

CONTEXT FOR THE COUNCIL'S UNITISATION AND CREDIT FUNDING PILOT

UNITISATION AND CREDIT

INTRODUCTION

1 The stage 2 funding review group considered the implications of a unit-based credit framework, including the curriculum implications, at its meetings in July and October 1997 and in April 1998. A unit-based qualifications framework and funding based on units of qualifications is considered by the funding review group to be essential if the numbers of adults returning to learning are to be increased. The development of the funding methodology therefore should be linked to a unit-based credit framework.

2 Set out in this paper is the background to and the key points of a proposal for a unit-based qualifications framework to which credit could be attached which would address key government policy objectives and the developments in progressing the proposal.

BACKGROUND

Widening Participation

3 The Widening Participation Committee, chaired by Baroness Helena Kennedy QC, identified the credit framework as an important contribution towards improving access. The committee recommended to government in July 1997 that it should create a national partnership to develop a credit framework for implementation within the next five years. The national framework of credit would provide accreditation for interim achievement and enable learners to build up credit throughout their lives.

4 The Widening Participation Committee recognised that one of the barriers to widening participation is the limitation for learners to gain credit for small bits of learning. Education and training needs to become more flexible to meet the needs of under represented groups and a national framework providing credit for interim achievement would support an expansion of learning in the community and in the workplace, enabling learners to build up a bank of credit throughout life. Such developments would require funding to be available which recognises achievement at this level.

Schedule 2 Qualifications Group

5 The Council's schedule 2 qualifications group has considered the development of a unit-based credit framework in the course of the last year and recommended:

- in November 1997, that a paper should be published to the sector for information on the potential for the development of a unit-based credit framework
- in January 1998, that qualifications should be unitised, the size of units being expressed in terms of multiples of a standard 'block' of learning time
- that unitisation needs to be linked to the development of a national credit framework as essential to enable adult learners to obtain recognition for small stages of learning and progress towards the achievement of qualifications

- that awarding bodies should be invited to work on proposals to develop a common unit-based approach, taking account of work already done in Wales and by the Further Education Development Agency (FEDA)
- in May 1998, in response to the green paper *The Learning Age*, that there is a need for unitisation at higher levels
- in February 1999, that proposals in consultation from the Qualifications and Curriculum Authority (QCA) for greater flexibility for adult learners and improving the value of NVQs should be supported in respect of units of qualifications and credit.

The schedule 2 qualifications group has warmly supported work undertaken to date and has encouraged the Council and other organisations to continue to progress the initiative.

Quality and standards in further education

6 There is a clear role for unit-based qualifications in the quality improvement strategy. The chief inspector's report for 1996-97 highlighted the barriers faced by colleges in making effective use of funding when there are over 17,000 qualifications available and more than 500 awarding bodies which colleges deal with. The chief inspector reported that having many qualifications available poses a serious impediment to the effective and efficient management of the curriculum. The large number of qualifications limits the freedom of colleges to create more viable teaching groups. For example, in 1996-97, there was an average of just under 11 students per class. Colleges could by themselves achieve further rationalisation of the curriculum through modularisation and the creation of common units of study but a national initiative would enable colleges to make the most effective use of resources without restricting their ability to respond to individual learning needs.

University for Industry

7 A credit framework is key to the success of the University for Industry (Ufi), providing a nationally agreed system for the recognition and accreditation of learning wherever that takes place.

The Learning Age

8 A credit framework built on unit-based qualifications is key to motivating learners and building the confidence needed for lifelong learning. It would enable achievements from a range of work place, college, open and distance and community learning to be brought together into a common format which could be added to throughout life.

MEETING POLICY OBJECTIVES

Value for money

9 A unit-based qualifications framework linked to credit would offer learners the opportunity to set realistic learning goals, which would contribute to improvements in retention and achievement. It would also provide colleges with greater flexibility in organising teaching and learning, particularly where students are undertaking units common to a number of qualifications. A credit framework would provide an effective means of allocating resources if funding could be related to credit.

PROPOSAL

10 A unit-based qualifications framework would have units aggregated coherently into qualifications to which it would be possible to attach credit. The characteristics of a unit-based qualifications framework would be:

- the potential for new units to be proposed by awarding bodies which have both added value to the national framework of qualifications and do not duplicate units already in the framework
- learning outcomes of units are clearly stated
- determination of the level of demands made by the unit, for example, in terms of the amount of learning time and accompanying assessment
- rules of combination specified for particular qualifications and especially for qualifications for 16 to 19 year olds.

11 A unit-based qualifications framework would involve an analysis of existing qualifications into units of achievement and result in a simpler and more flexible system. It would allow for credit to be accumulated towards qualifications.

KEY POINTS

12 The key points in relation to taking forward proposals for the development of unit-based qualifications within a credit framework are:

- existing proposals for the development of the national framework of qualifications already include components of qualifications in the shape of AS levels, and six unit and three unit GNVQ qualifications
- qualifications drawn from combinations of units need to be coherent and there should be national rules of combination determined by the QCA, particularly for 16-19 year olds
- units do not need to be of the same size and the particular character of NVQs and A levels can be preserved
- the concept of accumulation of units towards a full qualification is already present in the

NVQ framework

- an effective way of achieving rationalisation of qualifications is to judge qualifications on a unit by unit basis and identify duplication and overlap at this level
- existing proposals for the development of the qualifications framework include components of qualifications.

DEVELOPMENTS IN PROGRESSING A UNIT-BASED CREDIT FRAMEWORK

Awarding bodies, DfEE and QCA

13 Members of the schedule 2 qualifications group met with representatives of the four main vocational awarding bodies (Edexcel, City and Guilds, RSA and the National Open College Network (NOCN)) in July 1997 to consider developing a joint approach to developing the qualifications framework for further education. A joint proposal to the government was formulated which was supportive of the development of a unit-based qualifications framework.

14 It was agreed that government endorsement for a credit framework policy was essential in order to ensure that resources were available to implement the policy, to have the assurance that it would meet the objectives of other government policies and to ensure a national coordinated and authoritative approach.

15 A copy of the paper produced as a result of this work and endorsed by the schedule 2 qualifications group was circulated to the sector in November 1997. This paper has been shared with the Department for Education and Employment (DfEE) and the QCA and discussions with awarding bodies, including the Joint Council of National Vocational Awarding Bodies, on taking forward proposals for unitisation are continuing in 1998.

16 The Council, encouraged by the DfEE, has been taking forward the proposals for unit-based qualifications within a credit framework through positive discussions with the QCA. The schedule 2 qualifications group has also been asked by the QCA for its advice on how practical steps can be securely taken towards a wider use of unitisation in qualifications.

17 As an outcome of the recent QCA consultations on flexibility for adult learners and improving the value of NVQs, the Council will work with the QCA on the links between a credit framework and funding.

National Advisory Group on Continuing Education and Lifelong Learning

18 A paper on unit-based qualifications within a credit framework, drawn from the joint statement described above, was discussed by the National Advisory Group on Continuing Education and Lifelong Learning (NAGCELL) and recommendations on unitisation and credit are included in *Learning for the Twenty First Century*, the first report of NAGCELL.

Qualifying for Success

19 The government consultation, *Qualifying for Success*, set out a number of aims for advanced qualifications and qualifications in general and in particular, to promote the aim of wider access to lifelong learning. In its response to the consultation, the Council suggested that the way to combine general, general vocational and vocational studies would be through units and credit, which could promote access to and returning to learning and assist with progression routes, by making it easier to understand and compare the totality of students' achievements.

20 Baroness Blackstone wrote to the QCA on 3 April 1998 following the QCA's advice to Ministers on the outcomes of the consultation asking the QCA to undertake further work on the implications of a unit-based credit framework. The QCA expect to do this in spring 1999, following the recent consultations in July 1998 and February 1999 with key bodies including the Council. The Council's responses are set out at annexes A and B. The government wishes to see that for 16-19 year olds there is a qualifications offering which is rigorous and of a substantial size: it is not persuaded that there is a case for breaking down qualifications further than the three unit GNVQ.

21 In the preparation of advice and in their consultation, the QCA are looking at existing developments and good examples of local practice. The key themes in the framing of the questions for the consultation by the QCA and which are likely to form the basis of the advice include whether:

- a unitised qualifications framework, with unit achievement recognised through certification, would offer a more flexible framework, more accessible to adult learners than non-unitised qualifications
- there is an additional value to assigning numerical credit rating to units and/or regulating their size
- there should be rules of combination that would ensure that young people on publicly funded full-time programmes undertake coherent qualifications/packages.

The Learning Age Green Paper

22 *The Learning Age* green paper sought views on the issues which would need to be addressed in establishing a system of credit accumulation and transfer (CAT). In its response to the green paper, the Council acknowledged that a system of credit accumulation would have a significant function in widening participation and in lifelong learning. For adults returning to learning in particular, the possibility of taking a small part or unit towards a full qualification for which achievement is recognised and recorded is a strong motivator. Retention and achievement, highlighted in *The Learning Age* as important in the drive for higher standards, would be improved as a result of a system of credit accumulation.

23 For learners to be able to accumulate credit for small steps, programmes and qualifications need to be broken down into units. Many qualifications, such as NVQs, GNVQs, and now Advanced AS levels, are already in unitised form and many institutions

have unitised their programmes of learning both in order to meet learner needs and to achieve efficiencies.

24 It is important that learners gain accreditation for their interim achievements or units towards qualifications and that this is recorded in a form which can be used and added to over time and transferred between institutions and forms of learning. The national record of achievement should be developed to form a record of lifelong learning, which can be started and added to at any stage during a person's life. The need for effective student tracking systems is to enable the recording and monitoring of progress towards full qualifications. This should be linked to consideration of the development of a unique student identifier.

25 There are also links between the development of a system of credit accumulation and the government's aims for the rationalisation of the number of awarding bodies and making the qualifications system easier to understand.

26 The development of a national framework for higher education (HE) qualifications and the national Credit Accumulation and Transfer System would both underpin the qualifications framework. These are important strands of a coherent post-compulsory education system, a qualifications framework from entry level to degree level and beyond which allows for partial and cumulative achievement of qualifications. Both the HE qualifications framework and CAT system need to articulate clearly with the national qualifications framework for which the QCA is responsible, to provide a credit system for lifelong learning. It is important that opportunities for transfer and progression are readily understandable and that transfer between the two sectors is seamless.

Wales

27 At the beginning of April 1998, the Welsh Office minister proposed in the Wales Green Paper on Lifelong Learning, a single post-16 qualifications framework for all students in schools, colleges, university and work. The proposed framework will bring together all qualifications into a single system of levels and credits. The vision is that people will be able to learn in discrete blocks or modules, accumulating credits and aggregating them into qualifications over time. This may be significant in England, as the same qualifications are used in Wales as in England and these are subject to the same regulation as in England through ACACC, the Welsh equivalent of the QCA.

Unitisation and Qualifications Database

28 The Council's unitisation development working group, which has a membership of college representatives, was convened to look at the technical issues and implications of the unitisation of qualifications to which credit could be attached. The group concluded that a unit database could be developed alongside the Council's qualifications database and that there were no major technical impediments to its development and the recording of unit achievement for funding purposes.

Education and Employment Committee

29 The education and employment committee in its report on further education in May 1998 recognised that the organisation of qualifications is more important in the further

education sector than elsewhere because funding is closely tied to the achievement of qualifications. The report went on to comment on the widespread support for the view that post-16 qualifications would better serve students if they were unitised, allowing for credit accumulation and transfer, and if they were integrated into a single framework to provide the flexibility to meet learners' needs.

30 The report covered the advice of the schedule 2 qualifications group and the critique by the Council, set out at annex C, of the criticisms the New Zealand national qualifications framework had attracted and which had been reported in the educational press. The report also highlighted the cost effectiveness benefits of a unitised curriculum offering which were drawn to the committee's attention by the chief inspector.

EXISTING UNIT-BASED QUALIFICATIONS AND CREDIT SYSTEMS

FEDA model

31 A proposal for a national post-16 credit framework was developed by the former Further Education Unit (FEU) and set out in *A Basis for Credit?: developing a post-16 credit accumulation and transfer framework*. FEU's work drew on a number of reports and papers proposing a more unified framework for post-16 qualifications, including the IPPR's *A British Baccalaureate*. It identified a consensus for a unified framework containing both academic vocational programmes which was based on units, enabled credit to be accumulated and facilitated the development of a common core of knowledge and skills in all learning programmes, especially for 16-19 year olds.

32 The underlying rationale in the proposal for a post-16 credit accumulation and transfer framework was said to be to:

- increase the participation and achievement of post-16 learners
- improve access to learning opportunities and enhance possibilities for progression in education and training
- provide for greater choice and give learners a greater say in what, when and how they learn
- encourage learners to undertake broader learning programmes whether they are in employment, preparing for employment, preparing for HE or developing basic skills
- facilitate the development of a core of knowledge and skills
- develop new study combinations which are more relevant to an innovation culture and which render obsolete divisions and terminology such as academic/vocational, practical/theoretical, creative/technical, arts/humanities/science
- allow specialised and customised education and training.

33 Although a credit framework was not promoted as a national policy at the time of FEU's work, many colleges have been making use of it over the last five years, both because they anticipate national systems in the future and because they see it as relevant to

the development of their own provision in order to increase flexibility, cost effectiveness, participation and opportunities for progression.

34 There is now an agreed credit framework operating in further education using the FEDA specifications which were developed from the FEU proposal. The key feature of the model is that all learning is specified in terms of units of assessment with a unit constituting a set of learning outcomes. A unit can be of any size in order to ensure coherence and avoid fragmentation within subjects. Each unit consists of:

- title (a defined and specific subject name)
- learning outcome (what a learner is expected to know, understand and do)
- assessment criteria (standards for achieving outcomes)
- level (one of seven levels of difficulty or achievement from national curriculum to HE)
- credit value (a numerical value derived from unit size).

35 Under the FEDA system, unitisation would create a full range of units, each with specified learning outcomes, built and assessed around agreed criteria with a defined level of difficulty and a credit value. To build a national credit framework, FEDA proposed the following:

- qualifications would be unitised so that each unit is an agreed set of learning outcomes
- all units and therefore qualifications would be assigned to one of four levels within post-14 education and three levels for HE and professional qualifications
- the credit value of a unit would be set by agreeing the notional learning time for a learner to achieve each units learning outcomes.

36 The units would form a national unit database from which providers could choose units to build courses. Specific combinations would be required for specific qualifications. The value and level of units, and therefore the qualifications derived from them, would be indicated on a national credit transcript which could serve as the front sheet of the new National Record of Achievement. The credit transcript could be used by admissions tutors and employers to select candidates.

Open College Networks

37 In 1994, open college networks (OCNs) adopted the FEU/FEDA unit specification. OCNs offer opportunities for accreditation outside mainstream qualifications and operate across the whole of England, Wales and Northern Ireland with a national coordinating body, the National Open College Network. There are currently 31 OCNs in England and an estimated 95 per cent of colleges are members of them.

National CAT Network

38 There are over 400 organisations, mainly FE colleges, in the FEDA National CAT

network. Regional and local initiatives began with development funding from the former Employment Department, Welsh Office, TECs, private sector employers and other sources. Significant initiatives include:

- Derbyshire Regional Further and Higher Education Network
- Milton Keynes and North Buckinghamshire Framework
- Greater Manchester Unitisation Project
- Leicestershire Progression Accord
- London CAT Consortium
- North East Midlands Credit Consortium
- Solihull, Warwickshire and Coventry Credit Consortium
- South Thames Unitisation Project
- North West Credit Consortium
- Wirral Unitisation Consortium.

Credit System in Wales

39 In Wales, the Welsh Office funded a development programme to improve participation and achievement, contracting with FFORWM, the college's representative body, to develop credit. Around £900,000 was allocated to the Wales Modularisation and Credit-Based Development Project (later becoming the CREDIS project) which used the FEU/FEDA credit framework model. Agreement was reached on the definition of a unit of assessment and guidance for writing units for a database. OCN peer processes were used to approve new units and agree a credit rating. The Welsh Office required 2,000 units to be written and quality assured in the first year. In the second year, the unit database was developed to provide access to the new units and colleges were funded to develop unitised and credit-based programmes accredited through the OCNs. Work then began on establishing credit ratings of national qualifications and values were attached to GNVQ, A level and GCSE which were then used as a basis for funding by the Further Education Funding Council for Wales. NVQ credit ratings have proved difficult to apply fully, but an average credit rating has been applied for funding individual NVQ units.

Links with HE CAT Schemes

40 The FEDA model is for a national credit framework from post-14 to HE, covering schools, FE and HE to provide progression opportunities for a learning society. The Derbyshire Regional Network, involving one university and five colleges has developed a unified credit framework across HE and FE. The credit framework specifications are based on those developed by FEDA, having four levels within FE and four within HE. External accreditation is provided through the North East Midlands Access Partnership, the

University and other nationally recognised agencies working in collaboration with the Derbyshire Regional Network. It is envisaged that an effective system of credit accumulation and transfer within the credit framework will build on the University's established integrated credit system and similar developments in some of the FE colleges. Comprehensive unitisation across the curriculum and external accreditation of units and programmes for the award of credit is planned, leading to the establishment of a network-wide bank and database of accredited units.

41 In Northern Ireland, a CAT system is being developed which is a single post-14 credit framework across schools, FE and HE.

42 The Welsh HE CAT scheme is linked to the Welsh FE credit framework described in paragraph 27 above. Both the HE and FE funding councils in Wales link credit to funding. The two initiatives have worked towards the development of compatible credit frameworks. Both define credit as a measure of outcomes achieved in notional hours at a given level with levels defined in terms of level descriptors. The HE framework uses a credit size of 10 notional hours which can be articulated with the 30 notional hour FE credit.

COMMON OBJECTIONS TO CREDIT FRAMEWORKS

43 There are a number of objections to a proposal for a credit framework which are recognised and which can be overcome. Objections commonly raised to a credit framework and ways they may be addressed are:

- a. the use of notional learning time would undermine the principle of individuals learning at their own pace:
 - notional learning time is a method of establishing the relative 'size' of units or qualifications. It does not imply that programmes would be taught in a particular way and be time-specified. This is especially so if there is the same level of funding for a qualification regardless of the time spent achieving it. The Council, for example, individually lists NVQs and other qualifications so that the same number of basic funding units is available for whatever time period is taken to achieve the qualification;
- b. a large number of units would make standards difficult to control:
 - the creation of a credit framework offers scope to reduce the number of qualifications and units available;
- c. it would erode standards by making independent assessment more complex and expensive:
 - unit-based qualifications do not necessarily demand certification for each unit. The government has initiated measures to ensure that all awarding bodies have strong internal quality assurance mechanisms. Criteria for accreditation will include robust and valid assessment measures. Where qualifications are unit-based, each unit is separately assessed, and the outcomes recorded. Modular A levels, and GNVQ units, for instance, already have an element of independent assessment of

- each unit;
- the records of successful completion of units would not necessarily take the form of the individual certification of such units unless needed. This would be a separate decision from the unitisation of qualifications to underpin a credit framework;
- d. a credit framework is too complex and would cause confusion:
- the addition of a credit framework to a unitised qualifications structure would enable total achievement at any given time to be presented simply in terms of an overall number of credits at particular levels. This would make it easier to compare the achievements of different learners and to measure progress over time;
- e. incoherent combinations of units would result, undermining whole qualifications (the 'pick and mix' scenario):
- this would be avoided by the QCA specifying, for the purposes of a national qualification and therefore for public funding, rules of combination for particular awards. This would particularly apply to 16 to 19 year olds who would be required to have particular combinations for breadth. This is not dissimilar to the proposal for a national advanced diploma which would combine qualifications and units from different families and subject areas.

44 Objections to credit frameworks have also focused on the experience of other countries. A recent well-publicised example was that of Professor Alan Smithers' critique of the New Zealand system. Further details on the New Zealand experience and a commentary on the criticisms are at annex C.

ROLE OF THE QCA

45 The criteria for the accreditation of general and general vocational qualifications (which have been the subject of recent QCA consultations) should require that awarding bodies' qualifications submissions are specified in units. The proposed criteria for the accreditation of vocational qualifications require that these qualifications are specified in units. The QCA should give guidance on a common format for specifying qualifications in unit terms, each unit specified in terms of learning outcomes so that achievement can be described and measured in a common way across all qualifications.

46 The QCA could take unitisation forward by developing its approvals process so that units of qualifications become eligible for public funding and appropriate combinations of units are specified for the purposes of public funding. The QCA could address duplication and overlap by looking at proposals for qualifications on a unit by unit basis. The QCA could create a national database of units which providers can draw upon but within the rules of specified combinations. This means that awarding bodies will need to make available units of qualifications for others to use.

47 Other key roles for the QCA could include:

- the commissioning of credit rating of qualifications

- the mapping of existing units and their relationship within occupation and subject areas
- requiring awarding bodies to define the number of guided learning hours necessary for the achievement of a unit when units are submitted to the QCA for approval
- the maintenance of a national unit database.

FUNDING

48 Unit-based qualifications could be funded if the following were in place:

- an agreed standard unit length or size (or multiple of)
- qualifications expressed as a number of standard units
- a coherent unitised framework for combination
- effective student tracking systems within colleges
- a single tariff value for a standard unit
- a qualifications database holding details of units associated with approved qualifications.

49 The development of the funding methodology should be linked to a unit-based credit framework. Initial studies suggest that existing data and funding systems are consistent with such an approach.

SUMMARY OF ADVANTAGES OF A UNIT-BASED QUALIFICATIONS AND CREDIT FRAMEWORK

50 To summarise, there are significant advantages to a unit-based qualifications and credit framework. These include that it would:

- provide the means to reduce duplication and overlap in the qualifications framework by requiring components of qualifications to be justified on a unit by unit basis
- encourage adults and those not currently participating in education to work towards achieving nationally recognised qualifications by the recognition of achievement of units towards a qualification
- enable adult learners to build a personal, relevant portfolio of lifetime achievement
- ensure that qualifications formed from agreed combinations of mandatory and optional units would meet the diverse needs of employers and individual learners
- encourage parity of esteem between academic and vocational qualifications
- facilitate recognition of the fact that an overarching certificate or qualification may be

built up of units at different levels

- improve student motivation and improve retention and achievement
- provide an effective means of allocating resources, in that funding could be related to credit
- increase efficiency in the use of teaching resources can be achieved by the identification of units common to a number of qualifications
- enable distinctions to be made more easily between provision which should be publicly funded and that which it is more appropriate for employers or others to fund.

SHADOW PILOT

51 The stage two funding review group is considering for 1999-2000 the unitisation of the curriculum within a credit framework and believes that the development of the funding methodology should be linked to a unit-based credit framework. Initial studies suggest that existing data and funding systems are consistent with such an approach. The review group recommended that the Council runs a shadow pilot in a small number of volunteer colleges in 1998-99 for a range of qualifications which would shadow the normal application of the funding methodology.

52 Circular 97/38 asked for volunteer colleges to take part in a small shadow pilot in 1998-99 for a range of qualifications. The response to requests for volunteers has been very encouraging, with 125 colleges responding to say they would like to be considered for inclusion. The shadow pilot project is now in progress.

53 The pilot project is jointly-funded by FEDA and the Council. FEDA is undertaking the day-to-day work and will prepare proposals on:

- the approach to credit rating
- how to attach the elements of the funding methodology to credits
- the data collection mechanisms required.

54 The role of the group of pilot colleges is to:

- provide practical advice and guidance on the approach to be piloted
- supply data in relation to their institutions
- comment on the likely impact on college practices of a unitised curriculum
- comment on the feasibility and potential costs of full implementation
- provide feedback on issues arising during the shadow implementation.

CONCLUSION

55 The development of a unit-based qualifications and credit framework is strongly supported by the sector and has a role to play in meeting key policy objectives. The need for its development has been reflected, for example, in the growth in demand for OCN accreditation over the last five years. The time is now right to move forward on its development and the key issues to be resolved are who leads the development and how it is resourced. A national policy direction is needed. The Council's shadow pilot in the meantime will identify the issues associated with linking funding to such a framework.

| | A Based on whole qualifications | B Based on unitised qualifications | C Based on credit-rated units and qualifications |
|---------------------------------|---|--|--|
| 1 Flexibility and access | <p>A qualifications system based on whole non-unitised qualifications does not provide sufficient flexibility for lifelong learning nor for learners to combine parts of qualifications for broader study. Whole qualifications vary greatly in size when measured by the actual guided learning hours. The Council currently funds qualifications which are longer than 9 guided learning hours. The system does not allow easily for the mixing of types of qualifications. Most importantly, in terms of widening participation, it does not allow for the recognition of smaller steps of achievement and accumulating achievement over time. <i>How to Widen Good Practice</i>, the report of the Widening Participation Committee recommended that ‘accreditation must allow for the recognition of small steps in achievement and for credit to be transferred’.</p> | <p>A unitised qualifications framework would provide greater flexibility and access to opportunities for gaining a whole qualification. In the context of lifelong learning, it would allow learners to build up units towards qualifications over time. It would also allow employers and professions to select units to meet their training needs.</p> <p>A unitised qualifications framework does not necessarily require certification at unit level, particularly where students are combining units from the same qualifications. Certification of each unit however, would need to be available for learners who are undertaking only one unit at a particular time. For some learners, the Progress File could be used to record certification of units.</p> <p>The public currency of a unitised system should be units but this does not preclude certification of specified combinations, for example, the overarching certificate.</p> <p>There should be rules of combination specified by the regulatory body for the assembly of units into qualifications and for eligibility for public funding. This is particularly the case for full-time 16-19 year olds.</p> | <p>Credit ratings can be applied to whole qualifications as well as units. This would depend on the rules of combination applied.</p> <p>Credit accumulation with unitisation however, would provide greater coherence, rigour and flexibility. Transparency and ease of understanding would be made possible if it could be seen clearly which units made up a given number of credits.</p> |
| 2 Quality assurance | <p>The criteria for accreditation of whole qualifications need to be flexible enough to accommodate qualifications which provide access to further education: the emphasis should be on making the framework more flexible to encompass access provision made within the sector.</p> | <p>Rigour can be sustained in a unitised framework from certification at unit level and from imposing rules of combination.</p> <p>The responsibility for unit development should be with awarding bodies although the regulatory body has a role in identifying gaps</p> | <p>For rigour, coherence and public confidence, credit values need to be applied by a national body. QCA is best placed to do this, drawing on the data and information held by other national bodies. In Wales, agreement on credit values was reached with the colleges and in England, much work has already been done on this by</p> |

| | A Based on whole qualifications | B Based on unitised qualifications | C Based on credit-rated units and qualifications |
|--------------------|--|--|---|
| | | <p>in the framework and the need for the development of new units to meet sector or subject needs. It may be possible for providers or professional bodies to devise units which fit particular specifications but in order to ensure rigour and comparability, it is essential that the regulatory body determines whether the units are sufficiently rigorous and of the required level. The quality assurance arrangements would be similar to those proposed for whole qualifications at the moment. It would be important that QCA takes a strong role in rationalising what is available and has an overview and systems to prevent overlap and duplication at unit level.</p> | <p>the Council for funding purposes through the process of individual listing of qualifications based on guided learning hours, which now covers 80 per cent of enrolments.</p> <p>If credit is applied to units, then the quality assurance issues are for the units rather than credit.</p> |
| 3 Coherence | <p>A qualifications framework based on whole non-unitised qualifications makes comparisons and equivalences between most qualifications difficult and also leads to learners repeating the content of qualifications when combining more than one.</p> <p>QCA could more easily address the duplication and overlap in the system at present through a unitised framework.</p> | | |

THE FURTHER EDUCATION FUNDING COUNCIL**FLEXIBILITY FOR ADULT LEARNERS WITHIN THE NATIONAL
QUALIFICATIONS FRAMEWORK**

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?*

The changes explained in paragraph one go some way towards offering flexibility for adult learners, where they are studying the main qualifications on offer to 16-19 year olds. This will have minimal impact, given that only 20% of adults in further education are studying for these qualifications. The new framework does not of itself offer a great degree of flexibility. For the framework to be more flexible would require all qualifications to be unit-based. It would also require:

the admission to the framework of entry level qualifications which were unit-based, and linked directly to specified routes within the rest of the framework

clear rules of combination within the unit-based qualifications, which determined which pathways could be followed, and what final qualification would be achieved

a cumulative recording and certification system.

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?*

Enabling adults and other part time learners to register for single units of qualifications, either as learning goals in their own right or as a way of unitising qualifications over time, would contribute significantly to widening participation and raising achievement.

However any learner, not just adults and part-time students, should be able to register for single units of qualifications. It would cause unnecessary complication to create artificial barriers to a unit-based framework and raises definitional issues such as what is an adult and how much study is part-time. There are many reasons why a full-time student, for example, someone following a three A level course, might wish to add to their programme one or two accredited units from another part of the qualifications framework.

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?*

The supposed 'barriers' should be seen in terms of administrative and policy problems which have not yet been resolved. The key tasks are:

to agree rules of combination, for instance of core plus options, which would create coherent qualifications for particular purposes. These 'rules' should be approved by the QCA but could be proposed by awarding bodies, by National Training Organisations, or by professional associations and higher education institutions. Universities have let it be known, for example, which additional units of GNVQ would assist admission to particular degree courses

to identify units which are so similar in content that either they cannot be combined with each other, or that one of them is redundant (this would further assist rationalisation)

for institutions to agree, through collaborative arrangements, which of them can contribute expertise in a given area in order to maximise student choice. This already happens, for example, in consortia of schools and colleges which offer a wider range of A levels than any one of them can provide; through co-operative arrangements between colleges and schools to offer GNVQ, and through education/work combinations which allow NVQ assessments to be completed

tracking student achievements, which is already a duty performed by colleges and training providers. With appropriate backup from information technology, this need not be as burdensome as some of the systems devised to track NVQ achievements have proved to be.

The Council's unitisation funding pilot which will report in July is exploring logistical issues for institutions such as tracking and recording student achievement, in addition to modelling ways in which funding can be attached to unit-based delivery.

Other issues which need to be addressed are:

the costs of accreditation for a unit-based system, particularly if the number of awarding bodies which learners need to register with increases in order to gain the particular units required

the level of guidance and support needed, particularly on entry to unit-based programmes.

Question 2c: *Would you wish to see safeguards such as rules of combination of units in order to avoid fragmentation of learning programmes?*

Where public funding is involved, there needs to be rules of combination for units leading to whole qualifications. This is important to avoid fragmentation and duplication of units similar in content. It should also be possible, however, to achieve a single unit.

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?*

It is important that small steps of achievement are available to adult learners and therefore there is a need for units which are smaller than many of those currently available in the framework. It would not be helpful however, particularly from a funding point of view, to have too much variation in size, although multiples of a standard size could be allowed.

It would be helpful if units in the framework had the same credit value. FEDA has made proposals for the nature of the building blocks in the framework, and could be asked to help.

Question 3b: *Would you include NVQ units in any standardisation of unit sizes?*

NVQ units should be subject to the same degree of standardisation as other units. It is acknowledged that because they have been designed to be free of particular learning contexts there are difficulties in standardising NVQ unit sizes, and therefore that this may take place over a longer period of time.

4 Defining the size and level of units

Question 4a: *Would you advocate anything other than notional learning time as the method of allocating a size to a unit? If so, what?*

Whilst it is recognised that notional learning time is the most widely accepted method of allocating size to a unit, it is not possible to attach funding to learning time. The Council's funding methodology is based on funding guided learning hours, as this represents the largest part of the resource a college uses in supporting learning.

The definition of guided learning hours is: 'all times when a member of staff is present to give specific guidance towards the qualification being studied on a programme. This includes lectures, tutorials, and supervised study in, for example, open learning centres and learning workshops. It also includes time spent by staff assessing students' achievements, for example, in the assessment of competence for NVQs. It does not include hours where supervision or assistance is of a general nature and is not specific to the study of students'.

If funding were to be attached to a unit-based credit framework, guided learning hours would need to be attached to units. The QCA could require awarding bodies to define the number of guided learning hours required for achievement of a unit when units are submitted to the QCA for approval. The proposals could then be moderated by the QCA possibly working with a panel of experts.

The Council welcomes the opportunity to discuss further with the QCA the ways in which funding can be related to units.

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?*

There are qualifications such as Access to Higher Education units which allow learners to take units at different levels and this flexibility should be retained. The level of a unit should be set independently of the qualification.

It would be helpful if units were accorded the same level as the qualification of which they formed a part. This would not prevent learners from beginning with a unit at a lower level, if that was what they needed, nor progressing to achieve one or two units within the qualification at a higher level, in order to accelerate their progress.

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?*

Small steps of achievement need to have credit value to be motivating for adult learners, encourage accumulation and to be placed in the framework. Credit values make it easier for learners to understand the relationship and comparison between units.

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?*

Credit values should be allocated to all units in the framework. This would be important in assisting the many people whose learning programme is interrupted in some way (30% of all A level students; 30% plus of all adult learners). It would greatly assist the lifelong learning agenda in enabling all learners to begin and continue accumulating credits over time.

Question 5c: *Do you favour the allocation of additional credit for achieving full qualifications?*

If a synoptic assessment is deemed useful for particular forms of qualification, it should itself be accorded credit value. For instance, someone following a unit-based course might complete the course with a multi-faceted project or dissertation. This would itself be a unit carrying credits. It would be more helpful to add credits to acknowledge distinctive performance than to acknowledge the completion of a qualification; to do the latter would suggest that the whole is greater than the sum of the parts, which would cause some difficulties.

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?*

Higher education learning is of a different order from further education, as are the student numbers involved. A credit that is awarded for the equivalent of two days' work would create a huge administrative burden for colleges. It would also complicate funding, lead to

over-assessment and be more difficult to quality assure. It would be far more helpful to associate a credit with 30 hours' learning (about a week's learning time, or two weeks teaching time in the average college) than with 10. If the 10 hour credit were adopted (and the durability of a single framework for FE and HE is acknowledged), this should be the smallest size. Unit sizes could be multiples of 10 hours.

7 General feasibility and timescales

Question 7a: What would you see as the most challenging aspects of the proposals you have made in response to the questions above?

The biggest challenge would be to develop a "can-do" approach to the task. If Scotland, USA, New Zealand, and others can develop a credit-based system, England and Wales can. There is enormous support for the ideas within the FE system, and the educational world in general. The second challenge is to the vested interests in the awarding bodies and lead bodies which the QCA has the power to change.

The particular tasks to be undertaken are:

- agreeing a system of ascribing credit value to units and qualifications
- applying funding mechanisms to a unit-based credit system
- developing approaches to tracking student achievements
- training and development for staff
- mapping qualifications, identifying common units, finding ways of getting awarding bodies to work together to offer common units and rationalising their awards
- marketing and presenting clear information to learners, employers and providers
- developing regulatory and quality assurance procedures.

Question 7b: When would you think it feasible to expect the changes to be put in place?

The changes should be implemented as soon as possible but it is important that they are fully tested first and an incremental or staged approach is therefore recommended. There is much that can be done fairly quickly by building on the developments and pilots already underway in further education.

The timescale is linked to the resources available. The task will take considerable work, and need the help of many expert practitioners. The resources allocated will have to match the task.

THE NEW ZEALAND EXPERIENCE

1 Professor Alan Smithers was commissioned by the New Zealand Education Forum in 1997 to respond to the government's green paper, *A Future Qualifications Policy for New Zealand*. His report, *The New Zealand Qualifications Framework*, attempted to address the government's dissatisfaction with the progress of qualifications reform. Professor Smithers was critical of the qualifications reform in New Zealand and in his view, the development of the qualifications framework in England should not follow the same path.

2 The main premise in Professor Smithers' report is that the New Zealand government was mistaken in a search for a 'magic' formula for reform of the qualifications system which has taken two forms: first that of unit standards and more recently in the form of quality standards. These were both thought in their turn to be the ways to transform the education and training system in one go and Professor Smithers believed neither were capable of achieving what was being asked. In respect of the unit standards approach in particular, it may not be possible to state the standards with enough precision to convey what a qualification is about. To specify a qualification clearly enough for teachers and moderators, it is necessary to provide the minimum information of purpose, content and assessment. The idea of a unit is separate from that of a standard. Whilst it is sometimes an advantage for a qualification to consist of components, they too need to be expressed in terms of purpose, content and assessment. The shift of emphasis to quality threshold is no more an answer than unit standards. 'Quality' was considered to be an elusive notion.

3 The main recommendations of the report in respect of the New Zealand Qualifications Framework were:

- that the emphasis in qualifications reform should change from seeking a single formula (in the form of unit standards or quality threshold) to working through issues from first principles
- a national qualifications system is desirable as it gives recognition to qualifications and assists choice
- a qualifications structure should start from determining how learning can be represented in qualifications and then seeing what linkages can be made
- a national qualifications network is a more helpful concept than a framework as it indicates more flexible and open arrangements
- the use of unit standards as the common currency for a qualifications structure should be abandoned as they cannot be stated with enough precision to ensure fairness, consistency and validity of assessment
- qualifications should be stated in terms of their purpose, content and assessment
- there are sometimes advantages to identifying components of qualifications but it should normally be the whole qualification which is identified within the framework
- links between qualifications and opportunities for cross-crediting and credit accumulation should be identified wherever possible.

Response to criticism of the New Zealand system

4 Professor Smithers identified a number of difficulties with the New Zealand approach, not all of which are applicable to the position in England. The difficulties identified and comments on their applicability and relevance to both the circumstances which apply in England and the Council's proposal are compared in the table below:

| <i>New Zealand system difficulties</i> | <i>Comments</i> |
|---|---|
| Few qualifications have been obtained | This could be a parallel with the experience of early low take up of NVQs in England |
| Many schools and all universities have been reluctant to take part | In England, the Council and the sector supports a proposal for unit-based qualifications and a credit framework for further education |
| The New Zealand approach was to organise all qualifications into units, set down what needs to be done as standards and then create qualifications | The Council's proposed approach emphasises the unitisation of existing approved qualifications and the specifying of coherent combinations of units rather than the creation of new qualifications |
| Teachers reported difficulties with school subjects specified as unit standards and universities are unhappy with simple pass/fail components | There is no proposal that grading should be abolished nor that academic subjects should be defined by unit standards |
| Inconsistencies in assessment and heavy workload | This is a difficulty which has been experienced in England with the introduction of a number of qualifications reforms and the lessons which need to be learnt from this are well known. The government has recognised this in the delay to the introduction of proposals for advanced qualifications by delaying introduction by a year in order to allow time for further consultation and planning |
| The attempt to state what a qualification is through unit standards misunderstands the nature of qualifications which differ in their purpose, content and assessment | The proposals for England do not envisage a uniformity for all qualifications of this nature |

5 The key points drawn from a comparison between the New Zealand system and what is proposed in England are:

- grading units is possible and it does not have to be a simple pass/fail system
- it is not proposed in England that standards can be assured through unit specifications alone

- there are too many differences between the qualifications systems, the policy and other contexts of the system in New Zealand and those of England to make comparisons
- the closest comparison to the system in New Zealand is NVQs in England and it is the NVQ approach above all that Professor Smithers is critical of, rather than unitisation of qualifications which he recognises is of benefit in some cases.