

Appendix D

Consultation response form

Respondents are invited to comment on any aspect of the proposals made within the consultation document (*Recognising achievement on Access to Higher Education programmes: proposals for a credit framework*).

All responses should be submitted to QAA by **15 July 2005**.

<p>Section 1 Purpose and scope of a credit framework for Access to HE programmes (paragraphs 1-2)</p>
<p>a Do you broadly support the proposals in this section?</p> <p>The first purpose of a credit framework should be to support an effective system of credit accumulation and transfer. The benefits sought through the framework would result from the effective operation of this system. NIACE supports these purposes, but perhaps the distinction between 'framework' and 'system' needs to be made clearer in this opening statement.</p>
<p>b Do you have any reservations about the proposals in this section?</p> <p>None</p>
<p>c Do any of the proposals need clarification or explanation?</p> <p>See comments in a above</p>
<p>d Would you like to see further proposals in this area?</p> <p>An explicit reference to the intention of the credit framework to articulate with the new Framework for Achievement</p>
<p>Section 2 Specifications for a credit framework for Access to HE programmes (paragraphs 3-17)</p>
<p>a Do you broadly support the proposals in this section?</p> <p>Yes</p>
<p>b Do you have any reservations about the proposals in this section?</p> <p>The proposal that each AVA should establish its own unit databank seem unnecessarily costly and potentially inefficient, especially as most AVAs (ie those that are OCNs) will have access to a national databank. At the very least QAA should publish an agreed set of technical specifications that will require all AVA databanks to interoperate with each other. In the longer term we would wish to see all units available within the Access framework located within the national databank that will</p>

<p>support the FfA. We suggest QAA should explore the feasibility of this option with QCA at the earliest possible opportunity.</p>
<p>c Do any of the proposals need clarification or explanation?</p> <p>Although NIACE supports the proposal for a limited range of credit values (15) this probably needs a more substantial rationale. There are benefits to this proposal in relation to the stability of the credit system and to the development of 'distinctiveness' between units that would also support this proposal.</p>
<p>d Would you like to see further proposals in this area?</p> <p>As part of the development of the FfA, QCA proposes to conduct a brief review of the NICATS level descriptors in the near future. We suggest that QAA should be part of this review process, and that a single set of agreed level descriptors, based on the original NICATS descriptors, should be developed that serve the needs of both the FfA and the QAA framework.</p>
<p>Section 3 Operating the Access credit system (paragraphs 18-31)</p>
<p>a Do you broadly support the proposals in this section?</p> <p>Yes</p>
<p>b Do you have any reservations about the proposals in this section?</p> <p>NIACE welcomes the explicit commitment to developing arrangements for the Accreditation of Prior Experiential Learning (APEL) within the new framework. We see this as an important feature, and one that we hope QAA and AVAs will actively promote to adult learners in the future.</p> <p>The concept of Accreditation of Prior Certificated Learning (APCL) seems less clearly thought through. The definition explicitly acknowledges that this learning has been previously certificated, yet section 26 states that credits would be awarded for this previously certificated learning. This suggests that a learner would be certificated twice for the same achievement, and NIACE questions whether this is a sound principle. Having said this, we see the ability to recognise other qualifications, and in particular qualifications from overseas, as important to the future development of the Access framework.</p> <p>Within the FfA the facility to include previously certificated experiences within the requirements for award of another qualification is referred to as 'exemption' and credit is not awarded for such achievements. This seems to us a more logical position, and one that we think would make the concept of 'equivalence' meaningful to learners on access programmes. We suggest that QAA reviews the concept of APCL within its proposals, and takes explicit account of the concept of 'exemption' within the FfA.</p>

c Do any of the proposals need clarification or explanation?

The wording of the section on credit transfer could be made more explicit. The principle of credit transfer must be an explicit condition of operation for all AVAs within the framework, and an entitlement for all learners. Of course the operation of credit transfer arrangements would be subject to rules of combination, but QAA needs to have access to some mechanism through which it can ensure that individual providers of Access to HE programmes don't use restrictive rules of combination to block credit transfer from other programmes. AVAs need some teeth to enforce this principle, and QAA needs to ensure that the approval of rules of combination by AVAs respects this entitlement to credit transfer for learners.

d Would you like to see further proposals in this area?

- i) In relation to APCL (or exemption) we think QAA has some responsibility to ensure that learners on Access programmes are made consistent offers in relation to their previous achievements. Again, we appreciate that these offers will be conditioned by rules of combination, and must be subject to judgements about the relevance of previously certificated achievements to the 'target' programme. Nevertheless we suggest that QAA should hold a central register of agreed equivalents for these 'other certificates' (again including those gained outside the UK) that effectively set out the maximum number of credits that may be awarded or exempted for these certificates. In other credit systems this is referred to as a 'precedent log' and is built up through case law. Such a register could be a simple web-based resource, networked across all AVAs, and moderated by QAA to ensure no anomalous precedents were created in building up this register of credit equivalences. Once again we suggest a dialogue between QAA and QCA would be useful on this issue, as the FfA's proposals on exemption will require a similar facility.
- ii) We would like to see an explicit reference in the section on credit transfer that QAA will seek to establish some form of formal articulation agreement with QCA that would facilitate the transfer of credits between the FfA and the QAA framework. In a similar vein we suggest that QAA should also seek to establish an articulation agreement with the SCQF so that credits may be transferred to and from relevant programmes in Scotland.

Section 4

Consistency of academic standards and the Access to HE qualification (paragraphs 32-42)

a Do you broadly support the proposals in this section?

Yes

b Do you have any reservations about the proposals in this section?

We note the intention that further work is to be carried out on recording the differentiation of individual learner achievement within Access programmes. NIACE questions the need for such a costly, bureaucratic and complex development in a context where (according to QAA's own statistics) almost all access learners secure a place in HE on the basis of the current, undifferentiated, arrangements. It also

seems strange to be developing this facility alongside a consistent credit system that can deliver many of the benefits of 'differentiation' of individual learners' achievements through the award of credit for individual units.

If the proposals for individual differentiation are to be taken forward, then these would need to be made explicitly separate from the operation of the credit system. Again the FfA proposals offer a useful model for this. Secondly, we suggest that such individual differentiation should become an option rather than a requirement for Access programmes. This will save a great deal of time and resources for those programmes (eg those offered through OCNs) that function effectively without recourse to individual differentiation. Thirdly, we suggest QAA needs to carry out a cost/benefit analysis of such a system. Our view is that it is technically impossible to establish a consistent grading system across all Access to HE provision within the current specifications of the proposed credit framework. We suggest again that QAA should consult with QCA's research team on the problems of developing such a system (eg in relation to AVCEs) before proceeding further with this suggestion. Any system of individual differentiation that could not be guaranteed as consistent at national level by QAA itself would very quickly bring the national scheme into disrepute. We do not think that QAA has the remit, the powers, the capacity or the resources to do this within the arrangements set out in these proposals.

c Do any of the proposals need clarification or explanation?

See above

The development of a credit transcript needs to be just that. We suggest that it may be useful to separate out the process of awarding credit (which the section on credit transfer confirms is common to all AVAs) from the award of a qualification (which may take different forms in different AVAs). More work is needed on the purpose and format of the credit transcript (see d below)

d Would you like to see further proposals in this area?

Again we note the proposals to develop a credit transcript and the parallel proposals for such a transcript within the FfA. This is one more issue where we suggest it would be very useful for QAA to discuss with QCA the possibility that an electronic credit transcript might be developed that would serve the needs of users of both frameworks.

Section 5 Regulatory and management responsibilities

a Do you broadly support the proposals in this section?

Yes

b Do you have any reservations about the proposals in this section?

We welcome the requirement that AVAs will have to demonstrate ‘the potential to securely transfer and exchange data with other AVAs in due course’, though we question whether this data should include the ‘tracking’ of learner achievement, rather than the representation of learner achievement (ie through the credit transcript). This is an important facility, and will become more important if the Access framework is to interoperate with the FfA in the future. We suggest that QAA should publish details of its expectations of AVAs on these requirements, and enforce them rigorously through the process of re-licensing AVAs within the new framework.

c Do any of the proposals need clarification or explanation?

We suggest that the requirement for AVAs to award credit to individual learners should be ‘on demand’, based on an explicit claim for credit from the learner, rather than an automatic process (as implied in the current responsibilities)

d Would you like to see further proposals in this area?

We would like to see QAA take on an explicit responsibility to establish the maximum transferability of credits awarded within the framework to other frameworks, explicitly the FfA and the SCQF

Any further comments

Despite our reservations on some of the specifics, NIACE congratulates QAA on the production of a set of proposals that we believe will considerably enhance both the credibility and the flexibility of Access to HE programmes across England, Wales and Northern Ireland.

If the FfA fulfils its ambition to be an inclusive framework operating across England, Wales and Northern Ireland, then NIACE would see great advantages in the future merger of the proposed framework with the FfA. However, we recognise that the FfA has yet to realise this ambition, and so we support the current position of QAA that the Access to He credit framework should develop independently of the FfA in the immediate future. Nevertheless, we urge QAA to work closely with QCA (and we hope with ACCAC and CCEA in the near future) to establish the maximum number of common design features between the two frameworks from the earliest possible date.

NIACE would be pleased to support the development of the Access to HE credit framework in any way that it can.

This response is submitted on behalf of (name of institution or individual)

Alan, Tuckett, Director, NIACE (National Institute of Adult Continuing Education)

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	please tick	role (please specify if not responding on behalf of the whole organisation)
AVA		
FE college		
HE institution		
Individual		
Other (please specify)	✓	Director, NIACE