

UNIVERSITY VOCATIONAL AWARDS COUNCIL

UVAC response to: Skills: Getting on in Business, Getting on at Work – White Paper, March 2005

Introduction

The University Vocational Awards Council (UVAC) is the UK representative organisation of over 100 HEIs and FECs committed to influencing, promoting and supporting the development of vocational education and training in both higher and further education.

UVAC was established in 1999 as a not for profit organisation to *advance education for the public benefit* by championing vocational learning. As such UVAC acts as an independent voice for higher education and further education on higher vocational learning.

UVAC undertakes the following activities:

- Advocacy – we champion vocational learning and represent our members' views on higher level vocational education and training to government, funding and planning agencies and stakeholders
- Membership services – we provide a portfolio of membership services including disseminating information, production of good practice guides and the organisation of conferences
- Research and publications – we manage a research programme covering the accreditation of prior experiential learning, vocational progression, unitisation, vocational qualifications and other issues as appropriate and topical
- Awarding body products – we support the provision of QCA regulated awarding body products to the higher education sector through appropriate UVAC/awarding bodies agreements
- Accreditation services – we provide a range of accreditation services covering foundation degrees, professional development programmes and initiatives to support progression from apprenticeship, vocational and work-based qualifications to higher education.

Our objectives and work are also supported by our corporate members who include the Qualifications and Curriculum Authority (QCA), the Universities and Colleges Admissions Service (UCAS), the Learning and Skills Council (LSC) - National Office, and Sector Skills Councils (SSCs)/former National Training Organisations (NTOs). We also work closely with our strategic awarding body partners, commissioning appropriate research and supporting the development and implementation of learning products. Accordingly, UVAC is a unique organisation and an essential partner when engaging HEIs and FECs in the implementation of national vocational education and training policy initiatives.

As a result of the activities we undertake we aim to ensure:

- More learners have the chance to progress to and benefit from higher vocational learning wherever it takes place
- Barriers preventing different groups of learners access higher vocational learning are identified and addressed thereby widening higher education participation
- The quality and relevance of higher vocational learning provision is enhanced for the benefit of individual learners, employers and the nation as a whole.

Summary

UVAC welcomes the publication of Skills: Getting on in business, getting on at work. Higher education has a fundamental role to play in the development of the skills and knowledge individual learners, employers and the country as a whole require. The greater emphasis placed on higher education in the Skills Strategy in contrast to the earlier Skills Strategy published in July 2003 is a significant and welcome move forward. For too long national skills policy in England has, for the most part, focused on the development of intermediate technical skills at National Qualification Framework level 3 and below. At a time when the UK is facing the challenge of increasing globalisation, the rapid industrialisation of China and India and the competitive challenge of the Eastern European economies it is essential that the contribution of higher education in England to the development of higher level skills is maximised.

Accordingly, although there is much to welcome and applaud in the White Paper, we still believe that the role envisaged for higher education in developing the UK skills base significantly underestimates the potential contribution the higher education sector could make. Additionally, there are some fundamental issues and barriers relating to the development of higher level skills that, in our view, the White Paper does not sufficiently address. In the following paragraphs we have summarised the key issues we believe need to be considered if the skills base of England is to be enhanced in the manner envisaged in the White Paper. Thereafter we have provided a detailed response to the points raised and proposals outlined in the White Paper.

- **The Status and Quality of Practical Learning, Work-Based and Vocational Qualifications** – We are surprised that so little is said about the historic and current low status of practical learning, work-based learning and vocational qualifications in the UK. Academic 'A' levels remain the gold standard qualification for 16-19 year-olds, as do honours degrees for 18-24 year olds. Foundation Degrees are undoubtedly making progress, but they are a new and largely untested alternative to the established and brand leading honours degree. The proposed introduction of 'specialist diplomas' with SSCs leading the process will, in our view, do nothing but reinforce the notion of vocational and work-based qualifications as being the second class alternative. SSCs should certainly have a role in defining the skills such diplomas need to deliver to equip an individual with the skills they need for a long-term career in an industry. Unfortunately, the Labour Market Intelligence (LMI) used to inform the development of qualifications and learning programmes has too often not been sufficiently accurate, up to date or reliable and has focused on short-term skills needs rather than the long-term

requirements of individuals and employers. That said, even if specialist diplomas are designed on the basis of the best LMI they will still lack credibility as a 'learning product' unless they are developed by established awarding bodies with the full and active involvement of higher education and the professions. For example, extensive UVAC research has revealed that the existing SSC apprenticeship completion certificate lacks credibility with higher education and is not generally perceived as confirming an individual is qualified to enter the next level of learning. Unless higher education, awarding bodies and the professions play a leading role in the development of specialist diplomas, they will suffer from the same image problems as existing apprenticeships – a perception that will undermine delivery of the Skills Strategy. Furthermore, while the A level remains in its current form, vocational and work-based learning at 16-19 will continue to be seen as the second best option. If the DfES wants to ensure the success of the Skills Strategy, the implementation of Tomlinson recommendations, where barriers between academic and vocational learning are removed at 16-19, combinations of learning styles recognised and encouraged and vocational learning is regarded as appropriate and valuable for all, is essential.

Although UVAC fully support the development of Foundation Degrees, the availability of honours and post-graduate degrees that develop skills, recognise work-based learning, incorporate National Occupational Standards, APEL etc is equally, if not more, critical to the development of the UK skills base. We are concerned that an exclusive emphasis on foundation degree development could result in the need to ensure all vocational higher education programmes contributed to the Skills Strategy being neglected. This is perhaps illustrated by the lack of consideration given to graduate employability in the White Paper, a skills issue continually raised by employers.

- **Definition of Higher Education** – Universities perform a fundamental role in the provision of general (liberal) education and this role must be recognised and celebrated. However, where a course specifies that it is vocational then provision should be driven by the needs of the customer, the individual learner and employer. The definition of higher education should be broadened to include all higher level learning programmes (whenever and wherever they take place) that could be of benefit to individual learners and their employers. We are encouraged by proposals in the White Paper to support and accredit 'higher education' undertaken at employers' premises. Higher education can perform an extremely important role in developing the workforce, linking training to university research and development, assessing skills needs on the basis of APEL, National Occupational Standards, new technologies and procedures, accrediting employer training etc. Although a substantial amount of excellence exists in all these areas, the role of higher education in developing the skills of existing employees and supporting workforce development needs to be expanded. Higher education should be encouraged by DfES and HEFCE to move to a position where it is able to support, recognise and accredit higher level learning of whatever size, whenever and wherever it occurs.

We are disappointed that little is said about the use of NVQ levels 4 and 5 in developing the skills of the workforce. NVQs can represent an excellent tool to develop and recognise the occupational competence individuals and employers require. UVAC research has confirmed that the historic low take up of NVQ levels 4 and 5 has had more to do with problems associated with the HE/FE interface, agency funding, recognition and awarding procedures than the needs of individual learners and employers. Similarly, we believe the existing and potential role of professional bodies and professional qualifications is neglected in the White Paper.

- **Barriers arising from the Learning and Skills Infrastructures** – We note with encouragement the commitment that agencies will work together to implement the skills strategy. There are, however, a range of issues not identified where a lack of co-operation and co-ordination have caused and will continue to cause problems. The development of a Framework for Achievement, which has much to commend it but does not currently explain how to incorporate higher education qualifications is one example, the lack of involvement of higher education organisations in the development and approval of apprenticeship frameworks is a second and responsibility for funding higher level provision in the National Qualifications Framework is a third.
- **HE Support for Employers and the Role of SSCs** – HEIs and their FEC partners often have excellent relationships with employers, an established record in relating research to skills needs, assessing higher level skills needs and developing provision to meet such needs, through vocational degree programmes, HNDs and CPD. On occasions the White Paper can give the impression that SSCs have a unique understanding of the skills needs of their sectors and are the way to work with employers, or for employers to work with education. Although many higher education institutions will welcome a relationship with SSCs and the provision of good labour market intelligence, such support should supplement, rather than replace, existing HEI and employer partnerships. Furthermore, SSCs are new and largely untested organisations and vary in capacity and capability. In contrast employers have enjoyed productive and proven partnerships with many HEIs and FECs for decades, relationships that have made a major contribution to the success of the UK economy. We believe that the substantial emphasis placed on the role of SSCs in the Skills Strategy represents a major risk. Surely, SSCs should be promoted as just one of the many ways in which employers are encouraged to engage with the education and learning and skills sectors.
- **The Potential Contribution of UVAC and our members** – UVAC would welcome the opportunity to meet with DfES and the DTI to outline our views in more detail and explain how we and our members could make a contribution to the implementation of the Skills Strategy. In particular we would welcome the opportunity to explore how the recently established NVC could support the implementation of Skills Strategy proposals. The NVC has been formed by UVAC following extensive consultation with HEIs, FECs and detailed discussions with DfES, QAA, UUK and specialist solicitors. QCA, the LSC and QCA regulated awarding bodies have also been consulted on proposals.

Through a national partnership of HEIs the NVC will operate across all levels of higher education provision. Its activities will include:

- Validating degree programmes as meeting national employment and academic standards.
- Validating company training programmes as meeting national higher education standards.
- Researching, supporting and implementing innovative approaches to APEL, credit, progression, delivery and partnership.
- Supporting the development and brokerage of partnerships between HEIs, FECs, employers, SSCs, awarding bodies and professional bodies.

Detailed Analysis – The following paragraphs outline our comments on the detailed proposals outlined in the White Paper.

Page 3, Skills for Employers – We agree with the sentiment that government should make ‘*a commitment to deliver publicly-funded training in a way that is led by the needs of employers.*’ In some cases, particularly at the higher levels, employers and SSCs may need support in defining what the skills needs (especially long-term needs) of a particular sector are. HEIs act at the cutting edge of research and innovation, their skills and expertise and innovation should be harnessed to both assess the impact of innovation on industry skills needs and support learning delivery. In the White Paper, the assessment of skills needs can appear to be the exclusive function of SSCs. We do not doubt that SSCs have a role to play, but they remain a new and untested network, whereas the higher education sector, as the White Paper acknowledges, has a world class reputation. We would also note that, for sensible commercial reasons, employers and employer representative organisations can overly focus on short-term rather than long-term skills needs.

Paragraph 15 - 20 – We note proposals for ‘*Regional Skills Partnerships to look at the range of brokerage and business support services in their region to ensure integration of employer skills brokerage with the broader business support service.*’ And ‘*At higher education level, brokers will work with Foundation Degree Forward and regional associations of universities and colleges to help employers make the most of what higher education has to offer.*’ This proposal ignores the contribution other higher education organisations can make in this area. For example, UVAC has undertaken extensive work to support HEIs in accrediting work-based learning, applying APEL, and using National Occupational Standards and works extensively with multi-national companies. Supporting higher education in responding to employer skills requirements is a major task and should involve all organisations who have a contribution to offer. We would also emphasise that brokers must have an understanding and affinity with higher education and knowledge of how the sector operates. Finally, although FDF will have a useful role to perform in supporting foundation degree provision, developing the skills the workforce requires will also require a focus on honours, post graduate provision and HE research expertise, areas where FDF does not have a remit. Work in this area will accordingly require the support of HE representative organisations including UVAC and CMU.

On many issues there will also be a need for national coordination, a response to national needs that cannot be defused at regional level and for connection with activities in Scotland, Wales and Northern Ireland.

Paragraph 68 – We are pleased that the role of SSCs in developing National Occupational Standards is acknowledged. From a higher education perspective NOS, as a tool that defines the occupational skills that employees and perspective employees need are a highly effective curriculum tool across all higher education levels. UVAC, with LSC support, has developed detailed guidance on how NOS can be used and case studies on good practice on the use of NOS in higher education to respond to skill needs. In our view and in the opinion of many of our members, NOS are a significantly under-utilised tool and would be an ideal vehicle to support SSCs working with HEIs. Furthermore, they provide a shared forum for the development of curricula without the friction that can occur in the operation of employers and higher education partnerships.

Paragraph 77 – The development of the Sector Qualification Strategies by SSCs in the manner outlined will be problematic. Firstly, we and many in the higher education sector are unclear on how such sector qualification strategies will relate to higher education. The fact that SSCs are developing such strategies with QCA rather than with QCA **and** the higher education sector (including QAA, professional bodies and awarding bodies) also seems liable to cause further problems. We would advise that urgent action was taken to consult with higher education in this area.

Paragraphs 80 – 87 - We believe Sector Skills Agreements could perform a useful role in informing the development of learning provision that meets employer needs. However, we do regret that higher education has not been sufficiently consulted on the framework for their development, what they would contain and how higher education could most effectively respond to priorities specified in such agreements. As previously outlined higher education also has substantial expertise and proven experience of working with employers to define and deliver skills requirements. Many in the higher education sector remain to be convinced as to the quality and accuracy of higher level skills intelligence produced by SSCs. UVAC believes it is critical that the expertise and experience of all agencies and partners are used to ensure there is a full understanding of higher level skills and plan appropriate delivery arrangements.

Paragraph 90 – We welcome the commitment to explore how Skills Academies ‘*can develop strong links with higher education, to share expertise and to support progression routes into higher education.*’ We are, however, unsure as to how this will be achieved. Historically, developing effective progression routes from vocational level 3 programmes has been extremely difficult. In this area, finding ways of ensuring progression is particularly important and UVAC would like to see Skills Academies developed which involved both FE and HE and have progression built into their design.

Paragraphs 95 – 96 – We agree that the Framework for Achievement is of fundamental significance for many of the reforms set out in the White Paper. The following paragraphs summarise our position on the Framework for Achievement, a copy of our full response is also attached as Annex A.

UVAC broadly welcomes proposals to establish the Framework for Achievement. Its aim and objectives, approaches to unitisation, credit and the principles for the design and development of qualifications are to be applauded. Indeed, we believe the Framework for Achievement, if appropriately revised and implemented, may deliver many of the

benefits QCA envisage. In particular, subject to appropriate modification and engagement of higher education as outlined in this document, we believe the implementation of the Framework for Achievement could result in the realisation of the opportunities outlined below. If the issues identified in our response are not addressed then these opportunities will not only be missed, but the implementation of the Framework for Achievement could lead to confusion and the development of additional barriers at the critical FE/HE interface.

- *The recognition of learner achievement in employment, community-based activities and less formal contexts could enable higher education institutions to consider applications from learners from such backgrounds more confidently and effectively and thereby broaden their admissions base. If this opportunity is to be realised, however, higher education must be confident in the rigour and quality arrangements for the validation of such learning. HEIs will also need to make far greater use of APEL than is currently the case.*
- *The opportunity for individuals to seek recognition of their achievements in learning for personal, career, employment or professional progression by accumulating credits at a pace and direction appropriate to their circumstances could increase personal motivation and the ability to succeed. This in turn could offer higher education institutions the prospect of improved retention and progression rates, **but only** if the Framework for Achievement credit system is related to higher education credit rating systems.*
- *The production of a credit transcript, by which learners would be able to present in an accessible form a record of their learning achievement, could clarify and simplify the process of admission to higher education **but again** only if higher education has been consulted upon and agreed the system, credit volume, ratings etc.*
- *The development of a Framework for Achievement would facilitate collaboration between HEIs, FE colleges, schools and employers, perhaps within a lifelong learning context and within a region or locality. This could ease progression between institutions and enable students to combine units and levels of study across institutions where such combinations supported learner progression.*
- *In the longer term, the Framework for Achievement offers the potential to achieve a comprehensive national post-14 credit framework, subject to the effective engagement of the higher education sector.*

From the perspective of the individual learner and employer we would argue that the principle weakness of the Framework for Achievement is its failure to encompass or sufficiently consider higher education. To the regulators (QCA and QAA) this may seem logical. From the perspective of the customers of the Framework for Achievement, individual learners and employers, this can only be described as displaying a tendency for a 'lack of joined-up government' and a lack of focus on the customer. England requires only one qualifications framework and one related system of credit. We should also record our sympathy with those who argue for one UK framework and credit system. Developing separate systems in England for further and higher education not only leads to additional bureaucracy and costs, but potential disadvantages to users who will be faced with different systems, processes, terminology and, at worst, issues of incompatibility.

Having two systems means that:

- *Progression from further education to higher education in vocational subject areas will remain problematic even with the introduction of the Framework for Achievement and may, in the worst case scenarios, mean vocational progression becomes more difficult. Extensive UVAC research conducted in 2004/5, with the sponsorship of the LSC and QCA, has revealed the very real difficulties and barriers associated with vocational progression from QCA regulated qualifications and associated learning programmes (i.e. Advanced Apprenticeships) to higher education. The retention of two distinct frameworks, particularly, if insufficient consideration given to the FE/HE interface will mean vocational learners continue to face difficulties gaining appropriate recognition for their achievements when seeking entry to higher education. These issues are outlined in detail in this paper.*
- *Credit transfer between the Framework for Achievement and higher education qualifications will remain problematic. Again this issue is explored more fully in subsequent paragraphs of this paper.*

The above issues are not restricted to limited numbers of learners. Significant numbers of learners undertake vocational qualifications. As with 'A levels', QCA and its partners must ensure progression routes to higher education are clearly articulated and available to vocational learners who could benefit from such provision. With notable exceptions, such progression routes are currently lacking.

Finally, in terms of generic issues we would suggest that is important to consider the Framework for Achievement in a broader context.

- *Although we would agree that the existing National Qualifications Framework can be unresponsive, not inclusive enough, too complicated and too bureaucratic. This is not necessarily due to deficiencies in the framework itself, but instead reasons concerned with funding and quality assurance regulations and procedures. In implementing the Framework for Achievement, such issues must be considered carefully and where possible resolved.*
- *Secondly, we believe more needs to be said about the use of National Occupational Standards (NOS) and in particular how NOS can be used as a common currency in the development of both FE and HE qualifications. If this approach was adopted then some of the issues outlined in our response regarding vocational progression and credit transfer between the Framework for Achievement and higher education qualifications would be eased. Similarly, vocational progression from the Framework for Achievement to higher education could be supported if a more explicit link was established between NOS and QAA Subject Benchmarks*

Paragraph 97 – 98 – Apprenticeships are rightly a key stand of the Skills Strategy. We would, however, offer the following observations:

- We regret that the Graduate Apprenticeship initiative, announced in the 1998 Learning Age Green Paper, has been allowed to disappear at a national policy level. Graduate Apprenticeship was a complimentary initiative to foundation degrees focusing on honours and post-graduate degrees, developed by national Training Organisations/HEI partnerships and designed to deliver the skills sector employers required. Recognising the value of work-based learning at every higher education level is important, as is developing a work-based progression route without artificial barriers.
- We disagree with the statement in the White Paper that apprenticeship offers opportunities for progression ... including higher education. There are certainly examples of apprentices progressing to higher education, but such examples are rare and exceptional. Extensive UVAC research in this area has identified that in reality progression routes from apprenticeship to higher education do not generally exist, the benefits of progression for apprentices and their employers have not been appropriately defined and a question mark remains over the 'fitness for purpose' of many apprenticeship frameworks as a higher education entry qualification. We would note that where progression from apprenticeship to higher level learning does occur it is as likely to be to honours degrees, NVQ levels 4 and 5 and professional qualifications and that an exclusive focus on developing progression routes to foundation degrees is, accordingly, an inappropriate approach.
- The future development of apprenticeship should be considered in the context of the overall development of a work-based progression route from key stage 4, though higher education and professional qualifications. The development of such work-based progression routes, if they are to be successful, will require the co-operation of a wide range of organisations including FECs, private training providers, HEIs, awarding bodies and professional bodies. Unfortunately, there is currently no national framework for developing work-based progression routes, which results in incoherence, incompatibility and confusion in the development of vocational initiatives and a lack of connectivity. There is also confusion as to which organisation, if any, is responsible for co-ordinating the development of work-based progression routes.

Paragraph 149 - UVAC has supported the development of Foundation Degrees since their introduction. We welcome recent work to focus the development of Foundation Degrees on work-based learning, part-time delivery and use of APEL. We should, however, emphasise that Foundation Degrees are but one product of the sector and that if we are to develop the skills of the nation, we must fully realise the potential of honours, post graduate degrees and associated certificates and diplomas and NVQs as learning products that can develop the skills of both those in and entering employment.

Paragraph 154 – We applaud proposals to developing new ways of supporting higher education in the workplace. To date, the HEFCE definition of the funding process for higher education has been too restrictive and acted as a break on the development of flexible higher level skills provision. HEIs have a critical and unique role to play in the validation of higher education, opportunities need to be explored as to how this role can

be used to support the planning, quality assurance and confirm the value of higher level learning. NVC, recently established by UVAC, has potentially a very important role to play in this area. We also believe that the use of NVQs at levels 4 and 5 (which are a different and distinct product to Foundation Degrees) should be reviewed. UVAC research has confirmed that higher level NVQs can play a key role in developing the skills employers and individuals require and in supporting work-based progression, particularly from apprenticeship. Unfortunately, take-up of higher level NVQs has been disappointingly low, a fact perhaps more to do with agency funding and the operation of quality assurance regimes than the skill needs of employers and individual learners. We are disappointed that no specific reference is made to the value of higher level professional qualifications in developing the skills needs of employers.

Paragraph 155 – We agree strongly with the need to *‘review current funding boundaries between FE and HE which can create obstacles, SSCs and others.’* We would, however, add learners and employers to this list and suggest action from other bodies such as Connexions, HEIs, FECs, UCAS, QCA, QAA etc is required if progression pathways are to become more widely available and understood. UVAC has conducted a substantial national analysis of obstacles to progression and how such barriers could be overcome. We would welcome the opportunity to share this work with the Department.

Paragraph 280 – We note proposals to review how higher education can best be integrated in the work of regional skills partnerships. Many HEIs have national and indeed international expertise in particular areas and it will be important that such contributions can be made nationally and not simply confined to the region in which the HEI is based. Regional Skills Partnerships will undoubtedly have a role to perform in supporting vocational progression. As indicated in previous paragraphs there are, however, a range of national barriers e.g. credibility of Apprenticeship certificates and fitness for purpose of Apprenticeship frameworks for higher education entry that must also be resolved.

The Skills Alliance – We are very surprised and alarmed that the Skills Alliance lacks higher education representation (in the form of an HEI representative body as distinct to HEFCE). We note and welcome the involvement of ALP and AoC as members of the Skills Alliance, but are surprised that HEIs are not represented through an appropriate representative body. This omission can reinforce the erroneous contention that skills are concerned mainly with provision to level 3, equally importantly, the expertise and commitment of higher education institutions will be absent from discussions.

UVAC – June 2005

UVAC response to: 'A Framework for Achievement' Recognising Qualifications and Skills in the 21st Century

Introduction

The University Vocational Awards Council (UVAC) is the UK representative organisation of 47 HEIs and 30 FECs committed to influencing, promoting and supporting the development of vocational education and training in both higher and further education.

UVAC was established in 1999 as a not for profit organisation to *advance education for the public benefit* by championing vocational learning. As such UVAC acts as an independent voice for higher education and further education on higher vocational learning.

UVAC undertakes the following activities:

- Advocacy – we champion vocational learning and represent our members views on higher level vocational education and training to Government, funding and planning agencies and stakeholders
- Membership services – we provide a portfolio of membership services including, disseminating information, production of good practice guides and the organisation of conferences
- Research and publications – we manage a research programme covering; the accreditation of prior experiential learning, vocational progression, unitisation, vocational qualifications and other issues as appropriate and topical
- Awarding Body products – we support the provision of QCA regulated awarding body products to the higher education sector through appropriate UVAC/awarding bodies agreements
- Accreditation Services – we provide a range of accreditation services covering foundation degrees, professional development programmes and initiatives to support progression from apprenticeship, vocational and work-based qualifications to higher education.

Our objectives and work are also supported by our corporate members who include the Qualifications and Curriculum Authority (QCA), the Universities and Colleges Admissions Service (UCAS), the Learning and Skills Council (LSC) - National Office, and Sector Skills Councils (SSCs)/former National Training Organisations (NTOs). We also work closely with our strategic Awarding Body partners, commissioning appropriate research and supporting the development and implementation of learning products. UVAC is, accordingly, a unique organisation and an essential partner when engaging HEIs and FECs in the implementation of national vocational education and training policy initiatives.

As a result of the activities we undertake we aim to ensure:

- More learners have the chance to progress to and benefit from higher education
- Barriers preventing different groups of learners access higher education are identified and addressed thereby widening higher education participation
- The quality and relevance of higher education provision is enhanced for the benefit of individual learners, employers and the nation as a whole.

In producing this paper we wish to acknowledge QCA's support in contributing to the organisation of a consultation event for our members.

Overview of Response

UVAC broadly welcomes proposals to establish the Framework for Achievement. Its aim and objectives, approaches to unitisation, credit and the principles for the design and development of qualifications are to be applauded. Indeed, we believe the Framework for Achievement, if appropriately revised and implemented, may deliver many of the benefits QCA envisage. In particular, subject to appropriate modification and engagement of higher education as outlined in this document, we believe the implementation of the Framework for Achievement could result in the realisation of the opportunities outlined below. If the issues identified in our response are not addressed then these opportunities will not only be missed, but the implementation of the Framework for Achievement could lead to confusion and the development of additional barriers at the critical FE/HE interface.

- The recognition of learner achievement in employment, community-based activities and less formal contexts could enable higher education institutions to consider applications from learners from such backgrounds more confidently and effectively and thereby broaden their admissions base. If this opportunity is to be realised, however, higher education must be confident in the rigour and quality arrangements for the validation of such learning. HEIs will also need to make far greater use of APEL than is currently the case.
- The opportunity for individuals to seek recognition of their achievements in learning for personal, career, employment or professional progression by accumulating credits at a pace and direction appropriate to their circumstances, could increase personal motivation and the ability to succeed. This in turn could offer higher education institutions the prospect of improved retention and progression rates, **but only** if the Framework for Achievement credit system is related to higher education credit rating systems.
- The production of a credit transcript by which learners would be able to present, in an accessible form, a record of their learning achievement could clarify and simplify the process of admission to higher education, **but again** only if higher education has been consulted upon and agreed the system, credit volume, ratings etc.

The development of a Framework for Achievement would facilitate collaboration between HEIs, FE colleges and employers, perhaps within a lifelong learning context and within a region or locality. This could ease progression between institutions and enable students to combine units and levels of study across institutions where such combinations supported learner progression.

- In the longer term the Framework for Achievement offers the potential to achieve a comprehensive national post-14 credit framework, subject to the effective engagement of the higher education sector.

From the perspective of the individual learner and employer we would argue that the principle weakness of the Framework for Achievement is its failure to encompass or sufficiently consider higher education. To the regulators (QCA and QAA) this may seem logical. From the perspective of the customers of the Framework for Achievement; individual learners and employers, this can only be described as displaying a tendency for a 'lack of joined-up government' and a lack of focus on the customer. **England requires only one qualifications framework and one related system of credit.** We should also record our sympathy with those who argue for one UK framework and credit system. Developing separate systems in England for further and higher education not only leads to additional bureaucracy and costs, but potential disadvantages to users who will be faced with different systems, processes, terminology and at worst, issues of incompatibility.

Having two systems means that:

- Progression from further education to higher education in vocational subject areas will remain problematic, even with the introduction of the Framework for Achievement, and may in the worst case scenarios mean vocational progression becomes more difficult. Extensive UVAC research conducted in 2004/5, with the sponsorship of the LSC and QCA has revealed the very real difficulties and barriers associated with vocational progression from QCA regulated qualifications and associated learning programmes (i.e. Advanced Apprenticeships) to higher education. The retention of two distinct frameworks, particularly, if insufficient consideration given to the FE/HE interface, will mean that vocational learners will continue to face difficulties in gaining appropriate recognition for their achievements when seeking entry to higher education. These issues are outlined in detail in this paper.
- Credit transfer between the Framework for Achievement and higher education qualifications will remain problematic. Again this issue is explored more fully in subsequent paragraphs of this paper.

The above issues are not restricted to limited numbers of learners. Significant numbers of learners undertake vocational qualifications. As with 'A levels', QCA and its partners must ensure progression routes to higher education are clearly articulated and available to vocational learners who could benefit from such provision. With notable exceptions, such progression routes are currently lacking.

Finally, in terms of generic issues we would suggest that is important to consider the Framework for Achievement in a broader context.

- Although we would agree that the existing National Qualifications Framework can be *not responsive enough, not inclusive enough, too complicated and too bureaucratic* this is not necessarily due to deficiencies in the framework itself, but instead reasons concerned with funding and quality assurance regulations and procedures. In implementing the Framework for Achievement such issues must be considered carefully and where possible resolved.
- Secondly, we believe more needs to be said about the use of National Occupational Standards (NOS) and in particular how NOS can be used as a common currency in the development of both FE and HE qualifications. If this approach was adopted then some of the issues outlined in our response regarding vocational progression and credit transfer between the Framework for Achievement and higher education qualifications would be eased. Similarly, vocational progression from the Framework for Achievement to higher education could be supported if a more explicit link was established between NOS and QAA Subject Benchmarks.

Within our response we have outlined measures and approaches, that if adopted could support QCA to address these issues. We must, however, record that the most logical and customer focused approach would be to have one qualifications framework and credit system.

Detailed Commentary

The lack of connectivity with the FHEQ and higher education approaches to credit is a major limitation of the proposals and this will undermine the potential benefits of the framework to its end customers; individual learners and employers. In the consultation document references to higher education are rare. Where reference is made, (e.g. section 10, page 17) the language used is non-committal *'we envisage a relationship of 'alignment' between the FHEQ and the higher levels of the FfA. We want learners to have the opportunity to gain credit at the higher levels of the FfA and transfer these credits towards qualifications within the FHEQ, and vice versa.... Where such agreements (on credit) are not feasible (i.e. with the FHEQ) we will align the FfA as far as possible with these frameworks so that specific agreements on credit transfer and progression between users of the FfA and the FHEQ can be easily established.'* Envisaging alignment, or hoping that specific agreements on credit transfer can be developed is not sufficient, and compatibility between higher education approaches to credit or indeed acceptance of what is proposed will not happen unless specific action of the type outlined in this paper is taken.

- 1. Higher Education Awareness and Understanding of Proposals** – Higher education awareness and understanding of the proposals to establish a Framework for Achievement is very low at all levels - senior managers, registry, academic and admissions staff. Additionally, the relationship of the Framework for Achievement to related policies - Sector Skills Agreements, Sector Qualifications Strategies and higher education policy developments needs to be explained.

Higher education awareness of proposals is not particularly helped by the publication of the consultation document as a QCA (and lesser extent LSC, SSDA) document with no visible higher education involvement or endorsement (through QAA, UUK, UCAS and UVAC). Such an approach may wrongly give the impression that the consultation proposals only apply to further education, despite the significant implications for higher education regarding progression and credit. Indeed, we believe the Framework for Achievement has significant and potentially very positive implications for progression for higher education which need to be more fully explained as should their relationship to HE credit proposals, Access Agreements, Lifelong Learning Networks and other approaches to widening participation. In future, we would advise that papers updating partners on the development and implementation of the Framework for Achievement were produced and disseminated with visible higher education involvement. UVAC would be more than willing to advise on how this could be done. Additionally, we would suggest that:

- QCA continue to work with UCAS to update admissions staff on proposals and what they are likely to mean for admission to higher education. We would advise that there will also be a need for HEIs to review their admissions processes and procedures, and advice and guidance to take account of the structural and operational changes arising from the implementation of the Framework for Achievement and review internal staff development needs.
- QCA work with HEFCE (potentially through UVAC) to determine how the implementation of the Framework for Achievement should relate to the development of Lifelong Learning Networks and regional partnerships involving RDAs and SSCs
- QCA work with UVAC to determine a strategy for engaging higher education in the implementation of the framework, covering awareness and acceptance, progression and widening participation and combining credit from the Framework for Achievement with higher education awards. A briefing paper outlining what is proposed, what it means to HEIs and its relationship to related higher education policies could be an important initial activity.

On a minor point, the terms award, certificate and diploma have specific meanings in the context of higher education. QCA needs to be aware of these meanings when explaining and referring to award, certificate and diploma in the context of the Framework for Achievement.

- 2. The Rigour and Quality of Units Awarded for Community and Employer Based Provision** – UVAC welcomes support for and the recognition of learning wherever and whenever it takes place. We therefore fully endorse QCA proposals to recognise learners' achievements in *'employment, community-based learning activities, and other less-formal contexts.. that.. are not currently recognised through existing qualifications.'* (page 5) HEIs will, however, rightly question, or seek assurances regarding the rigour and quality of such learning and related assessment and validation mechanisms. QCA needs to ensure there are sufficient safeguards and processes that reassure HEIs of the rigour and

quality of such learning. Gaining acceptance via individual approaches to autonomous higher education institutions will be difficult and time-consuming. As a network body representing approximately 50 HEIs UVAC would welcome the opportunity to work with QCA and our membership to establish systems and processes that were transferable across the HE sector to give HE reassurance regarding such quality assurance matters, both at level 3 and at higher levels within the Framework for Achievement.

- 3. The ‘Appropriateness’ of Unit Combinations for Higher Education Entry –** We are surprised that no role is proposed for higher education in the ‘Rules for Combination’ or determining the ‘appropriateness’ of different unit combinations as an acceptable entry qualification for higher education. UVAC’s experience is that many HEIs are either unaware of, or do not consider that some existing QCA level 3 ‘vocational’ and ‘work-based’ qualifications are ‘fit for purpose’ for higher education entry. This is particularly the case for many ‘technical certificates’ specified in Advanced Apprenticeship frameworks that, despite the original reason for their inclusion, are not accepted by higher education as providing the knowledge and understanding required for higher education study, even within the same subject/sector area. Although the ability to combine different units will be advantageous in many respects to individual learners there must be guidance as to whether such combinations will meet higher education entry requirements. UVAC has already discussed this issue with representatives of the Federation of Awarding Bodies. Using our respective memberships we would like to explore with QCA how we could develop and implement systems and procedures that established this ‘fitness for purpose’ and provide individual learners with appropriate advice and guidance on this issue.
- 4. The Appropriateness of HE Learning Programme Design and Delivery for Learners with New Types of Achievement Recognised through the Framework for Achievement –** By recognising and accrediting different types of learning occurring in different environments at QCA level 3, in theory, learners with very different qualifications and experiences will have the requisite qualifications to seek entry to higher education. These developments will place significant demands on HEIs. Such learners will typically require more part-time and e-learning provision, greater use of APEL, more emphasis placed on recognising and accrediting work-based learning and more support in terms of access and bridging programmes. We would suggest that SSC Foundation Degree Sector Frameworks could usefully consider referring to delivery styles and support that would potentially meet the needs of such users. UVAC has also recently undertaken extensive research into the recognition and accreditation of work-based learning in higher education programmes. We would welcome the opportunity to share our work with QCA and discuss how it could be used to develop learning programmes that supported vocational progression in the context of the implementation of the Framework for Achievement.
- 5. Compatibility of Framework for Achievement Units with Higher Education Qualifications -** We fully endorse QCA’s desired objective to align the Framework for Achievement as far as possible with the FHEQ so that specific

agreements on credit transfer and progression between users of the FfA and the FHEQ can be *'easily established'* (page 17).

Although highly desirable, specific agreements on credit transfer between the higher levels of the Framework for Achievement and FHEQ **will not** be easily established. It will be for individual HEIs, and frequently, individual departments to determine if they will recognise credit at the higher levels of the Framework for Achievement as contributing to their own awards. At a basic and mechanical level we have concerns regarding the relative size and specification of units within the Framework for Achievement and their compatibility with modularisation and credit approaches in higher education. Of more fundamental concern will be HEI/faculty/department decisions as where to accept units at the higher level included within the Framework for Achievement as providing credit towards their awards. **Left to market forces movement in this area will be minimal and the chance to develop a 'common currency' at the higher levels of the framework will be missed. Individual HEIs will not have the resource to consider credit arrangements and where they do, the duplication of effort and waste of resource with individual HEIs developing bespoke approaches to the consideration of credit will be considerable.** HEIs could also potentially play an important role in populating the Framework for Achievement with units at the higher levels. **Through UVAC's new Validation Consortium(*), working with the Federation of Awarding Bodies and QCA, as appropriate, we could validate units (subject to their fitness for purpose) at the higher levels within the Framework for Achievement as having an HE credit value. This would enable the credit transfer of such units from the Framework for Achievement to higher education awards. The consortium approach adopted could mean national transferability to a range of HEIs and higher education programmes could be achieved. Through the Validation Consortium, higher education qualifications could also be designed to a national standard to meet national employment and professional body needs.**

Finally we would suggest that some of the benefits of the Framework for Achievement for HEIs and their end customers (individual learners and employers) have not been fully explored. We would offer the following examples:

- **Higher Education Usage of Lower Level Units in the Framework for Achievement** - Learning is not simply about an escalator, continually upwards with no right turn or downward movement. Individuals will need and want to learn in different ways and at different levels throughout their lives – this applies equally to higher education provision. HEIs would benefit from having access to the unit bank at all levels to incorporate, or add to their qualifications to meet the needs of individuals. When HEIs were working with SSCs/NTOs to develop Graduate Apprenticeship frameworks (based on employer skills requirements), the skill sets required for individuals seeking to enter an occupational area did not solely involve the development of skills at higher levels, but also units from QCA level 3 qualifications. HEIs could use units at lower levels in the Framework for Achievement to supplement their own programmes to ensure individual learners were equipped to enter particular sectors. Guidance on the use of such units to supplement higher education programmes could also be offered to HEIs through SSC sector qualification strategies.

- **Inclusion of Foundation Degrees within the Framework for Achievement –** UVAC would welcome discussion with QCA as to how foundation degrees and other higher education qualifications validated through the Validation Consortium could also be included in the Framework for Achievement. This could, for example, be a vehicle to enable QCA regulated Awarding Bodies to effectively jointly 'award' Foundation Degrees in the context of the recommendations of the Foundation Degree Taskforce, but without the need for legislation.

() The Validation Consortium (provisionally entitled NVC) is being formed by UVAC following extensive consultation with HEIs, FECs and detailed discussions with DfES, QAA, UUK and specialist solicitors. QCA, the LSC and QCA regulated awarding bodies have also been consulted on proposals. A detailed business plan has been developed and the NVC will shortly be established.*

UVAC – February 2005