Consolidated Feedback on Review of QQI Award Standards:

Approach and Schedule Discussion paper

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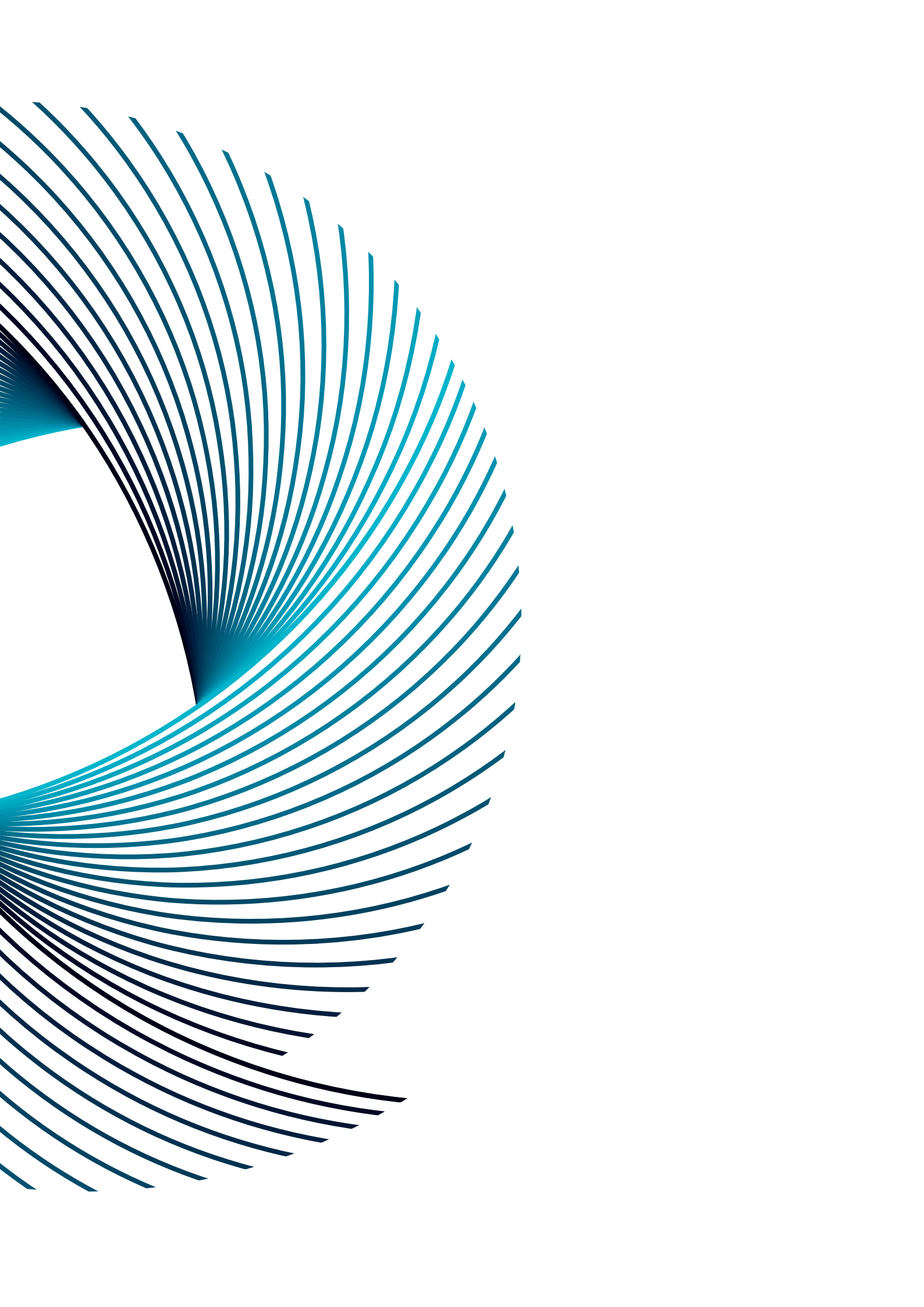
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Executive Summary

QQI published a discussion document in 2017 titled *'Review of QQI Award Standards: Approach and Schedule Discussion Paper'* which refers to standards at levels 1 to 9 of the National Framework of Qualifications (NFQ). It outlined the scope of review, posed general and specific questions (see Appendix 1) about the review process and set a proposed schedule for same.

An online survey was created to garner responses and a series of workshops was held to give providers, stakeholders and other interested parties an opportunity to discuss the implications of the review and provide feedback (Appendix 2). In general, the response to the review was favourable. Specific issues arose in each sector, together with themes which were common to both FET and HET:

- the tension between awards for labour market purposes versus for personal education and development.

- the overlap at level 6 between FET and HET presents challenges in terms of differentiation of awards and progression opportunities

- the need for clear communication on the timing and implementation of reviews and their subsequent impact on provider programmes

Key findings from each sector include:

FET specific:

- the relevance of awards and standards to industry

- facilitating work placements (from provider and employer perspectives)

- clarifying the concept of capstone modules

- the introduction of broad standards in FET allows for creativity by providers but there is a need to consider how learner achievement can be recognised

- funding influences both learner behaviour and programme provision

- the need for resources for public sector providers to allow them to work on programme development and validation

- concern was expressed about the combined impact on providers of the rollout of quality assurance re-engagement, the new validation policy and criteria and the associated costs for both functions

HET specific:

- challenges for multi-disciplinary/inter-disciplinary programmes as to how standards are used and interpreted

- whether the influence of occupational standards and regulations drives the 'fragmentation' of standards

- a need for clearer distinctions between registers of language used

- a need to engage with all stakeholders including students, graduates and universities

Next Steps

QQI welcomes the range and depth of views expressed on the approach to the review of award standards at levels 1-9 of the NFQ. Our aim is ensure that we have appropriate and relevant qualifications and standards in place across further and higher education and training to meet the future needs of learners, employers and providers in an ever-evolving education and training environment. To achieve this, we will rationalise the awards and standards available in FET, monitor the currency of HET standards and develop a strategy for Qualifications that reflects future needs.

Specific actions include:

- establishing criteria and a timetable for the deactivation of non-performing and non-certified awards in FET

- exploration of issues around level 6 major awards in FET and HET

- improved communication to providers and external stakeholders on awards and standards activity

- a Green Paper on Qualifications

- the extension, as appropriate, of the broad standards approach to FET levels of the National Framework of Qualifications

- alignment with the implementation of the 'Policies and Criteria for Validation of Programmes' and Quality Assurance re-engagement activities.

Feedback on consultation questions

The Approach

1. What is your view of the approach to reviewing QQI award standards as outlined in this consultation paper?

The Cycle of Review

Consultation on the approach to the review of award standards was welcomed, with an acknowledgement that the process and associated document was *'clear, open and transparent'*. It was noted that *'QQI are taking a thorough and comprehensive approach to reviewing Award Standards'*. Reviewing standards is a *'positive activity, timely and needed'* activity, ensuring that learners get the best possible outcomes/standards. Feedback centred on: the timeline for review; the resources required for review (and associated programme development); the tension between employment/skills formation and lifelong learning; progression up the levels of the NFQ, both within FET and HET and from FET to HET.

Opinions on the suggested 5-year review timeline varied, in the range from fair to unrealistic. It was suggested that some specific FET vocational areas such as healthcare would merit a 3-year review due to the *'dynamics of this particular vocational area and the rapidly changing nature of both employment and progression'*. In contrast, some respondents indicated that a 5-year review cycle seemed ambitious and doubt was expressed that *'the system can cope with this level of activity'*. There was also a suggestion that the *'5-year cycle is too long'* and that the *'solution might be to allow for [the] validation process to throw up concerns about award standards and to feed those back'*.

'We would urge QQI to give this review the time it requires rather than forcing an arbitrary time constraint'.

Whilst public sector contributors mentioned the need for resources for review and programme development, private sector contributions mentioned being *'very concerned about how many private providers will be around to benefit from the process'*.

Where providers are involved in providing training for employment, there was a desire *'to have autonomy at local level to respond to local needs'*.

By contrast, in the HET-specific consultation, opinion varied between 5 years being appropriate, suggestions for a mid-term mini-review after 3 years and suggestions for a more realistic timescale of 7 years.

The Review Process

The discussion paper set out the review process i.e. the establishment of a standards review group according to field of learning (or subfield where appropriate). The group will comprise representatives of providers/industry/communities of practice/international experts where appropriate/other stakeholders; it will work to terms of reference and be provided with information on certification, and scale of provision. Public consultation on proposed reviewed standards will be a standard feature of the process.

Generally, the review process was welcomed *'as long as all sectors/ groups are equally represented for each award'*. A gap was identified in the representation i.e. that learners and former learners were not involved. Other feedback centred around 'Who will do the standards review?', not only in terms of subject matter expertise but also (from the public sector) *'payment for the work and release arrangements for relevant staff to participate in the review/development activities'*.

It was suggested also that features of the review process may vary depending on the cognate area and/or levels of awards e.g. *'to enhance employability and entrepreneurship' may not be applicable across levels and award areas'*. Feedback also pointed out that focussing too much on employability does not necessarily prepare learners adequately for the changes in occupational profiles. The role of occupational profiles was mentioned as significant. The opinion was expressed that *'skills formation policy in Ireland has not been synchronised with the characteristics of the Irish labour market. While a great deal of the industry certification available in Ireland is from the UK and in some cases the US, e.g. Microsoft and CISCO, their suitability within the Irish labour market has received little critical analysis'*.

It was also noted that the proposed methodology of review *'...will test the relevance and purpose of new and existing Major and Minor awards for Providers, Learners, Communities of Practice, Employers and as an ongoing process to ensure a robust and up to date approach to accreditation'*.

Also noted is *'the importance of maintaining standards in qualifications, and the need for well-defined quality assurance procedures'*. The link to programmes was a consistent theme, as expected, in the form of *'ensuring educational programmes are designed to properly deliver and assess learning outcomes that are consistent with industry requirements - but in a fluid manner (CAS)'*.

The discussion document outlined the broad approach of a review group but did not give details. This appeared to raise concerns that the review would be high level *'The approach needs to be more comprehensive and should include: Specific validation requirements for occupationally specific awards. The balance between transversal and technical skills. The validity of prescribed assessment techniques. Approach to writing learning outcomes...the amount of overlap in learning outcomes within the components of a major award. Consideration of the use of competence-based assessment'*.

In the review process all elements of the standards will be considered, whether in the prescribed format of the Common Awards System or in more broad-based statements of knowledge, skill and competence, as shown in HE standards. This highlights the importance of communication, particularly regarding the content of the review process, to ensure that providers are *'not being left in the dark'*. Equally it was noted that QQI should use the current consulting model – there is no need to reinvent the process.

Specific issues were mentioned, such as the relevance of learning outcomes, inconsistencies in credit values, speed of review, integration of generic outcomes instead of separate components and the purpose of awards.

2. Is the approach feasible?

Opinion generally was that the approach is feasible but with the caveat *'if resources and time are allocated to Review Teams'* and *'provided it is resourced adequately'*. There was also a view that *'existing standards are relevant, no need to re-invent a new process'*.

Public sector feedback indicated *'Recruiting staff from our centres for these Standard Review Groups will impact on teaching and learning in the classroom, and without adequate teacher cover for releasing staff this would be very difficult to implement'*. The ETBI sector indicated that it would need to provide teacher allocation hours for members of these Standards Review Groups, and this case would need to be strongly made to SOLAS.

From the private sector, it was noted that *'the approach is feasible but if the process is dragged out it would be difficult to sustain. My reservation is that this would be seen as "helping" QQI with no tangible benefit for Providers especially the private ones. I don't think it would help to market more courses and that's important'*.

Emphasis was placed on the requirement that *'the award review process is quality assured to ensure that the outputs are accurate and fit-for-purpose'*. Some feedback confirmed that the approach looked reasonable but concerns were expressed about the availability of resources *'on the ground'*.

The symbiosis between award standards and programme validation was mentioned by many respondents. *'With the implementation of the new validation policy, more resources will be required in order for the sector to meet the related demands. The related programme development work will require much input by the FET sector. This work/these roles must be structured and recognised this time around'*.

Tensions were noted on the matter of award standards suitable for use and interpretation by learners, providers (both FET and HET), employers and other stakeholders. The need for research, discussion and consultation across stakeholders was reiterated. Some concerns were expressed about the availability and flexibility of awards (in FET), gaps in engineering and technical-related fields of learning and the need to ensure learning outcomes are relevant.

Specific comments were made on the need to review learning outcomes to ensure consistency in standard across levels.

3. Do you have an alternative option?

Suggestions about alternative approaches mentioned the role of consultation with key representatives in the education and training sectors, in particular to ensure former learners are involved.

The option to have a *'special request for review of awards'* was suggested so that standards that are not fit for purpose or which could be skills-related would trigger an early review. Ensuring standards are reviewed across levels in the same field of learning was also highlighted.

The return to 'pilot' standards was mentioned as an option. It was suggested that where gaps are identified, QQI would *'allow some existing providers to pilot new minor awards where the learners can benefit from their participation irrespective of whether or not the pilot survives to become a permanently validated award'*.

Another suggestion was for QQI to explore the option of *'working more closely with focus groups or steering committees that can offer specialist insights'*. This could take the form of 'advisory groups' to help bridge the gap between education and training and industry.

Interestingly, there was a proposal that when reviewing HET awards in particular fields, FET level 5 and 6 awards should be included in that review process. The value of this approach would be to facilitate a clear ladder of progression for L5 and L6 learners from FET to HET. By contrast, the question was raised that *'if the only differences between the different levels of the NFQ are based on different expressions of knowledge, skills and competence, is there an argument for considering a similar qualifications design at all levels of the framework, i.e. should FET and HE qualifications converge to a similar design?'*.

The Schedule

4. Do you have any views on the proposed schedules?

In FET, there were mixed views on the schedule. These ranged from moving some fields of learning forward in the schedule (e.g. languages) to noting that groups of similar awards should be reviewed together so that progression options for learners are ensured and that the transition from existing to revised awards will enable providers to finish existing programmes and revalidate programmes. *'Sufficient time needs to be given to the sector to resource the comprehensive development of new programmes in line with the new validation policy'*.

It should be noted that some respondents considered the schedule unrealistic and that the criteria for selection for review should be more visible. This points to the need to publish a schedule that is realistic and an aid to operational planning for providers.

In HET there was no particular issue with the proposed schedule though interestingly some divergent views on the need for new HE standards were expressed. These ranged from providers who stated that the development of what were called 'sectoral' standards in HE (e.g. architecture, social care, counselling and psychology) was not necessarily the best approach and QQI should have more faith in a provider's ability to interpret broad standards. By contrast there was also a view that there should be a development of HE awards standards in new areas to allow for a specialist focus *'For example, Art & Design standards currently span a very broad range of programmes. Additional specialist resources would be helpful to higher education programme designers (at levels 6 to 9) when specifying requirements for disciplines such as Music Production, Film and TV, Fashion Design, Animation, Photography, Drama Performance, Dance, etc'*. An interesting suggestion in this regard was to do this *'through an extension of the standards developed by QQI in respect of related FE programmes'*.

Participation in review groups

5. If you are willing to participate in Award Standards Review Groups or comment on draft award standards when published for consultation, please indicate which fields of learning are of particular interest to you.

Most respondents indicated a willingness to participate or offer resources towards standards review, development and consultation. Notwithstanding issues raised around the availability of staff, releasing staff during work time or being willing to pay for individuals to participate in their own time, it was noted that *'the quality of a panel will reflect the quality of review. Must work together, listen, look at things from education view'*.

HET Standards-Related

6. Please identify any gaps in QQI's suite of HET award standards

Responses referred to differentiating levels through language *'...the positioning of indicative learning outcomes within awards standards might be reviewed to reduce overlap and provide where possible a consistent mapping to the particular knowledge, skill or competence being advanced'*.

Mention was also made to specificity in HE standards, *'...a comprehensive review of Art, Design, Media and the Humanities might allow separate focused consideration of the different specialisations involved, particularly in the light of the considerable growth in the media sector and perhaps justifying its own awards standard'*. In contrast there was concern about *'...the influence of regulation driving 'fragmentation' of standards'*.

7. Do you consider that 5 years is an appropriate schedule for review of QQI HET award standards?

There were divergent views on the review timeframe, ranging from *'...this timeframe is long enough to give the opportunity to facilitate ongoing evaluation towards a five-year review'* to *'a mid-term mini-review (after 3 years) might be adopted with a view to confirming continued relevance (as opposed to anticipating widespread change)'*. An opposing view is that it was *'too ambitious - the system will become too congested. 7 years is more realistic'*.

8. Do you think that HET award classification needs to be reviewed and what issues do you foresee in doing so?

This question was stimulated by particular issues that arise for Master's degrees where the classification is first class honours, second class honours and pass. However, the feedback did not indicate that overall it was an issue *'...not aware of issues at this juncture'* and *'the current award classification system continues to be fit-for-purpose'*.

FET Standards-Related

9. How can best use be made of occupational standards/profiles?

It was noted that in Ireland there is a dearth of occupational standards/profiles. Some respondents indicated they did not have any knowledge or insight into them or into how they could influence award standards. Others saw occupational standards or profiles as being significant for the future e.g. they could *'allow someone from a different background to access an area i.e. role profile would certainly help'*.

Where occupational standards/profiles exist, there was agreement they should be used in both award standards and programme design as a means of enhancing consistency and quality. *'Build awards broadly around profiles as profiles will change over time; develop programmes around profiles to capture education & training for skills shortages'*.

Divergent views were expressed on how occupational standards could be used. For example, it was suggested they be used *'...as a basis for deciding on the composition of [the] Major Award e.g. the appropriate combination of the component awards required'*. Whilst others saw their value being reflected in learning outcomes at component level to *'reflect the needs of the employer and the profile of the occupation'* so that *'learners are work-ready for their occupation on completion of their award'*.

The role of occupational standards/profiles should drive programmes: *'Occupational Standards should be driven by the sector; industry should set standards and then feed back to the programme learning outcomes'*.

Occupational standards are extremely important for all professions as they can be used to ensure that best practice is followed and delivered. Having a framework for occupational standards provides confidence to service users, clients and customers of the range of employer organisations.

Concern was expressed that *'there is a growing body of opinion that the current qualification design is diverging from the occupational profiles in the labour market. This has been a function of several contributory factors such as the increasing rigidity of the QQI qualification structures at level 5 and 6; the reduction in variability in the suite of awards available; as well as the dearth of sufficient awards available, particularly at level 6'*.

Based on experience in the agriculture sector it was suggested that QQI consider 'dual' awards i.e. where learning in one field may be combined with some specialist training e.g. agriculture and building/construction.

10. How best and to what extent can and should work-based learning be incorporated into the requirements for FET awards?

There were wide ranging comments regarding the benefit, requirement, duration and operation of work-based learning in FET.

Benefit:

Generally, the value of work-based learning was acknowledged, however there was a call for better definition of work-based learning as it has different meaning in different types of programmes. (e.g. PLC programmes, apprenticeship, traineeship, others).

Overall there was consensus that work experience or practice can be easy in some vocational areas but difficult in other areas. It is seen as empowering learners.

Requirement:

Views ranged from making it mandatory to optional. At present the majority of Level 4-6 major awards have a work experience/placement requirement. Earlier comments about the purpose of programmes, i.e. that they are not always employment oriented, means that the requirement for work experience/practice is not always appropriate. Suggestions were made to make it optional so that where it is

required it can be catered for but where a programme is not employment oriented then an alternative personal development type component could be used (as currently happens at level 6).

Feedback indicated that there should be flexibility in how providers include work-based learning, particularly as it is contingent on independent employers providing relevant and adequate placements. It is important to be cognisant of the difficulty that some learners experience in gaining relevant work placement. A question was raised as to whether previous work experience in the relevant field should be considered in lieu of required work placement credit.

Duration:

Inconsistency between work-based hours and academic hours was raised. This was expressed in the huge variation noted in the length of work experience. Feedback indicated that it varies across awards with some providers requiring up to 150 hours actual on-the-job experience and others requiring shorter periods. The quality of experience for learners will vary as a consequence.

Operation:

The appropriateness of work placement to vocational area needs to be considered. In particular, whether it can cover *'short vocationally specific work placement to situations where all learning takes place in the workplace'* and *'Employers need to understand that they are offering work experience/ placement, not acquiring a fully trained person (labour unit)'*.

Currently work-based learning is available in the form of work practice components at levels 4 – 6 (which includes a specific placement period) and work experience at levels 3 – 6. The duration of work experience in particular has proven controversial, with some providers in the health care sector requiring 150 hours of work experience. In other sectors, it has been implemented as a 10-day requirement. Key message from the feedback include:

'Work experience should be relevant and related directly to the programme of participation'.

'Work experience from one vocational area should not be given value in a programme within a different vocational area'.

'WBL is more relevant to some vocational areas than others. This is an area that will require much co-operation with industry...'

Other suggestions included mandatory training for hosts so there would be a greater understanding of what they are undertaking. There was support for a coherent quality assurance framework for work-based learning with appropriate resourcing. The latter, in terms of operational models and funding, was cited as a difficulty.

The problem of recognising a learner's past work experience was raised. The ability to carry credit for work experience achieved in one environment to a different vocational area was cited as problematic e.g. doing work experience in hairdressing which is then cited in a completely different vocational area such as business. Where work specific components are included in an award structure the learner expects to be able to carry the credit. However, from a major award perspective, certain awards demand that the work experience be in the specific vocational area. Hence the tension between policy and practice arises.

Where there is a large number of part-time learners, many of whom have significant practical experience in specific sectors (e.g. agriculture), a mechanism is needed to give recognition to prior learning for work.

Assessment:

Quality assuring the assessment process as part of work-based learning will need to be considered by the FE sector, in particular how work placement supervisors make the assessment judgement. Concern was expressed at how providers can be expected to sign off on work-based learning which took place off-site at another location.

In HET it was noted that work-based learning is established in some programmes and once it is established the main issue is to ensure *'learners have been allocated the right preceptor who can sign them off'*.

FET Structural

11. Would removal of the residue credit feature enhance the major award standard?

Residue credit is the term applied to non-assigned credit that forms part of the overall credit value of a major award in FET. For example, on a level 5 major requiring 120 credits of which 15 are non-assigned, a statement is included to the effect that **'The remaining credit value of 15 can be obtained by using relevant component(s) from level 5. A maximum of 15 credits may be used from either level 4 or level 6'**. Most major awards have this facility but there are variances in how it is applied and in some major awards it is not available at all.

There was consensus that residue credit is of benefit to the major award standard and removing it would not enhance the major award. It was acknowledged that residue credit is used in several ways, as a means of:

- delivering specific content not named in the award structure but which is vocationally relevant

- allowing learners to 'carry' credit from a previous learning experience whether at a lower or higher level.

- providing a range of options within programmes to allow for the achievement of the linked major award.

The advantage to having residue credit was noted e.g. *'for <u>flexibility</u> within the programme for a lot of reasons, such as – to allow for timetabling criteria, to attract learners, to enhance KSC learning, to meet employer needs, and to allow for existing and new ATP routes'*.

Comments regarding the disadvantage of removing residue credit include that it would restrict the components that can be used towards a major award and *'runs the risk of reducing or eliminating the flexibility that Providers currently have to respond to the needs of particular Learner groups'*. E.g. residue credit is a useful way of enabling a weaker learner to use lower level credits or a motivated learner to use higher level credit.

Operationally, it was acknowledged that there have been anomalies in how residue credit has been used by learners and providers. It has allowed learners to use a range of credits, whether vocationally relevant or not. For providers it has in some instances meant that the range of options covered is so wide that the focus of the major award is somewhat diluted.

Overall, removing residue credit was seen as problematic and subtracting rather than adding value to major awards. The scope or credit value assigned in some major awards for residue credit was considered problematic e.g. the general learning major awards usually have a high value of residue credit whereas in others it is not present at all or limited to the equivalent of one component.

12. Will it make the award standard more relevant?

This question was based on *removing* residue credit but some respondents interpreted it in the opposite fashion i.e. *keeping* residue credit. The choice was considered too broad and in other responses the absence of residue credit provoked comments that CAS awards are too rigid.

Recommendations were made to increase the relevance of component awards named in the major award structure. Only in some majors such as General Learning or at Levels 3 and 4 might it be appropriate to leave larger volumes of residue credit to allow programmes to respond to varying learner needs.

13. Should further education and training major, special purpose and supplemental awards be graded?

Grading of major, special purpose and supplemental awards was introduced with the Common Awards System on awards at Levels 4, 5 and 6 in the NFQ. It is based upon the cumulative grading of the components. Awards at Levels 1,2 and 3 are not graded, learners are designated 'successful'.

Respondents identified the advantages of grading e.g. that it *'has been a motivational factor for students and we would strongly recommend maintaining this'*. It was also seen as being an indicator for employers of learner achievement and distinguishes learners for employer recruitment and selection purposes.

It was noted however that for learners at levels 5 and 6 progressing to third level education, individual higher education institutions and the CAO rely on the grading of individual minor awards within the major rather than the grading of the major award itself.

The lack of grading at levels 1-3 could be perceived as being unfair in terms of recognising learner achievement. That grading should be introduced at level 3 was cited as important to help learner progression.

A suggestion was made that FET grading be reduced to two categories: Pass and Distinction. By contrast, a completely different view was that it be graded in the same manner as degrees and master's qualifications.

Some flexibility in grading for higher education programmes at levels 6 to 9 was suggested i.e. for awards to be *'either graded or ungraded depending on what is considered most appropriate in respect of the particular programme of learning'*. The example provided is for a 10 ECTS programme in Safety might be determined on a pass/fail basis, whereas learners undertaking a 50-ECTS Special Purpose Award in Forensic Science at level 8 or 9 might be more appropriately assessed by using a range of grades. It was proposed that this be determined on a case-by-case basis by the programme validation panel.

14. What is your view on the introduction of a capstone module in some major awards and what issues do you foresee in implementing such a feature consistently?

A capstone component is a feature introduced through QQI's 'Policy on Determining Award Standards'. A capstone is uniquely associated with a particular major award. Its purpose is to facilitate the demonstration by the learner of the major award's overarching expected learning outcomes, where this cannot be assured through achievement of other kinds of component awards.

The capstone is a new feature in FET and this was reflected in the feedback from the consultation. It centred on the 'newness' of the concept, the burden of assessment, the need to provide information and support to teachers/tutors, the type of awards and programmes in which it would be most useful and the potential barriers it could create for learners.

Newness:

There is an acknowledged lack of awareness e.g. *'Is this a replacement or add-on module?'* and knowledge of the purpose and use of a capstone e.g. *'Who is responsible for delivering a capstone module?'*.

Role:

The novelty of a capstone points to the need for careful consideration of its merits within an award structure and the associated need for information and supports on its implementation. Suggestions included making it mandatory on some awards at higher levels in FET and that *'it suits some fields of learning more than others'*. Clarity is needed as to whether the capstone is additional, mandatory and where it comes in the order of programme delivery. It could *'enhance the relevance of the major award and improve its usefulness as a skill formation process'*.

Some caution was expressed about the potential negative effect of introducing a capstone. It could be considered *'a barrier of access to vulnerable learners as it is difficult for part-time learners to demonstrate all K,S,C, in one certification event, if that learning has occurred over some years'*.

The challenge of implementation was also cited, given the 'spiky' nature of FET learning. This refers to the differences between learners undertaking a one-year full-time programme (irrespective of the level) versus those who undertake learning component by component. This *'building blocks'* approach applies where *'it may take some learners 3 or 4 years to complete a major award'*. It is unclear how the introduction of a capstone module/component would impact on such learners. If the key to the capstone is the integration of learning across components then providers may have concerns about the delivery of programmes including a capstone minor to part-time learners. Whilst the introduction of a capstone will decrease potential fragmentation, it will have to be implemented very carefully to avoid a resultant lack of flexibility for learners. Moreover, if the capstone is only applied to 'some' awards this will need to be managed carefully.

Assessment:

Generally, the concept of the capstone was supported as relevant within some major awards as it would help integrate learning from components. If it helped reduce the burden of assessment then it would be welcome. However, if it led to a duplication of assessment then it would not.

A key issue that may arise is the timing of this module (particularly for part-time courses) and assessment of such a module.

15. Please identify any gaps in QQI's suite of FET award standards

The consultation process, both online and via workshops, produced a list of subjects. These were mainly in single subject areas rather than at major award level. Those identified at major award level relate to more clinical/technical skills in healthcare, engineering, energy related subjects.

Also identified was the duplication of awards in fields such as healthcare and business. The current structures are seen as too broad so that the award risks losing its focus.

Recommendations were made to follow national policy and research on skills shortages. The influence of third parties such as funding bodies and sectoral bodies was noted. Examples cited were the influence of funding on early years provision and the impact of Health Service Executive (HSE) employment policy on educational requirements for healthcare assistants. Another issue identified was English language requirements for access to programmes. This principally related to written and verbal fluency among learners for whom English is a second language.

It was noted that the Regional Skills Fora (www.regionalskills.ie) have identified areas such as Buildings Fire and Alarm Prevention Systems, Financial Technology, Medical Technology, Biopharma, Data Analytics and broader engineering fields including energy-related standards.

Greater synergy with industry was recommended, to identify appropriate technical skills such as those in engineering and energy fields. Some replies commented on the apparent *'dearth'* of awards whilst other felt happy with what was available. Such feedback seemed to reflect provider exposure to particular fields of learning rather than all fields and whether awards in the same subject area should be available across levels.

Recognition for using other standards i.e. non-QQI standards, was recommended, where these are available.

16. Do you agree with the proposed amendments to the Common Awards System? Are there other amendments that merit consideration?

The proposed amendments to the CAS related to removing residue credit, grading of major, special purpose and supplemental awards and the introduction of a capstone component.

Removing residue credit was generally not welcomed as it *'would restrict flexibility and currently allows for programme development on a regional basis which is critical to address job vacancies and skill shortages'*.

There was no agreement on removing grading of major, special purpose and supplemental awards. The introduction of a capstone component was generally seen positively but best implemented as an optional requirement. Support for programme development and delivery would be required for staff to understand how a capstone can be implemented.

Other amendments suggested a change in the use of learning outcomes. Concern was expressed that *'The rigidity of the learning outcomes as standards to be met in a QQI component is far too onerous on teachers and learners'*. Suggestions were made about changing the presentation of learning outcomes to 'learning goals' or to changing to *'one overarching standard statement (this being the only standard to be met), with suggestions for desirable learning goals'*.

The inclusion of certain vendor/professional awards as components of major awards should be considered.

Impact of Review

17. In HET, what issues/impacts do you foresee for providers, learners, employers?

The review of HET award standards was welcomed as it would increase alignment with the employment market and identification of future needs. It should also allow for easier access from FET to HE.

However, it was noted that the adoption of new standards *'will require sensitive transitional arrangements as providers manage the re-alignment of their existing programmes to benefit from the new standards'*. This could be done in *'the form of provider produced reports as to how their existing programmes might be revised to align with the new standards, and managed by means of a desk review by external examiners and QQI'*.

18. In FET, what issues/impacts do you foresee for providers, learners, employers

Feedback voiced concern about the implementation of the new validation policy (2016), the volume of programmes to be developed and the timing of the deactivation of standards being replaced.

The requirement for additional resources and the impact on staff resources was highlighted repeatedly by public sector respondents. It was noted that *'a great deal was learned from previous rounds of programme development'* when CAS was introduced. However, *'the way in which programmes were produced at levels 1-6 the first time around is not sustainable into the future'*. Upskilling, staff CPD and resourcing colleges with teacher allocation to facilitate re-engagement, reviews, CPD and employer engagement were highlighted. The danger that *'poorly resourced courses will pre-empt the possibility of delivering quality programmes'* was mentioned.

It was considered vital that this process be timed carefully, discussed and agreed. Concern was expressed about the deactivation dates for existing standards.

The impact on learners is generally considered positive as the revised standards will be more relevant and up to date. The issue of progression from FET to HE is still seen as problematic in terms of the availability of places for FET learners, understanding of FET qualifications by higher education institutions and the ability of providers to devise programmes for separate needs rather than adopt a one-programme-fits-all approach (employment, progression, personal development), as at present.

Other providers expressed concern about direct and indirect costs. There was a feeling that re-engagement and re-validation appear to be *'all happening at once. This has huge resource implications on providers'*. Fees are seen as *'prohibitive'* and *'a major concern'* that could exclude charitable or small independent providers. An explicit reference was made to *'what happens to the small private providers competing with the subsidy of ETBs'*?

Non-vocational learning needs to be valued as well e.g. for personal development, in the spirit of lifelong learning. Taking a more optimistic view, it was noted that the review could lead to better employer involvement in standards review and development and better provision of relevant work experience for learners which should lead to *'improved employment and progression prospects for learners'*.

19. Any other comments?

Issues indicated below arose from additional comments in the consultation.

The introduction of broad standards in FET

The consultation workshops for FET providers asked about the introduction of 'broad standards' (i.e. non-CAS standards) into FET. This is a new concept in FET and to date is confined to the use of the **Professional Award Type Descriptors** for apprenticeship programmes. Broad standards are generally statements of knowledge, skill and competence (per the substrands of the NFQ) tailored to broad fields of learning. If such standards were introduced at levels 1 to 6, providers could use them to devise programmes and to bypass the current prescribed pool structure of the Common Awards System. The rationale for introducing broad standards is to reflect the evolution of provision in FET and give providers more flexibility in programme design and, in principle, make the timeline to a validated programme shorter.

Feedback indicated that more information was needed as to how these standards would be used and *'balance would be a concern'*, that they should not be too broad and should *'allow for transferability'*. There was a concern that the move to broad standards *'could have implications for FET learners'* and that they *'could make the objectives in the Action Plan for Education to 'upskill' and 'reskill' learners, difficult to achieve'*. The need for information and guidance on the use of broad standards will be crucial to their introduction into the FET sector.

The overlap at Level 6

This refers to the co-existence of two major awards at level 6: the **Advanced Certificate** in FET and the **Higher Certificate** in HET. There is a belief that they are not regarded as being at the same level: learners seeking advanced entry to HET are limited to 2nd year of the Higher Certificate. This limitation has a practical impact in that learners seeking grant aid are then disadvantaged as they cannot get aid for a programme at the same level of the NFQ, only for progression to a higher level.

Levels 1-3

Level 1-3 standards have been subject to a separate review. However they were included in the discussion paper to ensure all levels of the NFQ were covered.

Three main issues arose: a) the type of assessment, b) the gap between levels 3 and 4 and c) the use of maths at levels 1-3. Views expressed included *'the level of student assessment is very high'* and that *'more variety of assessment is needed'*. That *'100% of learning outcomes to be assessed is unreasonable'* and *'there is too much pressure on learners in terms of assessment level'*. Feedback also indicated that *'the gap between Levels 3 and 4 is a big step'*. In relation to mathematics it was noted that *'the gap between level 2 and 3 maths is quite an issue, exiting level 2 with a big step up to level 3'*. Also, concern was expressed that learners are disadvantaged at level 3 as mathematics-related components are mandatory and this *'may be a barrier to achieving a full award'*. Level 4 and 5 major awards do not have compulsory mathematics and therefore level 3 learners are being disadvantaged.

Mathematics

Feedback also indicated that *'QQI does not provide clear guidelines around the level of mathematics required – specifically related to apprenticeship'*.

Progression from levels 3 to 4 in the disability sector is seen as a stepping stone to FET and a lot of learners are *'getting caught out by application of numbers. Seems to be at a different level to other modules at level 3'*.

Assessment

Commentary was received about the design and delivery of assessment in FET in particular. The *'calibration of what is expected and what is achieved'* is needed *'to ensure consistency in level'*. Pitching assessment at the right level is important otherwise *'Learners being asked to submit coursework beyond their (reasonably identifiable) skill set will just result in declining numbers or 'drop-outs'*.

Recognition of Prior Learning

Comments were received from the FET sector about the role of Recognition of Prior Learning (RPL), what part it plays in the process and how it can be utilised. One suggestion was to introduce a *'mentoring system for RPL'*, however whether for learners or providers was not clear. The recognition of prior certified learning in FET being limited to 5 years was seen as *'not fair'* and *'against lifelong learning'*.

Progression

Progression between NFQ levels and between FET and HET was raised. At lower NFQ levels the increase in the volume of learning associated with moving from levels 1 and 2 to level 3 was noted i.e. 20 credits at level 1, 30 credits at level 2 and 60 credits at level 3. Also, the increase in default credit values for components was also highlighted as having an impact on learner capacity to progress i.e. 5 credits at levels 1 and 2 and 10 credits at level 3. The mathematics element required to achieve a major award at level 3 is proving difficult for some learners wishing to progress to level 4 and upwards.

In relation to progression from FET to HET, views were consistently expressed that there is a lack of equity of access for FET learners in terms of named programmes to progress to, higher education institutions *'not accepting the standards at FE for progression'* and quotas on places available which learners may not be aware of. A specific recommendation was that *'QQI needs to promote the relevance and currency of FE levels to IoTs and Universities'*.

Funding

The influence of funding on the provision of programmes was raised, *'Funding streams affect the courses/awards'* and that there is pressure on providers in terms of offering *'an education perspective and vocational training specifically for jobs'*.

Other comments

The FET sector expressed concern about the implications for providers of the implementation of other QQI functions and their impact on providers i.e. *'there are a lot of moving parts and a helicopter view is required'*.

Specific reference was made to the roll out of re-engagement with providers, the introduction of the new validation policy and criteria and the fees associated with both activities. *'The current process of re-engagement, re-validation is all happening at once. This has huge resource implications for providers'*. Also, that *'the fee is a major concern for small independent providers as this could exclude us from gaining validation or quality assurance for learners on a small scale when demand is there'*. There were suggestions that *'overall, mentoring and support from QQI is required'*.

Next Steps

QQI welcomes the range and depth of views expressed on the approach to the review of award standards at levels 1-9 of the NFQ. Our aim is ensure that we have appropriate and relevant qualifications and standards in place across further and higher education and training to meet the future needs of learners, employers and providers in an ever-evolving education and training environment. To achieve this, we will rationalise the awards and standards available in FET, monitor the currency of HET standards and develop a strategy for Qualifications that reflects future needs.

Specific actions include:

- establishing criteria and a timetable for the deactivation of non-performing and non-certified awards in FET

- exploration of issues around level 6 major awards in FET and HET

- improved communication to providers and external stakeholders on awards and standards activity

- a Green Paper on Qualifications

- the extension, as appropriate, of the broad standards approach to FET levels of the National Framework of Qualifications

- alignment with the implementation of the 'Policies and Criteria for Validation of Programmes' and Quality Assurance re-engagement activities.

Appendix 1:
Consultation questions

Approach

1. What is your view of the approach to reviewing QQI award standards as outlined in this consultation paper?

2. Is the approach feasible?

3. Do you have an alternative option?

4. Do you have any views on the proposed schedules?

5. If you are willing to participate in Award Standards Review Groups or comment on draft award standards when published for consultation, please indicate which fields of learning are of particular interest you.

HET Standards

1. Please identify any gaps in QQI's suite of HET award standards

2. Do you consider that 5 years is an appropriate schedule for review of QQI HET award standards?

3. Do you think that HET award classification needs to be reviewed and what issues do you foresee in doing so?

FET Standards Related

1. How can best use be made of occupational standards or profiles?

2. How best and to what extent can and should work-based learning be incorporated within the requirements of the FET awards?

3. Would removal of the residue credit feature enhance the major award standard?

4. Will it make the award standard more relevant?

5. Should further education and training major, special purpose and supplemental awards be graded?

6. What is your view on the introduction of a capstone module in some major awards and what issues do you foresee in implementing such a feature consistently?

7. Please identify any gaps in QQI's suite of FET award standards

8. Do you agree with the proposed amendments to the Common Awards System? Are there other amendments that merit consideration?

Impact of Review

1. In HET, what issues/impacts do you foresee for providers, learners, employers?

2. In FET, what issues/impacts do you foresee for providers, learners, employers?

3. Any other comments?

Appendix 2:
Consultation participation and feedback

Workshops

Date	Participants
13 February 2017	FET providers, Radisson Hotel, Dublin 8
16 February 2017	HE providers, Alexander Hotel, Dublin 2
2 March 2017	FET providers, Tullamore Court Hotel, Tullamore, Co. Offaly
9 March 2017	ETB representatives, Cork Training Centre, Co Cork
10 March 2017	Training Nurses Network, Cavan Institute, Co. Cavan
12 April 2017	Teagasc, OakPark, Co. Carlow
23 May 2017	EU Key Competences Consultation, Radisson Hotel, Dublin 8

Online submissions and direct submissions

City of Dublin QA Steering Group
City of Dublin ETB
Coláiste Stiofáin Naofa College of Further Education, Cork
CDETB/Educational
DRA CDC Ltd.
Dublinia Heritage Centre
Dundrum College of Further Education
Further Education Support Service
Griffith College
National Association of Principals and Directors (NAPD) Further Education and Training Committee
Quality Services International Ltd
Restorative Practices Ireland
SOLAS
Teagasc
Training Nurses Network (TNN)

Appendix 3:
Outline Terms of Reference for Awards Standards Review Group

Terms of reference

Purpose

The purpose of the Awards Standards Review Group is primarily to ensure that the QQI award standards within the National Framework of Qualifications (NFQ) are relevant and fit for purpose. The work and recommendations of the ASRG are informed by external expertise and sectoral requirements.

Functions

The Awards Standards Review Group will:

- Inform itself of QQI policies and procedures
- Consider current and future requirements of a sector/s
- Review occupational standards and/or profiles
- Consider international practice
- Consider access, transfer and progression routes
- Prepare draft standards including revised learning outcomes
- Make recommendations to QQI and if appropriate identify areas for new award development
- Identify matters regarding standards that may be referred to the Policies and Standards Committee

Reporting

The ASRG will submit periodic reports outlining details of its activities at agreed intervals to the QQI Executive

Composition

The ASRG will consist of approximately eight members (including the Chairperson) made up of representatives of communities of practice, FET and HET providers, professional and occupational associations, employers and where appropriate regulators and funders. A dedicated subject matter expert will be assigned to each group. The executive will appoint a chairperson to each ASRG.

Assignment to a review group will be on the basis of:

- expert knowledge and/or experience of the issue(s) under consideration
- capacity to contribute a wide range of viewpoints
- representation of affected stakeholders

Frequency of Meetings

The ASRG will meet on a schedule to be determined in agreeing the Terms of Reference.

Draft minutes of each meeting will be provided to the executive.
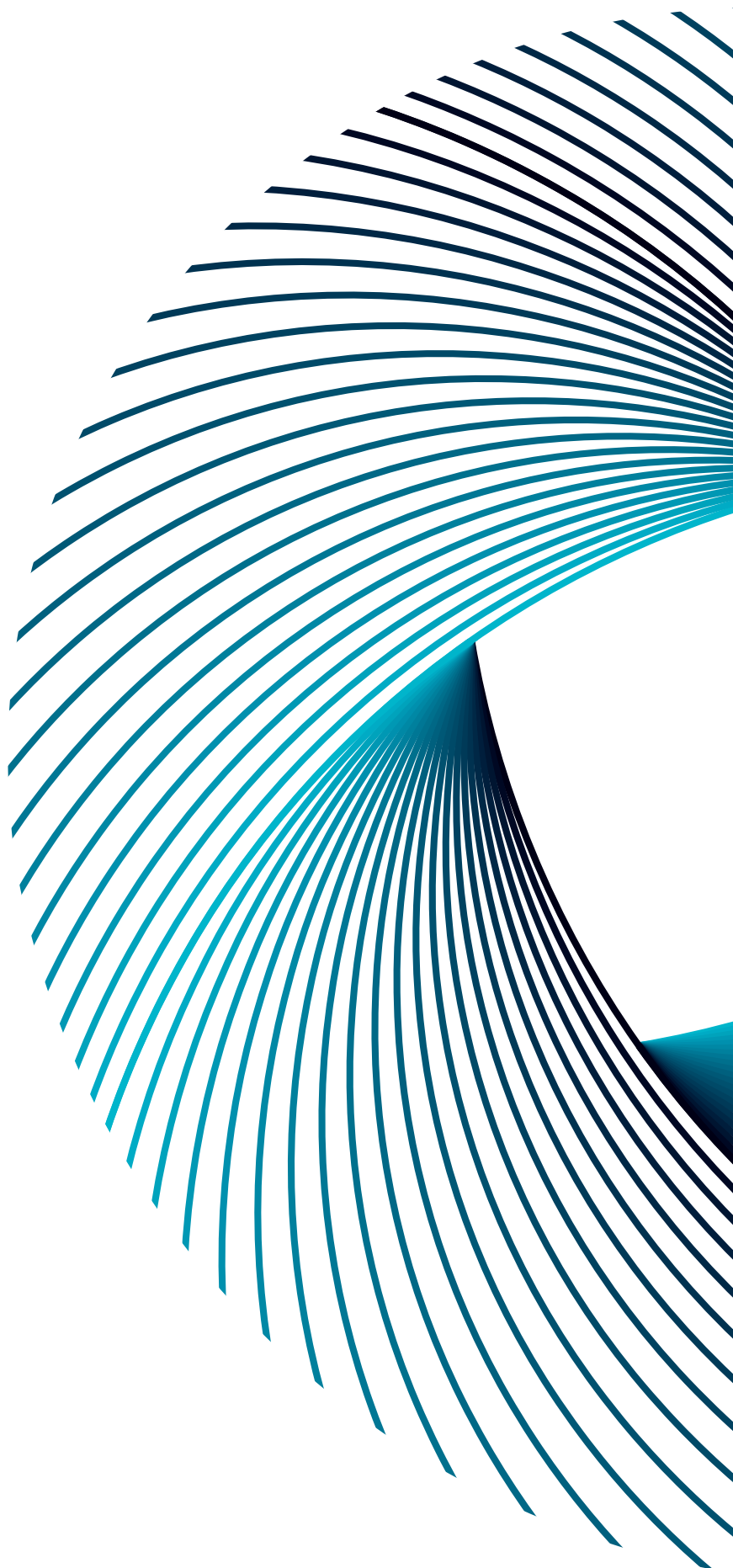
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