

# **The Council for Industry and Higher Education**



**response to the**

**Qualifications and Curriculum Authority**

**“Reforming Qualifications and Promoting learning  
for the 21<sup>st</sup> Century”**

**consultation paper – February 2005**

# **A Framework for Achievement: recognising qualifications and skills in the 21st Century**

## **Response from the Policy Forum of The Council for Industry and Higher Education (CIHE)**

### **Introduction**

The CIHE is a partnership between leading business people and academics. We develop an agreed agenda on the learning issues which affect our global competition, social cohesion and individual development; debate that with the Government and its agencies and seek to effect change in policies and practices. Our members range alphabetically from the Chief Executive of Astra Zeneca (Sir Tom McKillop) to the Chief Executive of WPP (Sir Martin Sorrell). Our academic leaders range from the Vice-Chancellors of Cambridge and University College London to the Principal of Lewisham Further Education College.

Our Policy Forum reflects our membership and is composed of practitioners particularly from our members companies. They received a presentation from the QCA and discussed this response at their last meeting.

We welcome the opportunity to respond to this consultation paper on a new framework for achievement (FfA) for adults which will radically change the way qualifications and other achievements are recognised in the future. We were pleased to have the opportunity to discuss your proposals following a presentation by QCA staff at our January Policy Forum, which was attended by representatives of CIHE member organisations. This submission is based on the discussion which took place then and wider consultation with our members, in particular employers.

While the CIHE's main focus of interest is higher education, our work embraces the advancement of all kinds of learning. We have a strong interest in helping employers overcome skill shortages at all levels which affect their competitiveness, through encouraging investment in training and the recognition of achievement. We have long argued for parity of esteem between so-called vocational and academic learning – though we make no such artificial distinction – and we also support diversity and the widening of participation in higher education (whether through higher or further education institutions). To achieve all these aims, we have stressed the need for a comprehensive framework of qualifications and credits and the encouragement and facilitation of progression.

The following reports are particularly relevant (and can be obtained via the CIHE website: [www.cihe-uk.com](http://www.cihe-uk.com)):

*Work Based Learning: a consultation*, February 2005; *The Value of Higher Education for students*, 2004; *Diversity & Cooperation in Higher Education*, September 2003; *The Future of Higher Education* April 2003; *The Strategic Review of Higher Education* December 2002.

## **Overall**

The CIHE welcomes the need for reform, and, in principle, these proposals for England. The current National Qualification Framework (NQF) has become cumbersome, overly bureaucratic, confusing to use, and lacks responsiveness to both employers' and work-based learners' needs. There are problems in trying to fit existing qualifications to new skill and business needs, which has led to the NQF being viewed by many employers as increasingly inflexible. There is a large volume of in-company training which goes unrecognized, and so undervalued in terms of national awards.

So, we welcome the overall aim of the proposals to have a more streamlined and relevant framework, by significantly reducing the number and amount of overlap between qualifications, giving greater recognition to smaller 'chunks of achievement' (not just whole qualifications) and recognizing a greater amount of learning that is undertaken. The new proposals have the potential to significantly improve flexibility in the system and, in particular, help people make seamless progression, especially those who wish to do so at different rates over their lifetime, and help release their potential; and also help employers meet their needs for skilled and qualified staff. One of the main barriers which has divided much of post-16 education and training for many decades is a lack of a simple framework that recognizes both vocational and academic achievements at all levels and enables comparisons to be made by employers between qualifications gained at different levels.

We agree it is important that a wider range of achievements (rather than just qualifications) are recognized in the future, as it will encourage more individuals to get back into learning or progress better for personal or professional purposes. We envisage it could lead to individuals being able to look at 'maps' in their work areas to see what combination of credit they need in order to gain a particular qualification, thus opening up the potential for more to achieve qualifications in more flexible ways and progress on work-based learning routes. In time, it should lead to a much more manageable and coherent vocational system, one which will be valued more by young people, and so help improve take-up of vocational qualifications. For employers, it should not only help them recognize qualifications and achievements of individuals better at recruitment, but also help career development and retention of employees through giving opportunity for

their own individualized training programmes to be recognized in a national system.

The proposals will build a new structure which has the potential to bring these and other benefits, but to do so they need widespread support. In particular, engaging a wide range of employers, and gaining their support for a new system, and also their close involvement in its development, is essential. We welcome the significant role that Skills for Business and the Sector Skills Councils (SSCs) are expected to play here, as they have an important role in ensuring qualifications meet the needs of their sectors (though the Sector Skills Agreement process). But the resources needed and costs involved are likely to be considerable, and so funding implications need to be given attention. In particular, the development costs for SSCs and awarding bodies implied by the proposals are likely to be considerable. We also recognize that the 'devil is in the detail', and so much of the challenges to be overcome and solutions to the current inadequacies and problems with the current system will lie in the technical detail of the new structure and its operation in practice. On much of the latter, we are in a position to make only limited comments (which we have done below, rather than in your questions and answer framework).

Our main concern, however, is the little attention given in the proposals to higher level learning, and in particular how higher education qualifications will be treated. In the UK, we have a serious problem of skills deficiencies at intermediate and higher levels, including management, which inhibit the ability of businesses, especially smaller ones, to improve their performance and economic competitiveness. There is a need to encourage greater investment in workplace learning by employers and to recognize the value of achievements gained.

This new framework has the potential to do this. But we are disappointed that the proposals do not encompass higher education qualifications, and that there seems to have been such limited progress made to develop a single unifying framework in England, unlike in Scotland and Wales. We understand the complexities involved in doing this, which are considerable, especially when dealing with the independent status of the large number of universities who are awarding bodies in their own right, but we urge that the overall vision is not lost. After all, a significant proportion of existing employees, and upwards of 40-50 per cent of young entrants (aged 21-30) to the labour market, are likely to hold higher education qualifications. Furthermore, many HE qualifications, such as the new Foundation Degrees (the development of which the CIHE supports) have significant work-based elements in them; and are being taken up by people with work-based learning achievements, which need to be accredited in a consistent way before they start on them (where the new FfA could be of help).

Leaving higher education qualifications out of a new national framework of achievement for adults will do little to help encourage progression routes to be developed from further to higher education; nor counter confusion among

employers and lack of awareness about the range of opportunities available to people who might wish to follow this work-based route (and are actively being encouraged to do so by Government via the 'apprenticeship' route). Nor will it help in the development of the use of National Occupational Standards in Foundation degrees and other work-based HE awards. We make some suggestions of ways in which more progress might be made (below)

In a post-Bologna context where the EU is moving towards a coherent framework for credits irrespective of level, the approach in England will appear increasingly anachronistic.

We also want to see the new FfA for adults matching with the new 14-19 framework (post-Tomlinson) so that there are no discontinuities. A sensible long term aim would be to look to developing a combined 14+ or lifelong learning framework.

### **Structural and operational issues**

With these proposals, England is now making good progress, but it is some way behind other UK countries in developing a credit and qualifications framework for adults which is 'fit for purpose'. Scotland and Wales have been developing qualifications and credit frameworks separately (and in Scotland's case with a different structure to that proposed here) and their frameworks are at different stages of development. There are also systems in other European countries on vocational education and training which are different from those being developed in the UK. We are concerned about potential difficulties that will be created for individuals wishing to transfer between the different systems, especially within the UK where most of the mobility is likely to take place (though we note that the proposals state that 'learners who achieve credits in the SCQF (the Scottish system) should be able to transfer these credits towards qualifications within the FfA, and vice versa'). We also see some problems for employers as they recruit a more international workforce.

We would like to see much stronger links being developed between different systems, especially across the UK, so as to make such credit transfer happen very easily. We see little mention on the document about how this is going to be done, nor on what timescale. The preference of large employers with UK-wide operations is to work with one integrated system; SSCs, who will have responsibility for helping to implement the proposed reforms and aligning general qualifications to sector needs, work on a UK-wide basis. We believe that a single unified UK wide system is the preferable way forward in the long term future. If this is not feasible in the short term, then, care needs to be taken that agreements reached on transferability should not be made so complex that employers will not want to get involved in developing them.

A standard form of units, with level and credit value attached to it, as building blocks of all qualifications of the new system seems a sensible way forward, as many providers and employers are familiar with this kind of concept. However, having a standard template which will be used by all sectors, providers, employers and awarding bodies requires a considerable amount of agreement on mutual recognition of units, especially by the different awarding bodies. There is also danger if a plethora of units is developed to cater for learning designed to meet some very specialist needs of employers, each with slightly different assessment systems, and so creating hybrid qualifications which could be more confusing for learners and employers than the current system. In the further detail that needs to be worked out on 'rules of combinations' for a qualification, it is important that the framework is not made too restrictive or too simplistic (and loses value and respect) or too complicated (and produces a more complex system than we have already). We urge that employers are fully involved in this process, and welcome the significant role suggested for the Sector Skills Councils and Skills for Business (for sectors without SSCs) in determining core occupational qualifications.

We see advantages in having a 'common bank of units' as a way of streamlining the system and reducing the amount of overlap between qualifications, but we feel this needs to be carefully managed as it needs to be maintained and kept up to date. It is important that it is as responsive to market needs as some of the individual awarding bodies have been in the old system (as a result of them operating in a commercial environment). How will a Government managed 'bank' ensure high responsiveness? Will it not be better to manage this in a consortia approach, involving SSCs, awarding bodies, Government and others?

### **Funding support**

There are a number of funding issues which may inhibit the delivery of advanced vocational learning and achievements in the new framework. Different funding methodologies in the HE and FE sector, and the different bodies involved, can make it problematic to obtain appropriate funding for delivering the kind of flexible provision needed towards obtaining credit for part-programmes of learning at advanced levels. A more consistent approach to funding of higher education in both sectors would help. In particular, the funding of higher level learning in FE which leads to vocational qualifications awarded by various professional and other (ie non-HE) bodies, which is very diverse and fragmented at the present time (currently called 'non-prescribed HE'), needs to be reviewed. It could be either brought into mainstream HEFCE funding or funded in some other more consistent way (e.g. through the SSC network). The new Lifelong Learning Networks (LLNs), if given appropriate support from both HEFCE and the LSC, should help to bring greater consistency of funding between the two sectors.

One of the reasons for the low take-up of NVQs at higher levels is said to be its costs to employers. The time needed to build portfolios for NVQ4/5 assessment

is more available to students on HE courses than in the workplace, so time pressures/costs to individuals are less, but the costs of delivering and assessing NVQs as part of academic course can be a prohibitive factor. More generally, many employers do not want to have to meet the costs of assessing such learning in the workplace, and so are less interested in doing so, yet they are likely to be in the best position often to undertake assessments of work-based learning as part of HE courses (as in some Foundation degrees). There needs to be greater incentives for employers to invest in assessment of work-based learning, especially where such learning will now be counted as units of achievement in the new framework. One solution may be for Government to pay more towards the costs of assessment and certification of training undertaken by employees, while employers meet the costs of the training itself.

We have questions about the funding support needed to make the new framework work effectively in relation to in-house training and short company specific courses. For instance, how much of the learning taking place, especially the new kinds of learning in the workplace which will now be recognised by the new FfA, will be eligible for public funding support? What are likely to be the additional costs for putting on to the FfA, short, job orientated training often provided by private training suppliers or as part of in-house company training programmes? And what are the consequences of choosing not to do so? And if these costs are to be met by employers (when purchasing training packages), will that have an effect on the amount of money available for the training itself, thus reducing their overall investment in training.

### **Timetable**

On timing, we note the commitment to have the new FfA set up by January 2006, which is a challenging target given the complexity of the current system and the detailed changes which need working through, but we agree it is important to move on the proposals quickly. No timescale is given for the operation of the framework, but given experience of other UK countries in getting a working unified credit and qualifications framework for adults established, it is likely that a fully functional 'framework of achievement' is several years away, possibly not till 2010 for including most areas within it. We would urge that timescales are kept under review and that more rapid progress can be made (without compromising quality). It may be possible to move ahead more quickly in some sectors than others, depending on the stage of development of their Sector Skills Agreement process and also on the scale of complexity of the current situation in each sector relating to their occupational qualifications and more informal and work-based learning delivery and assessment issues.

### **Integrating with HE**

As we have pointed out at the beginning of this paper, our main concern is the lack of much mention in the document of higher level vocational learning and

qualifications, and in particular those inside the Framework for Higher Education Qualifications (FHEQ), which will be left outside of the new FFA. We have serious concerns about the effect of this on the operation and long term viability of the new framework, as a significant volume of achievement by learners in HE, including employees, will not be recognized by it. We also query how HE qualifications in other UK countries, which will be inside their credit systems, will be treated in England.

We seek clarification about the relationship between the QAA, as the quality assurance body for HE qualifications, and the QCA, which will ensure overall quality for all other qualifications (in the operation of the new framework). As we understand it, the QAA is not concerned with credit per se, nor with learning needed or achievement at different credit levels. Nor does it make any reference to the learning (including assessment) needed, nor occupational standards in its qualifications guidelines, nor does it make clear how work-based learning relates to such standards or to say NVQ modules as part of degree programmes. This is left to individual universities and course providers, as it is part of institutions' autonomous status, though QAA helps by providing guidance to institutions in operating their individual or regional credit systems. What kind of role will QAA have in the future, if there is a greater alignment of the FHEQ to the FfA, and a greater role for building credit towards qualifications in the new system? Is there a need for just one body, thereby also reducing the burden of accountability and the different criteria currently used?

One particular query we have is about HE study with significant work-based learning components, such as Foundation Degrees. How, or indeed whether, any employer-based foundation degrees awarded by non-HE institutions (or the work-based part of those that are awarded by HE institutions) will be included in the new framework (and so outside of the QAA remit). If so, then there are issues about how decisions will be taken on this and how will it be managed? Will this be the responsibility of the SSCs, employers or the HE providers (HEIs or FECs), or the awarding body? Will funding be switched from HEFCE to SSCs?

Also, there are many training schemes and various kinds of work experience programmes designed to help give undergraduates opportunities to develop their 'employability'. Some of these are currently included in the NQF (eg those accredited by the Open College Network, City and Guilds), and so presumably will be incorporated in the new system, but others are not (eg STEP work-placements, student exchanges). We would like to see how these will be developed to be included in the new system. There are benefits of them being included, as it would help in improving standards and they may gain wider recognition by graduate employers. We do not see that bringing them under the QAA instead, would be useful.

We recognize the challenges and difficulties in moving to a unified framework encompassing HE qualifications. But we would like to see much stronger

proposals being discussed, not just about getting 'alignment' between the two systems but on how to make transferability or articulation between the two systems work effectively (we do not need to see all the wiring but to be confident that it's working well). Perhaps there are lessons to be learned from Scotland and Wales or other European countries in how they have gone about developing their unified system. Perhaps some areas could be identified for pilot work, where progress can be seen to be made relatively easily and there are likely to be fewer barriers (e.g. in very vocational areas like nursing, teaching, engineering).

### **Conclusion**

We hope these observations are helpful in persuading the QCA to work still closer with other agencies to evolve a comprehensive qualification and credit framework in England.