QQI
Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

SECTION 4.7

Green Paper on the Recognition of Prior Learning

FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the content of this proposed Policy Document please use the *Questions and Comments* area which appears immediately after it.

PLEASE NOTE:

13 SEPTEMBER 2013

CLOSING DATE FOR SUBMISSONS

SECTION   4.7

Green Paper on the Recognition of Prior Learning

4.7.1 Introduction

This Green Paper is intended to clarify QQI roles, responsibilities and intentions with respect to the recognition of prior learning (RPL). RPL is also referred to in the European context as the validation of non-formal and informal learning.

4.7.2 Legislative Context

The 2012 Act makes the following provisions in relation to the recognition of prior learning

- Learners may apply to QQI for awards where they meet standards that QQI has established (Section 50(3))
- QQI may request the assistance of providers to assess learners' prior learning for the purposes of making awards (Section 50(7))
- QQI shall establish and publish policies and criteria for access transfer and progression (Section 56(1))
- These shall include policies on credit and recognition of prior learning (Section 56(3))

In summary under the Act 2012, QQI is required to establish policies on recognition of prior learning within the policies and criteria for Access, Transfer and Progression (ATP). Providers must subsequently establish, have approved and publish their own policies and criteria for ATP, including for credit accumulation, credit transfer and identification and formal assessment of the knowledge, skills or competence previously acquired by learners.

Applications for provider access to programme accreditation, including for ATP, may result in approval for proposed procedures, refusal to approve making appropriate recommendations, or refusal to approve the proposed procedures.

Learners may also apply to QQI for awards where they meet standards that QQI has established and QQI may request the assistance of providers to assess learners' prior learning for the purposes of making awards.

4.7.3   National and International Policy Context

The Qualifications (Education and Training) Act 1999 established a firm legislative base for the development of RPL systems all of which elements were subsequently addressed by the NQAI through Framework ATP determinations, and though recognition and alignment policies. The NQAI published Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training in 2005.

The former FET and HET awards councils also developed relevant, if different, policies and procedures based on the NQAI principles and guidelines to enable learners gain recognition for having attained standards of knowledge, skill and competence however acquired.

The FET Awards Council policy on RPL required providers to agree specific procedures for RPL towards named awards. The Council published in July 2012 a list of providers and the FETAC awards for which they had approval to carry out RPL. This list is currently closed: no new providers or awards are being added by QQI. There was no provision for direct application by learners to the Council for FETAC awards.

The HET Awards Council validation policy required all providers to indicate at programme validation how they made provision for RPL in relation to access to the programme, partial exemption from the programme requirements and, where relevant, assessment for the full award for which the programme had been validated. HET Awards Council policy on Assessment and Standards deals explicitly with assessment of prior learning. It distinguishes between approaches to prior learning that is uncertified and prior learning that has been certified by another awarding body.

HET Awards Council policy on RPL also provided for direct application by learners to the Council for HETAC awards. While this provision did implement the relevant section of the 1999 Act it was very cumbersome and expensive to operate and resulted in fewer than ten awards being made. In most cases an applicant's portfolio of achievement were referred to providers for assessment. Application to the procedure was closed in 2011 and remains so.

Under the savings provision in the Act (84) (15) and to facilitate continued access for learners to RPL, legacy providers who have agreed relevant QA procedures may offer RPL in accordance with the established policies and procedures of the FET and HET Awards Councils and local arrangements.

QQI policy on recognition of qualifications in the NFQ, discussed in Green Paper 4.3, offers considerable support for the recognition of prior learning that has already been certified outside of the national statutory awarding bodies. This use of the NFQ is an important dimension of RPL and one in which Ireland has been seen to play a pioneering role in Europe.

There is a considerable documentation of the current practice of RPL in Ireland. The OECD published a *Country Note on the Recognition of Non-formal and Informal Learning in Ireland* in 2008. The European Inventory on Validation of Non-formal and Informal Learning 2010 includes a *Country Report on Ireland.* The Expert Group on Future Skills Needs drew on these sources in making policy recommendations in a 2011 report on *Developing Recognition of Prior Learning*.

Focus on RPL across Europe has gained focus since the publication of *Common European principles on identification and validation of non-formal and informal learning* in 2004. *European Guidelines for Validation of Non-formal and Informal Learnin*g were published in 2010. The current definitive statement of European policy on VNFIL is Recommendation of the European Council issued in December 2012.

The aim of this Recommendation is that by 2015 every citizen will have the opportunity to have his/her skills acquired outside the formal education and training system validated and to be able to use this validation throughout Europe. This Recommendation provides a frame for QQI policy and indicates:

- RPL may lead to a full or partial award
- There is an agreed four step process; identification of learning outcomes, documentation, assessment and finally certification
- Information on RPL must be widely available, with particular reference to marginalised groups
- Guidance and counselling must be available and affordable, to support a validation procedure
- The processes of assessment and the agreed standards must be quality assured
- Individuals should have the opportunity to undergo an audit of their skills, supported by Europass tools
- Links between credit systems such as the European Credit System for Vocational Education and Training (ECVET) and the European Credit Transfer and Accumulation System (ECTS) for the European Higher Education Area must be

strengthened. Incentives should be provided e.g. to providers to facilitate access to formal education and training with exemptions as appropriate.

The Department for Education and Skills has not yet formulated a national strategic response to this recent recommendation.

4.7.4 Rationale

There is a legal requirement to implement the relevant sections of the 2012 Act. The division of functions in the legacy bodies between NQAI and the Awards Councils and the differences of implementation of the NQAI principles and operational guidelines by the two councils need to be addressed in the context of an amalgamated agency. The changing national landscape of provision in FET and HET offer an opportunity to promote a more coherent approach to implementing RPL. The European recommendation is a spur to the development of national strategy.

There is equally a need for overarching strategic direction for QQI with regard to ATP, including RPL and Credit, consistent with QA, award and standards policy and validation to inform QQI's strategic contribution at national and European level with regard to ATP debate and practices.

QQI will develop a comprehensive policy and operational procedures in line with legislation on the basis of national collaboration, consideration of the current arrangements and identification of best practice nationally and internationally. Ultimately RPL is dependent on the development of a coherent national approach to credit, aligned with the requirements of both the Bologna and ECVET processes. Policy development will therefore be tied to the development of a coherent approach to credit with regard to programmes and awards. Consideration will be given to credit among and between national and aligned awards in as much as this is feasible.

4.7.5 Issues for consideration

Issue 1   RPL and ATP

RPL is complex as it encompasses RPL for access, for transfer including programmatic credit, and for progression. It impacts on awards and programmes and on quality assurance.

4.7.5.a *Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative?*

Click here or click on respective bookmark to respond >>

Issue 2   National strategy on RPL

There is a need for a coherent co-ordinated national strategy and direction with regard to RPL, including interdepartmentally across government departments and agencies. While RPL may be an efficient means of developing and recognising human capital and promoting social inclusion, it costs money to implement. QQI has a role in facilitating and promoting RPL but it is only one actor among many.

4.7.5.b *Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated?*

Click here or click on respective bookmark to respond >>

Issue 3   Direct application to QQI for awards

The HET Awards Council experience with the management of a direct awards process was that it was expensive and time-consuming. The cost of setting up a system for the processing of such applications would be considerable. It is likely that any such system would have to make use of the subject knowledge and assessment procedures of providers. If providers already have such appropriate RPL procedures in place then application through QQI would add an additional step to the process. If they do not have processes in place then referral would be pointless.

4.7.5.c *Should QQI develop a procedure of direct application for awards? How else might it fulfil its obligations under the 2012 Act?*

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Issue 4   RPL for access to FETAC awards

The fact that RPL for access to FETAC awards is not open to new providers or awards may disadvantage learners. Some providers have immediate interest in providing RPL as a service; there is a market gap for such services. Learners require RPL for access to programmes and awards.

Section 4.7 Closing date for consultation 13 September 2013

4.7.5.d *Should QQI reopen the process of agreeing RPL procedures with providers of FETAC awards?*

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Issue 5 Data on RPL

The extent to which RPL results in access, exemptions or awards across levels 1-10 is largely undocumented. This needs to be established as a basic minimum to inform targeting of policy, criteria and action where it is most helpful. RPL discourse consistently refers to the necessity of strong transparent quality assurance to build trust. This infers reporting on outcomes of processes, availability of data and active promotion of RPL developments and initiatives. National reporting is required under the European Council Recommendation on RPL.

4.7.5.e *What measures can or should be taken to improve the collection of information on RPL activities by Irish providers and awarding bodies?*

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Issue 6 RPL and Credit

The ATP determinations and the Principles and Operational Guidelines for RPL of the NQAI and the 2012 Act couple RPL with credit. FET and HET approaches to credit were different and create a challenge to coherence nationally - this is particularly evident at level 6 where awards of both bodies are available but not necessarily compatible in terms of transfer.

4.7.5.f *How urgent is the reconciliation of national approaches to credit in FET and HET to the realisation of objectives for RPL?*

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Questions and Comments

Q4.7.5.A Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative?

Q4.7.5.B Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated?

Q4.7.5.C Should QQI develop a procedure of direct application for awards? How else might it fulfil its obligations under the 2012 Act?

Q4.7.5.D Should QQI reopen the process of agreeing RPL procedures with providers of FET Awards Council awards?

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Questions and Comments

SPECIFIC CONSULTATION QUESTIONS (CONTINUED)

Q4.7.5.E What measures can or should be taken to improve the collection of information on RPL activities by Irish providers and awarding bodies?

Q4.7.5.F How urgent is the reconciliation of national approaches to credit in FET and HET to the realisation of objectives for RPL?

Q4.7.5.G What other issues in relation to RPL should be addressed as this stage?

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You can also give feedback to QQI at: consultation@qqi.ie

Thank you for your time!