

# FEDA RESPONSE TO QCA CONSULTATION PAPER

## FLEXIBILITY FOR ADULT LEARNERS WITHIN THE NATIONAL QUALIFICATIONS FRAMEWORK

### INTRODUCTION

#### *New opportunities*

We wholeheartedly agree with the view that many adult and other learners are put off by the time commitment which whole qualifications demand. We endorse the steps the Government has already taken to make qualifications more flexible for 16-19 year olds in full-time education by introducing the reformulated Advanced Subsidiary, the six-unit advanced level GNVQ and the three-unit advanced level GNVQ.

We welcome the opportunity to comment on how the qualifications framework might be made more flexible to meet the needs of adult and other part-time learners. We support proposals to move towards a unit-based credit system as a means of making the qualifications framework sufficiently flexible to widen participation in learning by adults.

FEDA has always been supportive of the need for an outcomes-based unitised credit framework to underpin the national qualifications framework. We welcome the consultation and believe that it can take developments forward in a number of significant ways. In particular FEDA welcomes:

- 1 consideration of the need to increase the flexibility of the national framework for the benefit of adult, part-time and work based learners. This also meets the expressed needs of employers seeking greater flexibility in order to develop and improve the skills of the workforce;
- 2 the way in which the paper takes account of key government initiatives such as the New Deal, Ufl and measures to extend participation and inclusiveness within the education and training system. FE colleges and other providers have indicated to FEDA that these policy developments will be difficult to achieve without complementary development of the qualifications framework;
- 3 the ways in which the paper successfully identifies many of the key issues involved in the introduction of unitised credit based systems within the qualifications framework. It should assist in generating serious, informed and sober discussion on many of these matters;
- 4 recognition that unitisation and credit may be linked to other policy initiatives including accreditation of qualifications, improving the value of NVQs, higher level qualifications and development of an overarching certificate at advanced level;

- 5 recognition that significant developments have already taken place in terms of unitisation in both national qualifications such as GNVQs, NVQs and modular A/AS levels and other qualifications offered by national awarding bodies including AQA, Edexcel, OCR and OCN/NOCN;
- 6 the possibility that many features of a unitised credit system are already in place and could be adapted or adopted to form part of the new national lifelong learning framework.

FEU/FEDA has argued for a credit related qualifications system for a number of years and has been at the forefront of developments and thinking in this area. FEDA has always maintained that a unitised credit based qualifications framework could complement the development of a national qualifications framework and assist in:

- the maintenance of standards in national qualifications
- increasing the flexibility of national qualifications
- development of a more rational and rationalised national qualifications framework.

### ***An inclusive qualifications framework***

FEDA recognises that there is a need for 16 to 19 year old learners to follow programmes leading to full qualifications to ensure suitable depth, breadth and coherence. Adults, work-based and part-time learners will take many of the same qualifications but will require a different approach and greater flexibility and customisation to meet their individual needs.

The proposals which have been put forward by FEDA envisage a **mixed economy** of:

- full qualifications available for all learners in particular 16-19 year olds;
- accredited units and whole qualifications available for adults, work-based and part-time learners.

**FE colleges have made it clear that what adult learners need is a single inclusive framework of qualifications and not separate pathways or qualifications whether credit- based or not.**

### ***Qualifications for the future***

A further factor which needs to be taken into account is that within Ufl and other new developments in education and training there will be increasing use of online/web based learning, assessment and accreditation.

Development work by FEDA and other national organisations has indicated that it would be extremely useful for such systems to comply to a standard (unitised credit) framework making the systems more transparent and accessible to learners and helping them to get the full value for what they have learned and achieved.

***We reiterate our view that a unitised credit framework should be seen as a set of solutions and will assist in overcoming more barriers to progress than it will raise. It will be nowhere near as difficult as were the creation of the National Curriculum or NVQs and will bring benefits at least as great as both.***

## **SPECIFIC ANSWERS TO QUESTIONS IN THE QCA PAPER**

### **1 ENHANCED FLEXIBILITY THROUGH EXISTING QUALIFICATIONS**

#### **Question 1**

***Do the changes already planned offer the flexibility needed by adults and other part-time learners, or are further steps required?***

FEDA believes that these changes need to go further to meet the needs of adult, work based and part time learners. Figures from the FEFC show that currently 70%+ of adult learners in further education do not take these qualifications. There is a demand from both individual learners and employers for qualifications to be accredited at the level of the unit and provide recognition of small steps of achievement.

We need to streamline the number of qualifications in the new framework. However, if we are to :

- a) succeed in widening participation generally;
- b) attract an extra 500,000 basic skills learners per year as described in *The Learning Age*;

we need a variety of awards at Entry level in order to be able to 'hook into' the specific goals and interests of adults. There will also need to be recognised and quality assured awards outside existing vocational qualifications, NVQs, GNVQs, A levels and GCSEs.

We are concerned, in particular, that there are currently very few qualifications kitemarked at Entry level and that such qualifications may be severely restricted after the Moser Group has reported. It may be worth considering development of a bank of approved appropriate units and rules of combination to meet generic titles. This would provide greater flexibility than seeking to recognise and accredit more and more (whole) qualifications.

FEDA believes that the concept of credit equivalence/rating<sup>1</sup> will allow comparison of all types of achievement within the national qualifications framework. It is preferable

---

<sup>1</sup> Credit equivalence, also referred to as credit rating, is a way of attaching values to existing full qualifications and their component parts based on the intentions of the designers and specifications of the credit framework. For example AS/A'levels, GNVQs, NVQs, BTEC Nationals etc. It is useful in the evolution of a flexible, unitised credit based system.

to a the restricting the use of credit to a limited and separate group of “adult” qualifications within the framework. Support for credit equivalence/rating has widespread support amongst FE colleges, awarding bodies, regional consortia and in Wales.

**Greater flexibility in national qualifications and funding of units would allay the need to develop new qualifications and assist in rationalisation.**

## **2 UNITISATION OF QUALIFICATIONS**

### **Question 2a**

***Should adults and other part-time learners be able to register for single units of qualifications, either as learning goals in their own right, or as a way of achieving qualifications over time?***

Adult learners should be able to register for single units of qualifications either as learning goals or as a way of achieving a qualification over time. There is a strong demand to be able to do this for a number of reasons. In particular the need for adults and work based learners to customise their own learning and qualifications to meet their specific needs and take account of the complexity of adult life including career transition, unemployment, redundancy, illness, changes in domestic circumstances, child care, care for the elderly etc.

We agree that all adult learners should be able to achieve a single unit or a collection of units that suit their circumstances and aspirations. If learners wish to gain a *whole* qualification, of whatever size, they would have to achieve all of the units and meet all of the assessment requirements. However, in order to widen participation, improve retention and enhance achievement, we believe that popular and coherent combinations should be considered for recognition as new qualifications in the framework.

**The most significant barrier to such flexibility in the current system is the FEFC funding methodology. Individual units are not funded in general and count against institutions in their performance data. It is crucial that the funding regime of the future is able to recognise units of achievement. FEFC is piloting approaches to enable this.**

### **Question 2b**

***What do you see as the main logistical issues that would need to be resolved and what measures would need to be taken to ensure they did not become barriers to implementation?***

FEDA believes that the benefits of a unitised credit related qualifications framework for adults would far outweigh the difficulties. The key logistical issues include: support systems, ensuring appropriate coherence, quality assurance, learner tracking and MIS systems, cost effective provision and funding.

Many of these issues are being addressed already in order to deliver existing qualifications such as NVQs, GNVQs and other unitised qualifications. There are interesting case studies of overarching, unitised curriculum frameworks/pathways in many colleges in England and Wales. For example OCN, Access programmes and the BTEC Award Framework.

Tracking of individuals' achievements and the quality assurance of large, flexible, unitised learning programmes are challenging. Colleges are introducing MIS systems to track progress of individual learners and their achievement of individual units. This forms part of two pieces of work FEDA is carrying out with FEFC addressing the need for sophisticated tracking and quality assurance systems in order to guarantee quality, complete self-assessment reports and deal with complex data on retention, achievement and progression. The work also involves investigation of the implications of such developments on both the curriculum and efficient funding and resourcing.

The FE sector has made considerable strides in this direction in the implementation of NVQs, GNVQs and other unit based qualifications. There is a great deal of existing good practice which could be extended, developed and widened to support such a system.

**Many in further education see a unitised credit based system as helping to overcome the logistical issues that they face rather than complicating and compounding them. Experience in Wales, college/local credit frameworks and OCN accreditation supports this. More common features in qualifications, greater flexibility, standard terminology, use of credit value and levels are seen as tools which help the work of providers.**

### ***Question 2c***

***Would you wish to see safeguards such as rules of combination of units in order to avoid fragmentation of learning programmes?***

There is clearly a need for rules of combination within a unitised framework. However, units will have a value in their own right as do customised combinations, in some cases and for some purposes. The framework needs to allow for both.

Fragmentation of knowledge and lack of coherence in terms of programmes and learning is often raised as a problem. However, it is possible to exaggerate this. For adults, in particular, it is important to ensure that learners follow a curriculum which is coherent for their own needs and aspirations. Learners and their tutors are usually eager to ensure that there is coherence within their programmes. This is true of both the relevance of the programme itself to an individual learner and the need for combinations which will lead to recognised qualifications.

Experience within HE, SCOTVEC and modular systems in FE in England and Wales have shown that they do **not** result in "idiosyncratic", "pick and mix" programmes or packages. Learners tend to follow the established recommended combinations. If anything, there can be a problem about learners lacking the confidence to put

together combinations that are tailored to their needs. This is often only clear in retrospect when learners see that their chosen options that were not of relevance and have missed opportunities to customise where the opportunity exists.

### **3. RECOGNISING SMALLER STEPS OF ACHIEVEMENT**

#### ***Question 3a***

***Would you restrict the range of sizes of units in the framework, and if so, what parameters would you set?***

Experience in further education has proved that recognising small steps of achievement provides a vital incentive to adult learning. If the national qualifications framework is to genuinely embrace adult learners on an increased scale, these smaller units do need to be available and recognised nationally as part of qualifications. In order to develop a fully inclusive framework a wide variety of achievement needs to be recognised.

FEU/FEDA developed its proposal for a credit-based framework because research had shown that modular systems have often failed as a result of being based around the use of a specific unit/module size and multiples. This tended to create problems in relation to fragmentation of subject/vocational areas, coherence and quality assurance of units. This would be particularly so if applied to qualifications such as NVQs.

A credit-based approach preserves the coherence of units and qualifications and allows values to be attached to them irrespective of their size. It would enable the qualifications framework to offer both:

- subject integrity, coherence and standards
- diversity, choice and flexibility.

The planning and delivery issues are real but colleges are in any case working in increasingly flexible ways and have the expertise to cope with units of different sizes.

We would **not** recommend therefore that a restricted range of sizes of units was built into the national framework.

#### ***Question 3b***

***Would you include NVQ units in any standardisation of unit sizes?***

Work by CREDIS in Wales, FEDA and other national bodies has shown that credit values/equivalences can be attached to NVQs and therefore standardisation of NVQ units would not be required.

## 4 DEFINING THE SIZE AND LEVEL OF UNITS

### *Question 4a*

***Would you advocate anything other than notional learning time as the method for allocating a size to a unit? If so, what?***

FEDA has investigated possible alternatives to using notional learning time in order to establish the size of units and qualifications. We are aware of other organizations carrying out similar studies but no alternative has been found to date. NZQA trawled the globe for an alternative but without success.

There are reservations about the use of time or notional learning time as a way of determining the volume of achievement. It is argued that a disadvantage of using notional learning time is that it will imply that a certain amount of study/training time is a requirement in order to achieve a unit or qualification. However, the fact is that not only credit systems but **all** qualifications systems make use of notional time, with the possible exception of NVQs.

Whether it is made explicit, or not, qualifications and unit components are bounded by a notion of how long it would take the average learner to achieve the qualification. The scope of a degree is set by what it is expected a typical undergraduate would be able to achieve in 3 years. The scope of 'A' Levels and GNVQ Advanced relate to two years, AS in one and so on. It is debatable as to whether assumptions about time have played a part in determining NVQs. However there is certainly a demand for a time/size dimension to be associated with these qualifications.

In many ways criticising credit-based approaches for using notional learning time is a red herring. Many outcomes based qualifications including GNVQs, as the paper suggests, do use a time basis. Notional time is nothing new and because the approach proposed by FEDA is fundamentally outcomes-based, actual time taken is less relevant than in many other systems.

Once a unit or qualification has been ascribed a size and credit value, the amount of time a learner actually spends in order to achieve the outcomes is not relevant. A fuller explanation of this approach can be found in a number of FEDA publications including ***A Framework for Credit (1995)***.

Though NVQs are not designed to be of any particular size, it has been possible to ascribe notional learning time to these qualifications in a reasonably consistent way. This has been done in HE, in the Credis development project in Wales and in work carried out by FEDA awarding bodies and colleges over the past five years.

#### **Question 4b**

***Would you allocate individual units to the same level as the qualification of which they form a part, or would you use other methods for deciding the level of a unit? If so, what other methods?***

CREDIS, FEDA research with EDEXCEL and development of OCN and Access programmes have shown that in fact many qualifications contain units of outcomes that are at more than one level. This is clearly the case in NVQs in areas such as maths, business planning, customer care and in many other qualifications including university degrees - for example business Spanish in an engineering degree or statistics in a social science degree.

In fact using the credit framework to analyse qualifications and curriculum reveals the extent to which qualifications contain outcomes at more than one level. Making this explicit can assist in improving:

- qualification design
- cost effective curriculum delivery
- access and progression for learners
- opportunities for APEL and credit transfer

FEDA has developed level descriptors for this purpose which have been widely adopted across FE in England and Wales. They also now form the basis of the NICATS/InCCA level descriptors recently adopted in HE.

FEDA therefore believes that as well as level descriptors which can help determine the level of units, related criteria are needed to determine the level of the full qualification. For example, a qualification in which at least 75% of the credit was for units at level 3 could be awarded at advanced level/level 3.

This is by no means new ground. Constructing qualifications and awards in this way has been practised for many years in higher education. It has also been carried out in work by FEDA and awarding bodies.

**FEDA therefore believes that the level of a unit needs to be set independently of the qualification of which it forms a part .**

## 5 CREDIT VALUES

### **Question 5a**

***Do you feel that the inclusion of qualifications and units that represent small steps of achievement in the national framework would be sufficiently motivating for adult learners, without allocating credit values?***

Research has shown that credit values do make it easier to compare the volume of achievement and motivate learners. A national system should continue to support the recognition of small steps of achievement at any level by allocating credit to all units in the framework.

Allocating credit values to units helps learners understand their progress in relation to:

- the immediate qualifications they are aiming at
- their own past performance
- other units and qualifications within the framework
- targets set by employers, funders and others
- performance of others.

A great deal of research confirms the motivating power of modularity and credit. See for example a recent ESRC project on Credit and Learning Culture.

### **Question 5b**

***If you favour allocating credit values, would you allocate them only to smaller units targeted at adult learners, or all units in the framework?***

FEDA favours credit values/ratings being attached to all qualifications and unit components in order to make comparison and interpretation across the framework easier to understand for the benefit of all including:

- learners
- teachers
- managers
- employers
- parents
- planners
- funders etc

Attaching credit to units and qualifications would **not** necessarily mean that credit will be awarded to all those achieving them. For example, it may be deemed inappropriate for 16-19 FT learners.

### **Question 5c**

#### ***Do you favour the allocation of additional credit for achieving full qualifications?***

This question represents a misunderstanding of how a unitised credit system might work. A synoptic element in a qualification is, in fact, an additional unit and therefore attracts additional credit in its own right.

It is not additional credit but explicit recognition of additional outcomes that can only be measured by the synoptic unit. In other words it is not additional credit but an additional unit which bears credit.

However FEDA does believe that many qualifications require synoptic units for full assessment and these are no more difficult to design, deliver and assess in a unitised credit based structure system than in any other.

This point also relates to the point made in 4b above that qualifications can contain achievement at more than one level. It may be that the synoptic aspects of the qualifications are also at a higher level than some of the unit components.

## **6. SIZE OF A SINGLE CREDIT**

### **Question 6**

#### ***If a credit based system were to be introduced for the national qualifications framework and its components, would you favour 10 or 30 notional learning hours as the basis for one credit?***

Since publishing **A Basis for Credit?** in 1992, FEU/FEDA has proposed the need for a single credit system encompassing the post school and higher education sectors. FEU/FEDA was the first body to propose such a framework but these views now find wide favour across the education sector and beyond, in the world of industry and training. The recent HE InCCA report has adopted this approach proposing an 8 level framework.

The rationale for a single framework was that the boundaries between achievement in the FE/post 16 sector and HE were not stable. FE institutions offer provision from basic level to higher levels including HND/C, degrees and post graduate studies and therefore recognise the logic for a single framework most clearly and in their everyday practice.

Clearly one framework is much more desirable than two. In Wales, Northern Ireland and Scotland such systems are already being developed and encouraged as part of government policy. All this clearly points to a single framework and a common unit of credit.

While 10 hours offers greater flexibility it has the disadvantage that it is harder to

quality assure, can complicate unitisation, funding processes and could lead to over-assessment and over-accreditation. The smaller the unit of credit the greater the risk of proliferation of units and debates about the size/credit value of the unit. For example with a 10 hour unit there is bound to be more debate about whether a unit is 40, 50 or 60 hours. All the more so if there is a link to funding!

In addition, a 10 hour unit of credit will complicate tracking learner achievement and the development of rules of combination for programmes and qualifications. FEDA believes that the unit of credit needs to be :

- small enough to be flexible
- large enough to be assessable and accreditable

It is often said that a 10-hour unit of credit is so firmly established in higher education that there can be no single framework unless it is based on this. However with the sufficient incentives 30 hours could be established.

In the final analysis a pragmatic decision would have to be taken to determine the best size unit of credit to use. FEDA is sceptical about the figure of 10 hours and believes that regulatory bodies, awarding bodies and the funding councils would ultimately find it difficult to work with such a small unit of credit. However, agreeing on this should not stand in the way of the much greater prize of establishing credit related qualifications and a national framework encompassing further and higher levels.

## **7. GENERAL FEASIBILITY AND TIMESCALES**

### ***Question 7a***

***What do you see as the most challenging aspects of the proposals you have made in response to the questions above ?***

Introducing a unitised and credit based system may not be complicated or difficult to achieve. As has been stated earlier in this document we believe it will be a solution to many existing problems rather than a complicating factor.

Many of the elements in the framework such as outcomes based unitised qualifications, levels, the development of common terminology for the description of qualifications are already in place. A credit-based unitised system would synthesise and inter-relate developments which have been evolving over a number of years.

In addition FEDA believes that a phased approach and the use of credit equivalences or estimated credit ratings would allow for developments to evolve in an incremental way over a period of time. Some of these challenges are at the macro national level, some at an institutional/provider/local level and some at both. Some of the most challenging aspects of what is proposed include are set out in the table below.

Staging the introduction of credit-based approaches over the range and level of achievement/qualifications involving adult learners	M+P
Ensuring the integrity of existing qualifications while increasing their accessibility to adult learners	M
Developing protocols and rules of combination appropriate to differentiated end users including work-based learners, trainees, full-time 16-19, part-time, employers etc	M
Ensuring that developments in Wales, Scotland and Northern Ireland are both aligned to and supported by those in England	M
Agreement of appropriate, regulatory and quality assurance mechanisms to be used as the framework is embedded over a period of time	M
Ensuring that providers have MIS and tracking systems capable of handling more flexible and customised forms of delivery, assessment and accreditation	M+P
Ensuring that the system developed genuinely meets learners' needs and aspirations and is designed to be user friendly and help recognise their achievement	M+P
Effective training and staff development to prepare for providers at all levels for flexible, unitised and credit based approaches	M+P
Marketing and presentation of a system to employers, parents and other end-users	M+P
<b>Note</b>	
M = macro national level	
P = institutional/provider/local level	

FEDA believes therefore that a **phased** approach over a period of 3 to 5 years would allow for a controlled and careful development of a system providing the necessary diversity and flexibility on the one hand and robustness and quality standards on the other.

Suggestions for the phasing and timescales are indicated below.

### **Question 7b**

#### ***When would you think it feasible to expect the changes to be put in place?***

Introduction of more flexible unitised credit-based arrangements for adult, part-time and work-based learners will not be a one-off event. We recommend a phased approach over a 3-5 year period. Some key points are set out below.

#### **1999-2000 Phase 1**

- 1) Government to commit itself to evolutionary development of a qualification system to meet the needs of adult, part-time and work-based learners to secure economic competitiveness, social cohesion and equity for the people of the UK at the beginning of the new millennium.
- 2) Government to announce introduction of a unitised credit related framework for adult, part-time and work-based learners using qualifications within the national qualifications framework. (While adults could accumulate credit within this framework, 16-19 year olds would be funded for the achievement of full qualifications if this is required).
- 3) National Task Group established in order to :
  - develop implementation plans,
  - research framework
  - plan trialing and piloting
  - provide guidance for interim arrangements.
- 4) QCA, development and awarding bodies to carry out programme to develop credit equivalences/ratings for existing qualifications used by adults but currently not ascribed credit values.
- 5) Cross sector and UK wide coordination to ensure supportive and consistent developments.

#### **Phase 2000-2002**

- 6) Introduction of public funding of units and full qualifications.
- 7) Piloting of flexible framework within regions, industry sectors and government schemes including the use of credit transcripts.
- 8) Provision of protocols and rules of combination appropriate to differentiated end users including work-based learners, trainees, full-time 16-19, part-time, employers etc.

- 9) Development and trialing of common unit specification with associated credit values.
- 10) Researching and monitoring effectiveness of MIS used by providers and regional/national bodies within pilots.
- 11) Researching and monitoring benefits and drawbacks of systems for learners and other end users.
- 12) Staff development and training for providers involved in pilots.
- 13) Marketing and presentation of a system to employers, parents and other end-users involved in pilots.
- 14) Piloting of single credit related funding mechanisms for adults in FE, HE community and workplace, post 16 and HE.

### **Phase 3 2002-2004**

- 15) Reports of pilots, synthesising findings, planning for wider implementation.
- 16) Development of agreement on common unit and framework specifications covering FE, HE and workplace achievement.
- 17) Implementation of common specifications across the qualifications framework, rationalisation of qualifications as appropriate and replacement of "credit equivalences" with "credit values."
- 18) Continuing staff development and training for providers to support implementation.
- 19) Marketing and presentation of a system to employers, parents and other end-users to support implementation.
- 20) Implementation of single credit related funding mechanism for adults in FE, HE community and workplace.

### **Further development**

These proposals, and associated plans and timescales represent work in progress. FEDA would be pleased to offer further advice and support in the preparation of the report to ministers and any subsequent work where our research, intelligence or specialist knowledge would be of assistance.

**Tony Tait**