

NATIONAL FRAMEWORK OF QUALIFICATIONS ISME SUBMISSION

ISME, the Irish Small & Medium Enterprises Association, is the only representative group in Ireland specifically representing the SME sector with a membership of over 6,000 member companies. Membership is comprised exclusively of entrepreneurs who own and manage competitive businesses, the true risk-takers in the economy.

Based on ISME's 2008 survey the main reason owner managers engage in training is to be more competitive. This is followed, equally in importance, by upskilling under-qualified staff, increasing the employee retention rate and to meeting legislative requirements. The results of this survey also show that 71% of owner/managers believe that certification is important while they believe that only 57% of their staff think it is important.

Employers expect training participants to be able to use what they have learned when they are in the workplace. The emphasis for them is on practicality.

Impact on Learners

For learners in employment who are funded by their employers the main focus is on gaining skills and abilities that are applicable immediately in their company. Many are not interested in certification.

On account of funding being linked to certification on the NFQ learners who are funded often need to achieve certification. Certification necessitates assessment of ability and therefore means learners must complete an assessment. This means that many learners in employment are presenting for assessment when they are not necessarily interested in being assessed/certified. Add to this the fact that many assessments are irrelevant to learners who are in employment, for example creating a cv, carrying out an interview for employment (Communications FETAC Level 6). This means that if learners in employment do wish to achieve certification (sometimes purely as a means to funding) they may have to complete assessments which are irrelevant to them.

With the introduction of the NFQ it is now easier to distinguish between qualifications on offer and to understand what level they are at. Examples would be the proliferation of courses called a Certificate in ... With the NFQ a learner or employer can now see if it is on the framework, and therefore recognised, and if it is on the framework, what level it is at.

Progression routes for learners are more obvious with the NFQ. However, they are not totally transparent. For example, having achieved a special purpose award at level 7, graduates may think they are eligible for progression to a level 8 programme, but this is not the case. The level of transparency needs to be raised and the use of special purpose awards for access and/or progression needs to be clarified. Part of the issue here is that there is no way of recognising short term practical learning at a high level. Credits achieved in special purpose awards should be recognisable for access and progression.

The introduction of the NFQ should have made APEL easier. However recognition of experiential learning is still difficult and can be a long process which is only worthwhile

for someone to do if they wish to pursue a course at a level higher than they automatically can access. This means that there are many people who have achieved a higher level of learning through their work or other means that have not been recognised at this level. With the government's aim to upskill the workforce significantly (500,000 individuals in the workforce to progress by at least one NFQ level – Tomorrow's Skills Towards a National Skills Strategy, Expert Group on Future Skills Needs, 2007) it would make sense to accredit the experiential learning on the framework and assess the actual learning level of individuals in the workforce. In order to do this it would first be necessary to streamline the APEL process to make it more accessible to people in the workplace.

Also many people in employment, or otherwise, are not aware of the possibility of using APEL for access. This should be clarified and made more obvious in prospectuses for educational institutions.

Strengths and Weaknesses of the Framework

Strengths

Programmes are now more easily comparable using the framework. The majority of owner managers however are not familiar with the framework or how it functions. A simple explanation of the framework should be distributed to employers. The key points would be to show where different qualifications are on the framework and what this would mean for someone to look to employ somebody at that level, i.e. what they can expect the individual's key capabilities to be.

Weaknesses

Higher level courses (Levels 8 and above) are highly academic and it is very difficult to certify practical executive training which is of a certain intellectual standard (e.g. levels 8 – 10) at the level which recognises that due to the need for academic rigour in assessment (referencing, etc.) at these levels. This means that courses, which are for senior management and owner managers, are delivered at a certain level but assessed and certified at a lower level. These are usually special purpose awards.

Special purpose awards, usually developed and used for learners in employment, often have ECTS credits but cannot be used for progression. Hence, courses with no progression routes have now been created to cope with demand from learners in employment. Credits achieved in special purpose awards should be recognisable for access and progression.

In order for training providers to access funding for training at level 7 or higher for learners in employment they either need to become HETAC approved or build relationships with academic institutions to have programmes certified. Either way, the academic system is quite slow and not very responsive. The academic calendar is not flexible which means timing is absolutely paramount for training providers. If a training provider who is going through another institution for certification does not meet that education provider at the right time a project could be held up by six months or more, which seriously reduces responsiveness to market.

In the case of FETAC, there is a difficulty with aligning training with certification already there. With FETAC deciding not to introduce any new qualifications for the moment and it being unclear what the system will be or when it will be introduced, there is a large gap

for relevant and market responsive training/education suitable for learners in employment or for any new and responsive certified education.

It takes too long to process and assess new training/education initiatives. The quickest possible time is approximately four months. The process and timeline should be reviewed to see if it can be refined and reduced while maintaining integrity.

The NFQ has yet to align with the professional bodies – accountants, lawyers, etc. This should be done as a matter of priority.

The NFQ hasn't brought transparency to qualifications from abroad. It is important that qualifications from abroad are easily understandable by employers. A mapping system of qualifications from abroad to our system which is available to employers would be very useful.

Impact on programme and qualifications

Some programmes will be delivered at a level higher than they are certified. This is due to how learners in employment are prepared to be assessed. There is a need to recognise practical ability at the level it is at not just academic capabilities, i.e. the ability to select and put theories into practice as well as referencing and critiquing theories.

There is a proliferation of qualifications that don't assist progression. (Special purpose awards) The limitation of the qualification needs to be made clear to learners and employers. This needs to be done in the context of creating greater understanding of the framework amongst employers.

Access, transfer and progression

Special purpose awards are not usable for progression and are not easily usable for access or transfer. As special purpose awards are developed mainly for learners in employment then these learners are not being given access to normal access, transfer and progression routes. This needs to be reviewed and a way of acknowledging the learning in conjunction with PEL or other qualifications should be made clear.

Relevance of the framework to employment

The NFQ hasn't added anything for employment that was not already there. The framework is not seen as relevant to many SMEs by SMEs. In fact almost 30% of SMEs don't know what HETAC or FETAC are. (ISME Survey January 2008)

Use of framework in public funding

The use of the framework in awarding public funding can be very problematic as funding is usually given on an annual or biennial basis. Courses which are not already certified are submitted for funding as they meet a need. If approved for funding they then have to be certified prior to being delivered but this can take a long time and the funding term may be over by the time the programme is certified. This is due mainly to the academic timetable and also the finding appropriate partners or getting HETAC approval. It is also due to FETAC's policy on not introducing new awards. This reduces flexibility and response to market needs and market demands. It can also be costly.

Many programmes for learners in employment are being designed to meet FETAC certification requirements not just learner group needs. This means there are elements of a course or programme that are not relevant to the learner group.

On account of the difficulty with aligning training with certification already there, there is a knock on effect for funded training, where the stipulation is for certification to be eligible for funding, in that programmes are required to deliver what is probably out of date curricula and there is no recognition for more up to date and relevant information. A system for recognising new curricula is imperative and needs to be completed as soon as possible.

Impact on the international recognition of qualifications

It still isn't clear how qualifications from other countries map to qualifications here or vice versa. Better transparency is required. A system for employers, similar to that used by academics in assessing the equivalence of qualifications from other countries should be created. (The academic system is one from the UK). This should be readily available, easy to use and employers should be made aware of its availability.

Summary of recommendations

- New system in FETAC for the approval of new courses to be expedited.
- Placing of professional qualifications on the framework to be expedited.
- The level of practical executive training, i.e. learning that has been implemented in the workplace, to be recognised without a need for academic referencing or detailed theoretical critique.
- The process for approving a course through HETAC or the academic institutions to be reviewed to see if it can be streamlined, made more flexible and the time it takes to be speeded up while retaining integrity.
- ECTS credits for special purpose awards to be recognised for access and progression, in conjunction with APEL
- The APEL system to be streamlined, made accessible and promoted to learners in employment
- A system for mapping qualifications from abroad onto the NFQ for employers should be developed and promoted.
- Raise awareness amongst employers of the framework and how they can use it to their benefit

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