

# **Recognising achievement on Access to Higher Education programmes: proposals for a common credit framework**

A report on responses to a consultation  
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# Recognising achievement on Access to Higher Education programmes: proposals for a common credit framework

## A report on responses to a consultation

### 1 Preface

Responses to the consultation were analysed by the Quality Assurance Agency for Higher Education's (QAA) Information Unit. The analysis was subsequently considered by the Access Qualification Development Group (AQDG), who agreed a number of amendments to the proposals as a result. The AQDG also agreed that greater clarification of some proposals was needed, and this had been provided, with the agreed amendments in the Appendix to this report (see pages 8-11). The proposals outlined within the consultation document, together with the revisions indicated here, will now be implemented, and a phased implementation plan has been developed which will lead to full implementation for the start of 2008-09. The final specifications of the Access to HE credit framework and qualification specifications will be published as part of the revised QAA Recognition Scheme for Access to HE.

### 2 Introduction

The consultation document outlined proposals for a common credit framework for Access to HE programmes and specification for the Access to HE qualification. It was circulated to all authorised validation agencies (AVAs); further education colleges (FECs) in England and Wales; higher education institutions (HEIs) in England, Wales and Northern Ireland; and funding and other bodies with an interest in this area of provision. The consultation period ran from May to July 2005.

The document sought feedback on proposals made in five areas.

- a the purpose and scope of a credit framework for Access to HE
- b specifications for a credit framework for Access to HE
- c operating the Access to HE credit system
- d consistency of academic standards and the Access to HE qualification
- e regulatory and management responsibilities.

The response form was divided into five sections relating to each of the five sections of the proposals. Each section of the response form consisted of the same four open questions which sought to ascertain one recipients' broad support, two their reservations, three areas requiring additional clarification and four areas in which further proposals might be beneficial. This report provides an overview of the level of support and main points made in responses to the consultation.

### 3 Response rates

A total of 132 responses were received. The numbers of responses received by category of respondents were:

Category	Number of responses	% of total responses
AVA	16	12%
FEC	47	36%
HEI	52	38%
Individual	4	3%
Other	13	10%
Total	132	

Table 1

Table 1 shows that the majority of responses were received from FECs and HEIs. Although the total of responses from AVAs was significantly smaller, this was also a much smaller constituency, and the response rate from AVAs was much higher than that for other groups, with 16 responses (on behalf of 19 AVAs) being received: a response rate of 67 per cent of all AVAs (on behalf of 79 per cent of AVAs).

#### 4 Overall support for the proposals

The overall level of support across the five areas of proposals was very high from all respondent groups, and an average of **82.5 per cent** across all sections gave a positive response to the question ‘do you broadly support the proposals in this section?’ A further average of **10.4 per cent** left this section blank. While it is not possible to interpret the intentions of these respondents with certainty, given that responses to the next question ‘do you have any reservations about the proposals in this section?’ elicited an average of only **1.2 per cent** responses, it seems unlikely that those leaving the first question blank had major objections to the proposals.

Table 2 shows the level of broad support for proposals in each of the main sections.

Section	% expressions of support	% blank
1 Purpose and scope	91	5
2 Specifications for credit framework	83	12
3 Operation of the credit system	82	11
4 Consistency of academic standards	78	10
5 Regulatory and management responsibilities	79	15

**Table 2**

While overall support was high in all areas, and reservations expressed about the proposals very low, respondents had a wide range of queries for clarification and suggestions for areas for further proposals to be developed. Comments made have been very valuable in helping QAA to identify where the proposals need to be explained more fully and in identifying priorities for the next stage of development. Clarification about many individual points of detail raised through the consultation process will be provided in the documentation that is to be developed as the formal point of reference for the specifications of the credit framework.

#### 5 The responses

##### Section 1 - Purpose and scope of a credit framework for Access to HE programmes

Broad support: 91 per cent [+ 5 per cent no response]

The general message in comments made in this section, from all respondent groups, was that the proposed framework was welcome, and that it provided a suitable structure within which much-needed reform could take place. It was considered that improved consistency of standards would lead to a greater recognition and acceptance of the Access to HE qualification, and that a common credit framework would ensure greater flexibility for learners to progress to HEIs across the country and promote more consistency in admissions policies relating to Access to HE.

Although the majority of respondents indicated their support in relation to the aims of consistency and flexibility, a number expressed concern regarding a perceived tension between these joint aims, and some were concerned that flexibility should not be allowed to undermine standards. **[See Response 1]**

Some respondents drew attention to the good practice that already exists within AVAs in this area and wished it to be noted that the proposals for a common credit framework were consistent with current practice in relation to credit in many AVAs.

## **Section 2 - Specifications for a credit framework for Access to HE programmes**

Broad support: 83 per cent [+12 per cent no response]

### **Unit databanks**

The consensus view was that the introduction of unit databanks would be beneficial, with some commenting that it would be useful if access to AVAs' unit databanks were available to HEIs seeking more detailed course information about applicants.

### **Credits and credit value**

While specifications in this area were accepted, some sought an explanation for the proposed maximum credit value of 12 for any one unit, and the rationale for credit values increasing in increments of three was queried. Others stressed the importance of small units for ensuring that all learners would be able to record achievement. **[See Response 2]**

### **Notional learning hours**

A number of respondents requested clarification of the proposal relating to notional learning hours and the relationship of this concept to 'guided learning hours'. For some, this also related to concerns about implications for funding by the Learning and Skills Council. **[See Response 3]**

## **Section 3 - Operation of the Access to HE credit system**

Broad support: 82 per cent [+11 per cent no response]

### **Credit accumulation and transfer**

It was generally felt that the proposal to introduce the facility for credit accumulation and transfer represented a positive step which would encourage widening participation and help to improve retention. Some concerns were expressed about the logistics and costs of data transfer and recording credit accumulation. The main area of concern, however, was the proposal that five years should constitute the maximum period for credit accumulation for the qualification, with 13 per cent of respondents considering that five years was too long. Those expressing support, however, thought it was necessary to maintain a generous length of time for learners to accumulate credits. **[See Response 4]**

### **Accreditation of prior learning (APL)**

Although the proposal relating to APL was generally supported, it also generated the greatest number of reservations and requests for clarity and guidance. While the majority of respondents were content with the proposal, over one quarter of respondents indicated some uncertainty about this proposal and its implementation. The primary areas of concern and requests for clarity focused on the 50 per cent proposed as a maximum, as well as a certain number of requests for guidance in relation to a range of technical matters. **[See Response 5]**

### **Rules of combination**

The area in which there was the highest number of responses in this section, was the proposal about 'open' units, and many respondents queried whether open units were necessary, what their role would be; how relevance and consistency across AVAs would be assured; and how their inclusion might affect the robustness of the qualification. **[See Response 6]**

### **Section 4 - Consistency of academic standards and the Access to HE qualification**

Broad support: 78 per cent [+10 per cent no response]

#### **Required credit achievement**

Respondents clearly supported the proposal to introduce a single total credit value for the Access to HE qualification and considered that it would ensure parity and equity across provision. While some respondents (about 10 per cent, from a cross section of respondents) stated that they considered that a credit value of 60 credits for the Access to HE qualification was too low, others (about six per cent) indicated that they considered 60 credits to be too high. Clarity was requested regarding the required level for the 15 credits which are required in addition to the 45 at level 3 to make up the total of the 60 credits for the award, and some requested assurance that these could not be achieved at level 1. **[See Response 7]**

#### **Qualification titles**

A number of respondents raised questions regarding the rationale for changing the title of the Access to HE qualification to 'diploma' from the current 'certificate' or expressed concerns about this change. While some thought that changing the name of the Access to HE qualification to diploma would cause confusion in some areas, others regarded the standardisation of qualification titles as helpful to students and HEIs and stated that they had no reservations regarding the change of the qualification title. Some concerns were also expressed about the requirement to indicate a subject area within individual award titles. **[See Response 8]**

#### **Differentiated individual achievement**

Although the consultation document contained no proposals regarding recording differentiated individual achievement, a number took the opportunity to express their support or opposition to the introduction of grading for Access to HE. Some requested further information and consultation in this area, while others indicated that any system should not increase the burden of external assessment or increase the costs of assessment and the recording of outcomes. A number of HEIs suggested that Access to HE should be included in the UCAS tariff, to provide a transparent measure of comparability with other entry routes.

### **Section 5 - Regulatory and management responsibilities**

Broad support: 79% [+15% no response]

#### **Responsibilities of QAA**

Some requested further information regarding the responsibilities of QAA, with particular reference to the AVA licensing system. A number of respondents requested additional clarification regarding the responsibilities of QAA and AVAs in relation to monitoring quality assurance systems within and across AVAs. **[See Response 9]**

It was noted that communication and clear information about the new specifications would be very important. Raising awareness of the framework to HEIs, and particularly to admissions staff, was seen as vital in promoting a shared understanding about the qualification specification and ensuring that Access to HE applicants received appropriate offers. **[See Response 10]**

### **Responsibilities of AVAs**

A concern expressed here, which also arose in response to several other sections, was the resource implications for AVAs and providers. Concerns focused, in particular, on the potential increase in resource which might be required for the implementation of unit data banks, data management requirements and associated increased administration costs. It was recognised that the framework provided an opportunity for shared practice and procedures across AVAs, and that AVAs might benefit from working together to develop common systems and software. Responses also sought clarity about support that might be available to AVAs. **[See Response 11]**

### **Implementation**

A number of respondents indicated concerns regarding the proposed timetable for implementation, most of these concerns focusing on the time needed to undertake the development work that would be required prior to implementation. It was also noted that there would need to be sufficient time to ensure that all involved had a clear understanding of the new credit and qualification specifications.

**[See Response 12]**

## **6 Summary**

The responses to the consultation indicated strong support for the proposals from all respondent groups. It was recognised that the credit framework would promote greater consistency, transparency and comparability of Access to HE provision, which was welcomed. It was also remarked that the framework would provide learners with greater flexibility to progress to higher education across the country. The proposals for improving consistency of academic standards within the Access to HE qualification were welcomed and a clear majority considered that the measures proposed would enhance the Access to HE qualification. Reservations that were expressed were, in general, related more to technical issues and potential resource implications than to issues of principle. However, respondents to the consultation noted that, for the framework to fulfil all its objectives, there would be a need for clear guidance and management of the transitional period, during which all parties were kept informed of progress.

## **Appendix 1 – Points of clarification and amendments to the proposals for the Access to HE credit framework and qualification specification**

### **Background and context for proposals**

The consultation proposals did not provide detailed background information about the Quality Assurance Agency for Higher Education's (QAA) remit for Access to HE, and its role in this area was unclear to some respondents. In addition to the specific request from the Department for Education and Skills (DfES) that QAA should develop these specific proposals, QAA has a more general remit for the oversight of the national arrangements for recognition and quality assurance of Access to HE provision, which is separate from its role in relation to higher education (HE) provision. QAA exercises its Access to HE responsibilities through the framework of the authorised validating agencies (AVAs), which are licensed, reviewed and monitored by QAA. These structures and procedures are described in the *QAA Recognition Scheme for Access to HE for England, Wales and Northern Ireland*.

The AVAs are responsible for the validation and monitoring of Access to HE programmes and for the award of QAA-recognised Access to HE certificates. The AVA licensing criteria also specify that AVAs have a responsibility to engage in the development of Access to HE provision. They do this through their work with partners in HE and further education (FE), and the licensing criteria also require both sectors to be represented within AVAs' governance structures and for both to be involved in the development, validation, and moderation of Access to HE programmes.

### **Proposals for credit and the QAA Recognition Scheme for Access to HE**

The consultation document explained that 'the proposals for a common credit framework...are in addition to, and are not intended to replace, those aspects of the QAA Recognition Scheme for Access to HE which relate to programme validation'. The purpose of this statement was to make clear that nothing which is already specified in the Recognition Scheme documentation would be invalidated by the new proposals. It was not intended to suggest that these proposals were separate from, or would run in parallel with, the requirements of the Recognition Scheme. Indeed, the specifications for the credit framework and for the Access to HE qualification will form a part of the Recognition Scheme documentation, and adjustments have been made in other areas of the Recognition Scheme, where appropriate, to accommodate the additional requirements implied by the introduction of these requirements.

### **Approach adopted to development**

The Access Qualification Development Group (AQDG) approached the development of these proposals with an intention to provide a framework with clear but broad parameters, within which providers, receivers and AVAs could continue to develop individual Access to HE programmes to meet particular needs; and to avoid placing unnecessary constraints on programme development. While AVAs will be required to ensure that they operate systems and validate programmes which are consistent with national specifications, the broad limits of the proposals will not necessarily be the full extent of requirements for individual programmes. It will be through the AVAs' validation processes, involving expert representation from Access to HE providers and receivers in HE, that detailed, appropriate specifications and requirements for individual programmes (including curricula) will be determined. As the awarding bodies within the system, AVAs will oversee the validation process to ensure that factors such as a programme's mode of delivery and intended progression route(s) are taken into consideration, and that additional requirements for particular programmes are specified where these may be required.

## **Relationship to other frameworks**

The introduction to the consultation document explained the particular relationship between the proposals for the Access to HE framework and the proposals for the Framework for Achievement (FfA). Some respondents queried the reasons for this relationship and suggested alternative links (for example in relation to credit systems in HE). QAA's remit for this work from the DfES explicitly required that QAA's proposals be consistent with the principles for credit being developed for the FfA. Features of the FfA proposals, as they were known at the time AQDG was preparing its proposals, therefore strongly informed the nature of proposals in many areas.

## **Responses to individual points**

### **Response 1 - consistency and flexibility**

Consistency will lie, first, in the achievement required for award of the Access to HE Diploma, as defined by a common credit requirement for the award of the Diploma, irrespective of the particular programme which the student has followed. The new qualification specification provides this. There will also be consistency in the way in which student achievement is described: the common definitions of the credit framework will assure this. The consistency of requirements will also be signified by the use of a title for the qualification which is presented in a common format that will appear on the Diploma with QAA's Access to HE logo.

At the same time, flexibility is provided for students by a system which allows variation in how, when and where students can achieve the qualification (through, for example, accreditation of prior learning (APL) or credit accumulation and transfer). Flexibility is also an essential characteristic of the framework because programmes are developed at the local level, using local knowledge so that they can respond to local needs and opportunities.

### **Response 2 - credit values**

The rationale for the proposals for both the maximum 12-credit unit, and the increments of three for the credit value of any one unit, was to maintain flexibility of programme design. (It is helpful to retain a distinction between unit size and module size, if there are concerns about the coherence of particular package of study.) The effect of larger units on student achievement was also considered in agreeing this proposal, recognising that the larger the unit size, the more difficult it could be for a student to achieve the full requirements for the award, as failure of one single large unit is more likely to lead to failure on the programme as a whole. A larger maximum unit size would also pull these proposals out of line with the proposals for the FfA.

### **Response 3 - notional learning hours**

'Notional learning hours' is a concept which provides the means of ascribing a particular credit value to a unit. Ascribing credit value in this way involves a judgement about the amount of learning time which it is expected that a student will have to spend, on average, to achieve the specified learning outcomes at the required level. It includes all learning relevant to achieving the learning outcomes, eg directed and private study, practical and project work, assignments and assessment. In this instance, the judgement is about how much learning an average student can reasonably be expected to achieve (with reference to the unit's learning outcomes) in a notional 10 hours of work; this is deemed to be worth one credit. Once credit value has been ascribed to a unit, it remains constant, irrespective of the time it may actually take any individual learner to achieve the learning outcomes, and irrespective of the amount of teacher input. Part-time and full-time courses leading to the same qualification will, therefore, have the same total credit value.

'Guided learning hours', on the other hand, are the number of taught hours or classroom-supervised activity which are allocated by a provider to the delivery of a particular programme or unit. For most Access to HE courses, funding is a matter for the Learning and Skills Council (LSC). The LSC was represented on the AQDG, the group which developed these proposals.

#### **Response 4 - credit accumulation**

While the limit for the maximum period over which credit can be accumulated towards the award of the Access to HE Diploma is five years, there may be good reasons for a shorter limit in individual cases and this will be identified and specified at validation.

#### **Response 5 – APL**

The primary function of these proposals is to ensure that concepts relating to APL are used consistently, and to draw attention to good practice guides (such as QAA's *Guidelines on the accreditation of prior learning*) which are available in this area. The proposed 50 per cent maximum for APL is the national maximum allowable for the award of the Access to HE Diploma: it does not mean that that the facility will necessarily be available at this level in all circumstances, and an appropriate limit, which may be lower than 50 per cent in some circumstances, will be set at the point of programme validation. It also does not assume an automatic right to the accreditation of prior learning: APL is awarded following a process which involves a claim for APL, which is assessed by the providing institution. The AVA is then responsible for reviewing claims through its moderation mechanisms.

#### **Response 6 - rules of combination**

Rules of combination will include mandatory and optional but **not** 'open' units. The proposal for open units has been withdrawn after consideration of responses to the consultation. While 'elective' units are proposed as a feature of the FfA, (with the same proposed features as 'open' units) they are not a necessary element of all qualifications, and they were considered a questionable feature of the proposals for the specification for the Access to HE Diploma. Considerable variety and flexibility can be provided through the use of optional units.

#### **Response 7 – required credit achievement**

Some respondents queried whether the proposed 60-credit requirement was a 'minimum' or a 'maximum'. It is neither; it is the total credit requirement for the award of the Access to HE Diploma. This requirement will not vary, whatever the programme or particular award title. In some instances, there might be more than 60 credits available on a programme, and some students could therefore achieve more. But while all credit achievement will be recorded on the credit transcript, only that which has been specified in the rules of combination will be accumulated towards the Diploma.

All programmes will lead to the award of the Diploma for any student who achieves 60 credits, with at least 45 at Level 3, within the rules of combination which define the requirements for any particular award. If the programme has sufficient units available at Level 3, it will be possible for students to achieve more than 45 of the required 60 credits at Level 3, but the requirement for the award of the Diploma remains at 45 at Level 3 credits, on all programmes, and all Access to HE programmes must be designed to ensure that this achievement at this level is possible and represents a coherent set of achievements.

The remaining 15 credits, which are not required to be achieved at Level 3, must be achieved at Level 2 or above. It will not be possible to include Level 1 or Entry Level credits in the credit achievement required for the award of the Access to HE Diploma.

### **Response 8 - qualification titles**

The use of 'diploma' to replace 'certificate' was made to provide consistency with FfA proposals about awards at this level. It was also considered important to signify a change in the nature of the qualification through changing its name slightly. The titles of different awards which lead to the Access to HE Diploma will all have a common format: Access to HE Diploma (subject(s)). There is no prescribed list or limited number of possibilities for what should be included in the brackets: this will be decided at validation, and will be stated in the rules of combination to best describe the intended progression route for the particular award. Where the focus of study for the particular award involves two or more joint or combined subject areas, this may be described within the brackets in whatever way the provider of the programme regards as most appropriate, subject to the approval of a validation panel.

### **Response 9 - monitoring quality assurance**

The quality assurance arrangements for Access to HE are described within the broader documentation of the QAA Recognition Scheme for Access to HE. AVAs monitor Access to HE provision through their separate structures and mechanisms, which are approved by QAA. The AVA licensing criteria, against which all AVAs are reviewed and monitored through annual reporting, have been amended to include specific requirements relating to credit and the new qualification specification. These revised criteria are due for publication shortly.

### **Response 10 – communication**

QAA will develop a programme to provide full information about the changes for HEIs, with a particular focus on the needs of admissions staff, to ensure that they are aware of the changes to the Access to HE qualification, including implications for making offers to Access to HE applicants. AVAs will also organise events at the local or regional level to support QAA's national activity.

### **Response 11 – resource implications**

Costs associated with information management seemed to cause most concern. While the necessary developments will not be without cost, they may be less costly than some respondents envisage. In part, this is because many AVAs already have in place appropriate systems, or systems that could be readily adapted or developed to meet the needs of the new framework. The use of the term 'unit databank' was adopted for consistency with FfA proposals, but it perhaps implies something more complex and costly than would be required for effective operation at a local or regional level. While the proposals might, in some instances, require more data about learners to be captured, inputted and retrieved, and there is clearly a human resource required here, there is not necessarily a requirement for an extensive programme of IT investment to make the proposals workable in a way which is both reliable and cost-effective.

QAA will provide support for AVAs which are not familiar with the approaches to credit-based programmes and qualifications which are proposed. The suggestions made in some responses to the consultation about joint working or shared systems would also be a way AVAs might explore for minimising additional costs.

### **Response 12 – implementation**

All AVAs have received notification about implementation requirements, and each AVA will be responsible for producing an implementation plan which allows it to meet an overarching timeframe for implementation set by QAA. A programme of AVA licensing and review is planned by QAA, to ensure that all AVAs can meet the new requirements.

All necessary developments will have been completed, and all programmes will have been validated in line with the common specifications of the credit framework and qualification specification will be the end of the academic year 2007-08. It will not, therefore, be until 2008-09 that all Access to HE courses will be expected to be running, and all awards to be made, in keeping with these specifications.