

## **HETAC responses to the recommendations of the Framework Implementation and Impact Study, 2009**

1. *The overview and implementation of the Framework should be a top priority for the incoming body following on from the amalgamation of the Qualifications Authority, FETAC and HETAC.*

Agreed

2. *Given the dynamic nature of the Framework, changes in qualifications and in the wider education and training context, the Qualifications Authority should put in place a process to periodically identify and re-visit issues that may affect the integrity of the Framework or its effective operation.*

Agreed, though practically this is more likely to be a matter for the new successor body.

3. *In the context of the process outlined in Recommendation 2, the Qualifications Authority should re-visit in consultation with the relevant stakeholders the following three issues as a matter of priority. They concern progression and the effective comparability of awards at Levels 4-6:*

*a) the inclusion of all craft awards at one Level*

*b) the co-location of further and higher education and training awards at Level 6 and the confusion which is deemed to arise therefrom*

*c) the challenges posed to the Framework by 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.*

Point a) should be reopened with the relevant stakeholders following the organisational changes currently underway within FÁS.

Point b) would be best addressed following amalgamation. The new legislation is not expected to include a clause comparable to Section 10 of the Qualifications Act (1999) which requires the Authority to differentiate further and higher education and training. FETAC and HETAC will be replaced by a single awarding body. The continuing validity and utility of two major award types at Level 6 will then be disentangled from the question of the awarding body concerned.

Point c) should be addressed with the NCCA. HETAC will contribute to the discussion, particularly on the basis of its experience of the role of the senior cycle in access to higher education and training.

4. *The universities should advance Framework implementation in the university sector. They should, in particular, complete the inclusion of the remaining non-major awards in the Framework and introduce the learning-outcomes approach. Inconsistencies arising in the process of including similar awards in the Framework should be addressed by the Qualifications Authority, the universities and their affiliated institutions.*

HETAC welcomes this recommendation. Some providers of HETAC awards are concerned that they are in competition with university awards of indeterminate level and volume and inconsistent titling in a manner that puts them at an unfair marketing disadvantage.

4. *The Qualifications Authority together with awarding bodies, institutions and agencies responsible for quality assurance should put in place a single set of quality assurance principles for Framework qualifications and the programmes that lead to them. The critical importance of quality assurance to the integrity of the Framework must remain at the centre of the Qualifications Authority's work. It is recognised that specific models and procedures for applying these principles may be required in different sectors.*

The higher education sector (awarding bodies, institutions, agencies and learners) has already developed a set of relevant principles through the IHEQN. A first step will be to examine the extent to which these are compatible with the principles that apply in the FET sector and the schools sector. The 1999 Act does not refer to the quality assurance of qualifications from the university or schools sectors. It is expected that the new legislation will incorporate reference to the universities.

6. *In relation to awards in further education and training at Levels 1-6, FETAC should, as a matter of urgency, advance the use of Framework standards and introduce new awards to meet learner and labour market needs and to support progression throughout the Framework.*

HETAC recognises the urgency of this recommendation and is working with FETAC on approaches to setting standards, particularly where they span levels of the two Councils. A joint working group has been established on a tripartite basis.

7. *Gaps in the understanding of the Framework should be addressed by the Qualifications Authority, awarding bodies and providers. A communications approach to the Framework should*
- *focus on users and stakeholders at the point where they have a practical need to engage with the Framework.*

- *be in a language that is clear and simple*
- *clarify the distinctions between major and minor awards*
- *address inconsistencies in titling conventions within and across further and higher education and training*
- *ensure that awards that are in the Framework are clearly communicated to learners in terms of their character as qualifications in the Framework (with reference to award-type, Level, title, credit or volume, entry routes and progression opportunities).*

HETAC is collaborating with FETAC on the development of an Industry Forum or strategy for sustained engagement with employers. While some progress has been made on this project it is currently somewhat bogged down in the uncertainty surrounding communications generally around the amalgamation.

HETAC has a very clear distinction between major and minor awards. However the standing of the subject certification (HETAC issued statements of credit) under the old policy on Accumulation of Credit and Certification of Subjects (ACCS) has given rise to some confusion and is currently under review.

Titling conventions within HETAC and under delegated authority are relatively consistent internally in policy and in practice. These are consistent with the policy adopted by university sector though there are some inconsistencies in practice within the university sector and this gives rise to confusion and in some cases competitive disadvantage between the sectors. For example the title of “diploma” is sometimes used by universities for awards smaller than 60 credits.

HETAC policy on validation requires that providers refer to award-type, level and credit in promoting the HETAC awards but has not routinely monitored compliance with this requirement. Compliance with this and the access, transfer and progression provisions are included in institutional review.

8. *The Qualifications Authority should recognise and make use of the potential which the guidance/counselling community brings not only to communicating the Framework but also to brokering the relationship between the Framework and learners and other users in the labour market and in education and training.*

One contribution HETAC makes to the supporting the guidance community is through validating the specialist training programme of the National Council for Guidance in Education.

9. *The Qualifications Authority, awarding bodies and providers should work to improve transparency and consistency in the interpretation and application*

*of prior learning and in the communication of pathways other than the Leaving Certificate into higher education and training.*

All programmes validated by HETAC are required to specify access pathways. HETAC providers are required to implement the national policies on access, transfer and progression and one of the objectives of HETAC's Institutional review is to assess this implementation these policies by providers, including the provision of information.

10. *Inconsistencies in the operation and application of RPL that present barriers to progression should be addressed. Action should be taken by the Qualifications Authority and awarding bodies to:*

- *encourage institutions and providers in further and higher education and training to clarify the contexts and circumstances in which RPL is available*
- *promote awareness and knowledge of institutional and sectoral arrangements for RPL amongst users*
- *explore the potential to develop cross-sectoral and cross-institutional brokerage services for RPL for learners*
- *develop and implement transparent sector-wide approaches to RPL.*

HETAC validation of programmes includes an examination of how RPL has been incorporated in programme design for admission and exemption from programme requirements.

Although HETAC has policies and procedures in place for the recognition of prior learning for the purpose of making full awards and has demonstrated the feasibility of these procedures through making a small number of such awards, in the absence of appropriate funding mechanisms to cover the costs of assessment HETAC has been reluctant promote this route. The policy gap on funding was identified in the OECD report on RNFIL in 2008. HETAC would welcome an opportunity to participate in developing a national plan in relation to RPL along the lines identified in the OECD report.

11. *The Qualifications Authority and relevant bodies should address a range of issues associated with the operation of credit, including:*

- *the need to develop common arrangements to ensure that different credit systems are compatible with each other*
- *the need for consistency in the association of credit volume with titles of awards*

- *the need to put in place a credit system for further education and training awards and to ensure that it is compatible with the emerging European credit system for vocational education and training (ECVET).*

The implementation of ECVET, coinciding as it does with the amalgamation of HETAC and FETAC makes it opportune to revisit the volume base for credit chosen by FETAC. The advantages of a smaller credit unit (based around 10 hours of notional learning) are outweighed by the simplicity of a single system based around the ECTS model of 20-30 hours notional learning for all credit based provision in Ireland. The two systems are compatible but very confusing for learners and providers that have to operate across both. At very least an adjective will need to be put next to the term “credit” wherever it is used. This will be particularly damaging to FET credits at level 6 where they will have a lesser volume than HE credits at that level.

While the credit weighting of traditional and especially full-time programmes at HE is relatively unproblematic, it is more difficult for special purpose awards. It would be useful to carry out some empirical research on the learning time associated with different programmes alongside the programme learning outcomes.

12. *The Framework underpins a deep, long-term cultural shift in teaching and learning from an inputs-based approach to an outcomes-based one. The Qualifications Authority, awarding bodies, institutions and providers should continuously support and monitor this process.*

*The alignment of assessment processes with teaching and learning will similarly take time and requires continued attention and support by the relevant bodies.*

Since the FIIS was carried out, HETAC has adopted an extensive new policy on assessment and standards, following an extended consultative process. HETAC and its providers is currently following a detailed dissemination and implementation in relation to this new policy which marks a significant shift to learning outcomes.

13. *As the concepts and use of learning outcomes are contested and subject to differing interpretations, the Qualifications Authority should facilitate on-going debate on them. This debate should be cognisant of the different interpretations and applications of learning outcomes internationally. All constructive contributions to this debate, including from critics and sceptics, should be welcomed.*

Debate about the usefulness and appropriateness of learning outcomes arises frequently in the development of HETAC standards. It is also a feature of discussions by HETAC validation panels. We have not sought to document

the contestation explicitly but could do so for a period as part of a research project to add to the debate.

14. *It is essential for the visibility and currency of the Framework that there continues to be active and continuous engagement with the key stakeholders in the labour market to communicate its use, facilitate access to awards and develop standards for the workplace. The Qualifications Authority and the relevant bodies should also continue to facilitate the greater use of the Framework in recruitment practices, particularly in the public sector, so as to ensure that Framework awards are fully recognised.*

HETAC believes that the inclusion of professional awards in the framework helps greatly in raising the visibility of the framework within the industrial sectors concerned and will continue to promote this activity.

15. *The role of the Framework in the recognition of international qualifications in Ireland and in the recognition of Irish qualifications abroad should remain a key element of the work of the Qualifications Authority. As with all other awards, the recognition of international qualifications must continue to be underpinned by rigorous quality assurance.*

HETAC continues promote the European dimension of quality assurance and qualifications policy. This exposure is primarily through the recruitment of international experts to our panels. HETAC also participates actively in the work of ENQA, Eurashe, the Bologna Process and in bilateral work with peer agencies in other jurisdictions.

16. *The Qualifications Authority should continue work with the relevant government departments and agencies to align public funding with the Framework. In higher education and training, this can best be done by introducing credit as a basis for institutional and learner supports. Dedicated funding of sectoral and cross-sectoral initiatives to support access, transfer and progression should also continue to be in place.*

It is increasingly clear that the widely admired policy architecture for access transfer and progression, in terms of qualifications and quality assurance, will not be effective in achieving national goals for lifelong learning unless there is a corresponding responsiveness on the part of funding policy.

17. *The requirement that publicly funded bodies must in general have programmes leading to qualifications validated by FETAC or HETAC should be reconsidered by the relevant bodies in the revision of the Qualifications (1999) Act underway in the context of amalgamation.*

This restriction is no longer necessary now that we have the national framework of qualifications in place. It is sufficient that all publicly funded programmes

should lead to awards that are included in or aligned with the framework and HETAC supports increased flexibility subject to this condition.

18. *It is essential that there is sustained engagement by the Qualifications Authority and key stakeholders in European developments relating to Qualifications Frameworks.*

HETAC continues to support the implementation and appreciation of the European frameworks and recognises that, as with national frameworks, many thorny issues only emerge in the implementation phases. We agree with the recommendation but note that participation in European initiatives, particularly across multiple fields of learning can be very demanding. HETAC is seeking to make greater use of disciplinary expertise among our providers to extend its European participation.

19. *Existing gaps in data, both qualitative and quantitative, on the availability and use of pathways and of their outcomes for learners, and on the implementation of the Framework by institutions and providers should be addressed. In particular, so as to establish the value of the Framework from a learner perspective, it is recommended that the Qualifications Authority embark on a longitudinal study of a cohort of learners as they navigate their way through the Framework. The Qualifications Authority, awarding bodies, universities, the Higher Education Authority and Department of Education and Science should work together to address these gaps.*

HETAC is collaborating in the cohort project already being carried out by the ESRI. A more complete, framework oriented study would be desirable but should probably also be conducted by external researchers. While the current fiscal environment is unfavourable, thought should be given to establishing a cohort and obtaining baseline data as soon as possible. HETAC is also discussing with the HEA and providers ways to define and collect data on completion rates in particular.