAC, the Dublin Institute of Technology and the universities.

Access, Transfer and Progression

The Authority is to determine the policies and procedures that must be implemented by providers with programmes validated by the awards Councils or by those with delegated authority. These must also be actively considered by universities and their implementation will be reviewed by the Authority.

The objective is that the learner should be able to enter and successfully participate in a programme, or series of programmes leading to an award, or series of awards, in pursuit of his/her learning objectives. The national framework of qualifications and associated programme provision should be structured to facilitate learner entry and to promote transfer and progression. Thus, learners will be encouraged to participate in the learning process to the full extent of their abilities and ambitions.

In this context, the following policy areas are being worked on: credit (and recognition of prior learning); progression routes; entry arrangements and information provision.

Time-table for further development of the outline framework

The key elements of the outline framework, in addition to the policies and criteria, are the levels and award-types. The award-types and award-type descriptors are expected to be determined by the Authority in March 2003. At the same time, the Authority is expected to determine policies on access, transfer and progression.

Review of the submissions on the inclusion of professional awards in the national framework of qualifications.

(presentation by Dr. Anna Murphy, Director of Framework Development)

The presentation covered the main issues concerning professional awards that were addressed in the Discussion Document on the inclusion of professional and international awards and in the submissions. Of the twenty four submissions received, over twenty addressed the inclusion of professional awards. Submissions were received from awarding bodies, statutory bodies, international bodies, non-statutory bodies and providers. They are available on the Authority's website (www.nqai.ie). The presentation reviewed the key issues raised in the discussion paper, reactions to these and other issues and that were raised by the submissions. The submissions revealed different views on whether professional awards should be included or not and surfaced distinct issues for those professional bodies that have a basis in statute and those that have not.

Rationale for the Inclusion of Professional Awards in the framework

The rationale was set out in the discussion document. The vision for the framework is it would be inclusive and comprehensive. The aim is that it will be the '*single, nationally and internationally accepted entity, through which all learning achievements may be measured and related to each other*'. Professional bodies play a key role in making and recognising awards and this is recognised by the market and learners. Inclusion in the national framework would provide national recognition for professional awards. It would provide increased opportunities for transfer and progression which will be of particular benefit to the learner. Inclusion would enhance labour mobility, both national and international. It would also confer an element of external quality assurance for the processes of the awarding body. However, the inclusion of professional awards in the framework is not compulsory and the document proposed that inclusion should be approached in an open and co-operative manner.

While many of the submissions agreed with the rationale proposed, some do not agree. A ‘wait and see’ approach appeared to be adopted by some. Many suggested additional rationale and factors to be considered in considering how professional awards might be included.

First, a number of general reasons were given as to why professional awards might not be included. It was claimed that professional qualifications were different and ‘the framework should not seek to compare them with other kinds of qualifications’. They may contain elements of practical training unique to the profession and elements not usually present in vocational or academic qualifications, e.g. professional values and ethics. Another submission stated that ‘if all learning achievements were arrived at in the same way, then they would be directly comparable, and could be included in the framework. However, they are not, and therefore should not be included’.

In contrast, other submissions gave further reasons for the inclusion of professional awards in the framework. Inclusion would enhance the international reputation of the framework. It would benefit employers who would have increased confidence in such awards and create a greater diversity of awards. Inclusion would be particularly important in the case of awards made by professions that are not regulated by statute. It would also allow long-standing relations between professional bodies to be maintained.

Other factors to be considered in the rationale for inclusion were identified in the submissions. This included the need to preserve the independence and special status of professional bodies, which is recognised in the discussion paper, and the need to have regard for the complexities of the market and existing relationships. The distinct features of professional awards may need to be safeguarded as this distinctiveness impacts on market confidence. The international dimension of professional awards needs to be considered. For example, certain EU legislation creates obligations regarding the recognition of professional awards and international agreements between professional bodies may also impact on inclusion. In addition, it was stated that mutual recognition arrangements in relation to license to practice may cut across the mutual recognition of qualifications.

Range of Awarding Bodies for Professional Awards

The discussion paper set out a range of awarding bodies for professional awards which are summarised in the Box below.

Box 2: Range of awarding bodies for professional awards

1. Professional Qualifications that may lead to Renewable Membership

Here, the professional qualification is permanent but membership may be renewable. The qualification may be linked to grades of membership. The professional body may also offer qualifications for continuing professional development. As well as the qualification, additional criteria may apply prior to membership/registration.

2. Professional body provides membership or registration based on recognition of award made by another awarding body

Some professional bodies set requirements for qualifications that are not administered by the professional body. Here, the professional body does not make the award itself: it recognises awards made by another awarding body. This practice is also known as accreditation. Some professional bodies accept a variety of qualifications. Prior to membership or registration, additional criteria may apply.

3. Membership or registration following assessment

The learner may become a member or be registered following an assessment that is similar to that used for an award or qualification. However the learner does not get separate recognition of this or retain anything should he/she leave the professional body. In this case, there is no award for the purpose of the framework and inclusion does not arise.

Arising from the submissions, it was clear that different meanings may be attached by professional bodies to ‘membership’ and ‘qualification’ than those understood in terms of the national framework. The term membership, when used by professional bodies, may act as a qualification which recognises someone who is ‘qualified’ or recognised as able to perform a particular function. A qualification or award, for the purposes of the framework, is one which recognises learning achievement. It may also confirm the learner’s ability to perform a particular function.

Different perspectives on the possible role of the professional body in recognising awards in the framework were offered in the submissions. These ranged from for example, a statement that ‘where publicly funded bodies provide qualifications for professional practice, there is a need to ensure that professional bodies will accept the relevant standards of relevant awarding bodies’ to a suggestion that ‘where a qualification is admitted to the framework then, in general, it is a matter for the professional body whether to recognise it for its own purposes or not’. The submissions indicated some concern amongst providers that recognition may not always be forthcoming for awards that are included in the national framework of qualifications, even in cases where programmes leading to those awards have been developed with the professional body.

Arising from the submissions, it appears that some relevant professional bodies may not be adequately covered in the three kinds of bodies described in the discussion document. There is a need to consider that some professional bodies operate across more than one jurisdiction, such as in the UK and Ireland. In addition, national and EU legislation impacts on how professional bodies deal with awards.

Range of practices and awards used by professional bodies

Some submissions suggest the need to consider in greater detail the practices that professional bodies use for: programme provision; programme validation; standards setting; assessment; making awards and recognition. This raises the question of whether this range of practices should be taken into account when deciding on how to include professional awards in the framework.

It is also clear that a range of distinct professional awards are used by professional bodies. These include: non-membership qualifications; membership implying attainment of a qualification; licence to practice; training (that may not lead to a qualification or national certification but which is relevant to the workplace) and continuing professional development.

Relations between providers and awarding bodies

In general, the different possible sets of relations between professional bodies and providers (of education and training) allow professional bodies different options for managing professional awards. These relations also provide a number of mechanisms or processes for including such awards in the framework. The Qualifications Act sets out key sets of relations between providers and awarding bodies. In general, other than in the case of the universities and the Dublin Institute of Technology, all publicly funded providers submit programmes to the awards Councils for validation. Validation is the process by which the Councils satisfy themselves that a learner may attain the knowledge, skill and competence for the purpose of an award. This would usually lead to an award from the relevant Council.

Publicly funded providers who submit programmes for validation may also seek to have awards made by other awarding bodies, i.e., 'parallel' awards. Finally, the Act stipulates that arrangements that the Institutes of Technology have for making awards with bodies other than the awards Councils must be approved by the Authority. This is in addition to the submission of programmes to the awards Councils for validation or any arrangements that may be in place for delegation.

The issue of parallel awards raises questions about who decides the question of mutual recognition of awards and the question of equivalence between parallel awards and those made by the Councils or others that are on the framework. The issue of competition between private and public providers, and between different kinds of public providers also arises in the context of these sets of relations.

Access, transfer and progression

This is a core dimension of the framework and raises issues for the inclusion of professional awards in the framework. A number of professional bodies have existing policies on access, transfer and progression. Many of those who made submissions support the need for consistency with the Authority's policies on access, transfer and progression. Some submissions queried whether the Authority's policies would be too restrictive in terms of access, transfer and progression or, alternatively, in terms of the professional body's policies. Some professional bodies insist that, even where they recognise learning achievements, a learner must also demonstrate that he/she has the necessary knowledge, skill and competence to perform effectively at the required level. It was also suggested that existing arrangements that professional bodies have for credit and exemptions should be also considered.

The following themes were also aired in the submission:

Consultation with professional bodies

It was suggested that consultations with professional bodies may be critical to 'buy-in' for inclusion of professional awards in the framework. It was suggested that the advantages and disadvantages of inclusion should also be clarified further. It appears as if further clarification about the shape of the framework may be needed before some bodies will decide on inclusion. Some questions arise: should consultations encompass all professional bodies that have relations with awarding bodies/Councils and should the interests of stakeholders of professional bodies e.g. their clients, be considered?

Placement of awards on the framework

The placement of professional awards on the framework is critical to mutual trust, confidence and recognition. This gave rise to a number of questions in the submissions: who decides what at level will awards be placed and will professional bodies have a role in this and/or can they be encouraged to accept the placement? When professional awards are made in more than one jurisdiction, such as in the member states of the EU, the question arises of the compatibility of placement in respective frameworks or with other arrangements.

Competition

A number of issues in relation to competition were raised in the submissions. These included questions about the awards or exemptions that professional bodies recognise in terms of access to membership or as professional qualifications. It was suggested that all awards placed at the same level in the framework may not in practice be recognised by a professional body as being equivalent to each other. An important issue that was raised in terms of the possible process for inclusion was that possible

conflicts of interest may arise were an awarding body to evaluate the awards of a professional body for the inclusion of that body's awards in the framework.

Funding and tax relief

A number of questions were raised in the submissions on this topic. Will publicly funded programmes, including those provided for professional bodies, require validation from HETAC, FETAC, the Dublin Institute of Technology or the universities? Could the placement of national awards that are recognised as professional awards have implications for student funding? It was also suggested that all programmes leading to awards in the framework should be subject to tax relief.

Status of Professional Bodies

It was clear from the Discussion Document and the submissions process that, while many similar issues and questions arise for all professional bodies, there are important distinctions between professional bodies that are based on statute and those that are not in terms of their involvement with awards. These are summarised below.

Professional bodies that are based on statute

Such bodies may be required to set and maintain standards for:

- education and training
- access to the profession
- professional conduct and ethics
- particular grades of membership

One of the first issues here concerns the different status and role accorded professional bodies under statute. The questions that arise are whether existing national and international legislation and arrangements will affect the recognition of and inclusion of awards. Queries about the impact of the Authority's policies on access, transfer and progression were also raised in the submissions.

Professional bodies that are not based on statute

The specific issues that arose in the submissions include which professional bodies are relevant in the context of inclusion, what is the status of these bodies and how this is determined. It was also suggested that the inclusion of professional awards in the framework might convey a status to these bodies that the State does not otherwise convey. On the question of professional bodies functioning as awarding bodies, it was suggested that there might be a need for a process to establish 'fitness of awarding bodies' for new or non-regulated professions. A particular issue for emerging professions was a concern that awards made by publicly funded bodies could threaten the discipline and underlying ethos of some, especially new, professional bodies.

Which process to be followed for the inclusion of professional awards in the framework?

Three possible processes for the inclusion of professional awards in the framework were set out in the discussion paper. These are summarised in the box below.

Box 3: Possible processes for inclusion

Process I

The full validation processes of the awarding bodies are used. Programmes of education and training are submitted in the normal way. Completion of the programmes, if successful, would lead to an award of the Council. As appropriate, a professional body may use the validation processes of universities or the Dublin Institute of Technology.

Process II

The Authority co-ordinates the recognition of awards with the assistance of the awarding bodies. In this process, the professional body aligns its awards with the framework.

The professional body applies to the Authority for inclusion. Procedures to determine how applications are considered need to be developed. The consideration of applications needs to take account of key Authority policies on the framework.

Process III (suggested for international awards)

The Authority co-ordinates recognition processes with assistance of international quality assurance agencies.

Process I and Process II are favoured by a majority of those who made submissions and by the awards Councils. There was limited support for the use of Process III for professional awards.

A general response to the proposals above was that ‘the simplest possible mechanism should be adopted’. It was generally stated that standards should be maintained. Professional awards should be included ‘in a manner and at a level which the professional body regards as satisfactory’. Questions were raised about how the quality assurance, standards setting procedures of professional bodies, where they exist, can be accommodated. It was also asked whether, given the different types and sizes of bodies, all professional bodies should be treated the same.

Different approaches to the process were also proposed. These ranged from suggestions that the awarding bodies might simply incorporate the standards of qualifications of professional bodies to including professional bodies as partners with the awards Councils in for example, standard setting and programme validation.

The following paragraphs briefly summarise the responses to Process I and Process II. Process I was generally seen to be fair in terms of the treatment of providers. It was also seen as being a simple approach. There was a suggestion that rather than actually make an ‘award’, the Awards Councils might instead ‘recognise’ professional awards in this process. However, a completely different perspective was offered by some who suggested that the prospect of a professional body subjecting any of its processes to validation by another awarding body could present serious difficulties if a different approach or requirements were specified by the awarding body.

With respect to Process II, some felt it to be more inclusive than the other processes. It also seems more appropriate in taking account of relations between professional bodies and international professional bodies/federations etc.. There were concerns raised about the comparability of professional and other awards. In addition, there was a query as to whether this process was over elaborate.

Professional qualifications and public accreditation: the UK experience

(presentation by Dr. Stan Lester, Stan Lester Developments, Taunton, UK)

Dr. Stan Lester is a consultant with an independent practice and has carried out work for the Qualifications and Curriculum Authority (QCA), the Council for the Curriculum Examinations and Assessment (CCEA), and the Qualifications, Curriculum and Assessment Authority for Wales (ACCAC) in the area of higher-level qualifications and alignment of frameworks. He is directly involved with the National Council for Conservation-Restoration on developing professional standards and qualifying processes.

The accreditation of professional awards is a relatively recent development in the UK and is occurring at a time of change and development with respect to the qualifications frameworks that are in place. Overall, the regulatory structure for education and training awards differs in important respects to that of Ireland, notably insofar as there is no single unitary framework for qualifications being put in place. These distinctions were set out in the presentation. However, the treatment of professional awards and practices for their accreditation or approval in qualifications frameworks may be of relevance to Ireland.

Overview of the regulatory situation in England, Wales and Northern Ireland

The qualifications regulatory authorities (QCA, CCEA, ACCAC) accredit and monitor public qualifications made by awarding bodies other than universities. Universities and other degree-

awarding institutions are self-regulated, but subject to the Quality Assurance Agency (QAA) for higher education.

There are two steps in the approval of qualifications by these bodies. An awarding body is approved by the regulatory authorities to offer accredited qualifications (Part A of the approval process). Professional bodies can be approved as awarding bodies. Individual qualifications are accredited into the National Qualifications Framework (under Part B of the approval process). Accredited qualifications are approved by the Department for Education and Skills for public funding. However, public funding is not restricted to accredited qualifications.

The diagram below illustrates the key groupings of qualifications frameworks and their associated levels in the UK. These are for Higher Education (covering England, Wales and Northern Ireland); credit frameworks, for example, Northern Ireland Credit Accumulation and Transfer System (NICATS); the National Qualifications Framework and the Scottish Credit and Qualifications Framework. The National Qualifications Framework is currently under review.

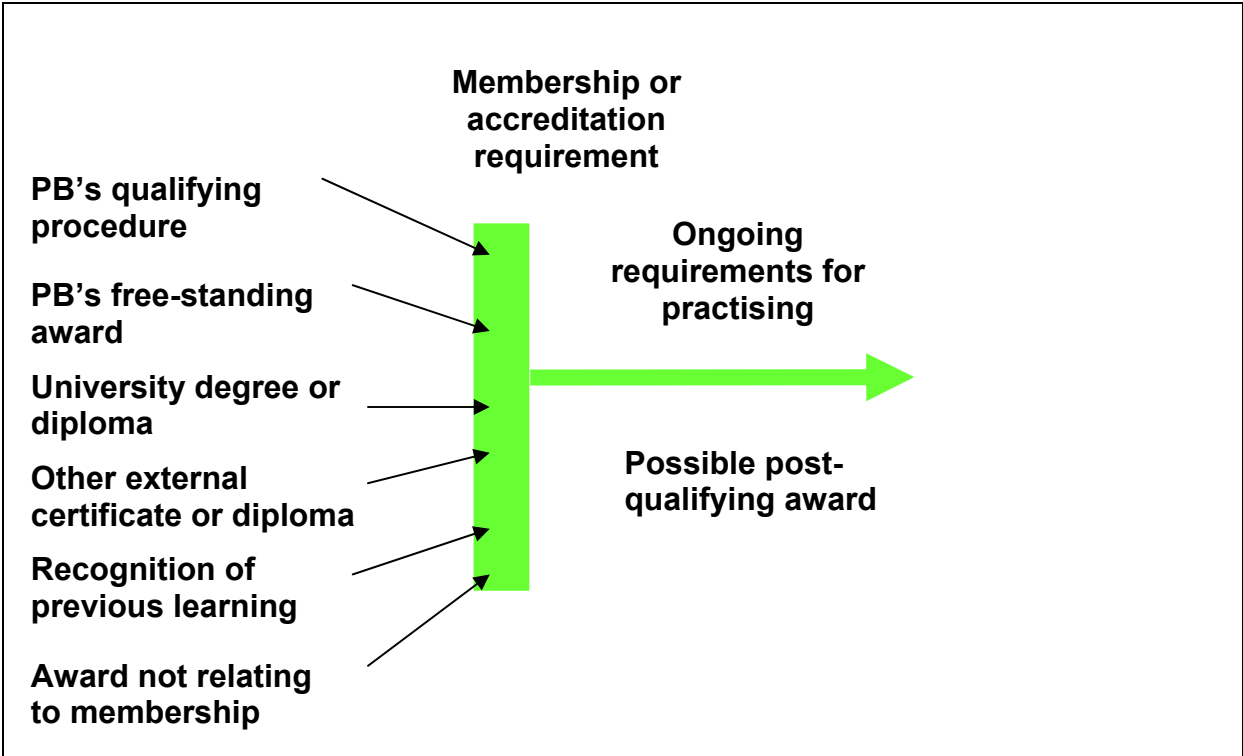
Diagram 2: UK Frameworks of Credit and Qualifications

EW&NI HE	Credit e.g. NICATS	NQF*: QCA, CCEA & ACCAC	Scottish
doctoral	8		12
master's	7	5 higher 4	11
honours	6		10
inter	5		9
certificate	4		8
	3	3	7
	2	2	6
	1	1	5
	entry	entry	4
			3
			2
			1

* Note that the NQF is currently under review

Turning to professional bodies, the diagram below indicates the range of awards and qualifications that are used by professional bodies in the UK.

Diagram 3: Typology of UK professional awards and qualifications



Eligibility of professional awards for accreditation in a qualifications framework

The following practice is used to determine whether professional awards can be accredited or approved and placed on the relevant qualifications framework. This is based on the features of the professional award in question. Free standing qualifications are eligible while qualifying memberships or equivalents, which do not involve a separate, irrevocable free standing-qualification, are not eligible.

Once achieved, a free-standing professional qualification is the ‘property’ of the qualified person: it can only be revoked under exceptional circumstances (e.g., discovery of fraud or misrepresentation by the candidate in undergoing the assessment). There should be no requirement for ongoing membership, registration or payment of a recurring fee in order to retain the qualification, even if in practice most candidates take the qualification because it is the (or a) requirement for gaining membership or joining a register.

A qualifying membership or membership by examination typically requires candidates to undergo a similar process to taking a free-standing qualification, but there is no separate certificate other than membership of a professional body or admission to a register. Typically, membership or registration

can be revoked for non-payment of fees, breaches of the profession's code of practice or ethics, or failure to keep up-to-date; it can also be resigned from.¹

There are three main, voluntary, practices used for the accreditation of professional awards, each of which is described below:

Professional Qualifications A

A professional body recognises a university or awarding body qualification, or devises a qualification that is then awarded by another body. The awarding body (not the professional body but with the endorsement of the professional body) can submit the qualification to the regulatory authorities for accreditation. Universities act under their own awarding powers as part of the Higher Education framework and there is no involvement by the regulatory authorities in this area.

Professional Qualification B

A professional body offers its own qualification which is distinct from membership (though it may be used towards it). The professional body can if it wishes submit the qualification to the regulatory authorities for accreditation.

Professional Qualification C

A professional body operates a qualifying procedure leading to membership or accreditation of/by the professional body and there is no separate qualification. The qualifying procedure, membership or accreditation is not a 'qualification' for regulatory authority purposes, even if it is normally thought of as being one.

The views of professional bodies on whether their awards should be accredited to the qualifications frameworks are varied. Some view inclusion as being critical because of its implications for public funding of courses leading to those awards. Accreditation is also seen by some as desirable insofar as it generates an external quality stamp for awards. Increasingly, accreditation is seen to support progression and transfer (although credit can also play a role here). For those whose awards are university-based, accreditation on the national framework of qualifications is not relevant. For others and for small bodies in particular, accreditation is often too onerous or involves unacceptable changes.

¹ This paragraph is taken from the Note to Design principles for higher-level vocational qualifications, QCA, CCEA & ACCAC, 2000

Report from Session I - awards concerning statutory bodies

(Chair: Mr. Séamus Puirseil, Chief Executive, HETAC. Rapporteur: Mr. Eamonn Carey, Development Officer, National Qualifications Authority of Ireland)

There was a general welcome for the inclusion of professional awards in the framework. It would help establish a currency for awards, assist learners (in particular those outside the mainstream) and would facilitate mobility and occupational change. The risks of non-inclusion were raised: a two-tier system might be created that would consist of awards that are in the framework and those that are outside the framework. In terms of additional considerations, the question of whether inclusion should be a matter of principle or an obligation to the learner/citizen was raised. The question of whether a voluntary approach was enough was also raised. It was also suggested that the needs of learners should be considered in decisions on inclusion.

A number of general issues arose in the discussion. A key theme was the need for clarification of terminology about awards and qualifications including the use of the words ‘title’ and ‘award’. Some clarification of existing legislative requirements concerning who has the authority to make and recognise awards was also sought. The distinctive features of licence to practice were also raised – this can be revoked and may be separate from an award. The question of if and how a licence to practice could be treated as an award (which cannot be revoked or withdrawn) also arose, bearing in mind the importance of such licences to professions. The need to clarify the issues for learners was also raised.

The extent to which EU legislation – both sectoral and general – impacts on qualifications was also discussed. The full implications of this legislation and draft directives for qualifications are not clear. Other international dimensions which are important to some professions concern international certificates of competence and other arrangements between professional bodies.

Access, transfer and progression was recognised as being important for learners making career changes and in focusing attention on the needs of the learner. Mobility was recognised as being important to all stakeholders. Support was given to the role of the framework in facilitating learners to build-up awards and gain recognition for their learning. In this connection, the development of a credit system was seen to be useful.

A number of issues surrounding standard setting were raised. There was a call for a joint approach (involving awarding bodies and professional bodies) and clear, transparent working arrangements. The question of how the specific requirements for professional practice can be accommodated and the management of structured training/practice were raised. A general question was raised about the involvement of employers in determining standards and the acceptability of awards.

With respect to quality assurance, it was stated that there must be incentives for professional bodies and their members to become involved. Specific attention needs to be given to the issue of ethical and other requirements for professional practice and how to deal with continuing professional development. It was suggested that there should be clearly defined and separate roles in relation to quality assurance for the professional body, awarding body and providers.

Some queries arose with respect to programme validation in particular as this is seen to be a three-way relationship between the professional body, provider and awarding body. There may be a challenge to reconcile differences that may arise in the validation process and to determine where ultimate responsibility for decision-making lies. The question was also posed of what happens should a provider/professional body not submit programmes for validation.

There are many types of existing and emerging relationships between professional bodies and providers. It was stated that providers will have to be flexible and that there must be as 'buy in' as possible to the framework. With respect to relationships with awarding bodies, it was stated that examples of successful current arrangements should be built upon.

Discussion of the issues above precluded detailed consideration of the process to be followed for the inclusion of professional awards. Many considered that decisions on which process to follow should not be rushed.

Report from Session II - awards concerning non-statutory bodies

(Chair: Dr. Frank McMahon, Director of Academic Affairs, Dublin Institute of Technology.
Rapporteur: Mr. Edwin Mernagh, Development Officer, National Qualifications Authority of Ireland)

Reasons for including professional awards in the framework, additional to those already discussed at the workshop, were offered. These included a mutuality of interest, increased possibilities for the recognition of alternative learning, enhanced status or identity for the professional body and increased relevance accruing to awards that are part of a larger system. The benefits to the learner were stressed – these included wider access, transfer and progression opportunities for holders of professional awards. It was also stated that inclusion could result in positive collaboration between professional bodies and statutory providers.

A number of concerns about inclusion were raised, for example, that the framework may not be able to accommodate the variety of professional awards and that it may alter perceived relativities between awards. The question of whether professional bodies could have ownership of awards made by other bodies was raised. The placement of awards was raised as a key issue with respect to maintaining standards, repercussions for existing award-holders and the possibility for conflict between framework

positioning requirements and other (e.g., international) regulatory requirements. The question of whether all professional awards would be grouped together at a single level was also raised. The effect of EU legislation and the proposed general directive on the recognition of professional qualifications were also raised as a general issue that may impact on inclusion.

In terms of the range of professional awards in place, there was some debate about distinctions between awards and membership/licence to practice. Many sectors have no licencing arrangements and new ones develop over time. In addition, the arrangements underpinning licence to practice may be defined by insurance considerations. It was also stated that the framework needs to accommodate recognition for the learning involved in continuing professional development – this is often very amorphous.

The benefit of the framework in terms of access, transfer and progression were raised in the general discussion about a rationale for the inclusion of professional awards. A main benefit identified was that this will enable learners with professional awards to progress into the “mainstream” system – and vice versa.

On the process of inclusion, some general issues were raised. The actual meaning of the (framework) levels in terms of the responsibilities of professional bodies in the real world was questioned. One of the critical tasks for professional bodies would be to align their quality requirements with those of an awarding body (e.g., one of the Councils). It was noted that there are varying levels of comprehensiveness in the quality arrangements in place at present. The question of whether it was feasible to have validation panels or other means of quality assurance for all occupations/professions was also raised.

In terms of the three processes for inclusion, it was stated that no one process would suit all needs – there is a need to maintain a variety of inclusion processes, even to deal with the range of activities of one professional body. Process I posed a particular challenge to international bodies who might need to work with more than one awarding body (e.g., with both Councils) where each may have different requirements.

General Discussion

(Chair: Seán Ó Foghlú, Chief Executive, National Qualifications Authority of Ireland)

The presentation of the rapporteurs reports was followed by a general discussion. It was clear from the submissions and the discussions in the workshop that statutory and non-statutory bodies are meeting particular needs of society. Additional points were made on the general question of inclusion in the

framework. It was emphasised that awards made at the lower levels of the framework are also important, as they help people get on the qualifications ‘ladder’, recognise achievement and are of particular relevance to the self-employed and those on short courses. The State does not currently have an awards system that recognises continuing professional development. The national framework of qualifications has the potential to facilitate this. A further reason for supporting inclusion was the need of employers and employees for national awards following on-the-job learning. This is of major concern to mobility, particularly in the EU. The lack of a comprehensive system of awards has also resulted in some bodies ‘importing’ awards from outside the State to meet their needs.

A number of professional bodies elaborated on their reasons for taking a ‘wait and see’ approach to inclusion, as indicated in some of the submissions. The chief reason given was the level of detail presently available was not sufficient to see how the professional bodies can be accommodated in the framework. Some had reservations about how their existing relationships and programmes established with providers might be affected by the processes used by the awards Councils. There was uncertainty about how continuing professional development might be included. It was suggested that the supplemental and special purpose award-types might facilitate this. The professional bodies and awards Councils would need to work together on this. A number of specific concerns were raised about quality assurance. Some professional bodies would have difficulty with external quality assurance which they feel they do not need as they have well established systems that are, in many cases, based on statute and recognised internationally. In general, the issue of what impact an external quality assurance agent would have on a professional body, especially on professional bodies that do not have quality assurance processes, was also raised. The degree of involvement of the professional body in such external quality assurance would have to be considered.

A number of other issues were raised in the discussion. It was stated that any changes resulting from the implementation of procedures for access, transfer and progression should not diminish standards. In addition, it was stated that policies on access, transfer and progression would reduce reliance on particular awards as prerequisites for entry. The resource implications for the implementation of Accreditation of Prior Learning (APL) were also highlighted. There was also a query as to whether there would be any difference in the way ‘for profit’ and ‘not for profit’ professional or awarding bodies would be treated in the framework or by the Authority. It noted that other than for global awards, the vast majority of awarding bodies are ‘not for profit’. In relation to ‘for profit’ providers, the Qualifications Act has requirements relating to the protection of learners fees. The question of how the ‘fitness of professional bodies to make awards’ might be addressed was raised. While there is no legislative basis for deciding this, it was noted that the restructuring of the qualifications system in the Qualifications Act was partially motivated by a wish to rationalise the number of awarding bodies in the State.

Some open questions remained after the discussion namely on whether professional awards should be included in the framework or whether they needed to be accommodated in another way e.g. by recognition as being equivalent to an award in the framework. Whether all professional bodies would want their awards to be included in the framework or wanted national recognition also seemed, from the 'wait and see' approach of some, to be an open question. Linked to this, the question of how the work of the awards Councils would impact on arrangements already existing between providers and professional bodies was an important one for many.

The workshop concluded with the chairperson thanking all for their participation. He indicated that, it was clear from the active engagement of all involved at the workshop, there is a need for further consultation by the Authority prior to any decisions being made on possible approaches to the inclusion of professional awards in the national framework of qualifications.