Forfás Submission
to the
National Qualification Authority of Ireland
on their
National Framework of Qualifications
Consultative Paper

January 2005
1. Introduction

1.1 Background
Forfás is the state agency responsible for providing policy advice to government on enterprise, trade, science, technology and innovation in Ireland. In view of the critical importance of education and training for each of these areas, Forfás has a keen interest in all aspects of the Irish education and training system. It is particularly interested in initiatives to drive and underpin life-long learning. Therefore it is pleased to be consulted by the National Qualifications Authority of Ireland on this latest stage in the development of the National Framework of Qualifications.

1.2 Overview
Forfás strongly endorses the objective of including awards by professional awarding bodies and by national awarding bodies from other jurisdictions, in the framework. It views this as an important further step in advancing the life-long learning agenda and in facilitating learning progression, as well as in promoting mobility among learners and the labour force. Failure to incorporate these awards would result in a significant gap in the coverage of the framework and thereby fundamentally undermine efforts to promote the NFQ as the single entity through which all learning achievements are measured and related.

However, as Forfás is neither an educational institution, nor an awarding body, it is not in a position to comment on the more technical aspects of the criteria and processes proposed in the discussion document\(^1\). Therefore rather than addressing the specific questions put forward in the paper, Forfás will restrict itself to advancing some general principles and highlighting some specific issues that should be considered when finalising these arrangements.

2. General Principles

2.1 Maintaining the Integrity of the Irish Educational Brand
Forfás welcomes the NQAI’s recognition of the paramount importance of quality and its explicit commitment to promoting and maintaining standards. Notwithstanding the importance of establishing a “single, nationally and internationally accepted entity, through which all learning achievements may be measured and related to each other”, the NQAI should protect the international brand of Irish education and steadfastly avoid compromising on standards or quality and eschew any drift towards the lowest common denominator, particularly in relation to awards from awarding bodies in other jurisdictions.

Bestowing the imprimatur of the NQAI on an award will give it credibility by virtue of the high esteem in which the Irish education system is held internationally. Therefore, caution must be exercised to ensure that the brand of Irish education is not devalued in the process. Consequently, Forfás believes that issues related to standards and quality assurance should be the foremost consideration when reviewing a candidate award for inclusion in the framework.

2.2 A Framework for All
There is overwhelming evidence that the likelihood of an individual obtaining education or training in employment is positively correlated with their level of prior educational attainment, or skill level. In other words, those in greatest need of further education and training are the least likely to obtain it. It was for this reason that the Enterprise Strategy Group proposed the national “One Step Up” initiative.

Implicit in the concept of “One Step Up” is the principle that the initiative should be available to all members of the labour force, irrespective of their current skill level. Furthermore, the ESG explicitly specified that the initiative should “pay particular attention to the people with low levels of qualification and in low-level occupations, who are least likely to receive sufficient access to learning opportunities”.

Forfás appreciates the complex issues involved and the diverse range of situations that must be catered for when including awards from professional awarding bodies and national awarding bodies from other jurisdictions. However, Forfás believes that while incorporating these awards into the NFQ is necessary and worthwhile, it should not be at the cost of an undue postponement of incorporation of other, lower-level awards. A number of specific examples are cited in the subsequent sections.

3. Specific Observations

3.1 Global Awards
*European Computer Driving License (ECDL)*
Non-professional awards such as the ECDL are particularly important for both employers and employees in the enterprise sector. The ECDL is a good archetype for a workplace-oriented programme that can be utilised to make life-long learning a practical reality for a significant number of workers, particularly those who missed out on educational opportunities earlier in their lives. Therefore it is important that such programmes should be included in the NFQ as early as possible in order to initiate and facilitate learning progression. Forfás proposes that the NQAI should initiate a concurrent thread of activity, in conjunction with FETAC and other relevant awarding bodies, to consider how these global awards can be incorporated more directly into the framework.

*Vendor Sponsored Awards*
The treatment of awards sponsored by a multi-national corporation such as Microsoft or Cisco poses unique challenges. However, the fact that the training recognised by these awards is ostensibly tied to a particular vendor’s product range should not detract from the reality that such awards do embody a genuine learning achievement. Furthermore, due to the near-monopoly enjoyed by some of these vendors in particular market segments, or the dependence

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of the technology on internationally recognised, open standards, the skills acquired are highly transferable and are therefore of great value to both the individual and the economy.

As increasingly sophisticated technologies (wireless, web services etc.) enter the mainstream, such specialised training and awards is likely to become a more prevalent feature of the workplace. Therefore if the framework is to achieve its objective of becoming “the single, nationally and internationally accepted entity, through which all learning achievements may be measured and related to each” this category of awards must be accommodated in some fashion.

**Professional Awards by Non-statutory Bodies**

An example of a sector where tertiary qualifications by non-statutory professional awarding bodies are becoming increasingly important is Financial Services. For example, the Qualified Financial Advisor award although not currently mandatory, is likely to become a de facto standard qualification for individuals advising retail consumers on financial products. Similarly, the internationally recognised Chartered Financial Analyst award, an initiative of the Association of Investment Management and Research is becoming increasingly important in international financial services. Ultimately, these awards should also be included in the framework.

### 3.2 Semantics

The definition of “programmes provided in Ireland” warrants some consideration. For example does this include correspondence courses, web delivery of course content etc?

A more fundamental issue is the need to distinguish between ‘recognition’ and ‘inclusion’ i.e. the treatment of an award acquired after study in the remote jurisdiction and the same, or equivalent, award by the same awarding body, for a programme provided in Ireland. This dichotomy is likely to become increasingly blurred and less meaningful in the future with the greater prevalence of distance learning and awards stemming from modular programmes. The onus in each case is on the awarding body to ensure that standards and quality etc. are equivalent.

### 4. Conclusion

The publication of the National Framework of Qualifications in 2003, a mere 2½ years after the NQAI was established, was a seminal event in the evolution of the educational landscape in Ireland. Significant progress has been made since then on the incorporation of existing awards from the universities, FETAC, HETAC and DIT into the framework. It is important that this momentum is maintained and that the NFQ is established as the overarching framework for all accredited education and training in Ireland; the inclusion of professional awards and awards from awarding bodies outside the jurisdiction in the framework is an

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4 These technologies deepen rather than supplant existing ones.
5 However, the extent to which these multinationals would wish to have their awards included in the framework and would be willing to participate in the formal application procedure, remains to be seen.
6 A joint initiative by the Institute of Bankers in Ireland, the Insurance Institute of Ireland, Life Insurance Association Ireland and the Irish Financial Services Regulatory Authority.
extremely important step in this process and Forfás fully supports the NQAI in this endeavour.

The NFQ has an important role to play in facilitating and enabling Life-long Learning in general, and in particular, the One Step Up initiative proposed by the Enterprise Strategy Group. As is noted in the consultative paper, in order for the framework to be useful in the “One Step Up” initiative, it is necessary that it is as inclusive as possible. Therefore, Forfás believes that while the current proposals are extremely worthwhile, it will be necessary to broaden the range of awards that are included in the NFQ. To this end, the NQAI should encourage national awarding bodies such as FETAC to look at learner needs, particularly those of workers and adults with low levels of educational attainment and low levels of skills and adopt a flexible approach to the recognition of global awards.

However, the forgoing comes with the crucial caveat that quality and standards must be protected, at all levels of the framework. This issue is particularly important in the context of awards from non-statutory bodies awarding and global awards and will require careful consideration.