### Submission to the National Qualifications Authority of Ireland

- Please use this form for submissions on the discussion document, *Towards a National Framework of Qualifications,* published by the National Qualifications Authority of Ireland in November 2001.
- The document may be obtained from www.nqai.ie or in paper copy from the Authority.
- The deadline for submissions is *January 31$^{st}$, 2002.*
- Do not feel constrained by the space provided for each answer; use as much space as you need.
- We prefer you to return your submission as a Microsoft Word document attached to an email to discussion@nqai.ie.
- Paper submissions should be sent to:

> *National Qualifications Authority of Ireland*
> *Discussion Document Submissions*
> *4$^{th}$ Floor*
> *6-9 Trinity Street*
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**Date: 31$^{st}$ January 2002**

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

### Organisational

All submissions will be made public and attributed to the author and/or their organisation. Contact details will not be published but will be retained on the Authority's database for future communication unless you request otherwise.

Submission: *Towards a National Framework of Qualifications*

**Question 1 – Chapter 5**

**Do you agree with the approach of the Authority in building from an initial set of principles? What are your views on the principles – Should some of the ones referred to be excluded? Are there other ones that should have been mentioned? Are the principles outlined accurately described?**
*Please type your answer here.*

**Transparency**- the essential element in this principle is the need for progression routes to be clear to all in a language that is easily understood. How this can be achieved needs to become a key principle of the NQAI's work, keeping in mind the different environments in which lifelong learning can be achieved and who can access learning, i.e. can the progression system be universal? How can this be achieved within the grounds of the Equal Status Act?

**Simplicity**- Try not to use acronyms to define awards. Use of the web will aid users and providers in the range of awards on offer and the user a clear and transparent image of progression routes.

**Equality**- This is clearly the most essential principle that will attempt to create a learning environment that is accessible to all. If this is not achieved at first principle, then the NQAI has failed to make lifelong learning a reality. It is also essential to have employers on board for this principle if informal learning is going to be credited. How will this be recognised by employers? How will they justify employing an individual with informal skills over someone with formal qualifications?

**Complimentarity**- A guiding principle in relation to the youth work sector. **Youth organisations** play an essential role in combating educational disadvantage as a structured approach outside of formal education that acts as an alternative and compliment to formal education. It is expected that new systems for the accreditation of non-formal learning will be established and the Further Education and Training Awards Council (FETAC) will promote and offer alternative forms of education and learning. While these developments are welcome, there is much that still needs to be done to bridge the gap between formal and non-formal education and the providers in these respective sectors. Until this is achieved, 'lifewide' learning will never be realised.

Youth work methodologies stand on their own two feet as a valid learning process but also as a way to offer good practice to formal education learning processes. Youth work has created a whole set of learning skills and methodologies that offer a structured approach outside of formal education as an alternative and compliment to formal education. There is therefore a need for youth workers to be adequately trained and accredited to support the social and personal development of young people.

**Question 2 – Chapter 6**

**Do you agree with the approach of the Authority in developing a set of guidelines for its working processes?  What are your views on the guidelines –should some of the ones referred to be excluded? Are there other ones that should have been mentioned?**

*Please type your answer here.*

Evaluation needs to be included as one of the core process guidelines for the NQAI.

Further explanation is needed about the 'Quality Process' and what it will entail.  Does this 'Quality Approach' include evaluation of the NQAI, the standard of the awards, and equality of opportunity?

**Question 3 – Chapter 7**

**Do you agree with the approach of the Authority in outlining the issues in relation to the policies and criteria for the measurement of  standards of knowledge, skill and competence and what are your views on the issues?  What other issues are there?  What other approaches should the Authority take? How should awards be grouped within the framework to assist in the setting of standards and in what way should the standards be set?**

*Please type your answer here.*

**Employability**- NYCI is concerned that there is little focus on internal employability if an individual is 'earning and learning' at the same time.  Appropriate programmes or high level supports should be established for young people who want to access workplace learning in less formal settings, particularly for the many young people who do not fit into the current workplace-learning model. Employers should work in partnership with other social partners to recognise the value of all forms of learning and create a flexible workplace learning environment.  Employers need to value non-formal learning as a way to engage young people in Lifelong Learning.

The highly focused attention on workplace skills and how to access them has direct implications for young people in low-skilled and low paid employment who may not have the awareness of, opportunity for or sufficient access to workplace learning.  Unemployment has dropped dramatically, but many young people who left school early or failed to gain qualifications at second level are located in semi-skilled or manual employment that offers little opportunity for workplace learning.  While the debate on paid educational leave for previously qualified and skilled employees continues, the debate on how to improve the learning opportunities for young people who are already educationally disadvantaged needs to be progressed.

Concerns also arise over appropriate workplace learning.  If employers create a flexible workforce where employees can access training at any time, issues arise over whether training should be job-specific or learner-specific.  In other words, if lifelong/lifewide learning policy claims to put the individual at the

centre of learning, the learner should be entitled to access any type of learning they deem appropriate. However, with the emphasis on technical and technological skills and the fear of company 'brain drain', employees are forced into formal education and training that may not suit their own learning needs. It is therefore essential that non-formal learning and informal learning are recognised and accredited as well as formal learning to achieve a more holistic and flexible learning society.

The final recommendations of the **Lifelong Learning Task Force** in the area of Workplace Learning need to be published and implemented**.** A workplace culture needs to be developed where training is accessible to all employees, at all levels, with clear and apparent promotional structures in place. NYCI believes that tax incentives and saving schemes are excellent ways of promoting learning in the workplace. Employers should work in partnership with other social partners to recognise the value of all forms of learning and create a flexible workplace learning environment. Employers need to value non-formal learning as a way to engage young people in Lifelong Learning.

NYCI welcomes the assertion that if lifelong learning means anything, the concept of duration of learning cannot be the principal driver of the level attained by a learner. It is also noted that the differences in duration between full-time learning and part-time learning need to be overcome. One of the main obstacles for part-time learners is the fact that part-time education is still fee-paying in Ireland. As long as an individual has to pay for part-time education, the issue of duration will not be solved easily. NYCI recommends that students in part-time higher education should be means-tested in order to receive adequate funding from the State in line with a more realistic policy of Lifelong Learning.

**Question 4 – Chapter 8**

**What design features upon which opportunities for access, transfer and progression can be built are a prerequisite of framework construction? Do you agree with the approach of the Authority in outlining the features set out and what are your views on the features? What other features should be built in? What other approaches should the Authority take?**

*Please type your answer here.*

Be careful of labels such as 'blue chip' to denote awards such as the Leaving Certificate and Bachelors degrees. While the view that these qualifications are 'portal' awards is accurate, labelling such awards creates added pressure on weaker students to achieve beyond their capability.

The thrust of the NQAI's vision in this document is accurate and progressive. Much work needs to be done to create a flexible system where courses are modularised and entry points to courses are at the discretion of the users.

**Question 5 – Chapter 9**

**How should the Authority define further education and training on the one hand and higher education and training on the other? Should levels of further education and training and higher education and training overlap? If so what are the characteristics which differentiate between the two at the shared levels?**

*Please type your answer here.*

Need to be aware of the **complimentarity** of non-formal learning- learning and good practice should overlap between formal and non-formal learning.

Recognition should be given to the role of the non-formal learning sector as 'educator' outside the formal education system, reducing the burden on formal education. Lifelong/Lifewide Learning is not just about the 'school' setting, it should also encompass a variety of institutions, such as community and youth organisations, and should recognise the work of youth programmes in out-of-school settings and strive to create a working structure that is accessible to all.

Courses available within the Youth Work sector should be professionally recognised. Under the Youthcert research, 23 courses were identified of real relevance to the sector that are not being formally recognised, even though they are seen to be essential and of benefit to those working within the sector.

Open dialogue between NYCI, the Department of Education & Science and the European Commission should be established in order to create workable structures to assess and recognise non-formal learning, particularly in youth work settings. Ireland is not at the forefront of innovative forms of assessment and skills-recognition in non-formal learning. Other member states have taken the lead in this area and NYCI would welcome support in implementing pilot programmes based on other European models in countries that are less developed.

**Question 6 – Chapter 10**

**Through what processes should the Authority include different types of awards in the framework – e.g., those of the Further Education and Training Awards Council, the Higher Education and Training Awards Council, the Dublin Institute of Technology, the universities, Department of Education and Science in relation to schools, private awarding bodies, international awarding bodies making awards in the State? Through what process should the Authority link the framework with frameworks of awards made outside the State?**

*Please type your answer here.*

Very important with respect to the ascension countries and young people's increased mobility in the European Union.

**Question 7 – Chapter 11**

**How should the Authority set the overall standards of awards of the Further Education and Training Awards Council, the Higher Education and Training Awards Council and the Dublin Institute of Technology? What approaches should the Authority take to determining the procedures which the Councils need to follow in the performance of their functions? How should the Authority develop its appeals role? What approach should the Authority take to working with the Dublin Institute of Technology in relation to quality assurance? How should the Authority encourage appropriate collaboration among the Further Education and Training Awards Council, the Higher Education and Training Awards Council and the Dublin Institute of Technology?**
*Please type your answer here.*

The link between the Youth Work Sector and FETAC- As a priority action of the Youth Work Development Plan, a Youth Work Validation Body will be established, with the purpose of developing a comprehensive framework for accreditation and certification in youth work, taking into account the provisions of the Qualifications (Education and Training) Act 1999 and the need for accessible and flexible progression routes for both volunteers and paid workers.

The Validation Body will have representation of all the relevant youth work interests in the Republic. It is the intention that it will be established on a partnership basis with youth work organisations and interests in Northern Ireland, where new arrangements for the validation of youth work training are also currently being implemented.

**Question 8 – Chapter 12**

**Do you agree with the approach of the Authority in coming to an understanding of access, transfer and progression? What are your views on the issues raised – Are they properly described? Should some of the ones referred to be excluded? Are there other ones that should have been mentioned? What are your views on the possible procedures discussed – Should some of the ones referred to be excluded? Are there other ones that should have been mentioned?**
*Please type your answer here.*

Please see comments above.

**Question 9 – Chapter 13**

**What are your views on the relevance of the issues and suggestions made in this document to meeting the needs of learners?  Are there other ones that should have been mentioned?  Does the document fully address the diversity of learners and potential learners?  What are the main actions that the Authority should take to meet the needs of learners?**

*Please type your answer here.*

Please see comments above.

**Question 10 – Chapter 13**

**What are your views on the relevance of the issues and suggestions made in this document to meeting the needs of employers?  Are there other ones that should have been mentioned?  What are the main actions that the Authority should take to meet the needs of employers?**

*Please type your answer here.*

Please see comments above.

**Question 11 – Chapter 13**

**What are your views on the relevance of the issues and suggestions made in this document to the role of providers?  Are there other ones that should have been mentioned?  Does the document fully address the diversity of providers and potential future providers and their appropriate roles and responsibilities?**

*Please type your answer here.*

Please seem comments above.

**Question 12**

**Are there any other comments you wish to make?**