

Public Submission on the Implementation and Impact of the National Framework of Qualifications and Access, Transfer and Progression policies: 2008

Respondent's Details

Name:	Carl Blake
Position (if applicable):	Senior Programme Manager
Organisation (if applicable):	Skillnets Ltd.
Address:	5th Floor Q house 76 Furze Road Sandyford Dublin 18
Telephone:	01-2079630
Email:	carl@skillnets.com
Date:	31-10-2008

Is this response a personal view or is it made on behalf of your organisation?

Personal [] On behalf of organisation []

Submissions will be made public on the website of the National Qualifications Authority of Ireland and attributed to the author and/or their organisation unless you request otherwise.

Do you agree that your submission may be made public?

Yes [] No []

Public submissions on the Implementation and Impact of the National framework of Qualifications and Access, Transfer and Progression policies: 2008

The following themes are suggested as a guide in making your submission. Please feel free to make a free form submission if you wish. Submissions should not exceed 2000 words. The themes are:

- *Impact on programmes and qualifications*
 - *standards, learning outcomes, assessment, quality assurance*

Impact on programmes and qualifications: From Skillnets perspective, as an enterprise led funding organisation, the move towards the consolidation of qualifications into a single National framework has been timely and useful. The impact of the access transfer and progression policies has been twofold:

- 1) the entry to formal learning (and assessment) of a significant cohort of employees who would have previously been discouraged – mainly within levels 3 to 5 and
- 2) the recognition of customised training for higher level qualifications leading to people development having a clearer link to business development – mainly within levels 6 to 10.

The consultation process for the policies has developed an awareness of industry's role and incumbent responsibility in the processes of formal learning. The divide between industry requirements and "academic" quality assurance - to meet those requirements through formal learning - is being narrowed somewhat but the "grail" of ultimately marrying the two still needs to be managed. Both sides – industry and academia – need even more immersion in each other's worlds to foster better harmony between the two and to recognise each other's legitimate *raison d'être*.

The work done to date on the NFQ has been huge and Skillnets believe the perception of the development as an academic exercise is changing, as more and more Skillnet networks engage to varying degrees. At a micro level this might be from an individual programme level which is now delivered by a trainer with NFQ Certification built in. While at a macro level we would cite two parallels.

Firstly, through the Skillnets Certification Focus Group – a group of Skillnets network managers, highly experienced in development of certification of qualifications - who have engaged directly with awarding bodies, especially FETAC. And secondly, through the engagement of Skillnets Ltd. at national policy development level through committees such as the Expert Group on Future Skills Needs, the Dept. of Ent., Trade

& Emp. Upskilling Committee, and the National Standards Authority of Ireland – training standards group.

Standards: Skillnets welcome the advent of new Standards Groups and Standards Development Groups within FETAC, but there is an urgent need to accelerate this process and put the standards into place. The development of standards is starting to engage industry and academia, but often fails to recognise or utilise a truly partnership approach. This can lead in many cases to “turf wars” as sections of representative bodies for both buyers and sellers (and “regulators”) of qualifications try to preserve a status quo.

Also our experience is that standards in training across Ireland are very inconsistent and in some cases are severely lacking. While some trainers, including some dedicated Skillnet trainer networks are at the forefront of trying to improve this situation through the development of standards for training providers and courses, there remains confusion at a provider and trainee level as to how courses can be developed and tailored in a practical way to suit the learner.

For example, a course can be branded “level 6” even if it is only one module of a Level 6 course. Whereas another course with all 8 modules required for full certification could have the same name. Some training providers are using this to their advantage and the trainees are unaware of the difference.

Learning outcomes: The move from narrow vocational type outcomes to broader knowledge based outcomes may on the surface need to be managed as Skillnets are being weaned off models such as the FETAC locally devised modules and may view the broad learning outcome as a move away from the “can do” comfort given by narrower learning objectives. The need to train for a specific job as exemplified in Skillnet networks places an urgency on training and its recognition of achievement through certification.

However the broadening of learning outcomes could also be seen as more accommodating and flexible, but the most pressing concern would be the transitional nature of the current migration policy, and the danger of trainees being left in limbo until the new broader learning outcomes become formally recognised.

This is a debate that needs to continue and has implications for cost effective imaginative delivery and assessment methodologies which will satisfy both sides.

Assessment: The Skillnets experience is that this is often the biggest hurdle to overcome for the lower skilled, and the fear of failure is a big issue. This can often be directly traced to the relative lack of education

and/or long time delay since their most recent national qualification e.g. middle-aged early school leavers currently at Levels 3-4 who need to move one step up.

The resources put into the first of multiple assessments will be paid back in the reduced resourcing needed as learner confidence is built up. Often strategies focus too much on the topic and too little on the learner in their application, even though at policy level we claim that the NQF is learner centred. At the higher trainee levels (e.g. third-level / Levels 6+), assessment tends to be more fully integrated into flexible delivery methodologies with a holistic approach to recognition of current formal learning. However here the need to develop CPD and RPL as examples is out of step with the recognition of formal learning, and both approaches are not viewed as equal by many. Marketing of non formal recognition often underpins the concept that this is a fast track and cheaper method to gain a qualification whilst often the opposite is true.

Quality assurance: Industry appreciates quality assurance and in general Skillnets networks are happy to have and to apply quality assurance. The biggest single issue here is the inconsistency and length of time required to get (FETAC) QA approval. According to FETAC this can range from 6 weeks to 18 months, but the overall Skillnets experience is very much that it tends to be the lengthier duration.

Providers as well as Skillnets networks – who might also be quality assured Qualification providers themselves – have anecdotal evidence that the development of, for instance FETAC QA status, has been driven by purely commercial criteria. It is here again that the divide between industry and academic requirements have conflicted. However having quality assurance policies and procedures in place is allowing a mechanism to deal objectively with these issues.

- *Access, transfer and progression*
 - *Expectations*
 - *Impact on learners*
 - *Key strengths and key weaknesses*

Access, transfer and progression: Skillnets has seen a significant increase in access to certified training while the transfer or progression is less evident given the two year cycle of the funding. That is not to say that the transfer and progression is not taking place. Anecdotally, some networks that are at a more mature stage of development (e.g. 3-4+ years and in at least their second round of a 2-year funding cycle) are seeing the learners moving towards higher levels on the NFQ.

Recently the uses of flexible access to certification through RPL and CPD are being developed, but progress is relatively slow and the networks are still in a development phase generally. In particular, knowledge of RPL and

its current availability among providers (private or public) is very limited, and it appears to be extremely disparate in its accessibility. Skillnets continues to promote its existence and to support this development at a strategic level, through representation up to board level in the various stakeholder organisations and through internal fora within constituent networks.

Expectations: Industry/enterprise expectations for the framework are high and it was/is expected to simplify and streamline the myriad of award routes in the country. Our experience is showing that in many instances it is confusing, but progress is being made as more and more of the networks engage and “learn by doing”.

Impact on learners: The impact on learners within the individual networks (123 Skillnet networks in the 2008-9 round) is positive and Skillnets uses evaluation techniques to facilitate up to the return on investment (ROI) of training interventions. Individual learners once they have engaged in gaining a component award (especially the lower skilled) are empowered and there is hard evidence that they actively seek further training once their confidence, and the threats of assessment, have been addressed.

Key strengths and weaknesses:

Strengths:

Pooling resources within industry (Skillnet networks) to identify a training need, to develop accredited programmes, to deliver and assess the programmes and to evaluate the entire process is at the core of what Skillnets is. To have a framework in which to do all of this provides:

- Value
- Sustainability
- Transparency & Fairness
- Opportunities for Progression

Weaknesses:

- Lack of awareness of its existence
- Confusion & lack of understanding of the Framework, especially in the practicalities of mapping Levels 1-10 to actual qualifications e.g. what level is a Pass Leaving Cert.? ECDL? etc.
- Time Delays in the following:
 - Development of new certified programmes which react to the rapidly changing needs of industry
 - Alignment & mapping of internationally recognised awards e.g. European Framework (macro level), City & Guilds (micro level), which undermines confidence in the system,
 - Actually getting the accreditation (e.g. limited entry points / assessment timeframes etc.)
- Exclusions and exceptions like ring-fencing providers such as former awarding body programmes, is thereby curbing a free

market (albeit a quality assured free market) and undermines the NFQ credibility.

- Complexity and range of the level 1-5 providers (FE) and looseness of the level 6 to 10 providers (HE) – specifically the degree to which the Universities are signed up to the NFQ, weakens the model of the NFQ.

- *Relevance of the Framework to employment*

Relevance of the Framework to employment: As awareness of the Framework grows, we note an increasing interest in and therefore relevance of the Framework for employment. The transferability and recognition of skills, including the international dimension, is increasingly relevant to employers who have to hire from a mobile workforce.

The opportunities to transfer and progress within can also be viewed as a positive for employers and employees, as formal certified learning opportunities are a valued form of recognition.

- *Use of the Framework in public funding*

Use of the framework in public funding: Skillnets has always promoted the certification and recognition of learning, and recently this has manifested itself in two ways. Firstly, all approved networks come through a competitive open call for proposals process, and the assessment process has always provided for extra marks to be awarded to projects who outline plans to either avail of NFQ accredited learning, and also to develop new modules, for which Skillnets has a very good track record in recent years.

On the latter point, not all training funded through Skillnets is NFQ certified, and in many cases this is neither desirable nor practical from the perspective of industry. However many networks who deliver non-NFQ Certified training have a simultaneous objective to either develop new certification or at least form part of a certified programme in the future. This provides an incubator for valuable developmental work.

Secondly, Skillnets has recently been promoting learning for the lower skilled, and additional financial incentives (i.e. higher grant ratios) were offered to networks that targeted this sector. As part of our project monitoring under the TNP 2008-09, in order to verify the learning level & highest qualification of the learner, it is a pre-condition for networks that all learning programmes be certified under or aligned with the NFQ. In this instance the level is Level 5 or below for the lower skilled.

There have been challenges in identifying true entry levels given that a Leaving Certificate achieved in 2008 is afforded the same recognition as one achieved in 1968, and quite often the learners have had no formal education/ training in the interim 40 years. The validity of benchmarking a

learner's level of qualification based only on the year attained is questioned by Skillnets.

- *Impact on the international recognition of qualifications*

Skillnets has seen a huge increase in interest in recognition of qualifications against the NFQ both for access to a job role and for access to further development through training – progression and transfer. Over recent months the information on the NFQ website has been improving greatly, and the direct engagement of international bodies such as City & Guilds with FETAC has contributed greatly in raising the awareness of the NFQ at home. However there remains room for improvement, for example greater clarity could be provided in linking the Irish NFQ to its European equivalent.

For many learners in Ireland there was an assumption that qualifications were already within a national framework so the work done to date has largely been un-appreciated. From a marketing perspective, there seems to have been some confusion in the perception of the learners: of whether they are gaining a FETAC or gaining an NQAI award, but that issue is probably now somewhat addressed by the announcement of the forthcoming merger of HETAC, FETAC and the NQAI. This presents a good marketing opportunity to demystify the process. There is still a lot to do to clearly map equivalence and to “encourage” the full third level sector to buy into the NFQ.