

FÁS submission on the Implementation and Impact of the National Framework of Qualifications (NFQ) and Access, Transfer and Progression Policies 2008.

Introduction

FÁS welcomes this opportunity to make a submission on the Implementation and Impact of the National Framework of Qualifications (NFQ) and Access, Transfer and Progression Policies 2008.

FÁS has been, and is, involved in the initial and on-going development and roll-out of the NFQ. To date that involvement has included: the nomination by the Minister of Enterprise, Trade and Environment of a FÁS representative to Authority Board twice since 2001; membership of the Consultative group since 2003 on the Development and implementation of the Framework; the establishment of the FÁS Liaison Group to coordinate the process of promoting and raising awareness of the National Framework of Qualifications throughout the FÁS organisation; membership of the Qualifax and National Learning Point Consultative Groups and other groups formed to address issues such as craft progression, the development of a skills database and the subgroup on Upskilling Coordination, with its focus on accreditation.

The NFQ and its implementation is therefore seen by FÁS as a most positive initiative, enabling as it does the potential for a coherent organisation of national qualifications, access, transfer and progression opportunities and the establishment of a nationally benchmarked, provider quality assurance system. FÁS particularly welcomes the fact that the framework has focused on the importance of awards that are based on learning outcomes, an approach which it has for many years adopted in the development of its programmes and assessment processes. Also welcome is the formal recognition of awards granted to FÁS learners on the NFQ. This national recognition means that FÁS learners can achieve parity of esteem, in recognition terms, and the potential to progress on the basis of those awards – albeit that FÁS believes that the ATP aspect of the framework still encounters some blockages that prevent seamless progression.

FÁS also embraces the opportunity provided by the NFQ for the development of programmes that might traditionally have been considered outside its remit. i.e., programmes leading to awards at levels 6 onwards. In this respect FÁS has a number of programmes in development that are targeted at awards in the higher education and training domain. FÁS sees this opportunity as a positive addition to its ability to enhance learner opportunity, both in terms of programmes it may develop itself, and in terms of strategic alliances that it may form with third level providers.

FÁS recognises that it has an important role to play in making all aspects of the NFQ work effectively. Consequently, it is and will be endeavouring to ensure that its own internal processes are examined and adjusted to assure maximum quality of provision and opportunity for its learners. To this end, FÁS has agreed its quality assurance procedures with the Awarding Councils; procedures which provide for the development and approval of programmes and the development and implementation of core NFQ requirements, such as access, transfer and progression – including the provision for RPL arrangements. FÁS also continues to advocate for the full representation of the needs of the labour market, in the further development of the NFQ.

Impact and Implementation of the NFQ in the FET Sector –

Listed below are points that FÁS wishes to make about the Implementation and Impact of the National Framework of Qualifications (NFQ) and Access, Transfer and Progression Policies 2008. These points are set out under the themes suggested by the Authority.

Expectations of the Framework

The NFQ is intended to be the single, nationally and internationally accepted entity through which all learning achievements may be measured and related to each other in a coherent way. While this is a simple enough sentence to describe the purpose and goal of the NFQ, the attainment of full implementation is more complex. Nevertheless, expectations of the NFQ, should be no less than those determined as its function. Fully operational, the NFQ should deliver on its objectives, and be the un-blocker of cul-de-sacs and obstacles and the promoter of learning opportunity, however, wherever and whenever it is attained.

Impact on Learners

The framework is therefore an important reference point for learners and source of information for learners which should bring more clarity, and assist decision making or selection of which programmes to undertake, as qualification levels, entry eligibility and future pathways are more clearly defined. Similarly, the quality assurance requirements of providers assists or assures learners of the both programme and provider merit. The degree to which the NFQ has impacted on learners however, is difficult to ascertain exactly. Anecdotal evidence suggests that awareness is evolving rather than embedded, partly due to past and current promotion and communication by the Authority, the Awarding Bodies (including the Universities) and statutory providers such as FÁS. It is probably reasonable to suggest that learners are aware, in broad terms, of framework and award levels, particularly in so far as awards for which they are studying are concerned. However, the level of knowledge or understanding that relates to eligibility to transfer or progress, or to access RPL, is probably much less developed.

Key Strengths and Weaknesses of the NFQ

While FÁS recognises, welcomes and is actively engaged in the development and implementation of the NFQ, which as stated above, it recognises as the most important development in the promotion of learning opportunity and diversity, there are some elements of the NFQ which are not yet fully operational and on which, FÁS has comment to make. The following are the key areas which these comments address:

- The current lack of a common awards system at the Further Education and Training levels.
- There is a need for the levels to be clear and unambiguous; for example the Leaving Certificate is confusing as it is spread over two levels.
- The Level Descriptors are confusing, particularly at Levels 6 and 7.
- The existence of two Level 6 Major Awards side by side on the NFQ with minimal difference is not satisfactory.
- There is a need for knowledge promotion and information dissemination.
- The QA process brings with it a need for considerable resources and this should be addressed.
- The existence of two distinct QA systems for HETAC and FETAC carries a further resource burden and different subsidiarity issues. A balance is required between centralised control and provider ownership.

Impact and Implementation of the NFQ in the FET Sector –

- The NQAI, HETAC and FETAC need to intensify their campaign to ensure that the NFQ permeates to the learner and the people imparting guidance.
- Guidance and counselling need to be embedded; the ‘fan’ diagram is a useful concept, but requires common standards and national awards to bring true currency/bring the NFQ to life.
- A divide still exists between the ‘Education’ and ‘Training’ cultures that needs merging. There are different understandings between the people involved in both; one issue being competency based assessment and the importance for awards that are effectively ‘licences to practice’ and/or require safe practice. Examples of employers who require ‘licence to practice’ include Bord Gáis who will only accept the Major Award for successful Craft apprentices and DOE who similarly will only accept the Award in ‘Oxygen depleting substances’. This format of assessment is quite different from the assessment associated within ‘Education’, and careful consideration is required, firstly to ensure true competency-based assessment applies to standards as necessary, and secondly when devising assessment criteria for common standards, particularly thresholds for minimum ‘pass’ and what the candidate MUST know/demonstrate.
- Lack of clarity with regard to levels on the NFQ for the Leaving Certificate Ordinary, Higher and Applied.
- An updated system is required that would provide information with regard to credits that can be obtained when the learner presents with an award from another body.
- IT infrastructures should be developed to eliminate system blockages in terms of information provision, technical support, learner data, monitoring and certification requests processing
- Knowledge levels regarding the NFQ among learners, guidance counsellors, employers and the general population need to be improved.

Impact on programmes and qualifications

In general, FÁS believes that the NFQ has had and is having a positive effect on programmes. The requirement to describe qualifications outputs in terms of competencies is a positive development, giving as it does, designers of programmes, clear guidance as to the level, depth and structure of curriculum content. Listed below are the main strengths and the weaknesses that FÁS perceives to still exist.

Strengths

- In programme design a more holistic approach has ensued with regard to the level and corresponding entry and exit points.
- Programmes will lead to National Awards on the framework.
- The framework requires providers to more explicitly take into account access, transfer and progression when designing programmes for validation.
- The NFQ has impacted on the development of programmes with a view to creating access and progression routes, thus awards and programmes do not exist in isolation but rather as a suite, and this represents a clear success.
- The opportunity exists to design programmes for validation that provide improved flexibility in addressing the needs of the learner.

Impact and Implementation of the NFQ in the FET Sector –

Weaknesses:

- Further clarity is required concerning the construct of notional learning hours and the implications for programme design.
- Assessing and recognising work-based learning requires addressing.
- The application of grading classifications for FETAC awards requires further consideration. FÁS believes that the classifications of merit and distinction do not logically apply in all instances, especially in respect of some special purpose awards or award that have a strong 'licence to practice' implication. Classification to represent superior levels of performance appears futile in such situations.
- The Craft area presents difficulties due to the design of the Craft awards being in stark contrast to the design of the NFQ. There is one award at the end of four years. There is therefore a potential issue around providing component awards that might be perceived as partial qualification, and could lead to undermining of the apprenticeship system in Ireland
- It is important that work-based elements of programmes are considered legitimate in terms of programme validation and subsequent granting of awards.

Access, Transfer and Progression

Strengths:

- FÁS prefaces its remarks by stating that access is generally not a problem, and that very few barriers to entry to FÁS programmes exist except where late entry and exemptions are sought. The NFQ and the progression group established by the NQAI have led to strong progression options for Major Award holders in Crafts. Currently, there are 14 progression pathways elaborated by IOTs for Major Award holders in Crafts.
- The traditional web of arrangements is gradually evolving to take account of the changes arising out of the introduction of the Framework.
- The ability to accumulate awards towards a major award is a success, with further potential once the limiting factor of credits is resolved.
- The opportunity for learners to identify, within a supported environment, their preferred career and the availability of minor and major awards that will testify to the achievements of learners as they progress.
- The NFQ has brought more focused attention on the concept of levels and progression.

Weaknesses:

- There is a need for one streamlined credit system across the Education and Training Spectrum (i.e. across FETAC and HETAC) to enable accumulation towards awards and access, transfer and progression.
- There is a need to ensure that learners are not 'over-progressed' and that where the widening/developing of knowledge at a particular level is required, this should occur.
- Credit allocation is also necessary as an indicator of volume and thus to distinguish between awards that are associated with programmes of very short duration and awards that are associated with more long term programmes.
- More information on progression eligibility is required.
- There is a need to establish networks and linkages and develop progression bridges/pathways. The HET sector will require more numbers coming via the FETAC route, rather than the Leaving Cert route, if the ambitions of the Skills Strategy are to be realised.

Impact and Implementation of the NFQ in the FET Sector –

- There is a need for speedy accreditation of trainers who have been providing training for some time on community based programmes.
- There is still a lot of confusion about what is happening on RPL.
- The development of a system of credit allocation for learners presenting with Junior or Leaving Certificates to facilitate both access and progression is necessary.

Relevance of framework to employment

One of the main benefits of the framework should be the ability to include in-company training to a national system of validation and quality assurance. The potential of including the workplace as a learning location has not been fully realised, in terms of the recognition or linking of that learning to a national system. There is a particular opportunity here for sectoral approaches, which can optimise investment in employee learning and help to avoid duplication when addressing training and education needs. While there are existing sectoral and occupational approaches to skills and training needs, the challenge is to formally link these to the NFQ, through qualifications outcomes, either for small or specialised pieces of learning, or through linkages to broader qualifications, delivered, for example, in partnership with other training and education providers.

Use of Framework in Public Funding

FÁS believes that the NFQ can have a positive effect, through the mechanism of effectively targeted public funding. To this end, public funding of programmes should, as much as practicable, be a requirement to lead to awards that are on the NFQ and that contain all of the relevant requirements for access, transfer and progression opportunities. The FÁS 'One-Step-Up' initiative and National Skills Strategy is one example of where such a funding requirement can facilitate the provision of quality assured programmes, which meet the needs of industry and provide opportunity for learners to access, or receive credit towards, nationally recognised qualifications.

Impact on International Recognition of Qualifications

The recognition of international awards can lead to confusion in terms of equivalence as an award, and as a licence to practice. The NQAI recognise equivalency but do not determine competency to practice. This can cause complications in the respective employment sector particularly where there is no regulatory body. There is a perception that little has happened regarding comparability and recognition of foreign qualifications. International mobility for Irish award holders has improved with the emergence of the NFQ, as evidenced by the demand from employers abroad for example for Advanced Certificates. Future direction on recognition of international awards, with timelines for completion should be made available to all.