SECTION 4.1

Green Paper on Awards and Standards

FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the

content of this proposed Policy Document please use

the *Questions and Comments* area which appears

immediately after it.

PLEASE NOTE:

13 SEPTEMBER 2013

CLOSING DATE FOR SUBMISSONS

SECTION   4.1

Green Paper on Awards and Standards

4.1.1 Introduction

This paper outlines the short term (continuity) policy positions for award making and standards determination and outlines an agenda for a comprehensive policy development process that will involve consultation with a range of stakeholders over an extended period. More detailed Green Papers will be published in due course on constituent policy areas as the process unfolds.

The paper is likely to be of particular relevance to:
- Organisations that provide or are seeking to provide QQI accredited programmes.
- Providers who have or are seeking delegated authority to make awards.
- Universities and other designated awarding bodies (in respect of mooted higher education subject guidelines).
- Professional Recognition Bodies and regulators (in respect of qualifications recognition approaches).
- Occupational/professional/academic associations and trade unions (in respect of standards determinations).
- Employers and employment sector groups (in respect of skills and qualifications needs and recognition).

The paper concerns the following QQI activities:
- Policy and criteria for making awards including joint awards. This applies to QQI and to awarding bodies to which QQI has delegated authority to make awards.
- Procedures and criteria for delegating authority to make awards.
- Policy for the determination (development and/or adoption) of standards for awards made or recognised under QQI's authority. This links with the policy and criteria for recognising awards within the framework.
- Framework guidance to other awarding bodies making framework awards concerning their award standards.
- Evolution of the FET Awards Council common awards system (CAS).
- Approach to credit and credit accumulation.

These are complex policy areas that affect many diverse individuals, groups and organisations. They are and will continue to be particularly influential in the FET (Further Education and Training) domain. FET and HET Award Councils' awards policies and criteria and their standards determinations remain in force until QQI has established its new policy and standards. As indicated above, this paper aims to indicate the approach to be taken in the short term (continuity) and introduce the some of the bigger issues that will need to be tackled by the policy reform process.

4.1.2   Public Policy Context

The landscape of post-compulsory education in Ireland is changing and will continue to do so. Publicly funded provision of HET is reconfiguring. The dissolution of FAS, the establishment of SOLAS (Seirbhísí Oideachais Leanunaigh agus Scileanna) and the reorganisation of the FET system are particularly noteworthy from the qualifications perspective. Qualifications needs are also changing as Ireland's employers re-profile and reform as they emerge from the recession. All this implies that QQI's policy suite must be agile and adaptable.

The implementation of the NFQ, European Qualifications Framework (EQF) and related international developments are raising expectations about the portability and comparability of qualifications. QQI's awards and standards policies must be consistent with the NFQ and can help exemplify its application.

Public sector reform is moving towards smaller more efficient regulatory bodies relying on the subsidiarity principle. QQI's awards and standards policies may provide opportunities to devolve some responsibilities to other agents in the qualifications system such as, for example, education and training programme providers, organised communities of practice (e.g. occupational associations) and such like.

The QQI awards policy and the associated standards determination policy will help support the broader reform of FET in Ireland, for example, by helping to enable suitable organisations to develop and maintain framework recognised FET standards. The awards policy developed by FET Awards Council, especially the Common Awards System (CAS), has been influential. QQI will maintain the CAS while planning its (probably gradual) evolution in consultation with stakeholders and their evolving needs. CAS will probably need

to be more open to integrating other awarding bodies' vocational qualifications where they are recognised within the framework.

The National Strategy for Higher Education to 2030 calls for "*subject guidelines [to] be developed to support the National Framework of Qualifications. This work should be progressed by subject experts from the academic community and coordinated by the new Qualifications and Quality Assurance Ireland agency.*" Such guidelines might be expressed as expected learning outcomes and cover broad fields of learning and apply across the whole higher education system. This would not preclude supplementary awards standards in more focussed areas where necessary for awards made under QQI's authority or more generally by consensus (e.g. the Architecture Awards Standards work coordinated by HET Awards Council and used by the RIAI).

4.1.3   Legislative and Organisational Context

Many of the activities listed in the introduction derive from statutory functions described by the 2012 Act. Notably, the 2012 Act requires that QQI develop policy and criteria for making awards as soon as practicable. QQI considers as soon 'practicable' to include time for full consultative approach because that is ethically, politically and legislatively vital.

QQI has inherited awards standards and policies and criteria from FET and HET Awards Councils. In the short term these can be continued with relatively minor amendments. Nevertheless the sustainability and efficacy of these, and the common awards system in particular, must be addressed within the policy reform process being launched by this paper.

4.1.4   Anticipated Stakeholder Expectations

Providers and other stakeholders will expect that QQI policies on awards and standards will not differ significantly from the legacy. Nevertheless, QQI anticipates some significant policy reform e.g. in the FET awards and standards system (CAS). This might result in more emphasis on major awards and a greater distinction being made between major and minor awards. Policy reform might challenge some of the fundamental principles of the CAS. Some providers might welcome an evolution of CAS that would render it more open to awards of other awarding bodies.

Green Paper 4.1 Closing date for consultation - 13 September 2013

Longer term changes in policy on standards and awards might make it harder for small education and training providers to operate as independently as they do now. Some larger private HET providers will no doubt be interested in securing delegated authority to make awards. Institutes of technology will likely wish to see more extensive delegation of authority to award research degrees and perhaps at FET levels. Universities may be concerned that subject guidelines would be unduly intrusive or prescriptive and infringe on institutional responsibility to determine standards for their awards.

It would seem that certain regulators have become over reliant on framework awards standards to select for fitness to practise. In effect there is an implicit expectation that QQI can develop and maintain education and training standards that also serve as occupational standards for regulatory purposes.

Professional recognition bodies who have a role in the approval of programmes may anticipate the possibility of collaborating with QQI in order to reduce the regulatory burden on providers without loss of rigour.

4.1.5   Continuity Arrangements

While this paper is concerned with the issues and options for the future of the awards system and QQI's role on standard setting within that system, arrangements have to be made for continuity of these functions. Learners and providers are rightly concerned that the recognition or attractiveness of awards are not undermined by uncertainty about the awards system operated by QQI. Section 84 of the 2012 Act confirms that actions of the FET and HET Awards Councils to validate programmes or determine standards for awards remain in effect with the establishment of QQI. The resultant awards retain their validity. These are now described as "FETAC awards made by QQI" or "HETAC awards made by QQI". The branding of these awards in the transitional period is discussed in Green Paper 4.2 on Certification. Pending development of new awards policy, the awards policies (explicit and tacit) of the FET and HET Awards Council will be codified and regularised. This will cover CAS awards, Craft awards, and HETAC awards, including awards made under delegated authority. Issues relating to fees for awards during the transitional period are discussed in Section 4.2.

Pending the development of standards determination policy, standards development activity is being resumed on an *ad hoc* basis in cases where QQI is of the opinion that there is a robust requirement for national standards for *major* awards or for discipline-area or sectorial frameworks. Standards for Counselling and Psychotherapy awards; for CELT (the Certificate in English Language Teaching) and for Craft (National Apprenticeship) awards are among those to be included by this.

The HET Awards Council delegated awarding powers to the 13 Institutes of Technology. This delegation continues in effect from QQI. Pending the development of new policy on delegated authority, QQI will continue to extend delegation of authority, in these institutes only, for new fields and levels of research degrees, and for collaborative provision and established joint awards, subject to the policies and procedures established by the HET Awards Council.

The HET Awards Council entered into a number of joint award agreement prior to 2010, after which time the Council suspended entering new joint award agreements. The 2012 Act makes explicit provision for joint awards for the first time. QQI will not enter into any new joint awarding arrangements pending the development of policy joint awards.

4.1.6   Rationale

As an awarding body, QQI needs standards for the awards it makes directly. It also needs to sets the standards for awards made under DA. It needs policy, procedures and criteria to carry out the functions set out in the introduction. The policies of FET and HET Awards Councils need modification to render them more consistent with each other, more responsive to the needs of stakeholders and more sustainable in the organisational context of QQI.

More generally, QQI's role is to ensure that public trust and confidence is warranted in educational and training awards that are recognised within the framework and their associated programmes. Securing that trust, while encouraging innovation and responsiveness to changing needs, requires a detailed and comprehensive understanding of the qualifications system. This understanding is described in a separate background paper, *Qualifications Systems and Related Concepts* (available here)*. The understanding is

learning-outcomes referenced and this is why awarding policy and awards standards are so important.

4.1.7   Options and Preferences

The options for awards policy and standards are multiply constrained. The slate is not blank. There is little alternative to continuity in the short term. Equally, conservation of legacy policies in the longer term is not an option because it would not be consistent with the QQI's new contexts. Policy, procedures and criteria concerning awards and approaches to the determination of awards standards all require reform for many reasons. It is premature to present a definitive set of considered options here. Rather, the following sections indicate the areas that appear to require development—some options are suggested for consideration and others will, no doubt, emerge when this paper is discussed with stakeholders and as events unfold.

The functions entitled 'making award' and 'determination of standards' are more centralised in the FET system than in the HET system. QQI will need to work closely with SOLAS to explore, among other things, how to optimise resources for development and maintenance of necessary standards.

4.1.8   Indicative Policy Development Agenda and Approach

4.1.8.1   Determination of Standards: development vs. adoption

The determination of framework standards must be informed by multiple (and often international) perspectives including those of providers of education and training programmes, professional/craft associations, regulators, employers, funding agencies, and unions. QQI has a coordinating role in this.

Not all standards determinations need to be developed by QQI. In principle, QQI will be open to adopting (or recognising), as framework standards or guidelines, standards established by other authorities (national, foreign or international). This will require consideration of possible approaches to, and policy implications of, the adoption of selected external standards such as the ones promulgated by national authorities; international Tuning project outputs; UK Quality Assurance Agency benchmark statements; professional, statutory or regulatory

specifications for educational standards; standards for multinational qualifications; and standards of other awarding bodies that accredit programmes in Ireland.

Recognition of awards within the framework is another way of securing access to necessary credentials within the Irish qualifications system. Policy questions concerning recognition of awards within the NFQ are covered by Section 4.3.

In summary, QQI can:
 a) Coordinate the development of framework standards (working with communities of practice).
 b) Adopt(or recognise) standards as framework standards (that might be available to all).
 c) Recognise (within the Irish framework) awards (and thereby their underpinning standards).

The challenge is to find the most appropriate balances of approaches having regard to the common good and the availability of resources and the different capacities and needs in different fields of learning and communities of practice. It is likely that a diverse range of approaches will be required owing to the heterogeneity of capacities, customs and practices, and needs.

In all of this QQI must resist any pressure to over-standardise. Framework standards need to be broad enough to allow a healthy level of diversity, adaptation and innovation. They need to focus on the substantial rather than the accidental. Standards are for the guidance of experts—they are not for the education of novices.

4.1.8.2 Resourcing Standards Development

Establishing and maintaining a framework standard can be expensive and there is a threshold below which it is impractical to develop a new standard or maintain an existing one.

QQI will need to estimate the cost establishing an award standard including initial set-up and continual maintenance (including periodic review). This will need to account for the availability and cost of QQI executive involvement as well as that of external resources that QQI might mobilise to support the system of qualifications and catalyse enhancements. As noted later an early task will be to explore the capacity/distribution of external resources (including providers, national and international awarding bodies, professional associations

and similar communities of practice) that may have potential to take on roles in developing and maintaining standards and /or making framework recognised awards.

QQI will need to develop relationships with collaborators within the qualifications system whom it can rely upon to develop and maintain awards standards. This need is particularly acute in the FET sub-system. It will need to identify and involve communities of practice in the disciplines concerned. Aside from the resources they bring, there is a developmental benefit from assigning formal roles in standards development to stakeholders within the qualifications system.

4.1.8.3 Support for Standards

QQI cannot determine standards by unilateral fiat. There is a critical mass of social, industrial, pedagogical and cultural infrastructure that must be in place to support any educational qualification and its associated standard. It is important that there is a stable and mature community of practice (or scientific or learned community) in the discipline concerned.

Developing and maintaining standards requires the direct involvement of the discipline's community of practice as well as that of programme providers' and potential employers'. Framework standardisation cannot lead the emergence of the community of practice. In principle, there can be emerging disciplines that have not reached the stage of maturity that warrants the development of framework standards.

4.1.8.4 Capacity Distribution within the Qualifications System

The possible move towards devolving more responsibilities raises questions about the capacities (particularly of communities of practice) in the qualifications system: for example to develop and validate programmes of education and training; to develop and maintain awards standards and/or occupational standards; to assess learning validly and reliably; to collaborate effectively to achieve critical mass; and such like.

4.1.8.5 Forms of Standards

Awards standards can take different forms in different situations and contexts. Their scope can range from the narrow to the broad. The level of detail for a given breadth of scope can also vary. They can be communicated in different ways ranging from sectoral frameworks (see below) to standards for specific qualifications (named awards). Different kinds of providers and awards have different needs and a wide variety of forms is likely to be necessary.

Green Paper 4.1 Closing date for consultation - 13 September 2013

4.1.8.6 Sectoral frameworks

In the future it may be useful to expand the framework by adding generic sub-frameworks or sectoral frameworks. HETAC awards standards, while not normally described as sectoral frameworks, have that form.

The *Common European Framework of Reference for Languages: Learning, Teaching, and Assessment* (CEFR) is a potential sectoral framework. CEFR is better suited for use with foreign language proficiency qualifications than the NFQ level-indicators. Linking CEFR with the framework-level indicators would pose technical difficulties but it would not be an immediate priority[1]. In due course CEFR linkage with the EFQ will probably be attempted and the linkage with the NFQ might follow from this (if linkage proves possible and that is not beyond doubt). Given the specialised nature of CEFR and its applications, the absence of linkages with the general purpose framework-levels is unlikely to cause difficulty.

Alternatively CEFR could be regarded as uncorrelated with NFQ level and recognised solely as a means of communicating expected/achieved foreign languages proficiency level. A sectoral-framework might facilitate the development of further education and training programmes and qualifications that are optimised for initial general education and labelled accordingly—this could be useful for VECs and other schools. Currently there is no distinction between initial general education and further education and training (FET) within the CAS. This was a consequence of Section 13 of the 1999 Qualifications Act which required awards to be designated as either FET or HET. Some of FET qualifications are used by schools (e.g. for children with special education and training needs) and the reference to *further* education is incongruous in such settings. This is not a trifling issue because labels matter to people.

4.1.8.7 Higher Education Subject Guidelines

Higher education subject guidelines (as envisaged by the Higher Education Strategy) are not necessarily awards standards. They can, however, be considered as part of the NFQ.

Subject guidelines, as contemplated by the HE strategy, might take the form of sectoral frameworks for broad discipline areas e.g. humanities, engineering, social sciences, life

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[1] Section 43 of the Act of 2012 referring to the framework includes "…*system of levels of awards based on standards of knowledge, skill or competence to be acquired by a learner to entitle the learner to an award at a particular level within the Framework*…" it is debatable whether this precludes parallel sets of levels.

sciences and natural sciences. The advantage of having such guidelines is that they would help clarify the interpretation of the NFQ across different discipline-areas.

4.1.8.8 The Common Awards System and Standards

QQI will need to review the criteria and the methodology for developing new awards standards. In the context of CAS, for example, it might move towards broader standards in some instances and place most of the emphasis on major awards. Broader standards afford more scope to providers to respond to local needs and innovate or adapt. However, they require greater scrutiny of the intended programme learning outcomes during the (programme) validation process. Their use might impact on the reusability of modules in the CAS (See the section on CAS below).

4.1.8.9 Credit Accumulation and Standards

Typical credit accumulation systems rely on:

- Modules or units of instruction with credit values.
- Rules for combining modules to earn a 'major' qualification.

Such rules are guided by the needs of the 'major'. Among other things this implies that there must always be opportunities for learners to integrate their knowledge and skills and develop competences specified for the 'major' qualification. This implies the need for integration of concepts and integrated assessment.

Extreme unitisation of programmes that eschews consideration of this integration, is an over simplification. Formation (education or training) is not a linear process. Learning outcomes are path dependent. Experience A after B does not necessarily result in the same learning as B after A.

It is also an over simplification to assume that credit accumulation can serve as a proxy for integrated learning. Earning 240 ECTS units, for example, does not necessarily entitle a person to an Honours Bachelor's degree. Credit is a convenient accounting device for expressing expected learner effort but has no direct connection with learning outcomes. Credit is implemented in different ways within the existing award systems of the NFQ. ECTS and CAS credits refer to learner effort. The NQAI published a National Approach to Credit, this may need to be reviewed and replaced by clearer guidance on the conceptualisation of credit and its applications and limitations in the qualifications system.

Related to the concept of credit, there may be a potential role for *non-framework certification* offered by quality assured providers that would be recognised (within zones of mutual trust) for the purpose of access to specified programmes possibly with exemptions. This might be an alternative to the proliferation of minors.

4.1.8.10   Validation and Standards

There is a trade-off between standards development and maintenance, and programme (re)-validation activity. Intended programme learning outcomes are specified by all programmes that are subject to validation—these complement framework standards. They contain outcomes not *specified* by the framework standards while being consistent with them.

Generally, providers with capacity to develop new programmes (and their intended learning outcomes) can be expected to be able to work with more broadly based framework standards (and sometimes even with the NFQ's generalised award-types). The more broadly scoped the standard the more scrutiny is required of the intended programme learning outcomes at validation. The existence of a standard, however detailed, can never completely replace the need for scrutiny of the intended programme learning outcomes at validation. Moreover, there is a practical limit on how much detail can be included in any standard.

4.1.8.11   Engaging Employers on Skills Needs

Educational and training qualifications are in the vast majority of cases sought by individuals to improve their employment prospects among other things. Employers and society have interests in ensuring that standards for educational and training awards are consistent with workforce development needs.

QQI will need to have a variety of ways of engaging with employers, working as best it can with the diverse structures, capacities and mechanisms that it finds, to ensure employers' needs and views are expressed in awards standards. Some other countries have formal structures for this, e.g. the UK's sector skills councils. Professional recognition bodies, regulators and associations can contribute in their own domains. The work of the EGFSN in Ireland is relevant but does not address occupational standards directly.

4.1.8.12   Educational and Training Standards vs. Occupational Standards and the Roles of Regulators

A new and more coherent national approach to occupational standards is needed. The need is particularly acute in FET (except for the apprenticeships which already have *de facto* occupational standards).

In Ireland there is not always a clear distinction between the concepts of educational and occupational standards except in a few cases. Occupational standards typically need to be more specific than educational standards and are likely to require more frequent updating. Occupational standards may be used to express (fully or partially) the criteria for licensing a person to practise in a defined role. Occupational standards are different from educational standards owing to their distinct purpose. Educational standards can refer to occupational standards. Occupational standards are the responsibility and concern of employers, regulators, professional recognition bodies and occupational associations for example. Ireland does not have the resources to implement the UK model of sector skills councils (SSC) and National Vocational Qualifications NVQs. Moreover some researchers have pointed out significant flaws in both. The over specification of NVQs and responsiveness of the SSCs are among these.

There are some pressures on QQI (as previously on the FET awards council) to develop (and maintain) quasi-occupational standards particularly in further education and training. This would not be appropriate but QQI could help guide their development and maintenance by others especially professional recognition bodies and could refer to well-formed and supported occupational standards in its education and training standards. Any educational standard might make reference to such occupational standards.

Ideally, in defined or regulated occupations, occupational standards should be maintained by the occupational regulator or professional recognition body (PRB) or professional/occupational associations.

It is reasonable to expect that PRBs (for example) would maintain criteria for recognising professional qualifications. Such criteria ought to be reasonable (fit-for-purpose and eschewing unwarranted conditions) and include criteria for the specification, prescription or approval of educational and training qualifications (and programmes) designed to meet their specified education and training requirements. It may be useful for them to reflect the NFQ approach to differentiating learning into sub strands of knowledge, skill and competence as programme providers are generally familiar with this approach and use it in the academic validation of their programmes. They might also reasonably specify programme-related conditions (e.g. supervised and assessed formation in a practice placement).

In regulated professions/occupations, prescription of educational qualifications without such criteria delegates de facto part of the regulatory function to an education and training

awarding body which may not have the necessary legal or professional competence to oversee.

The distinctions highlighted in this section have not been fully explored by all the relevant stakeholders in Ireland. QQI will need to explore divisions of responsibilities between professional recognition bodies, regulators, QQI providers and professional/occupational-related associations (including both practitioners' and employers' interests). It is likely that different arrangements may be appropriate in different fields.

4.1.8.13 Qualifications and Licensing to Practise

Educational and training qualifications express an accomplishment at a point in time. They are awarded to a person who has been assessed as having achieved the corresponding award standard. Qualifications may be added to but not normally renewed. They may only be revoked for educational reasons (e.g. if obtained fraudulently). Their corresponding educational and training programmes are useful in preparing a person to practise, providing all or part of the initial formation for entry into practice and continuing development for practitioners. A current licence to practise, in contrast, attests that the holder is considered fit to practise. A licence must be renewed periodically and can be revoked on the grounds of unsatisfactory practice.

4.1.8.14   Learning to Learn and Standards

Workforce skills requirements change quickly in many domains and the workforce needs to adapt to this. Change can be too rapid for adaptation to be accomplished solely by updating initial education and training programmes (targeted at new entrants to the workforce). Accordingly, the initial formation of the young, whether generally or vocationally oriented, must without exception, develop their learning-to-learn competence. This initial formation occurs within the education and training system but also within early employment. Employers who recruit the young are coming to accept that the working environment they provide is an important formational opportunity. The apprenticeship system when it functions well is one example of how employers can take on their due responsibility for formation. Embedding substantial work-placements into education programmes is another mechanism that when done well can be formational. Formation programmes for new recruits is another. Embedding workplace formation into programmes is encouraged in recent national and European policy statements. This is generally important and particularly important in vocational areas at all levels (e.g. medicine, engineering, accountancy and crafts). The workplace is the 'laboratory' for many vocational disciplines and cannot be easily replicated (if at all) in an educational institution.

4.1.8.15 Awards Policy

Qualifications (i.e. awards) may be awarded to certify non-trivial volumes of knowledge, skill and competence. Their function is to mediate trust and to communicate. They have no other valid functions. They signify achievement and neither entitlement, inclusion nor potential except in a consequential way. Misuse of qualifications may contribute to destabilising the qualifications system.

The QQI awards policy will apply to QQI as an awarding body and to providers with DA. The awards policy and criteria will need to address a range of technical matters including:

- Using NFQ award-types.
- Making a QQI award.
- Making an award under DA.
- Joint awarding and establishing joint awarding arrangements.

More detailed matters to be addressed include:

- Awards made on the foot of the successful completion of a validated programme including where prior learning has been presented in lieu of successfully completing part of the programme.
- Awards made on the foot of proctored assessment outside a validated programme.
- Using credit (e.g. as in ECTS or in the CAS or in Craft awards).
- Assessment, credit accumulation and use of QQI awards standards (knowledge, skill and competence).
- The evolution of the Common Awards System in FET.
- Craft awards.
- Policy and criteria for revoking an award after it has been made.
- Policy on the maintenance of records.
- Certificate and diploma supplements.
- Minimum volume of learning

Certification (production and issue of parchments) matters are addressed in Section 4.2.

Credibility of qualifications depends on credibility of summative assessment. Poor assessment undermines everything else. Valid and reliable procedures for the assessment of learning are essential for functioning qualifications system. Formative assessment by a teacher is what differentiates teaching from delivery. Summative assessment is the gateway

to qualification. If assessment is incompetent, conflicted or fraudulent the qualifications that depend on it are corrupted. Where a provider is responsible for summative assessment of their own students there is always a potential for conflict of interest. The use of external moderators (authenticators) can help but only to a limited extent. Such providers must have intrinsic capacities to militate against conflicts of interest. The alternative is to use external assessment or some other such collaborative arrangement that ensures robust objectivity. Small providers should never have dominant control of the summative assessment of their enrolled learners.

Should it be adopted QQI would likely enforce this aspect of awards policy through programme validation and review of delegated authority.

4.1.8.16 QQI as Awarding Body

Being an awarding body comes with many responsibilities. Typically an awarding body sets standards and examines candidates against those standards. The 2012 Act separates these functions for QQI as did the 1999 Act for the FET and HET Awards Councils. The separation requires that the QQI and providers of QQI validated programmes share the same understanding of the awards standards concerned. This shared understanding can be achieved but not by exclusive reliance on learning outcomes statements.

There could be situations where QQI's awarding function might lead to a conflict of interest. For example if QQI were to make awards similar to those of an awarding body (which is not authorised by statute, or a professional recognition body or a relevant provider) seeking "recognition within the NFQ" for its awards. The potential for conflict of interest is significantly lessened when QQI delegates authority to make the award particularly where delegation of authority is not tightly constrained.

Nevertheless, internal barriers that prevent conflicts of interest are required. QQI's policy and criteria for making awards and validation of programmes of education and training and its procedures and criteria for deciding on applications for delegated authority need to have regard for QQI's multiple roles. This is another strong rationale for a consultative approach to awards and standards policy development.

There are other practical reasons why QQI might wish to distance itself from awarding making when alternatives exist. To make an award QQI must validate the programme. Programme validation if done properly is costly and time consuming for QQI (as well as the

applicant) though worthwhile. QQI could easily be overwhelmed if it were to take on a large volume of this work. Eschewing proper validation is not a responsible option.

QQI will need to consider how best to position itself as an awarding body among other awarding bodies. One option might be to become the 'central bank' equivalent for awarding bodies working mainly through providers and other awarding bodies and delegating authority where possible Any transition from the *status quo* will need to consider the implications for providers (across all ten NFQ levels) and enrolled learners.

Changes in awards policy might require that smaller providers would need to become linked or quasi-linked providers to retain access to QQI awards.

4.1.8.17 Awards Branding

QQI will need to consider the branding of awards it makes and regulations for the branding of awards made under DA. New brands will be required for QQI awards. Branding if well designed can underpin a new departure in thinking about the qualifications system but if not well thought through it could have the opposite effect. Assuming that form ought to follow function, is it necessary that QQI's vision for the qualifications system and its awards policy and criteria be in place before any new brands are introduced.

4.1.8.18 The Common Awards System

The Common Awards System (CAS) was developed by FET Awards Council and contains (generally, but particularly at NFQ Levels 3-5) significant amounts of 'DNA' from the NCVA system that served PLCs (vocational schools). There is evidence of influence from the UK's VE system but there are also significant differences. For example, Ireland's VE system has no equivalent of the UK sector skills council's occupational standards.

The CAS system specifies component (minor) awards and composite (major) awards. Components are awards based on assessed units of learning. Composite awards are constrained aggregations of components. Learners who successfully complete components receive 'minor awards'. Component award specifications express expected learning outcomes and outline assessment modalities. Award specifications may include validation conditions that govern who can provide access to an award or influence how a programme is to be provided. New award specifications are produced by groups involving informed stakeholders such as regulators, employers, occupational associations, practitioners, institutions and such like. In the past the development work was coordinated by FET Awards Council. Most CAS award specifications have been 'migrated' from award specifications

(and or corresponding programmes) developed using the methods of the awarding bodies that preceded FET Awards Council. The migration process is nearing completion (May 2013).

Relatively, few award specifications have been developed *from scratch* using the CAS method. Most have been *migrated* from the awards of the bodies that preceded FET Awards Council. Most of the awards that have been newly developed are special purpose awards— special purpose award specifications are less constrained than other kinds of CAS award specifications and this may explain their popularity.

The CAS system is relatively stable and running its supporting quality assurance arrangements will need to be strengthened significantly. For certification purposes it will be continued because there is nothing to replace it yet.

As noted the migration to CAS project is nearing completion. New standards development might not apply the CAS model as it currently stands—some kind of evolutionary approach is likely, at least. If the method of developing new FET standards is significantly different, there might be reason to distance any such new QQI standards from CAS standards. Arguably, the CAS has been successful in bringing coherence to part of the vocational education system (outside apprenticeships). It has been criticised for being insufficiently responsive and insufficiently inclusive of external awarding bodies and their standards. Even if the CAS were flawless in design and implementation, operating it as the FET Awards Council intended it to be operated it is not sustainable for QQI.

The CAS specifications include built-in review dates. Some are currently due for review others are not due for review for another five years. Nevertheless it might be useful to bring forward the review of CAS (including as a credit accumulation system) in order to determine how the system is affecting learners and providers and how the qualifications are regarded by employers and progression provider admissions units.

4.1.8.19 Delegating Authority

Currently only the institutes of technology have DA to make HETAC awards. The HET Awards Council's policy was that delegation of authority to award research degrees is by NFQ level and by discipline area. DA is also restricted in respect of joint awards and awards in respect of transnational programmes. Institutes of technology were not entitled to apply for DA to make FETAC awards. From QQI's perspective the HET Awards Council approach seems sustainable in the short term with only minor change. The longer term approach will

need to be developed in the context of the new landscape for education and training and in consultation with stakeholders. The strategic positioning of some institutes to help them gain Technological University status is a relevant consideration here.

The 2012 Act requires the Minister for Education and Skills to make regulations (as soon as practicable) that shall be fulfilled by a provider of a programme of education (other than specified public providers) before it can apply for delegation of authority. How do the procedures and criteria for the determination of a request for delegation of authority take into account the extension of this policy to a wider range of providers?

4.1.8.20 Joint awards

The 2012 Act deals explicitly and extensively with joint awards policies need to be applicable to joint awards. This will require interacting with institutions outside of QQI's remit and consideration of awards not on the NFQ. QQI does not propose to enter into any new joint awarding agreements until new policy in this area has been developed.

4.1.8.21 Award-types and credit

The role of minor awards and the approach to credit will need to be considered in the policy development process. The concept of a minor award was established to facilitate recognition of some learning outcomes of a major award. The major award is fundamental to the NFQ, for example, for the purposes of transfer and progression.

Consideration of the certification and awards data available since the introduction of the minor award concept would suggest an over-emphasis on minor awards in the further education and training sector in proportion to the number of major awards achieved. QQI will need to consider how the practise relating to the implementation of the minor award has differed from the original NFQ intention and impacted on the overall system of education and training.

New policy development will consider the following questions:
- How small a unit of learning can reliably assigned to a level in the NFQ?
- Does the use of minor awards and the current practise of double certification where a learner goes on to achieve major award cause confusion?

- Can a more extensive use of the concept of credit provide a more appropriate means to recognising small units of learning?

- Should minor awards with a self-standing purpose be redesigned as special purpose awards.

- Should the policy on minor awards reflect the different requirements (learners, employers, providers) at different levels of the framework?

Questions and Comments

CONSULTATION WITH STAKEHOLDERS

The wide range of issues covered in this paper will require extensive and systematic consultation at multiple levels. This paper might be considered as an initial exploration.

Do you have any thoughts, comments or concerns raised by the issues outlined in this paper?

Further green papers will follow as will more focused consultation processes.

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