



The feasibility of employing the accreditation of prior learning (APL) to identify distance travelled towards the achievement of full Level 1, 2 and 3 qualifications

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Executive Summary

1. The aim of this study was to examine the feasibility of using accreditation of prior learning ('APL' - used throughout the report as a mnemonic for formal recognition of prior learning and achievement) as a means of supporting progress towards achievement at Levels 1, 2 and 3. The current education reform agenda, in particular the reform of qualifications and the development and implementation of a *credit and qualifications framework* for England, Wales and Northern Ireland, provided the context for this study.¹ The study also intended to examine whether APL could be used to further the objective of finding a reliable measure of adult 'distance travelled' (DT) for [New Measures of Success](#) in England.

This was a 'high level' feasibility study, intended to identify and inform further research. We wanted to understand current APL practice and find out if there were any indications it assisted progression towards level 2 and 3 qualifications; whether there were aspects of APL practice that would be improved (or hindered) by the introduction of the Framework and whether any increase in opportunities for APL in the Framework would assist progression; and whether recent or new developments or ideas in recognising and accrediting prior learning might help to improve progression opportunities and chances for learners, especially those without level 2 qualifications. The report makes a number of recommendations for further research and recommends actions for consideration and investigation within the trials of the Framework and FLT in 2006-8.

Examination of APL practice in HE in the UK and the applicability of APL approaches (elsewhere the UK and other countries of the EU) was beyond the scope of this study, though the need to be at least cognisant of such practice is formally recommended in this report.

2. Methodology

Key issues and questions were identified through face to face, telephone and email discussion with a range of stakeholders. A briefing paper on the background and aims of the study was circulated to stakeholders. Question prompts for telephone and face to face discussions were circulated to all stakeholders, including those responsible for or actively interested in policy development in this area in England, a number of practitioners in awarding and professional bodies, as well as expert opinion in Scotland and Wales. A list of those consulted is provided at Appendix 1. Desk research and responses to questions then informed our analysis, setting out some of the implications for practitioners, LSC and other key stakeholders and identifying areas for further research and action.

¹ From this point forward we use the term [the] 'Framework' to refer to the three country *credit and qualifications framework*, and do so purely for ease of reference. The technical reference points in this report accommodate the most recent specifications circulated by QCA for the Framework for Achievement and those for the [Credit and Qualifications Framework for Wales](#). Though there are differences between these specifications, there was sufficient commonality for the purposes of this report.

3. Summary of key findings

Any one of the many issues arising from this study would be worthy of more detailed research. Even a common understanding of the terms for APL appeared to be missing. In the main, there appeared to be little evidence of APL even being attempted below level 2. At level 2 and above, providers said that whatever potential there was for APL was hampered by bureaucracy; either over-prescription of the terms and 'guidance' for APL or, when awarding bodies adopted a lighter touch, uncertainty among providers about what constituted admissible evidence for assessment. Successful APL at level 2 and above seemed to owe much to mutual trust between employers, providers, and specialist professional and awarding bodies.

The future role of sector bodies was uncertain. Though the Skills for Business Network (SfBN) clearly expects to take a much more active role in setting terms for recognising prior learning and achievement we do not yet know what this means in practice, though it may vary from sector to sector. Their active involvement may clarify and speed up APL in some sectors, or it may do the opposite. There may be attempts to further prescribe admissible evidence and assessment itself, all in the understandable interests of maintaining or improving occupational standards.

By contrast it was expected or hoped that the regulator would adopt a more neutral position. Beyond setting the rules for the Framework and overseeing (the quality of) its operation, all stakeholders believed that the regulator should not be overly involved in the detail of APL processes and procedures (any more than other aspects of Framework operation). However there was a wish among most to work to a set of 'guidelines and principles' to assure mutual trust in the way APL was being operated for the Framework and that the regulator could perhaps oversee the devising of such principles.

Who should champion the interests of learners, particularly learners at work and those without qualifications at level 2? Enshrining in policy, entitlement to recognition of achievement, will help such learners but is the system currently capable of recognising prior learning and achievement? We know little of what learners think about APL. As this was a 'high level feasibility study' we did not interview learners on the receiving end of APL. But we know from our 'First Steps' study¹¹ for LSC that learners understood and would like access to APL at the earliest stages of learning and achievement, but the process has to be a positive one and encompass a range of achievements especially at lower levels.

The report does however identify positive practice in APL and suggests using action research to test out these approaches with the Tests and Trials for the Framework in 2006-2008. Two models (for different purposes) are suggested: the 'First Steps' and the 'Fast Track' models, each quite different in purpose and targeting different learners, but both having in common the aim of making recognition of prior learning and achievement straightforward and accessible. The 'First Steps' model is particularly suggested for application in the Foundation Learning Tier and the 'Fast Track' model for fast-tracking recognition of prior learning at work, at all levels.

One consistent message from interviewees was that 'APL' systems were prone to develop almost regardless of demand – the understandable wish to recognise prior learning and achievement gradually overtaken by the demand for 'robust' assessment and the subsequent development of an (often expensive and obscure) industry to manage APL processes. Learners and employers access to and understanding of such process then requires 'expert' intermediaries to make it work, and outcomes of the whole experience are disproportionate to the effort and cost. Our recommendations are made with these observations in mind. A workable system for APL in the Framework has to be devised to deliver on the government's Skills Strategy⁵, but the emphasis in future research and implementation has to be on 'workable'.

4. Recommendations for further research and recommended actions for consideration and investigation within the trials of the Framework and FLT in 2006-8.

Further research should include:

1. A detailed examination of the current weaknesses and failures in APL systems and practice and how these should be addressed in recognising and accrediting prior learning and achievement in the Framework.
2. Examination of the feasibility of using the 'integrated' and 'fast track' and approaches to APL, cited in this report (see also Recommendation 8 below), as Adult Distance Travelled measures for New Measures of Success.
3. Further examination of the opportunities for new approaches to APL offered by the Framework and identification of any threats posed by the Framework to existing good practice in APL.
4. An assessment of the implications for providers, IAG and learning support services of the extension and/or introduction of successful or new approaches to APL.
5. Clarification of how the regulator can support the devising of principles, parameters and guidance which will simplify APL approaches, build mutual trust among practitioners and underwrite the validity of credit achievements made through APL.
6. Finding out how learners perceive APL, whether the availability of APL increases their motivation and impacts on their progression and on what terms. These questions should be addressed particularly in the context of 8 below.

Investigation and action in Framework and FLT tests and trials 2006-8 should consider:

7. Developing and testing terms and definitions for APL in the context of the Framework.

8. Exploring ways of integrating recognition of prior learning into the curriculum and active accreditation of that prior learning within a learning programme. The 'First Steps' model, 'Fast Track' and 'Profiling' approaches cited in this report should be developed and tested to recognise and accredit prior learning in the Framework.
9. Testing out the premise, that 'ubiquitous' credit and shared or common units can facilitate recognition of a wider set of (prior) achievements.
10. The Skills for Business Network, through SSDA, taking the lead on developing and testing risk assessment in relation to Exemption and APL with SSCs (and/or SSBs) and awarding bodies. For example, use risk assessment to examine (a sample of) current sector qualifications to help SSCs recommend a strategy for using Exemption in relation to existing NQF qualifications. Risk assessment of any sample should relate to the eight priority areas identified by the LSC, based on its strategic objectives and targets, which need to be covered by and explored through the [Framework trials](#).

Beyond the Framework:

11. Development of practice in APL in the Framework should be cognisant of practice and development elsewhere, and the applicability of APL approaches (in the UK and other countries of the EU) for achievements below level 2. Any investigation should aim to support the objectives of the Copenhagen declaration and focus on systems which use learning outcomes, credit and frameworks intended to articulate and recognise such achievements.

5. Definition of terms and scope for APL, Exemption and Transfer in a credit system

Terms and definitions were developed (solely) for this report as we needed a common understanding of terms used when discussing APL with key stakeholders; and we needed to be clear about how we used terms associated with APL in this report. The definitions are intended to apply to the unit based credit system proposed for the Framework. By default, defining and explaining terms for this report helped to tackle some of the questions we set out to address.

Two key definitions included in section are:

Accreditation of Prior Learning: Within a Framework of credit based units this is defined as the award of credit based on verifiable evidence of the achievement of a unit or units gained through prior learning.

Credit Exemption: is claimed for already certificated achievement. Exemption offers the opportunity for learners to have already certificated achievement which is not credit based count towards the achievement of

credit based qualifications; e.g. from qualifications that are currently in the NQF and not credit-based.

6. Recognition and accreditation of prior achievement from informal and/or experiential learning

Integrating recognition of achievement into the curriculum

There was interest among a number of stakeholders in the idea of and active accreditation of the prior learning *within* a learning programme. The way in which practitioners record what has been learned could be organised to provide *post-hoc* evidence of achievement that counts towards the award of credit in the Framework. Such an approach assumes that the learner may wish to exercise a right to recognition of [prior] achievement at a future point on their learning journey. Providers would need to be organised to identify what had been achieved from the *beginning* of the learning journey; be equipped to support the learner to provide evidence of achievement from the outset of that journey which can count towards the award of credit in the Framework.

A proactive approach to recognising and accrediting prior learning within structured learning programmes is reflected in the 'First Steps'² model described in Section 4.

The cited OCR example of 'Profiling' has potential application for recognising and accrediting prior learning at all levels, but is perhaps particularly relevant for learning in the FLT, where the process of reflecting on prior learning is in itself instrumental in building confidence and making plans for further learning.

In practical terms such approaches would benefit from a set of common or shared units below Level 2 which reflect the curriculum objectives for the FLT and require:

- the development of appropriate APL tools and materials to support learners and practitioners
- the involvement and support of the SSDA and Skills for Business Network members and the Union Academy
- the involvement of selected providers which have the current capacity to assist development and testing of APL tools
- support for the development of principles for APL practice in the Framework and approval and active support from the regulator
- the involvement of awarding and sector bodies interested in and willing to collaborate on unit development, common standards for assessment and quality assurance of processes for recognising and accrediting prior achievement from informal and/or experiential learning.

² Credit Works, *Characterising First Steps Learning*. LSC 2006

7. 'Fast Tracking' recognition and accreditation of prior learning

'Fast Track' examples cited appear to address some of the concerns raised by providers and awarding bodies over clarity and purpose in APL and APL processes. The City & Guilds example illustrates how workers in construction and allied trades with skills and knowledge gain recognition of prior and current achievement through use of a set of straightforward assessment instruments. The CACHE example leads to a similar outcome, using different types of 'fit for purpose' assessment instruments.

In all examples cited in 6 and 7 above:

- Recognition and accreditation of prior learning is integral to a learning programme and not a precursor process.

In the CACHE and City & Guilds examples:

- Evidence of prior learning is expected to be presented in a standard format, and not always on paper.
- Employers and public bodies have (at least) influenced the design of the programme and APL process and there is confidence in the comparable value of achievement with other qualifications in the field.

Progression

Integrating recognition and accreditation of prior learning and achievement into the curriculum, and the potential to 'Fast Track' the award of credit through this route provides a possible model to enhance learning achievement and support progression.

APL and New Measures of Success

Notwithstanding some of the issues identified in this study, we suggest that the proposals in this report for integrating recognition and accreditation of prior learning and achievement **into the curriculum**, and the potential to "Fast Track" the award of credit through this route could:

- Support a quantifiable measure of distance travelled for adults
- Provide a manageable and reliable system for centres and awarding bodies
- Support progression for adult learners
- Enhance and complement the RARPA process

8. Current practice in APL and Exemption (in the NQF): challenges for the Framework

Current issues in APL and Exemption practice are explored and summarised here as follows:

For LSC and QCA:

There appears to be little or no evidence that prior learning and achievement below Level 2 is recognised within national qualifications.

For learner entitlement:

If, as evidence indicates, most APL processes are 'tortuous and time-consuming' (and therefore costly) there is little chance that most current approaches to APL will deliver on any entitlement to recognition of achievement for adult learners, particularly in the FLT but also at levels 2 and 3.

For learner progression:

Provider experience and views suggests that currently there is probably little positive impact on learner progression through use of APL and Exemption.

Among providers:

- Providers reported that little APL and Exemption takes place as they are concerned that responsibility falls to them to make decisions on admissible evidence. For example, providers were often unsure where to draw the line on the currency (age) of prior certificated learning.
- There is a perception among providers that awarding bodies do not encourage APL and Exemption because they themselves are uncertain about the rigour and quality of the process.
- There is little or no training or support for APL; this lack of capacity among providers deters them from using it. Providers said they would struggle to accurately identify and make judgment of an adult's prior learning achievements and then match these to units in the Framework. This would be a 'huge task' and resources would be needed.
- The validity of evidence of prior learning was easier to assess when it was more knowledge based. The trend towards assessing the practical application of skills and knowledge, visible in more recently developed units and qualifications, makes APL and Exemption more difficult.
- Providers were concerned that promotion of the Framework may raise expectations and that without proper guidance, providers may be placed in a worse position. If there were increased demand from learners for APL and Exemption, providers would need very clear guidance on decision-making, certainly more than they say they have access to now.

For the Skills for Business Network:

- There was general uncertainty as to the role and influence of SSCs and/or SSBs in relation to Exemption and APL arrangements. Interviewees recognised that SSCs were in a position to 'make or break' APL and Exemption; would another layer of approval from Sector bodies help or hinder recognition of prior learning and achievement? How could Sector bodies be confident that the currency and content of prior learning and achievement was valid?

For the regulator:

- There was general uncertainty as to the role of the regulator in relation to APL and Exemption processes. Most stakeholders assumed that the regulator would not be involved in approving or regulating the detailed process of APL and Exemption, in line with QCA's current position on regulating awarding bodies. The counterweight to the argument for a light touch from the regulator on these issues was a concern among many stakeholders that mutual confidence in each other's systems would have to be in place for APL and Exemption to work.

For LSC:

A general view that new funding mechanisms under *agenda for change* should not obstruct or prove a disincentive to providers employing APL, particularly if it begins to be associated with measuring adult DT.

For awarding and endorsing organisations:

- Any increased potential within the Framework for Transfer may mean more interest groups with views as to the validity of assessment and quality assurance of achievement. This might complicate or bureaucratised APL processes to satisfy demands from a wider range of interest groups.
- Mutual trust between stakeholders is built up over time. Rapid expansion of APL and Exemption may be hampered by a lack of mutual trust and confidence between stakeholders in each other's systems and regimes. Exemption arrangements were often built on mutual trust over time. There was an anxiety that open access to units in the Framework may destabilise mutual trust and Exemption arrangements established between specialist awarding bodies and professional bodies.

In relation to Exemption arrangements:

In most cases (we examined), Exemption arrangements in current practice were formalised and agreed between relevant institutions and bodies. Learners 'unpredicted' requests for Exemption had to conform to these arrangements. Providers were less comfortable when they had to make a decision on Exemption, without what was described as sufficient guidance as to the admissibility of the certificated evidence offered.

8. The positive value of existing practice in APL

There was a high degree of consistency in understanding and application of the principle that evidence of prior learning must be treated as equal to any other evidence of achievement and in the context of credit, has to match the requirements set out in a specified unit.

Though most stakeholders suggested that APL had a poor track record and reputation and that this was deserved in many instances, some stakeholders believed there was substantial positive practice that should be identified and carried forward. Exemption arrangements for some NVOs and arrangements between specialised awarding bodies appeared to support progression albeit with a limited range and number of learners.

Such Exemption practices and some APL practices between awarding and professional bodies were clearly central to the successful operation and use of qualifications in these areas.

9. What could be put in place to help facilitate APL, Exemption and Credit Transfer?

The effect of credit on existing Exemption and APL practice

There was general support for what credit might bring to existing practice. Explicit learning outcomes, a consistent level of achievement within a unit and an indication of the size of the unit – the credit value – would, it was felt, help in appraising the value of prior learning, certificated or not. These basic features of credit based units could make it easier to appraise the value of achievements more objectively, allowing greater transparency when comparing units or sets of units for Exemption purposes or appraising prior uncertificated learning against the requirements of a unit.

There was a general view that the Framework could help to facilitate APL, Exemption and Credit Transfer more effectively than the system is able to at present. The fact that credit is 'ubiquitous' in the Framework should mean that achievements will become more widely transferable and therefore more attractive to learners and centres.

Common or shared units

Where units are shared or held in common between awarding bodies the scope for credit accumulation and transfer is likely to increase; rules of combination will mean 'automatic' recognition of achievements that meet the requirements of such units. The presence of such units in the Framework should increase the range of possible achievements and number of ways that prior achievements are recognised within the Framework.

The premise, that 'ubiquitous' credit and shared or common units can facilitate recognition of a wider set of (prior) achievements is significant and needs to be tested out in practice in the Framework and Foundation Learning Tier (FLT) trials between 2006-8.

Risk assessment in APL and Exemption

The terms for using or allowing APL could have an effect on the credibility of an award (and awarding or professional body) depending upon what was at risk in accepting evidence of prior learning, certificated or not.

In areas of learning judged to be of lower risk, (e.g. Management and Communication) it was said there was greater opportunity for Exemption or APL. This may suggest that such prior learning may be more transferable, as the risk associated with APL or Exemption was lower. This perhaps mirrors the way employers judge the value and transferability of management skills in recruiting and employing staff.

Improvements to delivery

- Successful and trusted APL and Exemption depends on the quality and capacity of the provider – the new centre approval process could incorporate APL and Exemption requirements. Training and support

for APL and Exemption should be put in place to enable providers to meet such requirements.

- Providers may need time to develop confidence in meeting assessment requirements in the early days of new qualifications (and units).
- Address (or at least take account of) the growing issue of plagiarism, otherwise this may impact on perceptions of the validity of APL and Exemption.
- The integrated 'Fast Track' approach (see Section 4) may prove a better offer for learners and more manageable and reliable for providers and awarding bodies.

10. Setting parameters for the APL processes and their quality assurance

There was a view that for APL, Exemption and Transfer to work there was a need for some parameters of understanding in relation to:

- Boundaries of regulation
- Scope of and limitations for Exemption
- Assessing Risk in APL
- Role of the SSDA and SfBN
- Interpretation of adult DT for 'New Measures'

The challenge for the regulator will be to find ways of removing obstacles to the recognition of prior achievement, particularly, but not exclusively, in the FLT. This may mean taking a lead on action researching approaches to APL which are currently successful and developing new approaches which will deliver on a learner's entitlement to recognition of achievement. While the Association of Colleges (AOC), awarding bodies and the Skills for Business Network (SfBN) are unlikely to welcome detailed regulation of APL practice, there was some demand for principles and parameters and guidance which will simplify APL approaches, build mutual trust among practitioners and underwrite the validity of credit achievements made through APL. Some stakeholders suggested that awarding bodies could devise such a set of principles for APL and Exemption to help build mutual trust and help assure the regulator, professional bodies, sector bodies and councils of the integrity of their practice. In practice, the regulator and SfBN would need to underwrite such principles to secure trust, validity and transferability of credit achievements made through APL.

Applying Exemption to prior achieved qualifications

Within the published specification for the Framework it appears to be possible for awarding bodies to determine within rules of combination that learners with (specified¹⁵) prior certificated learning are exempt from having to demonstrate achievement of one or more units in a qualification. This can include qualifications (or components of qualifications) achieved prior to the inception of the Framework. Eligible prior certificated achievements would be identified within the rules of combination for a qualification in the

Framework and recorded in the LAR. The Framework itself will provide information on all qualifications and units in the Framework, allowing (potentially) learners, employers and providers to identify and correlate all units to qualifications and pathways in the Framework.

Addressing risk in Exemption and APL

The challenge will lie in agreeing Exemption arrangements where there is not a 100% match between the prior certificated achievement and the unit or units in the Framework. The degree of mismatch may relate to currency, content, credit value or level of prior certificated achievement. In Section 2 stakeholders suggested that there were instances where lower levels of risk might allow greater tolerance in matching prior certificated achievements to requirements of a unit or units in the Framework.

The role of Sector Councils and/or Standard Setting Bodies in APL and Exemption

All stakeholders discussed the relationship between (the development of) NOS, SQSs, unit development and APL and Exemption. Points made included:

- NOS could be written in ways which make the matching of evidence of prior learning to competence requirements a more transparent and accessible process. Reviews of NOS might take into account how such approaches might be facilitated.
- Greater clarity of expectation in the NOS might increase confidence of providers and increase demand for APL and Exemption.
- If the unit format supplied for the Framework is used to write NOS then there is a danger of prescription in assessment which may impact on the variety of ways a learner can achieve a unit. This will affect opportunities for APL and Exemption.
- How prescriptive (or otherwise) the assessment requirements are for sector qualifications (and units) will impact on the reach and effectiveness of APL and Exemption.

All stakeholders expressed a view that systems for APL, Exemption and Transfer in the Framework needed to be as simple and straightforward as possible and that reform of the qualifications system offered an opportunity to reduce the bureaucracy associated with APL and Exemption. Any idea that APL and Exemption might be seen as a 'quick fix for meeting targets' was countered by the view that the Framework needed to establish itself first and the effectiveness of APL and Exemption significantly improve before demand was likely to increase.

Introduction

The aim of this study

To study the feasibility of using accreditation of prior learning ('APL' - used throughout the report as a mnemonic for formal recognition of prior learning and achievement) as a means of supporting progress towards achievement at Levels 1, 2 and 3. The current education reform agenda, in particular the reform of qualifications and the development and implementation of a *credit and qualifications framework* for England, Wales and Northern Ireland, provided the context for this study.³ The study also intended to examine whether APL could be used to further the objective of finding a reliable measure of adult 'distance travelled' (DT) for [New Measures of Success](#) in England.

[Implementing New Measures of Success](#)⁴, reported that

Any framework for measuring adult DT needs to be flexible enough to reflect the wide variety of prior attainment of adult learners. In 2004, the LSC undertook a feasibility study for a statistical measure of DT, which could be applied to learners over 19 years old. The findings suggested that a robust statistical model could not be developed for adult learners using data from existing sources and that an alternative approach was necessary.

We wanted to find out if there were any indications that APL practice as it stood assisted progression to level 2 and 3; whether there were aspects of APL practice that would be improved (or hindered) by the introduction of the Framework and whether any increase in opportunities for APL in the Framework would assist progression; and whether recent or new developments or ideas in recognising and accrediting prior learning might help to improve progression opportunities and chances for learners, especially those without level 2 qualifications.

The report makes a number of recommendations for further research and recommends actions for consideration and investigation within the trials of the Framework and FLT in 2006-8.

Scope

A high level qualitative study to examine the feasibility of APL to support progression at Levels 1, 2 and 3 and production of a report to assist:

- Understanding of current practice regarding APL in relation to existing qualifications
- Understanding of the implications for LSC and other key stakeholders
Identifying needs for further research and development

³ From this point forward we use the term [the] 'Framework' to refer to the three country *credit and qualifications framework*, and do so purely for ease of reference. The technical reference points in this report accommodate the most recent specifications circulated by QCA for the Framework for Achievement and those for the [Credit and Qualifications Framework for Wales](#). Though there are differences between these specifications, there was sufficient commonality for the purposes of this report.

⁴ OFSTED, ALI DFES, LSC *Implementing New Measures of Success*. LSC 2005

Policy context

The Skills Strategy adopted in 2003 focused on those people with low or no qualifications. The strategy recognised market failure at level 2 and accepted the need to invest public funding to address this by offering learners an entitlement to free education to gain a first full level 2 qualification. First full Level 2 is defined as five GCSEs grades A* to C (or equivalent). Following trials and in its update to the strategy in March 2005, government committed to providing help for adults to achieve a wider platform of skills for employability, with free tuition, through national roll out of the new Level 2 entitlement from 2006/07⁵. In addition there is a further commitment for the Train to Gain programme, which aims to help employers get training delivered in the workplace. Trials for Train to Gain will extend to cover qualifications at Level 3.

Learner entitlements to learning and qualifications were also extended with the 2006 White Paper⁶, which created a new entitlement to free training to enable young people to complete their initial education and training to Level 3 up to the age of 25 from 2007-08.

A new system of learner accounts for adults was also signalled in the 2006 White Paper. This was linked to the costs of a level 3 course on completion of a full Level 2, to be supported by IAG and/or Union Learning Representatives

New Measures of Success

The proposal to develop new measures of success for the learning and skills sector was subject to consultation in December 2003. Subsequently the LSC has been progressively rolling out the new measures, including in 2005-6;

- Qualification success rates
- Value added and distance travelled for 16-19 year olds
- RARPA.

The original consultation in 2003 had also suggested a need to explore the feasibility of developing a distance travelled measure for adults that would have credibility with sectors and users. Subsequent advice to LSC from external stakeholders suggested that this would prove impracticable without the imposition of unacceptable bureaucratic burdens. This advice however pre-dated the development and implementation of the Framework, which has opened up opportunities to develop a quantifiable and credible measure of distance travelled for adults using credit.

The proposals in this report for integrating recognition and accreditation of prior learning and achievement **into the curriculum**, and the potential to “Fast Track” the award of credit through this route could:

- Support this quantifiable measure of distance travelled for adults
- Provide a manageable and reliable system for centres and awarding bodies

⁵ DfES, *Skills: Getting on in business, getting on at work*. DfES March 2005

⁶ DfES, *Further Education: Raising Skills, Improving Life Chances*. DfES March 2006

- Support progression for adult learners
- Enhance and complement the RARPA process

RARPA is now being adopted as the underlying quality assurance process for non-accredited learning. It provides a means of validating the outcomes of programmes which do not result in qualifications or other outcomes certificated by Awarding Bodies. However a practitioner recording what has been learned using RARPA could also organise this information to provide *post-hoc* evidence of achievement that counts towards the award of credit in the Framework. This model was explored and described in the recent Credit Works report on First Steps learning¹¹ and if developed further should complement and support the integrated Fast Track approach described here.

Vocational Qualifications Reform and the emergence of the Framework for Achievement (FfA)

The commitment to reform qualifications in England through credit also came with the publication of the Skills Strategy. In 2004 work on the development of credit was brought together with the reform of vocational qualifications and in July 2004 QCA set out the aims of this programme of work in '*New Thinking For Reform*'⁷.

In November 2005 LSC, QCA and SSDA received remits from the Secretary of State for Skills to proceed with testing and trialling of the Framework from January 2006 to March 2008. The next steps of development and implementation of the Framework were confirmed as:

- Sector Qualification Reform (SQR) to reform the content of VQs⁸.
- Reform of the NQF to reform the structure of VQs (in England this structural reform will be through the Framework)
- Developing approaches to planning, funding and delivery of provision including the trialling of provision in England.
- Preparatory rationalisation of existing qualifications
- Communication and dissemination

As one of the remitted partners taking the lead on key strands of the reform programme, the LSC will be "*taking the lead on ensuring the trialling of the new system with providers across England*". The remit across the three key partners also emphasises the need for the integration of vocational qualifications reform with LSC's *agenda for change*.

The commitment to the reform of qualifications and the Framework was reaffirmed in the 2006 White paper.

Replacing the NQF with the Framework by 2010 will mean switching from a qualification-based framework to a unit-based one with credit. Qualifications will still remain an important characteristic and device within the Framework

⁷ QCA, *New Thinking for Reform*. QCA 2005

⁸ *This is a four country UK remit for reform of VQs (with certain exclusions) which impacts on and interacts with Framework development.*

but the base currency of lifelong learning under the Framework will be unit credits.

The Foundation Learning Tier

The 2006 White Paper also established the commitment to the Foundation Learning Tier to develop coherent provision below level 2. The White Paper stated:

“A key driver of the FLT will be the establishment of progression pathways: clear stepping stones to enable learners to access a first full Level 2 programme. These will be supported by accredited units and qualifications from the FfA [Framework], developed in line with a clear qualification strategy. In order to promote the understanding and recognition of those programmes which provide progression to Level 2 we have asked the QCA and the LSC to consider what mechanisms can be applied to ensure that Progression Pathways within the FLT can be validated appropriately. We will trial these pathways in 2006/07 and expect to have identified and implemented a full set of progression pathways across the FLT by 2010.”

The FLT aims to include the establishment of an inclusive curriculum offer at Entry and Level 1 for learners of all ages from 14 years upwards. It will be supported by units and qualifications at Entry Level and Level 1 in the Framework. The FLT and the Framework will therefore play a major role in the strategy to progress more adults to achievement of level 2.

Recognising and Accrediting Prior Learning and Achievement in the Framework

There is also a commitment to ensuring that the Framework includes a wider range of learner achievements than the current NQF. It is acknowledged that much learning and achievement is not currently accredited within the NQF. This includes learning achievements gained in colleges, the community and the workplace, some of which already receive external certification.

The introduction of the Framework will provide opportunities for the LSC to develop provision better suited to delivering its targets and priorities. Qualifications based on units and credits will potentially impact on:

- How the level 2 and 3 targets are expressed
- How achievement of full Level 2 and 3 is defined, including details of what counts towards achievement of full Level 2 and 3 in terms of credits and units
- How arrangements for APL and opportunities for CATs within the Framework will impact on the Level 2 and 3 targets
- Quantifiable measures of progress towards full Level 2 and 3 achievement.

Ultimately with improved planning and focus on provision to support targets, improved qualifications and curriculum to support progression, and more sophisticated and flexible measures of achievement using credit and tools for recognising and accrediting prior learning and achievement, it should be possible for more people to successfully build achievements

towards “a wider platform of skills for employability” and full qualification at Level 2 and beyond.

Methodology

The aims and research questions have been explored with key stakeholders with experience and expertise in this area. The report does not include detailed guidance on APL processes or arrangements, or on what can count towards full qualification in the new Framework.

Key issues and questions were identified through face to face, telephone and email discussion with a range of stakeholders. A briefing paper on the background and aims of the study was circulated to stakeholders.

Question prompts for telephone and face to face discussions were circulated to all stakeholders, including those responsible for or actively interested in policy development in this area in England, a number of practitioners in awarding and professional bodies, as well as expert opinion in Scotland and Wales. A list of those consulted is provided at Appendix 1. desk research and. As this was a high level feasibility study we agreed not to attribute stakeholder views or quote stakeholder responses directly. We have however listed all those consulted in Appendix 1.

Key research questions

The following questions were used to frame discussion with stakeholders:

- What is the relationship between APL and credit, credit accumulation and credit transfer?
- How can APL work in a credit accumulation and transfer (CATs) system?
- How can learners’ prior experience and learning achievements be supported by APL and CATs?
- How can APL be applied to prior qualifications?
- How/would these applications of APL support CATs and progression to full qualification, especially at levels 1, 2 and 3?
- What are the differences, contributions and implications of different practices and arrangements? E.g. accreditation, assessment, Exemption.
- How/Can APL be introduced without creating an unacceptable bureaucratic burden?
- What are the implications for LSC in terms of defining and expressing full qualification level 1, 2 and 3?
- What are the broad implications for providers?
- What are the implications and issues for other key stakeholders, including awarding bodies?
- What are the key communication issues in arrangements for APL, including for example the impact on currency of “old” qualifications in relation to credit based qualifications?

Desk research and responses to these questions then informed our analysis, setting out some of the implications for practitioners, LSC and other key stakeholders and identifying areas for action and further research. This analysis is set out in the following sections:

1. Definition of terms and scope for APL, Exemption and Transfer in a credit system
2. Current practice in APL and Exemption (in the NQF): challenges for the Framework
3. What needs to be put in place to facilitate APL, Exemption and Credit Transfer?
4. Recognition and accreditation of prior achievement from informal and or experiential learning
5. Recommendations for further research and recommended actions for consideration and investigation within the trials of the Framework and FLT in 2006-8.

Section 1. Definition of terms and scope for APL, Exemption and Transfer in a credit system

Our interest in this report is in exploration of the relationship between APL and credit in the Framework. The report is not a discussion of APL and related systems and practice in general. There is a wide range of APL practice in Higher Education and systems for Validating Prior Learning are in extensive use in countries of the EU and elsewhere. These are not the subject of this study, though our recommendations identify a need for further research in this area to inform approaches to APL in the Framework. We have made reference to the Lisbon Declaration¹⁷ and aspects of guidance developed for the SCQF in Sections 1 and 4, as these were helpful for our objectives in this report. Development of practice in APL in the Framework should we suggest be cognisant of practice and development elsewhere, particularly in the EU.

There are a wide variety of terms used in discussing and/or operating systems for recognising and accrediting prior learning and achievement within and outside UK countries. In 2005 Credit Works supplied terms and brief explanations on the relationship between APL and credit for the analysis of awarding body practice in Wales⁹, where continuing work in the area of APL, Exemption and Mutual Recognition will hopefully help to inform developments in England.

Terms and explanations were included in the analysis for the benefit of awarding bodies, who had asked for discussion and clarification of the relationship between APL and credit. For this report we have extended and developed those original definitions for two purposes:

- We needed a common understanding of terms used when discussing APL with key stakeholders
- We needed to be clear about how we used terms associated with APL in this report

By default, defining and explaining terms for this report helped to tackle some of the questions we set out to address. In reporting stakeholder views we have used the definitions that follow, even where the stakeholder used different terms to mean the same thing or the same terms to mean something different. This was done to bring simplicity and clarity and to help the reader understand the report.

We discussed these definitions of terms and principles with each stakeholder in this study. Though not all stakeholders used the terms set out below in the same way, none expressed any difficulty in understanding the definitions we used. There *was* agreement that it will be important to agree terms for APL in the context of the Framework.

⁹ Credit Works & Federation of Awarding Bodies. *Learning from experience - implementing credit: A Comparative Analysis of Awarding Body Credit Practice within the Credit and Qualification Framework for Wales*. CQFW 2006

In this report:

To accredit: means to give official recognition [to learning achievement] or to certify as meeting required standards. In the context of a credit system this means the award of credit.

Prior Learning: might be recognised but not accredited. For example, in the [RARPA](#) staged process, prior learning might be acknowledged but not formally certificated as being achieved by an awarding body. Similarly, SCQF guidelines on Recognising Prior Learning (RPL)¹⁰ make a distinction between 'formative' recognition and 'summative' assessment of prior learning. The latter is a process of producing evidence which can count towards general credit in the SCQF or towards a programme of learning credit-rated for the SCQF. Recognising 'formative' prior learning is part of a reflective learning process where prior achievements are identified and valued and used to inform plans for future learning. This process may or may not lead to summative assessment and accreditation of prior learning.

An approach to recognising and accrediting First Steps learning is discussed in a separate report for LSC¹¹. In this report we have described that model (Section 4) and suggested that it has wider application for recognising and accrediting prior learning. We found that there were few approaches to recognising and formally accrediting prior experiential or informal learning at lower levels, though there was understanding and support for this among stakeholders who were able to see how credit might facilitate such practice.

Accreditation of Prior Learning: Within a credit system this is defined as the award of credit based on verifiable evidence of the achievement of a unit or units gained through prior learning. As in any award of credit, the award is made for the achievement of a unit with designated outcomes at a particular level. APL is not offered for already certificated learning achievements as this would lead to the same achievements being accredited more than once. (see *Exemption* below). Certificates of Attendance do not constitute certified achievement.

Producing Evidence of prior learning for assessment and accreditation: The nature of evidence of prior learning (and any assessment of that evidence) would need to:

- match the requirements of a specified unit in the Framework set out in its learning outcomes and assessment criteria and reflect the level and credit value of that unit
- match any assessment specifications or strategies set by the awarding body and/or a Sector Skills Council (SSC) and/or Standard Setting Body (SSB) or professional body

¹⁰ Whittaker R., *Guidelines for the Recognition of Prior Informal Learning (RPL)*. Scottish Credit and Qualifications Framework 2005

¹¹ Credit Works, *Characterising First Steps Learning*. LSC 2006

The more flexibility that exists in such assessment arrangements or requirements, the greater the potential opportunities for APL. Given that units identify learning achievements rather than the contexts or methods of learning then the nature of the prior learning (e.g. whether formally taught, experiential or work based) should be immaterial. It is possible however that other requirements linked to the units result in the evidence being insufficient to lead to the award of credit. In this instance assessment of prior learning may be required. Assessment of prior learning may be necessary where a particular assessment method or evidence is specified, or where the evidence is out of date, unreliable, or just not available; for example where prior learning was experiential, or occurred a long time ago or was very informal. In such cases formal assessment will be needed in order to supply evidence of unit achievement. However in the overall context of a credit system, where credit is awarded for verified achievement, it is not essential to distinguish between APL and APEL, or any other forms or descriptions of prior uncertificated learning.

Credit Exemption: is claimed for already certificated achievement. Exemption offers the opportunity for learners to have already certificated achievement which is not credit based count towards the achievement of credit based qualifications; e.g. from qualifications that are currently in the NQF and not credit-based. Exemption will in due course, apply to certificated unit achievement within the Framework where this is allowed and specified in the *rules of combination* for the qualification.

The more flexible the rules of combination are in allowing Exemptions (within and across awarding bodies) then the greater the opportunities for all achievements to count (and hence to support progression) towards whole qualifications.

Credit Accumulation: All units achieved in the Framework will count toward at least one qualification. Therefore learners will be able to accumulate credit with this understanding and this should (with appropriate IAG) inform the way they plan their own progression pathways to qualifications.

If units count toward more than one qualification in the Framework their achievement will increase the number of pathways open to learners. This is likely to be facilitated through the use of the Learner Achievement Record (LAR) (see Section 3) which will allow learners to check their credit achievements and consider options for progression.

In this stage of Framework development, credit accumulation in the Framework is not (as it can be in Higher education in England and elsewhere) a process of collecting 'credit points' towards a credit target or a means of gaining APL or claiming Exemption from all or part of a learning programme. In the Framework credit is only awarded for the achievement of specified units. It is important to understand this distinction. In the future it *may be* that a value is attached to a volume of credit accumulated at a particular level, perhaps as an indicator of a volume of study needed for entry to a course of study (as in Access to HE courses) or to employment. Volume of credit achieved could be used in much the same way that five GCSE passes at grades A-C are currently; as a measure of individual

attainment, as a measure of attainment of a target or 'threshold' of achievement identified for a cohort of learners, as well as contributing to measurement of the performance of the supporting learning institution. Accumulated credit achievements could be used to measure quantifiably the 'distance travelled' from the individual's starting point to 'completion' of their (funded) learning journey. Credit can be used in such a way – to indicate that public funds are being spent appropriately and that institutions are improving their performance. However, possession of a volume of credit is meaningless unless it has a personal value and is transferable; counting towards different achievement sets and progression pathways.

The potential for Credit accumulation to be used to mark 'milestones' of achievement in Continuing Professional and Vocational Development for those developing their skills and knowledge in their job or profession over time featured in interviews with employers and Sector Skills Councils in recent research.^{12 13} SEMTA (Wales) identified that

*'The added value of credit lies in its currency – operatives who arrive with accredited skills will save a company money and time in training.'*¹²

Credit accumulation can save employers time and money, improve effectiveness in recruitment and selection and provide incentives for individuals to learn and gain credit for their achievements.

*Employers in retail want unit-based qualifications with credit accumulation that can be exchanged in for qualifications generally without time limits. SKILLSMART SSC'*¹³

The concept of what constitutes a 'qualification' will perhaps evolve as understanding of the potential of the Framework matures. For example, once an individual has achieved competence (recognised in the form of a qualification) and goes on learning in that profession, how should their accumulated achievements be recognised?

*'I think though we will need awards to show how many credits people have got – you know maybe a 'gold award' for 50 credits for example. (SEMTA SSC - Wales)'*¹²

Credit Accumulation, APL and Exemption (as defined) do therefore offer additional ways of achieving units in the Framework and accumulating credit towards qualifications. However there is a need to consider how achievement of a (coherent) volume of credit achievements is marked as a 'milestone' of achievement, for an individual, an employer or a learning institution, particularly for achievements made over time.

¹² Credit Works for the Federation of Awarding Bodies, [Learning from Experience – A Comparative Analysis of Awarding Body Credit Practice within the CQFW](#). ELWA 2005.

¹³ Credit Works, [Key Issues in Including Employer-Led Provision Currently Outside the NQF Within the Framework for Achievement](#). QCA 2005

Credit Transfer: allows learners to transfer credits achieved for one qualification towards the achievement of a different qualification. The more flexible the rules of combination for achievement of a qualification the greater the opportunities for credit transfer to support whole qualification achievement.

Taken together APL, Exemption, and Credit Transfer are all devices which can support greater recognition of achievement, progression and accumulation of achievements towards whole qualifications. The rules of combination and other requirements specified (such as assessment) will determine how usable these devices are to individual learners. If arrangements for APL are established within the overall system of credit then the facility to claim credit on this basis can and should be part of the offer made to learners. If Exemption and Credit Transfer are enabled and supported across, as well as within awarding bodies then opportunities for people to build achievements towards qualifications from different learning episodes in different contexts can be greatly enhanced. There are issues in current APL and Exemption practice for providers (Sections 2 and 3) and these would have to be addressed for APL and Exemption to operate successfully in the Framework.

All stakeholders agreed that the introduction of credit should simplify and make transparent what the learner has to produce and have assessed to show that they have achieved a unit in the Framework. There was agreement that credit should facilitate and not hinder both recognition and accreditation of prior learning.

Rules of Combination: The current *Working Specification for Framework Tests and Trials*¹⁴ specifies that:

“Each qualification must have a set of rules of combination that specifies the credits need to be achieved through particular units for the qualification to be awarded...”

“...Rules of combination for qualifications will be specified by awarding bodies in consultation with other organisations, and must be consistent, where appropriate with relevant sector-strategic or other planning provision requirements. The rules will state:

- *the title of the qualification*
- *total credit value of the qualification*
- *minimum number of credits that must be achieved at each level*
- *any mandatory units*
- *any optional units*
- *minimum number of credits that must be achieved through mandatory and optional units at each level*
- *required and excluded combinations of optional units*
- *whether credits from ‘other’ units count towards the achievement of the qualification*
- *whether [there are] credits from other qualifications and awarding bodies that can be transferred towards the qualification*

¹⁴ QCA. *Working specification for framework tests and trials* Version 1 April 2006. QCA 2006

The feasibility of employing the accreditation of prior learning (APL) to identify distance travelled towards the achievement of full Level 1, 2 and 3 qualifications

- *any time limits on credit accumulation exemption arrangements.* "

While there may be differing views as to which agency should take the lead on or be responsible for defining rules of combination, the underlying principle is that credit based units can be combined and accumulated towards particular targets. These targets may include achievement of whole qualifications, each of which will specify the rules of combination for achieving and combining credit to achieve that qualification.

Section 2. Current practice in APL and Exemption (in the NQF): challenges for the Framework

When stakeholders described how they currently used or viewed APL there was a high degree of consistency in understanding and application of the principle that evidence of prior learning must be treated as equal to any other evidence of achievement and in the context of credit has to match the requirements set out in a specified unit.

In most cases (we examined), Exemption arrangements in current practice were formalised and agreed between relevant institutions and bodies. Learners 'unpredicted' requests for Exemption had to conform to these arrangements. Providers were less comfortable when they had to make a decision on Exemption, without what was described as sufficient guidance as to the admissibility of the certificated evidence offered.

Stakeholders also described (throughout our discussions with them) constraints on practice in APL and Exemption. These constraints were extensively discussed and of significant interest to the awarding bodies in the study. They are examined in context of the discussion in Sections 2 and 3. Some constraints constituted obstacles to APL and Exemption working effectively now and in the future and could be removed or addressed. In some cases constraints were justifiable – where assessment of current learning was essential to guarantee safety, for example.

The following points summarise the outcomes of discussions with stakeholders.

Current issues in APL and Exemption for providers

- Providers reported that little APL and Exemption takes place as they are concerned that responsibility falls to them to make decisions on admissible evidence for APL and Exemption. For example, providers were often unsure where to draw the line on the currency (age) of prior certificated learning.
- There is a perception among providers that awarding bodies do not encourage APL and Exemption because they themselves are uncertain about the rigour and quality of the process.
- There is little or no training or support for APL; this lack of capacity among providers deters them from using it.
- The validity of prior learning was easier to assess when it was more knowledge based. The trend towards assessing the practical application of skills and knowledge in more recent units and qualifications makes APL and Exemption more difficult.
- The feasibility of recognising and accrediting prior learning and a achievement as a means of measuring distance travelled for 'New

Measures' will be impeded unless these and other identified issues are resolved.

Exemption

Exemption arrangements are commonly used to recognise achievement in many NVQs and in Key Skills. There is provision for a candidate holding a GCE (A Level) unit (who for example, moves home during a programme of study) to gain Exemption for that unit in an equivalent GCE offered by another awarding body, though this practice is infrequent. In most examples of Exemption, candidates presented a 'carbon copy' unit/qualification certificate and were exempted from having to achieve that unit in a different (NVQ or Key Skills) qualification.

In some instances, assessors also examined the viability of recognising certificated achievement from different sector qualifications, working with the learner to 'appraise' the value of such certificated achievements to ascertain if they met Exemption requirements.

Professional bodies and Exemption arrangements for prior learning

Stakeholders described how holders of certain awarding body qualifications were by arrangement 'exempted' from full requirements for specified professional body membership. Many of these arrangements between awarding and professional bodies (where qualifications were approved as fulfilling some of the requirements for membership by the professional body), had developed as a result of the emergence of specialised awarding bodies following the establishment of QCA and the NQF in 1997. The route to full membership was often a combination of awarding body qualification, 'time served' in a profession or occupation and achievement of professional body examinations.

The value of existing practice in APL

The cost and ineffectiveness of APL was cited as the reason why many learners with uncertificated prior learning undertook a learning programme instead of seeking APL. The experience of 'learning on your own' with little peer support and only an assessor to guide the learner through the APL process was difficult, time consuming for providers and not always a positive learning experience for the individual. This was the case even if (or perhaps because) the awarding body was quite flexible about the type of evidence they were prepared to accept. Appraising the value of evidence of prior learning 'similar' to stated requirements was described as possible for an experienced practitioner but 'fairly tortuous' and 'tedious', and that it was easier to build evidence from current learning.

Recent parallel research² recommends that learner entitlements to personalised learning, recognition of achievement, progression and a coherent curriculum should be adopted for First Steps learning, particularly within the FLT. The report suggests that providers will need to be organised to deliver on these entitlements – and this logically includes recognition of prior learning certificated or not.

Though most stakeholders suggested that APL had a poor track record and reputation and that this was deserved in many instances, some

stakeholders believed there was substantial positive practice that should be identified and carried forward.

Some APL practice with NVQs and some Exemption practices between awarding and professional bodies were clearly central to the successful operation and use of qualifications in these areas. Three awarding bodies in the Insurance, Marketing and Finance industries all reported successful operation of what amounted to Exemption arrangements which were clearly very important to relationships with employers in their sectors. In each case, there was an interest in how the Framework offered an opportunity to take a fresh look at their APL and Exemption practice.

We also suggest it would be useful to assess the impact of the Framework on examples of 'fast-track' awards that currently used Exemption and/or APL successfully and effectively. Two examples are cited in Section 4. Each offer quite different approaches and routes to qualification for experienced workers in each field.

This report suggests that such successful existing practice ought to be examined for applicability to other learners and contexts. A new approach to recognising prior achievement in First Steps learning is also referenced. In order to deliver on learner entitlement to recognition of achievement in the FLT, the models proposed need to be tested to find out if they are workable and cost-effective.

'Risk' in APL and Exemption

It was said that the terms for using or allowing APL could have an effect on the credibility of an award (and awarding or professional body) depending upon what was at risk in accepting evidence of prior learning certificated or not.

The theme of 'assessing risks' in accepting evidence of prior learning was a focus of many of the discussions with stakeholders. Deciding on what constituted acceptable evidence of prior learning and/or achievement was described as a 'risk assessment process' by many stakeholders.

Most stakeholders said units with technical and operational content carried a higher level of risk if APL or Exemption were allowed. The following examples were all cited as increasing risk for the awarding or professional body, sector or provider. The relative significance of:

- Recognition of technical competence
- Health and safety
- Currency – the current validity of achievements due to the passage of time, changing national standards or a combination of both)
- Licence to practise requirements

In such instances the tendency was to ask for a '100% match' of evidence of prior achievement, and other additional conditions often had to be met to satisfy Exemption purposes. The same principle applied to evidence of uncertificated learning submitted for APL.

However in areas of learning judged to be of lower risk, it was said there was greater opportunity for Exemption or APL. In one NVQ example, mandatory units in Management and Communication were judged to carry lower risk, as there was less need to precisely match unit content and prior certificated learning for Exemption purposes, as long as there was comparability of value of the achievement. This meant that in theory, prior learning in Management and Communication had greater potential for APL or Exemption. This may suggest that such prior learning may be more transferable, as the risk associated with APL or Exemption was lower. This perhaps mirrors the way employers judge the value and transferability of management skills in recruiting and employing staff.

Though almost all discussion with stakeholders related to vocational learning and or Foundation Learning, the concept of varying degrees of risk in APL and Exemption practice appeared to apply to all qualifications. An observation was made of GCE units in English Literature, where though the texts studied might be different across awarding bodies, skills and knowledge in developing a structured argument or accurate spelling would be comparable.

Progression and Current practice in APL and Exemption

Provider experience and views suggests there is probably little positive impact on learner progression through use of APL and Exemption. Exemption arrangements for some NVQs and arrangements between specialised awarding bodies appear to support progression albeit with a limited range and number of learners.

Section 3. What needs to be put in place to facilitate APL, Exemption and Credit Transfer?

The effect of credit on existing Exemption and APL practice

There was general support for what credit might bring to existing practice. Explicit learning outcomes, a consistent level of achievement within a unit and an indication of the size of the unit – the credit value – would, it was felt, help in appraising the value of prior learning, certificated or not. These basic features of credit based units could make it easier to appraise the value of achievements objectively, allowing greater transparency when comparing units or sets of units for Exemption purposes or appraising prior uncertificated learning against the requirements of a unit.

There was a general view that the Framework could help to facilitate APL, Exemption and Credit Transfer more effectively than the system is able to at present. The fact that credit is 'ubiquitous' in the Framework should mean that achievements will become more widely transferable and therefore more attractive to learners and centres.

One stakeholder suggested that the need for an intermediary (for example, an NVQ assessor) to make judgements would be reduced or could be removed if Exemption was agreed between the relevant interest groups and that the introduction of credit could make APL and Exemption quicker, cheaper, less subjective and more efficient.

Credit could enhance the accessibility and effectiveness of APL by:

- recognising small steps of achievement
- recognising individual patterns of achievement
- allowing qualified people in work to accumulate credit towards higher levels of occupational competence
- recognising skills and knowledge developed at work that meet new or revised licence to practise requirements

The removal of the distinctions between qualification types in the Framework should help to facilitate Transfer.

Many observed that learners at present follow qualifications. There is little evidence among awarding bodies of learners 'collecting units' from qualifications in the NQF. Will people be more inclined to collect and transfer their achievements with the introduction of credit? If so, this may impact on demand for APL and Exemption.

Caution was expressed as follows:

- General uncertainty as to the role and influence of SSCs and/or SSBs in relation to Exemption and APL arrangements
- Uncertainty as to the role of the regulator in relation to APL and Exemption processes

- Increased potential within the Framework for Transfer, which would mean more interest groups with views as to the validity of assessment and quality assurance of achievement. This might complicate or bureaucratised APL processes to satisfy demands from a wider range of interest groups.
- Mutual trust between stakeholders is built up over time. Rapid expansion of APL and Exemption may be hampered by a lack of mutual trust and confidence between stakeholders in each other's systems and regimes. Exemption arrangements were often built on mutual trust over time. There was an anxiety that open access to units in the Framework may destabilise mutual trust and Exemption arrangements established between specialist awarding bodies and professional bodies.
- Providers were concerned that promotion of the Framework may raise expectations and that without proper guidance, providers may be placed in a worse position. If there were increased demand from learners for APL and Exemption, providers would need very clear guidance on decision-making, certainly more than they say they have access to now.

Providers suggested that:

- Successful and trusted APL and Exemption depends on the quality and capacity of the provider – the new Centre Approval process could incorporate APL and Exemption requirements. Training and support for APL and Exemption should be put in place to enable providers to meet such requirements.
- Will providers be able to accurately identify and make judgment of adults' prior learning achievements and then match these to units in the Framework? This would be a 'huge task', which would be difficult to manage and resources would be needed.
- Providers need time to develop confidence in meeting assessment requirements in the early days of new qualifications.
- Growing issues relating to plagiarism may impact on perceptions of APL and Exemption.
- Government needs to concentrate on securing confidence in and safeguarding the reputation of the Framework in the early stages of its development. Higher Education and employer confidence and acceptance of APL and Exemption achievements may impact on perceptions of the Framework.
- The 'Fast Track' approach, where the recognition and accreditation of prior learning are integrated into a learning programme (see Section 4) may prove a better offer for learners and more manageable and reliable for providers and awarding bodies.

All stakeholders expressed a view that systems for APL, Exemption and Transfer in the Framework needed to be as simple and straightforward as possible and that reform of the qualifications system offered an opportunity to reduce the bureaucracy associated with APL and Exemption. Any idea that APL and Exemption might be seen as a 'quick fix for meeting targets' was countered by the view that the Framework needed to establish itself first and the effectiveness of APL and Exemption significantly improve before demand was likely to increase.

The role of the regulator

The regulator's current interest appears to focus on recording and holding information concerning outcomes and achievement. QCA is working on linking APL to the prototype LAR which will include and accommodate:

- Rules of Combination
- Credit Transfer
- Exemption

There was general uncertainty as to the role of the regulator in relation to APL and Exemption processes. Most stakeholders assumed that the regulator would not be involved in approving or regulating the detailed process of APL and Exemption, in line with QCA's current position on regulating awarding bodies. The counterweight to the argument for a light touch from the regulator on these issues was a concern among many stakeholders that mutual confidence in each other's systems would have to be in place for APL and Exemption to work. The challenge for the regulator will be to find ways of removing obstacles to the recognition of prior achievement, particularly, but not exclusively, in the FLT. This may mean taking a lead on action researching approaches to APL which are currently successful and developing new approaches which will deliver on a learner's entitlement to recognition of achievement. While the AOC, awarding bodies and the Skills for Business Network are unlikely to welcome detailed regulation of APL practice, there is a demand from most quarters for principles and parameters and guidance which will simplify APL approaches, build mutual trust among practitioners and underwrite the validity of credit achievements made through APL.

Setting parameters for APL processes and their quality assurance

There was a view that for APL, Exemption and Transfer to work there was a need for some parameters of understanding in relation to:

- Awarding body processes
- Provider processes
- Quality assurance
- Boundaries of regulation
- Interpretation of adult DT for 'New Measures'

Trust between stakeholders was needed to ensure that credits awarded through APL have equal status to those achieved through other means. There was no enthusiasm for close regulation but it was clear that for APL and Exemption to work, stakeholders would need to trust the integrity of each other's approaches to Exemption and recognising and accrediting prior

learning. The regulator needed to be assured that such processes were consistent with an awarding body's practice and operation of assessment and quality assurance at all levels.

Some stakeholders suggested that awarding bodies could devise (or adopt) a set of principles for APL and Exemption to help build mutual trust and help assure the regulator, professional bodies, sector bodies and councils of the integrity of their practice.

How can Exemption be applied to prior achieved qualifications?

Within the published working specification for the Framework it will be possible for awarding bodies to determine within rules of combination that learners with (specified¹⁵) prior certificated learning are exempt from having to demonstrate achievement of one or more units in a qualification. This can include qualifications (or components of qualifications) achieved prior to the inception of the Framework. Eligible prior certificated achievements would be identified within the rules of combination for a qualification in the Framework and recorded in the LAR.

As long as prior achievements have 'equivalent value and status' there is the possibility of Exemption. There appears, from the current specification for the Framework¹⁴ to be few technical barriers to Exemption. In fact it is an aim of the Framework to encourage it. However how to calculate the level of risk in adopting such an approach exercised all stakeholders who would be directly engaged in managing Exemption arrangements.

Addressing risk in Exemption and APL

The challenge will lie in agreeing Exemption arrangements where there is not a 100% match between the prior certificated achievement and the unit or units in the Framework. The degree of mismatch may relate to currency, content, credit value or level of prior certificated achievement. In Section 2 stakeholders suggested that there were instances where lower levels of risk might allow greater tolerance in matching prior certificated achievements to requirements of a unit or units in the Framework. For example, there would be instances where:

- a 70-80% match¹⁶ of prior certificated achievement to a unit or units in the Framework would be sufficient to allow Exemption
- a 70-80% match of prior uncertificated learning to a unit or units in the Framework would be sufficient for APL

Such an approach might reduce the number of units in the Framework by allowing some variety in prior learning achievements recognised for Exemption or APL. However there may be implications for Transfer of such achievements unless they are universally recognised as equal in value to other exempted achievements where there *is* a 100% match.

¹⁵ How and by whom such achievements are 'specified' is more contentious – though not an issue specific to recognising prior learning and achievement.

¹⁶ [Examined in] Credit Works. *Report Identifying The Key Issues In Including Employer-Led Provision Currently Outside The NQF Within The Framework For Achievement*. QCA 2005.

Awarding bodies, SSCs and/or SSBs should be encouraged to develop and test risk assessment in relation to Exemption and APL. One idea discussed was to use a risk assessment approach to examine (a sample of) current sector qualifications to help SSCs recommend a strategy for using Exemption in relation to existing NQF qualifications. Confidence in such processes may then develop over time through practice.

Common or shared units

Where units are shared or held in common between awarding bodies the scope for credit accumulation and transfer is likely to increase; rules of combination will mean 'automatic' recognition of achievements that meet the requirements of such units. The presence of such units in the Framework should increase the range of achievements and number of ways that prior achievements are recognised within the Framework.

This approach has for example, been adopted by Skillsmart SSC for the retail sector. Lifelong Learning UK Sector Skills Council is devising a 'threshold' APL qualification for experienced workers in the learning and skills sector. The qualification could be offered by a number of awarding bodies.

The premise, that 'ubiquitous' credit and shared or common units can facilitate recognition of a wider set of (prior) achievements is significant and needs to be tested out in practice in the Framework and FLT trials between 2006-8

The role of Sector Councils and/or Standard Setting Bodies in APL and Exemption

All stakeholders discussed the relationship between (the development of) NOS, SQSs, unit development and APL and Exemption. Points made included:

- NOS could be written in ways which make the matching of evidence of prior learning to competence requirements a more transparent and accessible process. Reviews of NOS might take into account how such approaches might be facilitated. By the time a learner pursued a qualification at Level 3 they were accustomed to interpreting NOS and evidence requirements for an NVQ. At lower levels learners had not developed that experience and relied upon assessors for interpretation. The process can be solely assessor driven and rely on assessor interpretation of the evidence requirements.
- Greater clarity of expectation in the NOS might increase confidence of providers and increase demand for APL and Exemption.
- If the unit format supplied for the Framework is used to write NOS then there is a danger of prescription in assessment which may impact on the variety of ways a learner can achieve a unit. This will affect opportunities for APL and Exemption.

The feasibility of employing the accreditation of prior learning (APL) to identify distance travelled towards the achievement of full Level 1, 2 and 3 qualifications

- How prescriptive (or otherwise) the assessment requirements are for sector qualifications (and units) will impact on the reach and effectiveness of APL and Exemption.

Progression

Each of the factors described in this section have a potential positive or negative impact on learner achievement and progression. The credibility and use of APL and exemption are affected by particular factors:

- Provider confidence and capacity to deliver APL and Exemption
- The need for improved clarity and understanding of the relative risks involved in applying APL and Exemption to different achievement sets
- The need for clarification of roles of key stakeholders in supporting and understanding the validity of achievements gained through APL and Exemption

Section 4. Recognition and accreditation of prior achievement from informal and/or experiential learning

"Informal learning is a natural accompaniment to everyday life. Unlike formal and non-formal learning, informal learning is not necessarily intentional learning, and so may well not be recognised even by individuals themselves as contributing to their knowledge and skills..."

... informal learning is likely to be missed out of the picture altogether, although it is the oldest form of learning and remains the mainstay of early childhood learning. The fact that microcomputer technology has established itself in homes before it has done so in schools underlines the importance of informal learning. Informal contexts provide an enormous learning reservoir and could be an important source of innovation for teaching and learning methods."¹⁷

Most discussion with stakeholders for this study concentrated on Exemption. Accrediting prior uncertificated learning was (as reported in Section 2) regarded as a difficult and time consuming process fraught with issues for providers, such as the admissibility of evidence for APL and for awarding bodies, how to avoid over-bureaucratising a process and service for which there appears to be limited demand.

There was however interest among a number of stakeholders in the idea of integration of recognition of achievement into the curriculum and active accreditation of that prior learning within a learning programme.

SCQF guidelines make a helpful distinction between recognising and accrediting prior learning (RPL and APL) (See Section 1). Though the guidelines relate to accreditation of achievement within the SCQF, many of the principles described in the document have application for RPL and APL in the Framework for Achievement.

In *Characterising First Steps Learning*¹⁷ it was clear that in many cases, recognition of achievement was unimportant (or off-putting) for learners at first but was wanted some time later.

" "Had it been available on the first day, the first course ... that would have put me off! ¾ of the way through though - would give people so much of a confidence boost. To have that. To put it on your CV. What can I put down? especially living at home with the kids." Seacroft Sure Start

"Didn't matter initially but it has become important as I want to teach."
Blackburn with Darwen Borough Council¹⁷"

The report suggested that,

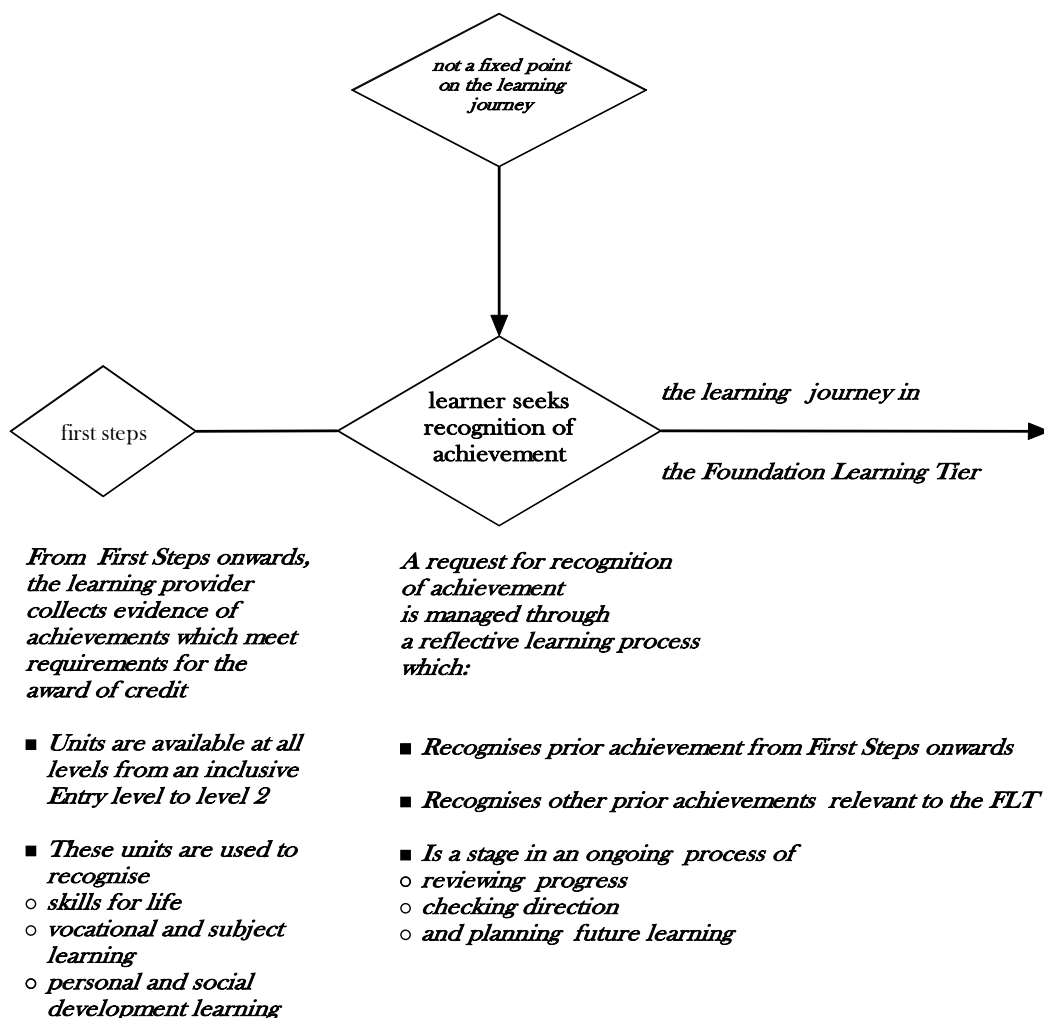
¹⁷ Commission of European Communities, 2000, *Memorandum of Lifelong Learning*, Commission Staff Working Paper, Brussels

"The challenge to learning providers will be to:

- *take an approach to First Steps learning which assumes that the learner may wish to exercise a right to recognition of achievement at a future point*
- *be organised to identify what they learned from the beginning of their engagement in First Steps*
- *support the learner to provide evidence of achievement which counts towards the award of credit in the FfA [Framework]."*¹¹

The report suggested that the way in which practitioners record what has been learned could be organised to provide *post-hoc* evidence of achievement that counts towards the award of credit in the Framework.

***Entitlement to Recognition of Achievement
from First Steps Learning onwards in the Foundation Learning Tier***



This model has potentially wider application for recognising and accrediting prior achievement in the Framework. The prior learning in this First Steps example is likely to be relatively recent, where the learner has enrolled on a

programme in the FLT funded by the LSC. Much informal learning will of course take place outside structured programmes and we would suggest that such prior learning could be recognised using this model. The integration of recognition of prior learning into the curriculum is an essential feature of this model, where the benefits of working with others to reflect on, value and describe prior learning is seen as an integral part of a structured learning programme. Evidence of achievement is then identified which meets learning outcomes within a unit and importantly, identifies further learning needs. The report also shows how such an approach can be used to enhance the RARPA staged process.

This approach had some parallels with a process described by one stakeholder, of appraising a candidate's prior learning for Exemption or APL in relation to units or elements of an NVQ. Appraisal may produce evidence of prior certificated achievement which meets Exemption requirements all or in part, and/or produce evidence of previously uncertificated prior learning which might be formally assessed and certificated. In one instance recognition and accreditation was given for some learning achievements and (guided by a practitioner/assessor) an action plan devised to organise a learning programme to enable achievement of the remaining units needed to gain a qualification. This process was used to shorten the time it took to achieve competence.

Proactive approaches to recognising and accrediting prior learning within structured learning programmes were perhaps closer to the model described for 'First Steps'. We found parallels with the First Steps model in existing successful approaches to recognising and accrediting prior learning, in some quite different settings with a range of different learners. Examples included:

- Profiling (non NQF) accreditation schemes offered at Entry Level by OCR to learners with profound learning difficulties and disabilities. The practice of profiling, which includes recognition of 'what the learner can do already', has potential application for achievement at all levels and should, we suggest, be examined for application with credit based units.
- New practice in language learning could be used to recognise and accredit prior learning in languages, using the type of reflective learning process described above and in the SCQF guidelines¹⁰

"The [\[OCR\] Asset Languages scheme](http://www.assetlanguages.org.uk/) is based on the 'can-do' statements of the Languages Ladder. These describe the outcomes of learning, they are adaptable to any context of learning and are not closely associated with any particular programme of study. These describe what learners can do with language at a certain level in terms of actual outcomes; 'I can talk about my plans for the future' and they can be related to real world activities; 'I can write a simple text seeking information'. "¹⁸

¹⁸ <http://www.assetlanguages.org.uk/>

This 'can do' functional approach has potentially wider application and could help to manage recognition and accreditation of prior learning and achievement in a structured learning programme in other areas of learning besides languages.

- The CACHE Level 3 Certificate in Work with Children (APEL) is for experienced early years practitioners or playworkers who have no relevant qualifications or those who gained qualifications prior to the Children Act 1989. Evidence assessed for the award is presented in a 'slim' portfolio which includes professional testimony and a reflective account of relevant knowledge and understanding.
- The City & Guilds CITB Construction (and other crafts) Awards offer an assessed route for workers with 5 years workplace experience and have been used successfully to recognise the prior skills and knowledge of construction (and other) crafts workers, including those coming from new member states in the EU. The APL process is integrated into a concise staged learning programme which leads to employer recognised qualifications.

Both the CACHE and City & Guilds examples appear to address some of the concerns raised by providers and awarding bodies over APL processes. The OCR examples have potential application for recognising and accrediting prior learning at all levels, but are perhaps particularly relevant for learning in the FLT, where the process of reflecting on prior learning is in itself instrumental in building confidence and making plans for further learning.

In all examples:

- Recognition and accreditation of prior learning is integral to a learning programme and not a precursor process.

In the CACHE and City & Guilds examples:

- Evidence of prior learning is expected to be presented in a standard format, and not always on paper. In the City & Guilds CITB qualifications, assessment of key (perhaps high risk?) prior learning is undertaken through an examination.
- Employers and public bodies have (at least) influenced the design of the programme and APL process and there is confidence in the comparable value of achievement with other qualifications in the field.

Progression

In Sections 2 and 3 we identified some of the issues for providers and other stakeholders in using APL and Exemption, many of which need to be addressed if APL and Exemption are to genuinely support progression.

In this Section we have identified some approaches which integrate RPL and APL into learning programmes to proactively support progression.

The feasibility of employing the accreditation of prior learning (APL) to identify distance travelled towards the achievement of full Level 1, 2 and 3 qualifications

As our interest in this study was in identifying the potential usefulness or otherwise of APL and Exemption in supporting progression, we suggest that the approaches we describe in this section (some current and successful in existing qualifications) should be a key focus of further investigation on recognising and accrediting prior learning in the Framework.

Section 5. Recommendations for further research and recommended actions for consideration and investigation within the trials of the Framework and FLT in 2006-8.

Further research should include:

1. A detailed examination of the current weaknesses and failures in APL systems and practice and how these should be addressed in recognising and accrediting prior learning and achievement in the Framework.
2. Examination of the feasibility of using the 'integrated' and 'fast track' and approaches to APL, cited in this report (see also Recommendation 8 below), as Adult Distance Travelled measures for New Measures of Success.
3. Further examination of the opportunities for new approaches to APL offered by the Framework and identification of any threats posed by the Framework to existing good practice in APL.
4. An assessment of the implications for providers, IAG and learning support services of the extension and/or introduction of successful or new approaches to APL.
5. Clarification of how the regulator can support the devising of principles, parameters and guidance which will simplify APL approaches, build mutual trust among practitioners and underwrite the validity of credit achievements made through APL.
6. Finding out how learners perceive APL, whether the availability of APL increases their motivation and impacts on their progression and on what terms. These questions should be addressed particularly in the context of 8 below.

Investigation and action in Framework and FLT tests and trials 2006-8 should consider:

7. Developing and testing terms and definitions for APL in the context of the Framework.
8. Exploring ways of integrating recognition of prior learning into the curriculum and active accreditation of that prior learning within a learning programme. The 'First Steps' model, 'Fast Track' and 'Profiling' approaches cited in this report should be developed and tested to recognise and accredit prior learning in the Framework.
9. Testing out the premise, that 'ubiquitous' credit and shared or common units can facilitate recognition of a wider set of (prior) achievements.

10. The Skills for Business Network, through SSDA, taking the lead on developing and testing risk assessment in relation to Exemption and APL with SSCs (and/or SSBs) and awarding bodies. For example, use risk assessment to examine (a sample of) current sector qualifications to help SSCs recommend a strategy for using Exemption in relation to existing NQF qualifications. Risk assessment of any sample should relate to the eight priority areas identified by the LSC, based on its strategic objectives and targets, which need to be covered by and explored through the [Framework trials](#).

Beyond the Framework:

11. Development of practice in APL in the Framework should be cognisant of practice and development elsewhere, and the applicability of APL approaches (in the UK and other countries of the EU) for achievements below level 2. Any investigation should aim to support the objectives of the Copenhagen declaration and focus on systems which use learning outcomes, credit and frameworks intended to articulate and recognise such achievements.

Appendix 1

List of those consulted for this report

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