

National Adult Literacy Agency

Submission to the

**Study on the implementation and impact of
the National Framework of Qualifications**

October 28th 2008



NALA

National Adult Literacy Agency
Áisíneacht Náisiúnta Litearthachta do Aosaigh

The National Adult Literacy Agency

The National Adult Literacy Agency (NALA) is an independent membership organisation, concerned with developing policy, advocacy, research and offering advisory services in adult literacy work in Ireland. NALA was established in 1980 and has campaigned since then for the recognition of, and response to, the adult literacy issue in Ireland.

Our mission

NALA is committed to making sure people with literacy and numeracy difficulties can fully take part in society and have access to learning opportunities that meet their needs.

NALA's vision

We want Ireland to be a place where adults with literacy and numeracy difficulties can:

- take part fully in society,
- improve their literacy and numeracy skills, and
- direct their own learning.

How NALA define literacy

Literacy involves listening and speaking, reading, writing, numeracy and using everyday technology to communicate and handle information. But it includes more than the technical skills of communications: it also has personal, social and economic dimensions. Literacy increases the opportunity for individuals and communities to reflect on their situation, explore new possibilities and initiate change.

Study of the implementation and impact of the National Framework of Qualifications and access, transfer and progression

The purpose of the review is to

1. Assess the extent to which the Framework is implemented and how well it is working
2. Support deeper implementation of the Framework and policies on access, transfer and progression
3. Identify progress in implementation
4. Identify gaps in implementation and drivers/obstacles in respect of its operation and implementation
5. Assess the initial impact of the Framework.

Key points

NALA remains an active supporter of the National Framework of Qualifications and the ongoing work of the NQAI and FETAC in the establishment and implementation of the framework, structures, levels, policies, standards and processes, particularly for the two new levels, Level 1 and 2.

NALA welcomes and supports the partnership approach by FETAC and the development of structures, policies and processes for accreditation purposes.

NALA has contributed to NQAI consultative forums and the various FETAC consultation forums for quality assurance policy and processes, standards, assessment, and the Expert Group on Levels 1 and 2. NALA welcomes the development by FETAC of the various systems for certification. The development of standards and awards structures are very positive steps to providing an option of accreditation for all learning.

NALA identifies three key points that require specific responses from the appropriate actors.

1. Implementation of Levels 1 and 2 not as advanced as envisaged.

Progress on the implementation of levels 1 and 2 is weak. There were delays in establishing the policies and processes by FETAC and the response from providers has been disappointingly slow, particularly from the statutory providers of adult basic education and training. The extent of implementation is insufficient to identify a comprehensive set of gaps and barriers at this stage.

2. Integration of the new levels 1 and 2 into the structures and processes for the realization of the framework is a matter of concern.

Based on the extent of progress and activity, NALA believe that there has been insufficient support for the integration of the new levels into the structure and fabric of the framework and Irish further education and training. NALA sees as essential the definition of an action plan for the integration of these new levels within the structures and processes under the NFQ as well as within the Irish further education and training sectors.

3. Integration of literacy and core competencies into existing awards at levels 3-5.

NALA is not aware of any significant move to enhance core competencies (such as literacy, numeracy and learning to learn) within existing awards at levels 3, 4 and 5. Nor does there appear to be any concerted focus or planned approach in this regard to reflect the depth and breadth of the levels, sub-strands and standards of the framework within existing awards. The establishment of standard development groups, the development of new awards at levels 3-5, and the processes for validation are key elements to achieve the necessary integration of literacy and core competencies.

Introduction

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Impact on learners

The impact on learners at levels 1 & 2 at this point is weaker than envisaged when the Framework was introduced. One of the factors is FETAC has not met the targets they set for development and implementation. Another key factor has been that the relative compliance by providers to the validating of programmes at Levels 1 and 2 has been weak. While nearly 700 providers have agreed their quality assurance systems with FETAC, only 14 of those providers have validated programmes at Level 1 and 2. The knock on effect is that very few learners are on programmes leading to awards at Level 1 and 2. 72 learners received the first awards at Levels 1 and 2 in May 2008. These outcomes are disappointing, and do little to enhance the value of these awards with learners and other stakeholders or the value of these levels to providers. As regards level 3-6, providers may not have to validate programmes for existing named awards until 2010.

Key strengths and Key weaknesses of the framework

The framework has provided for the accreditation of all learning, at any level, and this is a particular strength. The breadth and depth of the framework, the fact that it is blind to subject, is not course dependent and captures knowledge, skill and competence are commendable strengths.

Impact on programmes and qualifications

The NFQ has had a significant impact on the culture within Irish further education and training. The NFQ has fostered a shared understanding and language around certification, qualification and levels. For example, the national adult literacy reporting system was amended to specifically reference the NFQ levels. The main National Skills Strategy targets are described in terms of the NFQ levels.

At levels 1-6, the impact on programmes has been strongest on programmes leading to new awards, as existing named awards are not currently subject to a validation process. The impact on programmes at Levels 1 and 2 has been disappointing as most statutory providers have yet to validate programmes at these levels.

Access, transfer and progression

It is too early to discuss evidence of impact in terms of access, transfer and progression in relation to levels 1 and 2. The processes and systems have yet to be tested by practice. There are some issues and concerns.

- The current lack of availability of awards and programmes at level 1 and 2 is a barrier to access and progression. This impedes people getting on the qualifications ladder.
- There may be a need to provide a Level 2 major award in communications to facilitate progression.
- In the area of numeracy there is a significant jump in terms of both level and volume from level 2 to level 3, and this appears to be a wider gap than with other subjects. A level 2 major award in numeracy could facilitate lifelong learners to bridge this gap.
- The lack of processes for the recognition of prior learning at all levels is a barrier.
- NALA's experience is that there is insufficient focus on the integration of literacy and numeracy into programmes leading to certification at Level 3-5. This can result in a barrier in terms of access, transfer and progression, and does not reflect the inherent uses of literacy evident in the level determinations.

Providers response at Level 1 and 2 is weak.

While 693¹ providers of further education and training, incorporating 1419 separate centres, have agreed their quality assurance system with FETAC, only 14² providers have validated programmes at Level 1 & 2. These include eight VECs and six other providers, including the National Learning Network and NALA. VECs are a statutory provider with responsibility to provide a range of programmes in basic and further education including adult literacy, Back to Education Initiative, Senior Traveller Training Centres, Youthreach, and the Vocational Training Opportunities Scheme. The VECs are also active in other areas including community education. FÁS is a statutory provider of vocational training for the workforce. The fact that so few statutory providers have validated programmes at levels 1 or 2 requires examination, and, if appropriate, a response.

It should be noted that there are significant numbers of people with no or low qualifications. The National Skills Strategy identified that 30% of the workforce has Level 3 / Junior Certificate level qualifications or less.³ 10% of the workforce has no qualifications at all.

NALA Positively Supports FETAC's Development Work.

NALA welcomes and supports the partnership approach by FETAC and the development of structures, policies and processes for accreditation purposes.

Supporting the Integration of the New Levels

Within the implementation process for the overall framework and development at Levels 1 to 6, a number of measures will be required to ensure that the new Levels 1 and 2 are valued as an essential feature of the new structures and integrated into ongoing and future processes and development. This parity of esteem with the other levels will need to be actively supported by the NQAI and FETAC in all the development and the implementation of the framework processes, structures and new awards. Development at Levels 1 and 2, as well as the embedding of the understanding and value of these levels and awards is required.

¹ (FETAC Website 14 October 2008)

² (FETAC Website **Register of Validated Programmes, Levels 1 and 2**, 14 October 2008).

³ Expert Group on Future Skills Needs (2007), *Tomorrow's Skills, Towards a National Skills Strategy*

NALA sees as essential the definition of an action plan for the integration of these new levels within the structures and processes under the NFQ as well as within the Irish further education sector and other stakeholders.

NALA concerns with progress on Levels 1 and 2

NALA is concerned that the development and implementation necessary to advance certification at Levels 1 and 2 has still to be completed, and that FETAC and providers have responsibilities to fulfill.

The FETAC Strategic Plan 2003-2006 identified a number of key milestones that were missed. FETAC had planned that all new FETAC awards would have been established as part of the national framework of qualifications by winter 2005. FETAC had intended to have standards set, and programmes validated in a diverse range of learning environments by 2006. The validation of programmes policy set for winter 2004 was not approved by council until March 2006. The date for the establishment of the Level 1 and 2 awards was originally the 1st January 2006, with a review announced to begin in December 2006. However, by March 2007,

- no learners received awards at Level 1 and 2,
- no learners were on programmes leading to Level 1 and 2 awards
- no programmes at Levels 1 and 2 were validated by providers with FETAC, and
- no assessment guidelines were available to providers.

The knock on effects are still being felt today (October 2008). While FETAC has made over half a million awards since its establishment, 72 awards were made at levels 1 and 2. Compounding these delays is the response by providers at Levels 1 and 2, which has been weak.

Assessment

FETAC is required by the Qualifications (education & training) Act 1999 to *inform itself of the education, training, skills and qualifications requirements and promote practices in further education that meet those requirements*⁴. It is also required by the Act to *establish procedures for the assessment of learners which are fair and consistent*⁵.

In relation to the 'greenfield' Levels 1 and 2, there remains a particular need to identify what is appropriate assessment at these new levels and clarify what providers are being evaluated against with regard to assessment under quality assurance, validation and implementation of these new awards. Leadership from FETAC⁶ is required to embed assessment knowledge and practices in the further education and training sector. This is not support – it is essential to the establishment of quality and accessible certification systems and procedures.

In the area of assessment, FETAC will decide what is fair, consistent and appropriate assessment at these new levels. However key questions remain. What is appropriate assessment at Level 1 and 2? What is fair? What is known about, and what are the

⁴ 14.2.(c)

⁵ 14.1.(e)

⁶ An assessment working group was established by FETAC but it met only once in 2005.

implications of, assessing small and medium volumes of learning? Does assessment practice differ between level 1 and 6 and, if so, how? What can be learnt from the assessment for accreditation practices at the previous levels 3-6 that can inform development at Levels 1 and 2?

FETAC does not have a role in relation to the ongoing support for providers, and this is widely accepted and acknowledged. However, FETAC has a very clear role in the development of the awards and the understanding of processes around them, as well as to promote the integration of all the levels 1 to 6 into the Irish further education and training systems and culture. In NALA's view, FETAC is required by the Qualification Act to do this, on the basis that it must promote practices in further education that meet the qualification, education and training requirements of the sector. The providers alone cannot set these priorities, and the priorities of learners need to be taken further into account.

Awards at Levels 1 And 2

As regards the awards at Level 1 and 2, NALA believes

- There should be a Level 2 Major award in Communications.
- A Level 2 Major award in Numeracy should be considered to facilitate progression to Level 3.

Recognition of Prior Learning (RPL)

Processes to support RPL should be available to learners to demonstrate their achievement of a given set of knowledge, skill and competencies at any level of the framework. There is a specific gap in relation to the availability of RPL at Levels 1 and 2.

Definition of the Volume of Learning for Different Levels

It would be helpful to expand on the definition of 'volume' and explain what small, medium and large mean. The further definition of volume in terms of numerical credit and notional hours is insufficient.

Modularisation

The concept of the major award being a 'parent' award, the relationship between different types of awards, and the transferability of learning within this construct are issues which need to be addressed in greater detail than is currently available.

Expertise and Experience of Assessors

A guideline on, or definition of, the appropriate experience and qualifications requirement for assessment actors including assessors, internal verifiers and authenticators is needed, particularly in relation to the new Levels 1 and 2.

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