

Public submissions on the implementation and impact of the National Framework of Qualifications and Access, Transfer and Progression policies: 2008

Institutes of Technology Ireland welcomes the opportunity to make a submission on the impact of the National Framework of Qualifications. IOTI (and its precursor organisation – the Council of Directors of the Institutes of Technology) has been involved, since the outset, in facilitating its development and has worked closely with the NQAI and other stakeholders on the continuing development and implementation of the Framework. Indeed, the Institute of Technology sector led the way in redesigning and revalidating its programmes to make them compatible with the framework determinations.

IOTI believes that the emergence of a National Framework of Qualifications, for all awards in the country, has led to a coherence that was absent up to that time. While the higher education award system was well established, confusion reigned in the Further Education system and clouded its relationship with the secondary school system and with tertiary education. The emergence of the Framework has allowed us move from a plethora of often unrelated awards to a single progressive system that has access, transfer and progression as guiding principles.

The framework has provided a structure for national awards that is easily understood by learners, educators, parents and employers. This coherence has placed Ireland at the forefront of developments in education throughout Europe and has facilitated our participation in the international developments brought about as a result of the Bologna Declaration (higher education) and the Copenhagen Declaration (vocational education and training). This has strengthened the recognition of Irish awards internationally.

The structure of the framework, with its ten levels described in terms of sub-strands of knowledge, skill and competence, has provided a solid foundation on which programmes can be designed. The learning outcomes basis of the awards and the adoption in higher education of the nationally and internationally recognised credit basis of modules (ECTS) has ensured both the transferability of learning and its recognition for access and progression.

However, there are still some weaknesses built into the framework that need to be addressed:

1. The placement of Leaving Certificate subjects over two levels, while pragmatic, is unsatisfactory. This is a consequence of the fact that there is no award defining Leaving Certificate achievement. While individual subject achievement may be expressed in terms of learning outcomes, there is little visibility as to the level of knowledge, skill and competence attained in reaching Leaving Certificate “standard”.
2. The dual Further Education/Higher Education awards at Level 6 continue to be a problem. The titling (Advanced Certificate/Higher Certificate) remains

confusing – indeed with the further education awards, it is the only one to be distinguished by a title rather than level. It also leads to confusion when relating awards to other frameworks such as the Bologna Framework and the new European Framework of Qualifications.

3. We strongly advocated, at the early design stages of the framework, that higher education awards be distinguished by the use of the word degree and proposed that the Higher Education Level 6 award be called an Associate Degree rather than a Higher Certificate. The increased development, use and recognition of Foundation Degree awards in the United Kingdom, in recent years, only reinforces our belief that this is a necessary and rational change. Indeed, over the period since the first appearance of the National Framework of Qualifications, the Bologna framework has been modified to include such awards as foundation degrees in the United Kingdom, Associate degrees in Europe and Higher Certificates in Ireland as higher education awards “within the first the First Cycle”. The concept of the Associate Degree is not new and it is widely used throughout the USA, and in Canada, Australia and Asia. IOTs are expanding their role in international education in response to Government policy. Such a change would have distinct benefit facilitating understanding of our awards structure in different jurisdictions and making our awards more transparent, comparable and compatible – key features underlying the development of the NFQ.
4. There is a need to review the nomenclature for used for the Major Award at Level 7 viz. Ordinary Bachelors Degree. Many find the descriptor “Ordinary” pejorative. IOTI propose that this be changed to the more commonly used title of General Bachelors Degree. The latter is more indicative of the less specialised nature of the award whilst the former may be taken as a qualitative description.
5. There is little doubt that the development of the National Framework of Qualifications has facilitated access, transfer and progression. This has been particularly true of progression from further education to higher education. However, the very nature of the framework has also led to some unrealistic expectations – particularly that achievement of an award at a precursor level automatically confers progression rights to the next level irrespective of deficiencies in knowledge, skill and competence in critical areas and limitations on available places. It needs to be emphasised that while achievement at a particular level provides a basis for progression it does not give a guarantee.
6. The embedding of a system of credit accumulation and transfer, especially in higher education, is a major achievement and has provided significant underpinning to the strategic intention of making lifelong learning the norm. This is intention is strengthened through the continuing development of procedures for recognition and accreditation of informal, non-formal and workplace learning.

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Respondent's Details

Name:	Dr Dermot Douglas
Position (if applicable)	Director of Academic Affairs
Organisation:	Institutes of Technology Ireland
Address:	First Floor, Fumbally Square, Fumbally Lane, Dublin 8
Telephone:	+353 (0)1 7082900
Email:	dermot.douglas@ioti.ie
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