



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Green Paper on Assessment of Learners and Learning

FOR CONSULTATION

QQI Green Papers contain issues and options for consideration for policy development. They inform the development of QQI policy.

In this Green Paper, we set out a framework and context for discussing assessment issues.

Using the Green Paper as a basis, we aim to create some focussed opportunities for discussion of the issues through workshops and focus groups before collecting written feedback on the issues from stakeholders. We will announce details about timings and arrangements for workshops in due course.

QQI is seeking feedback from stakeholders on the issues and options contained in this Green Paper.

Submissions can be emailed to
consultation@QQI.ie

The closing date for submissions
is 7 December 2018.

In your submission please clearly indicate:

1. *Your contact details.*
2. *Whether you are responding as an individual or on behalf of an organisation*

Note: QQI will be publishing the findings (these may include extracts from and distillations of any submissions) from the consultation process. Please indicate if you are happy that your submission is published in full, attributing it to you

PREAMBLE

MARCH 2018

This Green Paper concerning assessment is necessarily aligned with the principles concerning education, training, learning and assessment that are embedded in Qualifications and Quality Assurance (Education and Training) Act 2012.

PREFACE

We have pitched this Green Paper at persons who are well informed about assessment and who may perhaps be involved in recognising, promoting and supporting effective assessment practices. All providers of programmes of further education and training, higher education and training or English language education should find parts of the paper relevant.

The sections that target specific aspects or parts of the education and training system may involve some seemingly overlapping issues that are subtly different (e.g. in how they might be caused or addressed).

We are concerned with summative and formative assessment of learners by providers who are quality assured by QQI.

We aim to provoke discussion about assessment with a view to facilitating reflection on what is being done well and what can be improved. We would like to stimulate discussions of issues at all levels ranging from the micro to the macro. We hope that champions of effective assessment practice will use the publication of the Green Paper as an opportunity to organise discussion of the issues raised within their communities involving as many people as possible. Naturally, we are particularly interested in feedback about what we might do better.

In this Green Paper, we set out a framework and context for discussing assessment issues. We identify issues of concern and present ideas about how some of them might be tackled.

Using the Green Paper as a basis, we aim to create some focussed opportunities for discussion of the issues through workshops and focus groups before collecting written feedback on the issues from stakeholders. We will announce details about timings and arrangements for workshops in due course.

The deadline for written responses to the Green Paper is 7 December 2018.

We will publish the findings along with our considered response. This initiative may result in the publication of future focussed White or Green Papers on specific aspects of assessment.

EXECUTIVE SUMMARY

As noted, we aim through this Green Paper to provoke discussion about assessment of learners and learning in further education and training, higher education and training and English language education contexts.

We begin by outlining our understanding of assessment of learners and learning. We discuss the use of learning outcomes: expected, intended and actual and offer a working definition of assessment of learning. We distinguish assessment of learning from its multiple purposes. Assessment of learning is intrinsic to assessment for and as learning. While we address all three aspects, in terms of volume we have most to say about assessment of learning in the context of the Irish educational infrastructure. There is an extensive literature on assessment for and as learning and we don't consider the that this Green Paper should attempt to survey that literature.

We then outline why we consider assessment to be important and worthy of attention by all involved with the education and training system and qualifications system. We show, for example, how it supports learning, quality, equality, standards and qualifications. We note how assessment depends on trust and consider the implications of that. We provide a selection of contextual background material to help set the scene for the rest of the paper.

We continue in section 5 with a discussion of standards and educational awards. This is motivated by our working definition of assessment of learning, our role in maintaining the National Framework of Qualifications and our role as a national awarding body responsible for setting our awards standards and validating programmes of education and training leading to our awards. In section 6 we briefly highlight our understanding of the distinction between programmes as educational processes and awards standards as guiding programmes' educational goals (the latter being expressed as intended programme learning outcomes).

In section 7 we set out some general issues for discussion affecting all providers. These include practitioners' adaptability, holistic assessment in the context of programmes with specified intended

learning outcomes, use and interpretation of standards, assessment in the context of: diversity of learners; the Qualifications and Quality Assurance (Education and Training) Act 2012; RPL; expectations for bodies making awards that are recognised within the NFQ; determination of professional competence; grading; competence of assessors; and several other topics.

We address further education and training, higher education and training, English language education and Apprenticeship in sections 8 to 11 respectively. In each area we outline the status quo and identify a selection of suggestions and issues for discussion.

Section 12 is vanishingly brief, serving only to highlight that new issues are emerging all the time.

We tackle academic integrity issues in section 13, identifying issues, noting what is being done and highlighting opportunities for improvement.

Sections 14 to 16 respectively address (i) the possibility of developing general principles and guidelines for assessment of learning; (ii) the motivation for establishing sectoral conventions and protocols for assessment and (iii) the possibility of developing general guidelines on external moderation.

Section 17 gathers together a selection of questions to facilitate discussion of the issues raised in the Green Paper.

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1 INTRODUCTION

The principal purpose of this paper is to facilitate discussion between QQI and stakeholders. Specifically, in this Green Paper, we aim to facilitate discussion of assessment of learners (and especially of their learning i.e. their knowledge, skill, competence and attitudes) and related matters in the following contexts in Ireland

- i) FET (further education and training),
- ii) HET (higher education and training) and
- iii) ELE (English language education).

In terms of QQI activity, the outcome of the discussions is likely to be in further discussion papers (white or green) detailing proposed approaches for further discussion. We hope that the discussion we aim to provoke by this Green Paper will also lead others to think about what they might do independently.

We are aware of a lot of work being done in FET, HET and the ELE sector towards the enhancement of assessment related practices. Only a tiny fraction of this work can be highlighted here and only for illustrative purposes. Nevertheless, we wish to assert unequivocally that we respect and value all of the initiatives at all levels by individuals and groups and institutions that are being directed towards the enhancement of assessment practice. It is most reassuring to see how seriously FET, HET and ELE institutions take the assessment of learning. It is fitting that they take it seriously given the trust that society has placed in them by giving them powers to assess learning for nationally and internationally recognised qualifications in the NFQ.

This paper aims to provoke discussion and for that reason it highlights risks and controversial topics and might make uncomfortable reading. Whether you agree or disagree with points made in the Green Paper and the underpinning rationales, it is important that you engage in the discussion and make your views known to us so that we can understand them. Discussions following the publication of a Green Paper will likely result in our thinking changing, perhaps substantially.

We are particularly interested in helping to identify what QQI, providers of education and training and others can do to improve assessment of, for and as learning (seeing these as three perspectives on different purposes of assessment, see for example (Cees van der Vleuten, 2017, p. 625)).¹ We are interested therefore in both the summative and the formative purposes of assessment. We see assessment as integral to the curriculum, to teaching and to learning.

We need a basis for tackling this complicated subject systematically. CEDEFOP² (CEDEFOP, 2015, p. 25) has developed a suitable model for the study of certification. Essentially, the CEDEFOP model involves two perspectives on the system under study. One perspective (IEO), slightly amended here (see the discussion below), involves:

- 1) Inputs;
- 2) Environment³; and
- 3) Outputs;

and the second perspective (MMM) involves activity levels:

- a) “macro level: ...⁴ system level with its statutory provisions, regulatory stipulations and recommendations;
- B) meso level: ...[education and training] providers and institutions such as schools, companies, programme teams and examination committees where certification takes place and which implement the macro-level regulations;

1 Here is another perspective on assessment of, for, and as learning: <https://www.teachingandlearning.ie/wp-content/uploads/2017/03/Sectoral-insight-web-ready.pdf>

2 “Cedefop is one of the EU’s decentralised agencies. Founded (1) in 1975 and based in Greece since 1995, Cedefop supports development of European vocational education and training (VET) policies and contributes to their implementation. The agency is helping the European Commission, EU Member States and the social partners to develop the right European VET policies.” (<http://www.cedefop.europa.eu/en/content/about-cedefop-o-26/10/2017>)

3 CEDEFOP refers to ‘processes’ instead of environment.

4 CEDEFOP presented the model in the context of a VET system (vocational education and training) but it can be generalised to other systems.

c) micro level: where actual assessment and verification takes place from teachers, assessors and in-company trainers.” (CEDEFOP, 2015)⁵

The first perspective comes from Alexander Astin’s IEO assessment model (Astin, 1991). Note that for Astin ‘assessment’ means educational evaluation. Astin’s model is “designed to produce information on how outcomes are affected by different educational policies and practices” (source just cited).

The IEO model is a simple, intuitive model for considering transformative processes. It is motivated by the recognition that it is not sufficient to rely on outcomes when evaluating a system, you also need to understand how the outcomes are caused hence the inclusion of ‘environment’ and ‘inputs’. The environment includes intended transformational processes and the wider context for those processes.

When evaluating the impact of a programme of education and training on learners, for example, you need to consider not only their achievements and potentials at the end of a programme but also their prior achievements and potentials and those caused by parallel activities and interactions while enrolled on the programme (e.g. general maturation) as distinct from the programme itself. The programme along with other parallel influences constitute the environment within which the learner progresses while enrolled on the programme.

We stress the IEO model because the notion that it is sufficient to focus exclusively on ‘outcomes’ is often peoples’ first intuitive response. For example, if an institution’s graduates are all securing top jobs it is tempting to see this as indicating that the institution’s programmes are of high quality, but it is possible it could have more to do with the institution’s enrolment selectivity. For another example, if an institution is awarding outstandingly high grades to a cohort of learners on a programme, it could be due to an assessment anomaly, or an outstandingly effective programme, or a cohort that was outstandingly strong at entry, or a combination of all three.

The CEDEFOP model uses Input, Process, Output instead of IEO but we have amended their model

slightly. We prefer Astin's 'environment' to 'process'. We consider that environment gives greater recognition to the roles of dynamically interacting autonomous individuals e.g. students, teachers, employers, journalists and other stakeholders in society) in shaping the environment and hence the processes and ultimately the overall outcome.

The IEO and MMM provide overlapping perspectives. The MMM model helps to distinguish, for example, the roles of educational and training professionals; providers; and regulators, at (micro level, meso-level, and macro level) respectively.

QQI mostly operates at the macro level but it is not alone at that level. Other regulators that operate at the macro level influence assessment practices notably funding agencies (DES, HEA and SOLAS) and professional regulators. Sectoral protocols and conventions agreed across groups of providers also operate at the macro level. Finally, and perhaps most importantly society and communities of practice operate at this level.

QQI's validation and certification activities (more specifically instances of these activities) operate at the 'meso' level while the governing policy and criteria operate at the macro level. Institutional policies operate at the meso level. Programme and module specific regulation operates at the micro level.

The MMM-IEO model is not a mathematically precise model. Rather it provides a framework for thinking about cause and effect at different levels in the context of educational policies and procedures. Its use in this green paper is rarely explicit; nevertheless, it frames the approach and thinking.

1.1 INCLUSIVE INTERPRETATIONS

For economy of expression, we intend the term 'teaching' when used in this paper, to cover all formational activities, for example: educating, training, providing professional formation, mentoring, coaching, tutoring and instructing are all to be included. Terms like learning, academic and such like should also be interpreted inclusively unless the context clearly indicates otherwise.

2

WHAT WE MEAN BY ASSESSMENT OF LEARNERS

This Green Paper is concerned with assessment of learners and learning, and not only where its purpose is summative.

Assessment of learning is involved in assessment for learning and assessment as learning. We take assessment of learning to mean inference (e.g. judgement or estimation or evaluation) of a learner's knowledge, skill or competence by comparison with a standard based on appropriate evidence (Higher Education and Training Awards Council, 2009). For the purposes of this definition, to maximise its generality, the 'standard' can be as narrow or broad as required and may be implicit or explicit. It can involve, knowledge, skill, competence or attitudes.

Learner assessment may be done by the learner themselves or by another person and it may be done for any of many different purposes. Assessment may, for example, be used to:

- » determine entitlement to a qualification (e.g. summative assessment);
- » confirm learning progress (by the learner or by another);
- » to determine a learner's 'learning' competence;
- » identify gaps in learning (to, e.g., enable and inform the development of formative feedback to the learner or to adapt learning strategy);
- » help determine special educational or training needs (e.g. diagnostic assessment);
- » provide a learning opportunity;
- » inform the evaluation of the quality of a programme of education and training⁶;
- » recognise experiential learning;
- » support the learner to monitor their own progress;
- » determine eligibility to enrol on a programme;
- » place a person at a level in a language programme;

6 Typically, we use the term education and training. It is used in the 2012 Act. The motivation is to be maximally inclusive of formational activity intended to enable learners to develop knowledge, skill or competence. Any text in the Green Paper that refers to education or training without reference to the other should be understood to apply equally to both.

- » competitively determine who may access restricted higher education places.

Frequently, assessment has multiple purposes. Both teaching and learning always involve assessment. When the purpose of assessment is formative it may aim not only to determine whether the primary learning objective has been achieved but also the learner's attitude to learning and learning-related knowledge, skill and competence more generally. An assessment that is valid for summative purposes may not necessarily be valid for formative purposes. Suppose, for example, a course is designed principally to support a learner to achieve declarative knowledge (consider something simple like ability to recall the '12 times' arithmetic table). An assessment that tests only the declarative knowledge in this situation might report an array of 12 binary values (each true/false). This is unlikely to help a teacher understand the causes of any problems a learner may have with memorising the table or retaining it in memory. A different kind of assessment might aim not only to test the learner's declarative knowledge but also knowledge, skills and competences relevant to memorisation of these kinds of data. In setting a programme's learning objectives (intended learning outcomes) and explaining them to learners it is useful also to build in the learning-to-learn outcomes. This underlines the interrelatedness of teaching, learning, intended learning outcomes and assessment.

Assessment may have consequences that can be problematic where it is not valid for its legitimate expected purposes. Summative assessment may, for example, establish actual (de facto) standards or curricula that are different from the legitimate ones. Teaching to the test in such cases is also problematic (academic integrity).

The creation, through assessment, of an alternative curriculum may be inadvertent. Assessment may have other kinds of unintended or unforeseen consequences and assessors need to be alert to this possibility.

2.1 ASSESSMENT IN THE QUALIFICATIONS AND QUALITY ASSURANCE (EDUCATION AND TRAINING) ACT 2012

The Qualifications and Quality Assurance (Education and Training) Act 2012 explicitly addresses the summative assessment of learning by relevant providers whose programmes we validate or to whom we delegate authority to make awards. For example, providers are required to

“... establish procedures which are fair and consistent for the assessment of enrolled learners to ensure the standards of knowledge, skill or competence determined by the Authority under section 49(1) are acquired, and where appropriate, demonstrated, by enrolled learners” (Section 45(3))

This quotation refers to standards. Standards in the context of the 2012 Act are discussed in more detail in Section 4.7.

2.2 TERMINOLOGY

The systematic study of assessment of learning as applied to education and training and its quality assurance in our context requires the use of some technical terms whose precise definition may not be self-evident or may be different from everyday usage. A glossary is provided in Appendix 3. We request that the reader scans this glossary at this point to note, for future reference, the terms included.

For example, the National Framework of Qualifications, our (QQI's) awards standards, our (QQI's) quality assurance guidelines, and many of our (QQI's) policies and criteria make use of the concept of 'learning outcomes'. The term is widely used in education in Ireland but can mean significantly different things to different people and in different contexts. To see this, consider that this paper distinguishes:

- » Intended learning outcomes (ILO, associated with programmes)
- » Actual learning outcomes (ALO, associated with individuals)
- » Expected learning outcomes (ELO, associated with standards)

A learning outcome (LO), whichever the type, aims to depict something about the state of a human being. A statement representing the concept of a learning outcome is not in itself an LO. It is an abstraction that aims to communicate the idea.

LO statements typically have symbolic value that can be best understood by their authors and those from the author's disciplinary or professional 'community of practice'⁷ or scientific community but may signify less to others. The same statement may signify different things in different communities. An LO statement can be interpreted in different ways and its interpretation can evolve over time. For these reasons consideration of learning outcomes and assessment of learning necessarily involves the consideration of human societies (e.g. communities of practice) and how they recognise competence, see QQI's background paper on Qualifications Systems and Related Concepts (QQI, 2013).

LO statements (or level indicators) expressed within qualifications frameworks and awards standards are generally not written as measurement standards (like the metre, kilogram or second) but rather as standards for writing ILOs.

When designing an assessment to infer whether an intended learning outcome (ILO) has been achieved it is normally necessary to develop:

- (i) an assessment strategy or plan that informs the design of assessment tasks and criteria to validly and reliably infer⁸ whether the ILO has been achieved;
- (ii) assessment tasks and associated robust arrangements (against, for example, malpractice) for their completion by the learners;
- (iii) assessment criteria and robust arrangements for their fair and consistent application by people involved in making assessment decisions.

The alignment of ILOs with ELOs is normally addressed when programmes are being approved (e.g. at validation) and periodically reviewed.

7 This term is due to Jean Lave and Étienne Wenger. Our use of the term is also similar to the concept of a scientific community due to Thomas Kuhn—see (QQI, 2013) for a more detailed discussion.

8 If splitting the infinitive improves clarity we think it should be done with impunity!

If assessment is valid and reliable the ALOs will be aligned with ILOs. Unfortunately, establishing valid and reliable assessment is easier said than done and there are multiple ways in which validity and reliability can be, and in practice are, challenged. Much of this Green Paper is concerned with this problem.

This discussion about LOs may help highlight for you the fact that commonly used terms here may involve nuances that might not be apparent at first glance.

3 THE SCOPE AND PURPOSE OF THIS GREEN PAPER

There are several reasons why a country should be interested in the good health of assessment and these are elaborated in the following sections with some additional commentary.

3.1 ASSESSMENT SUPPORTS LEARNING

Assessment is intrinsic to effective teaching and learning and the quality of education and training.

Effective learning involves not only the receipt of information⁹ by the learner but processing that information, engaging with it (to expand knowledge, skill or competence), linking it with their prior learning, and reflecting on whether and in what ways they have been transformed. Self-assessment is part of this reflective process. Learning how to learn involves among other things learning how to monitor learning progress i.e. to recognise or assess ones learning achievements and to help identify areas that need further work.

Effective teaching, in the context of quality assured programmes of education and training that have defined objectives, does not just deliver, or direct learners to, information or drill them in the execution of procedures and manoeuvres but provides purposeful goal-oriented interactive formation and guidance to learners, helping bring out their potential, while adapting to their receptivity and progress. Effective assessment is required to gauge progress towards goals and to interactively form and guide learners. There can hardly be purposeful teaching without assessment.

Where assessment in all its dimensions is healthy it is likely that teaching and learning are also healthy. Where assessment is undermined, whether by incompetence, incapacity or corruption (e.g. plagiarism, falsification or fabrication), education and training are adversely affected.

The health of assessment depends not only on the efforts of teachers, institutions, and learners, but on functioning communities of practice (e.g. societies of practitioners/professionals), employers, regulators and others as well as society more generally.

Teachers need to know how and when to use assessment. In further and higher education in Ireland many teachers will be expected to design summative assessment tasks and instruments that are both valid and reliable. Learners and teachers are expected to engage in assessment activities reflectively with academic integrity (eschewing corrupting practices).

Institutions are expected to manage their staff and operations and engagements with external entities in such a way that effective assessment practice (including academic integrity) are encouraged and poor practice (including breaches in academic integrity) are detected and addressed appropriately.

The quality of assessment is a central concern because, if assessment is weak, learning is hindered. An invalid assessment result may have a negative and ongoing impact. Further, the mutual trust relationships upon which the qualifications system is based are also adversely affected.

3.2 ASSESSMENT SUPPORTS QUALITY

Procedures for the assessment of learners are expected to be part of provider's:

- » quality assurance procedures;
- » access, transfer and progression procedures; and
- » programmes of education and training.

Internationally, procedures for assessment of learners are generally considered as part of a provider's institutional quality assurance procedures. Programmes of education and training are also generally expected to include specific regulations and procedures for assessment (diagnostic, formative and summative) that interface with the institutional procedures.

Educational programmes are at the heart of any educational institution. Programmes aim to transform enrolled learners, to change them. To evaluate the transformation, it is necessary to assess learners at the beginning and end of a programme. A proper evaluation of an educational programme will consider the effect on the change in learning that is explainable by participation in the programme (i.e. the programme's effect on learning). Understanding the causes of learning outcomes (i.e. how learning is promoted by programmes) helps providers optimise programmes.

3.3 ASSESSMENT SUPPORTS EQUALITY

Valid and reliable assessment of learning is necessary, for example, for the implementation of equitable procedures for the recognition of prior learning and access, transfer and progression-related procedures.

Educational and training awards should also be made equitably. This relies in part on valid and reliable assessment especially in the context of FET and HET where institutions assess their own learners and can have conflicting interests in that regard.

3.4 ASSESSMENT SUPPORTS CERTIFICATION

Designated awarding bodies, providers with delegated authority from us (QQI), providers whose programmes we (QQI) validate and (in the future) listed (i.e. formally recognised) awarding bodies whose awards will be recognised within the framework are all expected to implement valid and reliable summative assessment procedures to ensure that applicable awards standards are upheld.

As noted above it is a statutory condition of QQI validation that providers “establish procedures which are fair and consistent for the assessment of enrolled learners to ensure the standards of knowledge, skill or competence determined by the Authority under section 49(1) are acquired, and where appropriate, demonstrated, by enrolled learners” (section 45(3)(b) of the 2012 Act). There is a similar condition in section 53(4)(a)(ii) concerning delegated authority (DA). The quotation refers to three requirements for summative assessment in the context of validation and delegated authority.

These legal terms are related to assessment validity and reliability, which are the more commonly used educational terms.

The statutory conditions above refer to summative assessment. Expectations or requirements concerning other kinds of assessment (e.g. formative, diagnostic) are expressed, for example, explicitly or implicitly through our (QQI's) QA guidelines, validation policy and criteria and DA procedures and criteria.

3.5 ASSESSMENT SUPPORTS OCCUPATIONAL STANDARDS

Professional societies require mechanisms for determining initial and continuing fitness-to-practise. Assessment against practice-standards is involved.

Apprenticeship, for example, is one route to becoming a member of a profession or qualified for an occupation. A distinguishing feature of apprenticeship programmes is that a substantial proportion of learning and assessment takes place in the workplace where the learner is employed as an apprentice. Workplace supervisors and mentors need to assess apprentices to support their learning and to determine fitness-to-practise in accordance with the occupational standards.

3.6 ASSESSMENT SUPPORTS SIGNIFICANCE OF QUALIFICATIONS

Fundamentally qualifications are tokens that depend on trust relationships underpinned by valid and reliable assessment. Outright fake qualifications are obviously problematic. Qualifications that are not all that they appear, perhaps because of weaknesses in assessment, are also problematic. Problematic qualifications can undermine trust in qualifications generally and accumulations of them can have negative social and economic consequences.

Trust can wax and wane. Maintaining trust requires continual effort. Confidence or belief that educational or training qualifications are what they profess to be is underwritten by confidence in the validity and reliability of the assessment of candidates among other things.

Trust in qualifications is supported in other ways too, for example by various communities of practice (e.g. cultures, professional communities and scientific communities), by quality assurance infrastructure (including, for example, QQI's QA guidelines) and the National Framework of Qualifications (NFQ).

3.7 SUPPORTING ASSESSMENT

A lot rests on assessment and it is natural to consider what supports assessment itself.

Assessment depends on trust. We all rely upon the individuals involved in assessing and being assessed behaving with integrity (see section 13). We expect that the institutions that are responsible for awarding, or recommending the award of, Framework qualifications to be trustworthy and reliable. We rely on both national and international, trustworthy scientific, academic and professional communities for the establishment of norms and standards that underpin qualifications and the mechanisms for their recognition.

The Qualifications and Quality Assurance (Education and Training) Act 2012 explicitly provides for assessment to be supported by providers of education and training.

Providers do not normally work in isolation. In addition to their intrinsic resources, for high-stake assessment they will often need to rely on the support of professions, scientific and academic communities and other communities of practice. This external support is necessary to help address the conflict of interest that all providers face when assessing their own students as well as to help ensure wider consistency of interpretation of standards. Additionally, some providers may require external support to help with the burden of assessment.

We (QQI), operating mainly at the macro level, help support assessment quality through:

- 1) Regulations (examples listed below);
- 2) Quality assurance processes (monitoring, validating, reviewing effectiveness of QA);
- 3) Information (reporting on the findings of our QA procedures);
- 4) Enhancement activities (workshops, conferences and such like).

Examples of regulatory documents include:

- 1) Quality assurance guidelines (these apply to all relevant and linked providers as defined in the 2012 Act and providers awarded the International Education Mark; there are currently no topic-specific guidelines addressing assessment but that would be an option);
- 2) Awards standards (apply to providers whose programmes QQI validates and to providers with delegated authority to make the relevant award);
- 3) The National Framework of Qualifications (applies to all providers offering programmes leading to awards in the NFQ and the awarding bodies that make those awards);
- 4) Validation policy and criteria (applies to providers whose programmes QQI validates);
- 5) Procedures and criteria for delegation of authority (applies to providers with DA);
- 6) Guidelines on assessment in the context of DA or validation by QQI (these are/would be designed to explain how QQI would satisfy itself that relevant providers, to whom QQI had delegated authority or for whom it had validated programmes, meet the statutory conditions of validation or DA concerning assessment);
- 7) Protocols and conventions for assessment (these are/would be non-statutory and established by agreement between QQI and relevant providers to provide for some standardisation in the mechanics of assessment to facilitate fairness, consistency and fitness-for-purpose e.g. grading).
- 8) Policy and criteria for making awards (to date this has not involved itself in assessment

Implementing (4) and (8) involve the 'meso' level i.e. engaging in operations that could be carried out by institutions in the context of DA.

The sectoral conventions and reference assessment protocols contained in Assessment and Standards (Higher Education and Training Awards Council, 2009) are macro-level documents that were initially established by agreement between HETAC and providers in the interests of consistency, recognising that both HETAC and providers had roles in determining their content.

4 CONTEXTUAL OUTLINE

There are a range of contexts for assessment ranging from the global to the local. We all need to consider this context when reflecting on assessment in education and training.

We do not necessarily agree with all the views expressed in the sources cited.

4.1 INTERNATIONAL PERSPECTIVES

4.1.1 THE SCHOLARSHIP OF ASSESSMENT (OF LEARNING)

Assessment (of learning¹⁰) has long been an active field of research and there is an extensive literature that practitioners can draw upon ranging from practical manuals for teachers to tightly-focussed research papers. The bibliography provides some useful sources.

4.1.2 VOCATIONAL EDUCATION QUALITY AND ASSESSMENT

The 2009 recommendation of the European Parliament and Council “on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training” (EQAVET) identifies the following indicator that addresses assessment in general terms:

“Standards and guidelines for recognition, validation and certification of competences of individuals have been defined.” (C 155/6, 2009) (Official Journal of the European Union, 2009)

The establishment of EQAVET has not yet led to the production of a document of the equivalent of the ESG i.e. a succinct statement of generally agreed standards and guidelines. However, the raw material for such guidelines exists.

¹⁰ Incidentally, the term ‘assessment’ is used in the academic literature contexts other than ‘assessment of learning’ e.g. the assessment of the effectiveness or impact of a programme or an institution.

CEDEFOP, for example, has published a study entitled “Ensuring the quality of certification in vocational education and training” (CEDEFOP, 2015). It is most relevant to summative assessment and trustworthiness of certification. For CEDEFOP, certification comprises: (i) assessment; (ii) verification and grading; and (iii) awarding of a qualification. The key recommendations are:

- a) articulate clearly certification in VET policies;
- b) ensure appropriate definition and use of learning outcome-based standards;
- c) strengthen the involvement of labour market stakeholders in certification and relevant quality assurance processes;
- d) support the development of a common understanding of certification requirements among stakeholders;
- e) ensure assessors are competent and trained;
- f) share responsibility for certification quality assurance at all levels;
- g) strengthen evaluation and review in certification;
- h) consider possibilities to complement the EQAVET framework.

Incidentally, the CEDEFOP research has found a “slight trend which involves moving away from entirely decentralised approaches and more towards introducing some kind of standardisation, stronger external evaluation and regulatory control has also been identified.” (CEDEFOP, 2015, p. 13)

Of the 12 countries in the study, nine awarded the qualification based on a final assessment and three (Spain, Finland and England) awarded it based on “accumulation of units/modules/credits without a final assessment at the end”. (CEDEFOP, 2015, p. 32)

4.1.3 HIGHER EDUCATION QUALITY AND ASSESSMENT

STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA

The ESG, that is the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ENQA, ESU, EUA, EURASHE, In cooperation with: Education International, BUSINESS EUROPE, EQAR., 2015) is the benchmark for higher educational quality assurance in the European Higher Education Area.

ESG Standard 1.3 concerns assessment and states that:

“Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.”

COMPILATION OF STATEMENTS FROM SOME KEY EUROPEAN DOCUMENTS BY THE IRISH NATIONAL FORUM FOR THE ENHANCEMENT OF TEACHING AND LEARNING IN HIGHER EDUCATION

The National Forum for the Enhancement of Teaching and Learning in Higher Education has compiled (2016) a wider selection of relevant statements from some key European documents¹¹.

UNIVERSITIES UK: UNDERSTANDING DEGREE ALGORITHMS

The UK and Irish HE systems are similar and there is substantial mobility of staff including external examiners between the systems. For this reason, UK and Irish policies and practices tend to influence each other. Given the relative size of the two countries and the resources available for research and policy development the influence is asymmetrical. There are many useful UK documents concerning assessment in higher education.

There have been questions around the classification of higher educational awards for many years. There have been several reports over the years in the UK on award classifications and related matters. The most recent one is entitled “Understanding Degree Algorithms” (Universities UK, 2017) and it reports on a survey of UK universities on processes or the ‘set of rules’ they use to determine the final classification of a student’s degree.

Among the noteworthy observations is that

“Grade improvement is an observable and persistent trend in the higher education sector, both in the UK and internationally. Although understanding the drivers of sector improvement was not the focus of this study, it has not found¹² clear evidence that changes to the design of algorithms are the main cause of sector wide trends.” (Universities UK, 2017, p. 2)

The UUK report recommends that to maintain confidence in the design of degree algorithms that:

- a) “higher education providers should ensure that their degree algorithms are transparent and accessible for students, staff and external stakeholders
- b) the process and rationale for making changes to degree algorithms should be transparent and led by robust academic governance arrangements
- c) principles of good practice for the design, development and review of degree algorithms should be considered for inclusion in a revised Quality Code to guide institutional decision-making
- d) institutions should ensure that the rules governing the assessment of borderline cases do not have the inadvertent effect of effectively lowering the threshold for degree classifications across the student population
- e) more work needs to be done to understand the long-term drivers of grade improvement and inflation and develop sustainable measures that can mitigate sector-wide grade improvement” (Universities UK, 2017, p. 2)

NVAO PEER LEARNING EVENT ON ASSESSMENT AND DEMONSTRATION OF ACHIEVED LEARNING OUTCOMES

The PLA involved representatives from 13 countries. The emphasis is mostly on the implementation of learning outcome approaches. The summary of recommendations on assessment (in particular) captures in simple terms some useful advice for practitioners:

“Follow through the concept of student-centred learning in the assessment and demonstration of achieved learning outcomes

- » The formats of assessment should be congruent with the intended learning outcomes and with the formats of teaching and learning, by using instruments such as peer- or co-assessment.
- » The development of student-centred assessment should follow the transition to student-centred learning and avoid teacher-oriented approaches which assess the curriculum rather than the learning by the students.
- » There is much in a study programme that cannot be easily assessed, such as attitudes. Take care that the emphasis on competences or knowledge leaves enough room for properly assessing other aspects which have great value for students and for society.
- » Structure the assessment system, and make sure that methods and criteria are valid. Do not underestimate the challenge this can pose.
- » Using external examiners is a useful way of enhancing the validity of assessments, and should be implemented more generally.” (de Bruijn, 2016)

The PLA’s recognition of the risk of practitioners underestimating the challenge involved in ensuring validity is particularly noteworthy, as is its commentary on attitudes.

4.1.4 ENGLISH LANGUAGE EDUCATION QUALITY AND ASSESSMENT

A key driver in English language education quality and assessment has been the work done by the Council of Europe, under the auspices of the Common European Framework of References for Languages (CEFR). This framework focuses on the communicative nature of language and language learning. It has transformed how language proficiency is described and communicated, how language learning is approached, and how language is both taught and assessed since it was introduced in the mid-1990s.

Specifically, the CEFR is:

“[...] a common basis for the elaboration of language syllabuses, curriculum guidelines, examinations, textbooks, etc. across Europe. It describes in a comprehensive way what language learners have to learn to do in order to use a language for communication and what knowledge and skills they have to develop so as to be able to act effectively. The description also covers the cultural context in which language is set. The Framework also defines levels of proficiency which allow learners’ progress to be measured at each stage of learning and on a life-long basis.”
(Council of Europe, 2001, p. 1)

Since the introduction of the CEFR, ELE assessment design typically follows the global Common European Framework of References for Languages (CEFR) Proficiency scale (A1-C2), and providers may further delineate and granulate their levels and programmes according to their learner populations, the target communities which the learner is aspiring to join, and the associated scope and intended learning outcomes of the programme.

4.2 CURRENT QQI ASSESSMENT-RELATED PUBLICATIONS

We have published a set of Core quality assurance guidelines that address assessment in general terms. Topic-specific QA guidelines address assessment in more detail in some contexts e.g. apprenticeship and blended learning (planned guideline).

We also maintain specialised documents concerning assessment:

- » Quality Assuring Assessment - Guidelines for Providers, Revised 2013
- » Assessment and Standards, Revised 2013 (this includes guidelines, conventions and protocols)
- » Quality Assuring Assessment Guidelines for External Authenticators, Revised February 2015
- » Effective Practice Guidelines for External Examining, Revised February 2015

These are restatements of FETAC and HETAC published guidelines on the assessment of learners (Higher

Education and Training Awards Council, 2009) and (Further Education and Training Awards Council, 2007) and external moderation of assessment. This Green Paper draws extensively from the previous guidelines, especially in the appendices.

We have not included ACELS (Accreditation and Coordination of English Language Services (see Section 4.5)) documentation here because it is non-statutory (i.e. we are not operating ACELS under the 2012 Act).

We envisage that all four documents will be replaced in due course by a rationalised suite of principles, guidelines, protocols and procedures that will be consistent with the 2012 Act and have the support of stakeholders. Much of the content in these guidelines may survive the rationalisation. One objective of this Green Paper is to help establish principles and broad options for replacing them.

4.3 FET CONTEXT

There are in the region of 500 providers who have programmes of further education and training that are validated by QQI. 16 of these are Education and Training Boards (ETBs), which account for most of the education and training activity in the FET sector.

Much of the educational and training activity in the FET sector involves programmes leading to QQI awards in the Common Awards System (CAS).

There are more than 30 apprenticeship programmes of FET and this number is expected to grow with the establishment of new apprenticeships¹³. The standards for major awards made in respect of apprenticeship programmes are essentially determined by the NFQ's professional award-type descriptors.

The Education and Training Boards have been working actively (at the meso level) on improving their

documented assessment procedures and have published the following consultation documents:

- » Assessment malpractice procedures
- » Assessment procedures for reasonable accommodation
- » Assessment deadlines procedure
- » Assessment procedure for compassionate consideration
- » Developing an ETB Sectoral Model for the External Authentication of Assessment

These documents are intended for use by ETBs. We observe that initiatives like these might be a basis for meso-level sectoral protocols and procedures for providers of FET programmes leading to QQI awards.

4.4 HIGHER EDUCATION CONTEXT

Higher education providers of programmes leading to awards in the NFQ in Ireland comprise the universities, the institutes of technology (IoT), and a diverse group of independent providers, many of whom are in the private sector.

Universities, the Royal College of Surgeons in Ireland and one of the institutes of technology are ‘designated awarding bodies’ under the 2012 Act, 13 institutes of technology have delegated authority from QQI to make awards and the remainder of HEIs rely on either QQI or designated awarding bodies to provide access to NFQ awards for their students.

Other awarding bodies make awards outside the NFQ to students enrolled in programmes of higher education and training in Ireland¹⁴. These awarding bodies are currently not regulated by QQI.

While higher education and qualifications like bachelor, master and doctoral degrees have a long

heritage, the student demographic has changed dramatically in recent decades. The ‘massification’ of higher education is a worldwide trend and part of the context for considering assessment.

The National Forum for the Enhancement of Teaching and Learning in Higher Education took Assessment OF/FOR/AS Learning as its 2016-2018 Enhancement Theme. The “enhancement theme explores the purposes of assessment, initially defining these terms as:

- » Assessment OF Learning: completing assessment to demonstrate learning
- » Assessment FOR Learning: using assessment to give feedback on teaching and student learning
- » Assessment AS Learning: student empowerment and engagement to become a better learner.”¹⁵

The Forum’s assessment initiative also aimed to enhance “programme approaches to assessment and feedback in Irish higher education”¹⁶.

The Forum has proposed a set of eight principles concerning assessment:

“In addition to being valid, reliable and effective

1. Assessment and feedback should empower students to become self-regulated learners.
2. Assessment and feedback should be clear and understandable by staff and students.
3. Decisions on assessment and feedback should be guided by a programme-level approach.
4. Assessment and feedback approaches should foster partnership between staff and students.
5. Students should experience a diverse range of assessment methods, including, where relevant, authentic and work-based assessments.
6. Assessment and feedback should be manageable for staff and students.
7. Assessment and feedback should be enhanced through staff engaging in related professional development, including engagement in scholarship in this area.
8. Assessment and feedback should be supported by enabling policies.”¹⁷

Other notable Forum documents include:

¹⁵ <http://www.teachingandlearning.ie/priority-themes/enhancement-theme-2016-2018/> (retrieved 11/9/2017)

¹⁶ <http://www.teachingandlearning.ie/priority-themes/enhancement-theme-2016-2018/sharing-good-practices-policies-phase-5/programme-approaches-to-assessment-and-feedback-overview/> (retrieved 11/9/2017)

¹⁷ <https://www.teachingandlearning.ie/principles-assessment-offoras-learning/>

- » “Profile of Assessment Practices in Irish Higher Education¹⁸”, which aims to “provide a precise and accurate picture of what’s happening in assessment across the sector” based on a sample of about 30 programmes of HET.
- » “Work-Based Assessment OF/FOR/AS Learning: Context, Purposes and Methods”, which provides practical material that will be of interest to those involved in programmes where some of the learning is in the workplace (National Forum for the Enhancement of Teaching and Learning in Higher Education, 2017).

Additional resources relating to assessment are available on the Forum website¹⁹. Geraldine O’Neill, who led the Forum’s enhancement theme on assessment has published an eBook entitled “Curriculum Design in Higher Education: Theory to Practice” (O’Neill, 2015) that covers assessment among other things.

4.5 ENGLISH LANGUAGE EDUCATION CONTEXT

At present, our (QQI’s) main involvement in oversight of English language education (ELE) is via the ACELS ELE provider recognition scheme, an inherited non-statutory scheme, operated by us (at the time of writing). For legal reasons ACELS can only be ‘maintained’ with its current constituency. The ACELS recognition scheme is voluntary and renewed annually. In its current form, it was designed to be maintained until such a time as a statutory International Education Mark (IEM) is introduced.

There are 95 ACELS recognised providers involving approximately 130-40 centres nationwide, representing a range of provider types, some only seasonally active.

The 2016 student numbers for Marketing English Ireland (MEI) member schools, all of whom are required as an eligibility criterion to be ACELS recognised, were approximately 110-115,000. We estimate that there may have been in the region of about 30,000 additional students enrolled throughout 2016 with other ELE providers.

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<https://www.teachingandlearning.ie/wp-content/uploads/2017/01/Profile-of-Assessment-Practices-Final-1.pdf>
<https://www.teachingandlearning.ie/enhancement-themes/assessment-resource-portal/>

The Qualifications and Quality Assurance (Education and Training) Act 2012 specifies that we (QQI) will introduce a new statutory mark for providers of international education called the International Education Mark (IEM). The original legislative provisions for the introduction of the IEM were unworkable and an amendment to the 2012 Act is planned. We hope that the newly amended legislation will be finalised in 2018 and expect that this will allow for two versions of the mark: one for higher education providers; one for English language education providers.

Incidentally, we expect to validate some international foundation programmes reasonably soon. Typically, these are predominantly concerned with teaching English for academic purposes and preparation of international students for progression to higher education. We also expect to validate programmes designed to prepare people to teach the English language.

4.6 APPRENTICESHIP CONTEXT

Up until 2015 all statutory²⁰ apprenticeship programmes were provided by SOLAS (acting as the coordinating provider and working in collaboration with ETBs, IoTs and others). The number of apprenticeships (in the region of 30) had been stable for many years and each led to a QQI FET award at NFQ Level 6.

Since 2016 other kinds of providers have been enabled to provide statutory apprenticeship programmes. Further, apprenticeship awards can now be made at NFQ levels 5-10.

All new apprenticeship programmes are distinguished by being employer led and having a substantial proportion of the formation in the workplace.

QQI has published “Topic-Specific Statutory Quality Assurance Guidelines for providers of Statutory Apprenticeship Programmes”, which apply to all providers and address assessment in more detail that

its other QA guidelines. For example:

- » “The final assessment of apprentices must ensure that they are immediately capable of performing the activities and carrying out the responsibilities normal to the occupation. This assessment should be:
 - » holistic in that it measures the general competency of the candidate.
 - » final in that success should mean the entitlement to an award and to registration in the occupation where this is an intended outcome of the programme.” (QQI, 2016)

4.7 ECONOMIC CONTEXT

We do not dwell, in this Green Paper, on the economic context but it is relevant nonetheless because the maintenance of assessment infrastructure requires significant resources.

5 STANDARDS IN IRELAND

Considering the definition adopted for assessment (see Section 2), standards have an important role. We need to reflect on the standards that apply, issues concerning them and how they affect assessment (whatever its purpose).

5.1 THE NATIONAL FRAMEWORK OF QUALIFICATIONS

The NFQ is:

“...a system ... of levels of awards based on standards of knowledge, skill or competence to be acquired by a learner to entitle the learner to an award at a particular level within the Framework”

(Section 42(2) of the 2012 Act)

Most stakeholders understand the NFQ to be a system of 10 levels that differentiates qualifications. A specific qualification is either at one level or another: i.e. the levelling exercise produces a single number and not an array of probabilities of the qualification being at each of the 10 levels.

The concept of NFQ level is expressed through the sub-strand indicators (NQAI, 2003). The concept of an overall NFQ level is not explicitly defined at all.

The foundations of the NFQ are not definitive on the question of interpretation of the indicators. The foundational text implies that level indicators were interpreted as typical for their original purpose – the assignment of award types and qualifications to a level. It is clear that this interpretation was a pragmatic one.

‘Levels are not in themselves standards but indicators of a range of standards ... the indicators enable award-types to be matched to a level on an overall best-fit basis, rather than by conformity to a defined set of required standards’ ... ‘Levels of award-types are quite pragmatic constructs ... the assignment of knowledge, skill and competence to levels is a pragmatic activity rather than an exact science’ (NQAI, 2003)

The NQAI agency (National Qualifications Authority of Ireland which was amalgamated in 2012 with HETAC and FETAC to form QQI) was more definitive at times, such as when working with the HEI community on the interpretation and use of the NFQ

‘The Framework level-indicators (and award-type descriptors) are considered to indicate the ‘typical’ learning outcomes associated with the successful attainment of an award at a given level on the Framework, rather than being indicators of ‘threshold’ or minimum learning outcome attainment. This distinction has important implications for assessment design and for the development of assessment criteria.’ (The university sector Framework Implementation Network, 2009, pp. 42-)

Although on other occasions and for pragmatic reasons, a looser conceptualisation of threshold was employed to support the referencing of the NFQ to the EQF.

‘In both Frameworks, key words or phrases are introduced as “threshold” or distinguishing factors in the description of learning outcomes at each level;’ (NQAI?, 2009, p. 83)

The 2012 Act can be read to imply that level indicators are threshold 43(4) ‘Each awarding body in the State shall...ensure that a learner acquires the standard of knowledge, skill and competence associated with the level of that award within the Framework before an award is made’.

Currently, there is no settled position on the precise meaning of the NFQ level indicators — in general and in practice, level indicators have been interpreted as typical to inform original placement, referencing and recognition activities.

We could construct a coherent approach based on the indicators being either threshold or typical. To consistently use the indicators as typical one would need to be clear about how far from typical a qualification can be before it is no longer within the level and one would need a definition of what ‘far’ means. The problem with the indicators being regarded as typical is that it leaves the determination of the decision threshold to the user (QQI, providers, evaluators, or others using the NFQ).

We can think of the NFQ as an array of 10 one dimensional containers (considered as the space between levels) for qualifications where any qualification can be uniquely allocated to a container based on its 'standard'. Threshold indicators would define the boundaries of the containers (levels). Alternatively, pairs of 'typical' indicators along with a mechanism for determining best-fit would also define the boundaries between the putative containers.

The NFQ indicators are standards for drafting standards and not standards for assessment of learning. They are not restricted to traits that are directly observable. How well the NFQ reflects reality is not known with certainty owing to the lack of empirical work. The dearth of standardised assessment data makes it exceptionally difficult to address this question in HET or FET. Looking at grades alone to address the question is of limited value. Incidentally, the OECD AHELO²¹ project is noteworthy in this regard.

5.2 DESIGNATED AWARDING BODIES

Designated awarding bodies (DABs) are providers of programmes of education and training that set standards for their own awards using the NFQ as a guide. Currently the universities, Royal College of Surgeons in Ireland and the Dublin Institute of Technology are DABs. The other Institutes of Technology are expected to become DABs soon. With respect to the assessment of learners DABs are lightly regulated by QQI and are, in this regard:

- i) guided by QQI's Quality Assurance Guidelines;
- ii) required to establish procedures for access, transfer and progression in accordance with QQI's policies and criteria for access, transfer and progression in relation to learners;
- iii) required to ensure, in so far as is reasonably practicable, that each award that they make is recognised within the Framework.

21 <http://www.oecd.org/edu/skills-beyond-school/testingstudentanduniversityperformancegloballyoecdahelo.htm> (24/10/2017)

"The OECD's Assessment of Higher Education Learning Outcomes (AHELO) aims to provide a tool for Higher Education Institutions (HEIs) to assess what their students know and can do upon graduation, on an international scale." (<http://www.oecd.org/education/skills-beyond-school/AHELO%20FS%20Report%20Volume%201%20Executive%20Summary.pdf>)

5.3 PROFESSIONAL AND OCCUPATIONAL STANDARDS

A professional body represents and governs a professional association or society. It will normally rely on providers of programmes of education and training to help prepare prospective members for entry into the society of practitioners. Such bodies normally establish education and training standards for the accreditation of programmes designed to prepare learners for professional practice (or probationary practice) and these subject-specific standards help ensure consistency across different providers and help support educational standards generally. Many professions operate internationally, and this can help crosslink national standards.

Such accreditation standards need to be dynamic and adapt to current needs. Where a professional body fails to keep its accreditation standards up-to-date, the requirements it imposes can become barriers to the enhancement of programmes and ultimately to the health of the profession more generally.

Regulated professions, such as the accountancy profession for example, may be subject to additional standards established by the regulator concerned.

Apprenticeships in Ireland are subject to occupational profiles and the NFQ's professional award-type descriptors. Some apprenticeships prepare people for regulated occupations and are subject to additional standards.

5.4 QQI AWARDS STANDARDS IN GENERAL

The most general conceptualisation of standards in the 2012 Act is provided in the section about the NFQ:

“standards of knowledge, skill or competence to be acquired by a learner to entitle the learner to an award at a particular level”. (Section 43(2)(ii))

We (QQI) are required to determine standards for our awards and those of providers with delegated authority (to make awards) as follows:

“The Authority shall determine the standards of knowledge, skill or competence to be acquired, and where appropriate, demonstrated, by a learner before an award may be made by the Authority or by a provider to which, under section 53, authority to make an award has been delegated.”

(Section 49(1))

We have, in effect though not explicitly, interpreted the addition of the term ‘where appropriate’ as indicating that the prescribed knowledge, skill and competence, while always needing to be achieved, need not always be explicitly demonstrated. We will not dwell on the reasons for this interpretation here. Assessment principles, guidelines and good practice should be sufficient to enable providers to determine the appropriateness here.

Overall the provisions above could be interpreted to mean that we (QQI) must establish and maintain detailed standards against which candidates enrolled in each of the thousands of programmes leading to QQI awards would be assessed. This would be impractical to say the least in the Irish context.

A looser interpretation is that our (QQI’s) standards are determined to express knowledge, skill and competence in more general terms (that are open to interpretation by providers) and guide the development of programme-specific standards that are consistent with our standards but are determined and maintained by providers having been initially approved through our validation process or, in the case of a provider with DA, that provider’s validation process. In effect QQI uses this looser interpretation (QQI, 2014, p. 3) so, for example, it has established the highly generalised NFQ award-type descriptors as its default awards standards.

On this basis we (QQI) set standards for the awards we make. We maintain that our standards are threshold standards (standards that address the minimum or threshold requirements) and consider that we are required by the 2012 Act to do so. We use the NFQ award-type descriptors as our default awards standards. The interpretation of the NFQ indicators as typical would be somewhat problematic in that

context in the higher education context because it would mean that our pass standards are typical for the whole HET sector and, if awards standards were symmetrically distributed around the typical, then half of them would be lower than ours if not identical.

Our subject-specific awards standards range from standards for broad fields of learning in higher education to highly focused standards in the Common Awards System (see the next sub-section). The broader standards are more like discipline-oriented translations of the NFQ than standards for specific awards. This is in keeping with our interpretation of the 2012 Act.

Our standards are generally expressed using expected learning outcomes statements. They are designed to be used by providers when determining their minimum intended programme learning outcomes (MIPLOs). The MIPLOs and not the QQI awards standards are the reference for assessment (e.g. developing assessment strategies, procedures, tasks and criteria). The MIPLOs are formally approved by us (QQI) or, where we have delegated the authority to do so, by the relevant provider, at validation.

5.5 THE COMMON AWARDS SYSTEM

The Common Awards System is a system of standards that we maintain for providers of certain kinds of FET programmes. There are in the region of 1500 standards for component awards (minor awards) and several hundred compound awards standards.

A compound award is one where a learner must achieve prescribed component awards before they can qualify for the award.

CAS awards specifications include statements of expected learning outcomes (ELOs) and guidance on assessment techniques to be used. In the past this 'guidance' has been interpreted as being prescriptive but it is no longer intended to be.

CAS awards are available to candidates who have been assessed as having achieved learning outcomes that are consistent with the relevant award standards either in the context of an RPL processes or through the successful completion of a validated programme.

Our (QQI's) current validation policy and criteria (first published in 2016 with commencement for FET programmes leading to CAS awards having begun in 2017²²) envisages that learners are assessed not against the CAS ELOs but rather against the validated programme MIPLOs (minimum intended programme learning outcomes) and MIMLOs (minimum intended module learning outcomes). The MIPLOs and MIMLOs must be consistent with the relevant CAS ELOs.

MIPLOs and MIMLOs can be considered the refined versions of awards standards applying in respect of specific programmes (for compound and component awards respectively) and approved by QQI at the point of validation.

5.6 STANDARDS FOR FOREIGN LANGUAGE PROFICIENCY

The CEFR is a system of levels for second language proficiency. This was addressed in context in section 4.1.4, which is about the CEFR. It is not part of the NFQ currently. Incidentally, it should not be assumed that the CEFR can be aligned with the NFQ, which is a general-purpose framework. Using NFQ levels to define standards for language proficiency can be problematic.

We have referred to CEFR levels in situations where we needed to be precise about English language proficiency, for example in recent awards standards and in our programme validation criteria.

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They apply to all apprenticeship, ELE and higher education programmes. Implementation in further education programmes, excluding ETBs, commenced on 1 December 2017. ETBs will also be transitioning to the current QQI policy.

5.7 MIPLOS

All providers have a role in interpreting standards and expressing those interpretations, for example as intended programme learning outcomes (MIPLOs). The achievement or otherwise of the MIPLOs should be determined by assessment. Providers, when they express MIPLOs, are determining the actual standards that they profess to require to be met by students. The MIPLOs inform the development of programme assessment strategies.

5.8 AWARDS STANDARDS ARE GENERALLY DISTINCT FROM ASSESSMENT CRITERIA

Awards standards and learning outcome statements written to express minimum intended programme learning outcomes (MIPLOs) are generally not suited for use as assessment criteria.

5.9 STANDARDS FOR AWARD CLASSIFICATIONS

It has been some time since there has been any attempt at a systematic study about how awards classifications are determined in Ireland.

In both FET and HET there are rules linking classifications to marks but these are just mappings and the question about how marks are determined is essentially a transformed version of the original question.

Some have attempted to define descriptors for classifications (i.e. pass, merit, distinction, first class honours). For example, FETAC²³ and HETAC²⁴ had similar approaches to the determination of criteria for awards classifications.

23 The Further Education and Training Awards Council.

24 The Higher Education and Training Awards Council.

The FETAC version is:

A Pass is a grade awarded to a learner who has attained the minimum standard. To be awarded a pass grade a learner must have achieved a mark of between 50-64%.
A Merit is a grade awarded to a learner who has exceeded the minimum requirements. To be awarded a merit grade a learner must have achieved a mark of between 65-79%.
A Distinction is a grade awarded to a learner who has substantially exceeded the minimum requirements. For a learner to be awarded a distinction he/she is must have achieved a mark of 80% or over.

The HETAC version for honours bachelor degrees is:

Classification of Honours Bachelor's degrees (Level 8) and Higher Diplomas (Level 8)	GPA ²⁵ boundary values	PPA ²⁶ boundary values	Description 2009 - 2010 and following
First-class honours	3.25	70%	Indicative descriptor: Achievement includes that required for a Pass and in most respects is significantly and consistently beyond this
Second-class honours Grade 1	3.0	60%	Indicative descriptor: Achievement includes that required for a Pass and in many respects is significantly beyond
Second-class honours Grade 2	2.5	50%	Indicative descriptor: Achievement includes that required for a Pass and in some respects is significantly beyond this
Pass	2.0	40%	Definitive descriptor: Attains all the minimum intended programme learning outcomes

In both cases the only properly grounded criteria are those for pass. The other criteria were set down to provide some basis for classification but are vague and HETAC was certainly aware of this at the time.

²⁵ GPA: Grade point average. It is defined in Assessment and Standards (QQI, 2013).

²⁶ PPA: Percentage point average (QQI, 2013).

Prompted by reference to grade descriptors in section 3.10 of University College Dublin's (UCD's) Code of Practice on Assessment (UCD, 2015) an internet search of grade descriptors enabled us to locate UCD's descriptors²⁷ for modular programmes. For example, the following are headline indicators for 'acceptable' and 'good' for Levels 1-2 are (much more detail is provided, and additional indicators are used for Levels 3-7):

- » The indicator for 'acceptable' (threshold 40%) is: The minimum acceptable standard of response to the assessment task.
- » The indicator for 'good' (threshold 50%) is: An intellectually competent and factually sound answer.
- » The UCD descriptors are a lot more granular than FETAC's or HETAC's. The descriptors are not explicitly linked to minimum intended programme or module learning outcomes.

The question of nationally consistent standards for award classification might seem peripheral considering that we can struggle with questions about how to demonstrate that MIPLOs consistent with the NFQ are consistently achieved. However, it matters because people often use awards classifications (in HET and FET) to rank candidates for jobs or for access to educational programmes. (See also section 7.15 on the reliability of grading.)

6**PROGRAMMES AS TRANSFORMATIONAL PROCESSES**

We view education as transformational and therefore we are interested not only in learners' absolute achievements (e.g. expressed in statements of knowledge, skill or competence) but also how they are enabled to achieve (e.g. by programmes of education and training).

Section 5 of this paper has addressed standards. We have published other documents, notably our validation policies and criteria, that set out our views on programmes of education and training. Rather than repeat these, we address programmes briefly here via a metaphor that helps clarify how we envisage programmes and standards and how we distinguish between them.

If different educational achievements could be thought of as different places in some abstract territory, then standards provide the coordinates for places. Programmes, on the other hand, are processes that may be related to the routes from one place to another.

Programmes cannot be defined by standards. A programme is a transformational process that is designed to take a person from one standard to another. It is not defined by the start and end points, there may be many different routes between those points. Even knowledge of all the intermediate standards that were achieved at times between the start and finish would not define the programme that was followed because it would not address the causes of the changes.

Programmes necessarily involve assessment not only at the beginning and end points but all the way through. When we seek to quality assure a programme we aim to address the transformational process and not only assure that the intended learning outcomes are fitting goals.

7 GENERAL ASSESSMENT ISSUES

Having set the scene, we now begin to identify issues that we think are worthy of reflection, starting with issues that are likely to arise in all three sectors: FET, HET and ELE.

If we miss any that you consider important, please let us know. Recall that the principal purpose of this Green Paper is to facilitate discussion of issues concerning assessment.

7.1 ADAPTABILITY

It is important that practitioners keep abreast of the practical scholarship of assessment because educational and training contexts are changing rapidly.

It is almost trite to observe that the balance of skills that people need to function in the modern world is changing as they come to rely on technology to perform tasks such as the retrieval and processing of information. This is relevant to both standards determination and to assessment.

Information technology and especially its application by those who create or discover or systematise (in scientific, artistic, economic, social, cultural, professional and other contexts) has opened access to information to those who have uncensored access to the internet. Those with the skills and discernment to sift, find and use the information have a huge advantage. There is no sign that the pace of change is slowing.

Artificial intelligence and its applications by creative people, for example, may shape the future context for assessment and teaching and learning in ways that may be difficult to imagine now.

Assessment practices need to evolve to remain matched to current needs and realities. A practitioner would be ill advised to assume that they can or should assess their students the way they were assessed when they were students. Assessment practices in education and training that worked well in

the past may be challenged today on account of being based on assumptions that are no longer valid. Assessment practices that were once valid and reliable may no longer be either in the context of current technology and access to information.

The problem is compounded by the fact that some inherited assessment practices may be founded on tacit rather than explicit bases. This can make it more difficult to understand those practices and identify their strengths, weaknesses, risks and opportunities for improvement. It can complicate adaptation to rapid change.

On the other hand, the introduction of innovations in high stake summative assessment procedures must be properly governed so that validity and reliability are not only maintained but seen to be maintained and trusted.

In this context we are all ‘running to stand still’.

7.2 WORKING WITH INTENDED LEARNING OUTCOMES AND HOLISTIC ASSESSMENT

Our (QQI's) Core QA Guidelines state that:

“Policies and procedures for programme design and approval ensure that programmes:

- » are designed with overall programme objectives and programme strategies that are in line with the provider strategy and have explicit intended learning outcomes;
- » are developed in line with the requirements of the National Framework of Qualifications and associated policies and procedures on Access, Transfer and Progression; ...”

Our (QQI's) validation policy is more explicit, requiring that programmes specify minimum intended programme learning outcomes that must be achieved by all who pass. In other words, they must specify the learning outcomes that must be achieved to warrant a minimum passing grade. Naturally,

programmes may also specify additional higher educational goals for their students.

In our experience providers at all levels frequently find it challenging to articulate – and demonstrate – curricular support (including formative and summative assessment), for intended programme learning outcomes.

Some providers are evidently more comfortable with documenting their inputs to the education and training process (the modules that are offered, the content that they contain, the assessments that are set and so on) than articulating a programme level educational goal and demonstrating how this is realised through the learning environment and opportunities, the interactions between learners and teachers, the programme content and so on and how achievement of the goal is assessed. This might suggest a lack of sufficient reflection about the overall programme as distinct from its constituent subjects. We see this problem in HET and in FET.

Some providers prioritise units and see larger programmes as little more than bundles of units that are defined from their elements with little if any predetermined unifying principle. The idea is that the larger programme is emergent, and its outcomes are implied and do not need to be explicitly assessed.

We also have the impression that minimum intended programme learning outcomes (MIPLOs) when they are specified may sometimes be created more to comply with our requirements than as educational goals that govern the design and delivery of programmes and, particularly, assessment strategies. And if they don't govern assessment strategies then it is unlikely the assessment will be either valid or reliable to determine achievement of the MIPLOs.

7.3 CONSISTENT INTERPRETATION OF STATEMENTS OF LOS

We sometimes encounter a view along the lines that written learning outcome statements solve the problem of qualifications consistency when they are properly applied. Would that it were that straightforward, but it is far from it.

Certain kinds of expected learning outcomes can be written in such a way that they will be interpreted consistently by all. Outcomes such as memorisation of specific identities or the ability to execute a simple specific procedure are examples of ones that can be interpreted relatively unequivocally. In practice, this clarity does not extend to most kinds of outcomes that are of interest and all the more so where creativity or higher-level outcomes are involved.

Higher order outcomes can only be abstracted by (i.e. approximated by) textual statements. Further, such statements will normally need to connect with norms (tacit or explicit) established by the relevant professional, scientific or academic communities (especially where specialist language is involved). The recognition of the achievement of learning outcomes in such cases also generally defers in part either implicitly or explicitly to peer review by members of those communities.

7.4 CAPTURING IDEAS OF LEARNING OUTCOMES IN STATEMENTS

Writing intended learning outcomes statements is an art. The statements must be comprehensible at an appropriate level to learners, to teachers, to members of the discipline's wider communities of practice and to other key stakeholders.

We would encourage people writing learning outcomes to think in sentences rather than words and consider how those sentences are likely to be interpreted by the relevant communities of practice. Particular adjectives, for example, don't correlate with NFQ levels. We encounter MIPLOs that involve repeated use of a term like 'critically analyse' seemingly because the authors feel that 'critical analysis' is the hallmark of a particular NFQ level. Critical analysis can be incorporated into outcomes at any one of the 10 levels in the NFQ. To critically analyse the relative efficacy of several different targeted therapies for treating a particular kind of metastatic cancer is clearly not as straightforward as to critically analyse the different ways of making a Victoria sponge cake.

The expression of learning outcomes needs to come from a genuine internalised understanding of what a person is expected or intended to have learned by the end of a programme or module. Individual word choices are not that important if the ideas are comprehensible.

7.5 PROGRAMME ASSESSMENT STRATEGY AND INTEGRATED ASSESSMENT

This section is primarily about assessment strategy. This includes strategy for assessing programmes as well as module ILOs. There is some overlap here with section 7.2 though the perspective is slightly different.

We consider that, at the programme level, assessment of learning is complex and requires a strategic approach and yet our experience indicates that some providers can find it challenging to articulate assessment strategies (as we have defined them in (QQI, 2013)) that underpin integrated²⁸ (or integrative) approaches to assessment that are aligned with the intended programme learning outcomes (including any generalised graduate attributes professed by the institution). The National Forum for the Enhancement of Teaching and Learning in Higher Education has published a useful commentary entitled: “An Introduction to Horizontal and Vertical Approaches to Programme Assessment Integration”²⁹.

For example, many programmes in further education and training and in higher education and training are modular, where successful completion of the modular programme entitles the learner to a major award (e.g. an Honours Bachelor’s Degree or a Level 5 Certificate). Those major awards are expected to be aligned with NFQ award-type descriptors that set out generalised standards of knowledge, skill and competence. Named awards are expected to have explicit statements of the minimum learning outcomes (e.g. MIPLOs) that must be achieved to qualify for the award. An assessment strategy is particularly important to help (among other things) to ensure that learners meet those overarching standards and can select from and apply what they have learned in the modules in various contexts and roles. It is not always safe to assume that the overarching outcomes will look after themselves if the modules are delivered well and discretely assessed. We consider that holistic assessment can and should always be implemented.

Another example is the integration of assessment in the workplace. In vocational programmes (in

28 See for example <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5468715/> (21/11/2017)
29 <https://www.teachingandlearning.ie/wp-content/uploads/2017/06/Commentary-on-Horizontal-and-Vertical-Approaches-doi.pdf> (13/11/2017)

HET and FET) it is beneficial for certain kinds of assessment to be situated in an authentic context e.g. undertaken during an internship or work placement. For example:

“... in the case study from the German dual system, interviewees reported that for the practical part of the final assessment (in-company order/task, Betrieblicher Auftrag) examiners assess apprentices in a holistic way, meaning that they do not consider the competence-oriented descriptions in the trainings regulations but they base their judgement on the fulfilment of an occupation-typical task.” (CEDEFOP, 2015, p. 62)

In this instance, the assessment criterion to be used by the workplace assessor might include one overarching judgement as to whether the apprentice is capable of functioning as a practitioner in the profession and being a fully engaged member of the community of practice.

This example raises the question of how to ensure that workplace assessors have the necessary competence to validly and reliably assess learning. This question is acute in the context of apprenticeship but just as relevant in medicine, nursing, accountancy, social care and all other professions where education and training for professional practice involves an internship. See (National Forum for the Enhancement of Teaching and Learning in Higher Education, 2017) for insights into approaches to work-based assessment in higher education.

7.6 DIVERSITY AND ASSESSMENT

Designing an assessment invariably involves making some assumptions about learners. An assessment that is valid and reliable for learners who have come through the Irish secondary school system may be less valid and reliable if used to test international students or mature learners who have been away from formal education for many years.

7.7 ASSESSMENT IN THE QUALIFICATIONS AND QUALITY ASSURANCE (EDUCATION AND TRAINING) ACT 2012

The Qualifications and Quality Assurance (Education and Training) Act 2012 explicitly addresses assessment of learning. The implied purpose of the assessment explicitly discussed in the Act is summative.

One of QQI's functions under this legislation is to make awards in respect of programmes of education and training that it validates. QQI has no role in assessing learners for its awards.

The legislation establishing QQI and the associated qualifications and quality assurance infrastructure for higher education and training and further education and training envisages summative assessment for NFQ awards to be arranged by providers of the corresponding programmes.

As noted earlier, the legislation explicitly states that, as a condition of validation, providers of programmes validated by QQI:

“establish procedures which are fair and consistent for the assessment of enrolled learners to ensure the standards of knowledge, skill or competence determined by the Authority under section 49(1) are acquired, and where appropriate, demonstrated, by enrolled learners” (section 45(3)(b)).

One can envisage how a well-resourced provider of mainstream courses that are taken by many learners can efficiently establish and maintain assessment procedures that are reliable and valid for those mainstream courses.

However, for scantily resourced prospective providers providing niche programmes for few learners, the cost of establishing and maintaining assessment procedures that are reliable and valid may be unsustainable. Such prospective providers and especially their prospective learners might be better served by arrangements alternative to validation by QQI. They may be better working, for example, as collaborating providers with organisations that have the resources to sustain valid and reliable summative assessment.

Unsustainable burdens create perverse incentives for providers that can undermine quality and trust in qualifications. QQI must be able to ensure that only those providers who can undertake their responsibilities can access (or continue to access) QQI validation of their programmes.

QQI has inherited from FETAC and HETAC relationships with many providers, some of whom may not be able to bear the costs of compliance for all the programmes they currently offer. This applies not only to small providers. Large providers providing niche courses to few learners may find the cost of compliance prohibitive for some of their programmes. The costs of compliance here are not just the fees payable to QQI, which are likely to be only a small fraction of the total costs involved. The costs may include those for the maintenance of the quality assurance infrastructure, programme development and maintenance, and the development and implementation of assessment procedures.

One of QQI's many statutory functions is to make awards. As an awarding body, QQI is rather unusual by international standards in that it sets standards for its awards but provides no curriculum support and sets no examinations. By international standards it only undertakes some of the functions that are generally understood to be proper to an awarding body, for example in the UK.³⁰

“An awarding organisation must produce a written document in relation to an assessment which sets out clear and unambiguous criteria against which Learners' levels of attainment will be differentiated.” See Article G3.1 of (Ofqual, 2016, p. 61).

30 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/529394/general-conditions-of-recognition-june-2016.pdf

7.8 ASSESSMENT OF PRIOR LEARNING

Nationally and internationally facilitating RPL (recognition of prior learning) is important for multiple reasons, including for access to programmes, for achievement of credit within programmes, for entitlement to awards, for employment and for personal validation. RPL processes are likely to gain emphasis as the permeability between sites for new learning becomes greater.

Granting a person access to the achievement of a qualification through RPL requires that the qualification requirements can be described in terms of knowledge, skill or competence that are achievable and assessable by means other than participation in a specific programme. This can usefully inform the way in which expected learning outcomes are described. In principle, all NFQ awards should be achievable through RPL.

With this and other practical enablers (e.g. guidance, mentoring) in place, RPL then depends on the availability of arrangements for valid and reliable assessment. RPL practices sit therefore within the broader context of assessment of learners and learning.

Assessment in the context of RPL can potentially be challenging because learning is presented in atypical ways that require confident handling. Additionally, in some instances, bespoke tests are required to be constructed e.g. in technical areas and that can be onerous and expensive depending on the discipline and economies of scale. This might be supported, for example, by national co-ordination in particular fields of learning, and in other ways.

7.9 CLARIFYING GENERAL EXPECTATIONS OF ALL AWARDING BODIES MAKING AWARDS RECOGNISED WITHIN THE FRAMEWORK

In general, where there is summative assessment of learning to determine whether a candidate for an award has met the prescribed learning outcomes, it is more transparent for those outcomes to be expressed as minimum requirements, i.e. threshold as distinct from typical standards. Threshold standards can be complemented by other kinds of standards, such as expected median standards.

7.10 DISINTEGRATING COMPETENCE

Some approaches to competence assessment involve only checking whether a learner can perform a list of discrete skills. There are some who criticise this ‘atomistic’ approach as insufficient, for example (Hager, 2017), arguing for an integrated understanding of, and approach to, competence and its assessment.

Hager also notes, in the context of vocational and professional education and training, that

“it seems that attributes such as problem solving, analysis, pattern recognition, etc. are highly context dependent, so much so that efforts to teach and assess them out of context are largely ineffective. ...

...so this generic view of competence tends to omit those very features and activities that constitute an occupation’s distinctive or unique character” (Hager, 2017, p. 205)

These observations give pause for thought when considering existing assessment and standard determination practices, especially in the context of vocational and professional programmes in both further and higher education.

7.11 ASSESSMENT HINDERING LEARNING

Learning to become, for example, a carpenter, nurse, or journalist involves achieving knowledge, skill and competence that transcends what can be taught in any single module or subject. It involves developing the confidence for creative practice of the profession within the bounds of acceptable professional practice. Learners need time and space within a programme to develop this confidence. High frequency, highly granular summative assessment designed to keep students working on constituent subjects (that may be competing with one another for learners' attention) within a programme can interfere with this development.

Tony Hartland, University of Otago, has done some interesting work on the redesign of programmes and assessment to give more space for creativity. He uses the term 'Slow Scholarship'. The National Forum has published a case study on this subject by him that sets out the problem in the context of an ecology programme at the University of Otago, New Zealand and how it was tackled³¹. His work was recently showcased at the National Symposium on Assessment in Higher Education (Dublin, 31 October 2017).

7.12 KNOWLEDGE, SKILL AND COMPETENCE

Major awards in the NFQ specify generalised levels of achievement in terms of knowledge, skill and competence. All three domains are important, and assessment needs to do justice to outcomes in each domain.

Our experience of working with standards development groups is that different disciplines tend not to be equally comfortable in expressing expected learning outcomes in all three domains. One discipline might find it easiest to express skills outcomes, another knowledge outcomes.

We don't yet know whether there might be a corresponding preference for some kinds of assessment over others and whether that might lead to gaps in assessment and consequently in formation of

learners. Such gaps would be problematic.

7.13 NORM REFERENCING

When norm referencing is used a person's assessment result depends on their performance relative to their peers. The same performance (in terms of knowledge, skill and competence) may result in a different result when assessed in the context of different peer groups.

In theory norm and criterion referencing can be combined when reporting results. For example, a criterion referenced approach may be used to evaluate performance but the results of all those who meet or exceed minimum requirements may be communicated in terms of performance relative to their peer group rather than as an absolute value.

Norm referencing, where properly implemented (including being based on an accurate statistical model that justifies the approach) and permitted, is, in principle, unproblematic provided it is clear to all concerned that norm referencing is being used. Norm referencing is problematic in systems that profess not to use norm referencing, which may seem a trite point until one reflects on the ease with which unintended norm referencing can creep into assessment. In practice, it is quite easy for assessors to drift into relativistic practices, marking students relative to each other rather than to a standard that is independent of the group. External examining and authentication can also introduce relativistic influences.

QQI currently requires assessment in the context of programmes leading to its awards in both FET and HET to be criterion referenced using criteria that relate to knowledge, skill or competence.

Norm referencing can lead to drifting in academic standards (grade or qualifications inflation) if based on non-stationary populations unless there are other anchors that prevent this.

7.14 WHETHER TO GRADE

To design an assessment system that validly and reliably determines whether a person has achieved intended programme learning outcomes is challenging enough; to design a classification or grading system that fairly and consistently differentiates performance beyond this is even more challenging. This is one issue that has led some to question the utility of grading.

It is useful to reflect on the purpose and necessity of grading in the context of assessment for/of learning. The question of assessment without grades has been attracting some attention see for example (Chris McMorran, 2017). The paper (Susan M. Brookhart, 2016) provides a systematic review of evidence on grading.

7.15 RELIABILITY OF GRADING

We suspect, given the motivations (higher classifications may lead to better job prospects for students) and the limited number and efficacy of stabilising influences, that the link, for a given award-type, between the award classification and the actual performance may not be absolute, but may depend, in some measure, on the programme, the institution, the discipline, the enrolment selectivity and when the award was made.

That would mean that reliance on classification to discriminate between people who studied different programmes would not be safe. (See also Section 5.9.)

We doubt that either external examining in HET or external authentication in FET as currently practised can prevent gradual divergence.

We consider that systematic research is warranted to resolve the uncertainty.

The OECD AHELO project (mentioned in Section 5.1) is relevant in this context. Incidentally, HETAC published some pilot empirical work along these lines.

7.16 GRADING WORK-BASED LEARNING

Apprenticeships and many other programmes involve assessed work-based learning. One issue that often arises is whether work-based learning should contribute to the final award classification or grade and, if so, how to ensure consistency.

7.17 CAPACITY AND COMPETENCE TO ASSESS

Society expects its educational institutions, professions and employers to validly and reliably assess diverse learners, practitioners and trainees. The issue of competence to assess arises. Different parts of the education and training system have different ways of selecting and approving people who will be involved in the assessment of learners.

We need to understand how organisations recognise whether an individual is competent to assess in a given situation and how they support people in gaining the necessary competence.

There is a question about how institutions manage competing interests to ensure that they retain a balance of competences suited to the needs of their enrolled learners. In this context, for example, the criteria for appointing new staff may be relevant. There can be competing interests involved in the appointment of new staff. An HEI, for example, might be tempted to prioritise a new appointment as an opportunity to increase its research prestige over one to increase the HEI's pedagogical competence.

7.18 ONLINE OR REMOTE ASSESSMENT

Assessment in the context of distance learning is becoming more common. We (QQI) published a white paper in August 2017 entitled “Topic-Specific Quality Assurance Guidelines for Blended Learning” that deals with some relevant matters.

While the use of technology in assessment is ubiquitous, remote assessment in certain situations can involve specialised knowledge and equipment that may not be generally available. It should not be assumed that all learning can be practically assessed remotely. Using remote video to assess a practical skill might work with several remotely controlled high-resolution cameras but be unreliable with a single webcam.

7.19 CONTRIBUTION OF PROFESSIONAL BODIES AND PROFESSIONAL REGULATORS

Communities of practising professionals have an essential role in supporting the quality and relevance of professionally oriented programmes of education and training.

Their representative professional bodies can take a special interest in education and training. Some, for example, have processes and criteria for the accreditation of programmes. Professional regulators may also be involved in the regulation of programmes of professional education and training.

In principle, problems could arise were a professional body or professional regulator to impose requirements on programmes of education and training that conflict with effective assessment practice.

7.20 CONNECTION WITH COMMUNITIES OF PRACTICE

Communities of practice (including scientific communities for example) have an essential role in supporting the quality and relevance of programmes of education and training. We have discussed

their role, for example, in the consistent interpretation of standards (see sections 2.2 and 7.5 and (QQI, 2013)).

In principle, problems could arise where persons responsible for assessment are disconnected from (i.e. not in regular contact with) the relevant communities of practice.

7.21 ENGAGING LEARNERS AS PARTNERS IN ASSESSMENT

Learners can be engaged as partners in assessment (see for example (Healey, et al., 2014) and the resources published by the National Forum). This leads us to question what can be done to further engage learners as partners in assessment of, for and as learning?

7.22 QUALITY ASSURING ASSESSMENT IN THE WORKPLACE

This topic is important for apprenticeship programmes and for many professional programmes. It arises in FET and HET. With the growing interest in the inclusion of work-based learning in programmes interest in this topic is widening.

There is a range of approaches to quality assuring assessment in the workplace. Not all are equally effective. In some occupations there are concerns about the consistency of assessments undertaken in different workplaces. Mechanisms that work well for one occupation may not be practical in another.

7.23 ACADEMIC INTEGRITY AND ASSESSMENT

The issue of academic integrity is complicated and warrants a section of its own. It is addressed in Section 13.

7.24 DATA PROTECTION

In respect of Case C-434/16 (Reference for a preliminary ruling from Supreme Court (Ireland) made on 4 August 2016 – Peter Nowak v Data Protection Commissioner) the following judgement was made by the European Court of Justice on 20 December 2017:

“Article 2(a) of Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data must be interpreted as meaning that, in circumstances such as those of the main proceedings, the written answers submitted by a candidate at a professional examination and any comments made by an examiner with respect to those answers constitute personal data, within the meaning of that provision.”

Assuming this extends to all kinds of examinations, the implications include that providers (unless access is restricted in law) will have to make available the written answers submitted by a candidate at an examination and any comments made by an examiner with respect to those answers.

Restriction by member states is permitted to safeguard the rights and freedoms of others (Directive 95/46/EC, art. 13(g)) and where there are ‘other important objectives of general public interest of the Union or of a Member State’ (Regulation (EU) 2016/679, art. 23(e)). Bills have been published in Ireland³² and in the UK³³, both of which address restrictions on data subjects’ rights of access. Section 50 of the Irish Data Protection Bill stipulates:

“(1) A request from a data subject under Article 15 in relation to the results of an examination at which he or she was a candidate shall be deemed for the purposes of that Article to have been made on the later of—

(a) the date of the first publication of the results of the examination, or

(b) the date of the request.

(2) In this section, “examination” means any process for determining the knowledge, skill or ability of a person by reference to his or her performance in any test, work or other activity.”

The UK bill includes a similar provision, but also expressly states that:

“The listed GDPR provisions do not apply to personal data consisting of information recorded by candidates during an exam.”

QQI plans to take a proactive position to help providers and regulators explore the implications of the judgment. To this end we propose to host a workshop early in 2018.

8

FURTHER EDUCATION AND TRAINING ISSUES

In this section we identify additional sector-specific issues for discussion with colleagues in the FET sector. These add to the general issues presented in sections 7 and 13-16. If we miss any that you consider important, please let us know. Recall that the principal purpose of this Green Paper is to facilitate discussion of issues concerning assessment.

Providers of programmes of further education and training leading to QQI awards set their own summative assessments. In this they are guided in a generalised way by the following QQI documents:

- » Quality Assuring Assessment Guidelines for External Authenticators - Revised February 2015
- » Quality Assuring Assessment - Guidelines for Providers, Revised 2013

Assessment is expected to be criterion referenced using learning outcome-based criteria. The guidelines address the kinds of topics one might expect, for example, that assessment should be valid and reliable and that there should be arrangements for dealing with assessment-related malpractice, such as learner plagiarism, alteration of results and so on.

Programme-specific requirements and procedures for the approval of programme-specific assessment arrangements are set down by QQI's new validation policies and criteria (QQI, 2016) commenced in the FET sector in December 2017 (a longer implementation period is being allowed for the ETBs to facilitate a smooth transition).

QQI's new validation policy and criteria and its new awarding, and standards determination, policies and criteria have evolved thinking on assessment in some respects. One significant difference is that the new validation policy places the emphasis on module and programme outcomes (MIPLOs and MIMLOs) as the direct object of summative assessment rather than the expected learning outcomes in the CAS awards specifications, which are indirectly involved because the MIPLOs and MIPLOs must be consistent with the standards embedded in the CAS awards specifications.

The assessment guidelines set out five stages of certification:

- » Assessment,
- » Authentication (involving, inter alia, internal verification and external authentication),
- » Results approval,
- » Appeals, and
- » Request for certification.

Each is addressed by the guidelines.

The guidelines outline elements of a grading system to be used by providers. Marks are out of 100 with 50 as the minimum passing mark. Normally, providers of programmes leading to compound awards feed component marks into QQI's QBS system which calculates the grade for the compound award. This means that the grade for the compound award is completely determined by the grades for the components. This practice is a legacy of FETAC policy and practices.

The current assessment guidelines present generalised grading criteria for CAS awards. According to the current "Grading Criteria for awards at Level 4 - Level 6", to pass a learner must have "achieved the learning outcomes as outlined in the minor award - a pass is the minimum acceptable standard" (QQI, 2013, p. 23).

The grading criteria at levels 1-3 are unconventional in a learning outcome context because they involve the teacher and learner and therefore in effect qualify the learning outcomes statements in the awards specifications.

'Level 1: The learner has achieved the learning outcomes for the award in a structured and supported learning setting. The outcomes have been achieved with significant support and direction from the assessor, but the learner has demonstrated sustentative achievement on their own.

Level 2: The learner has achieved the learning outcomes for the award in a structured and supported setting with clear direction from the assessor. The learner has demonstrated some autonomy of action and has taken limited responsibility for the activities and for generating evidence.

Level 3: The learner has achieved the learning outcomes for the award with some supervision and direction. The learner has demonstrated autonomy of action and has taken responsibility for generating appropriate evidence.'

At all NFQ levels, there is an explicit requirement that learning outcomes must be achieved. Further (QQI, 2013, p. 34) states that "where a learner has not achieved the learning outcomes for the award the grade is recorded as Referred". Nevertheless, we frequently encounter a view in the FET sector that it is sufficient to assess all the expected learning outcomes and that it is not necessary that they all need to be achieved.

Compound award passing grades are classified as:

- » Pass,
- » Merit, and
- » Distinction

at NFQ levels 4-6; and as

- » Successful

at NFQ levels 1-3.

In the case of programmes leading to CAS awards, providers receive further guidance for summative assessment for CAS components (minor awards) as to the assessment techniques to be used and the apportioning of marks by assessment technique. QQI's FET guidelines set out six categories of "valid

and reliable³⁴ assessment techniques. They are:

- » Assignment,
- » Project,
- » Portfolio,
- » Skills demonstration,
- » Examination, and
- » Learner record.

The guidelines on the assessment and external authentication process take the QQI awards specifications as their reference rather than the validated programme as required by more recent policy.

In some respects, the current QQI FET guidelines on assessment fall short of being fully self-consistent.

The current authentication framework envisages QQI visibility of authenticator reports through a QQI monitor. Currently QQI does not monitor external authenticator reports and has no plans to become directly involved in routine assessment operations.

In recent times QQI has been systematically feeding data back to FET providers on certificate grades. Providers can use these data to compare their learners' results against those of other providers. If, for example, their learners are more likely than others to receive awards with distinction then: there might be an affirmative explanation e.g. that their teaching methods are uncommonly effective; or there might be another benign explanation; or it might be the result of the provider implementing lower standards than expected; or it could be symptomatic of assessment malpractice; or it could involve systematic error.

The current system requires that providers arrange for the summative assessment of learners. This is a strength for several reasons, not least because it enables providers to tailor their programme to their

learners. It is a weakness because it exposes providers to a conflict of interest (in common with all providers in HET) and it makes it difficult to achieve consistency.

Consistency in the assessment of programmes leading to QQI CAS awards is currently supported, for example, by:

- 1) QQI awards specifications (but see Section 7.3).
- 2) Curricula that are shared by the ETBs among themselves (and with some other providers).
- 3) National apprenticeship programmes with coordinating providers.
- 4) External authentication.
- 5) External accreditation (this applies to a relatively small number of programmes).
- 6) Providers benchmarking their grades against those of other FET providers (relatively recent and still patchy), which can indirectly help calibrate assessment procedures.

8.1 ISSUES FOR DISCUSSION

Unitisation of assessment

Unitisation of assessment means that there is no final assessment for a major award and the grade for the award depends exclusively on the grades for units of learning prescribed for the award (recall also section 7.5 and 7.10).

The practice of unitisation of assessment is widespread in the FET sector and has been actively encouraged by systems and policies. This is the case both in the parts of the system that have secondary school roots and those parts that have industrial training roots.

Incidentally, the practice is also widespread in the UK (especially England), from where there has been policy borrowing over the years, and from where Irish providers continue to import services e.g. City and Guilds. We are not criticising the import of these services. Indeed, we consider that use of imported services can enable the provision of services in niche areas that might be much more expensive were they to be developed locally from first principles. This owes to the small scale of Ireland's FET sector

relative to that of the UK and other countries.

Returning to the point at issue, unitisation of assessment is problematic when it facilitates the omission of explicit assessment of overarching learning outcomes. This problem can be alleviated by including some 'capstone' units whose purpose is to provide an opportunity to achieve and demonstrate overarching outcomes that would not otherwise be assessed.

Unitisation of assessment can also lead to inefficiencies for learners, who may be 'over assessed' as a result of each unit being individually assessed.

QQI's CAS awards specifications prior to more recent QQI policies encouraged unitised assessment and, while this is no longer the case, not all practitioners may have fully appreciated the implications of the QQI policy changes on the use and interpretation of CAS awards standards.

CAS awards specifications provide guidance on assessment techniques for each component award. For example, component X and Y might each guide an assignment and an examination. Following the guidance (which is not mandatory) unreflectively would lead a provider to set two examinations and two assignments, where as one of each (or something entirely different) might cover both. QQI's IT system (QBS), by providing for the upload of a breakdown of results for modules (even though it is not necessary for certification) may give the impression that the guided assessment techniques must be used and reported against.

In summary, the predominant practice in FET in Ireland has been to recommend a major award based on accumulation of components without a final assessment. QQI's current policy direction will require change in this regard unless the components are designed to ensure that the major as well as component outcomes are tested at component level (e.g. using 'capstone' components).

Burden on providers

Ireland's further education and training system benefits from having numerous and diverse organisations providing training for the workforce. All providers from the smallest to the largest can and should be involved in assessment of learning including summative assessment. However, designing and implementing summative assessment procedures and tasks that are:

- a) valid and reliable for the purposes of certification;
- b) nationally consistent;
- c) fair and suitable for use in competitive allocation of places in higher education;

may be, realistically, we suspect, beyond the unaided capabilities of many providers under the current arrangements.

We need to identify what can be done so that we do not risk undermining trust in qualifications while enabling smaller organisations to contribute to the provision of education and training services.

Collaborative approaches to final summative assessment may be one way to distribute the burden more realistically.

Centralised versus distributed assessment

Distributing responsibility for assessment to providers of validated programmes has advantages, but it makes consistency more difficult.

Referring to the CEDEFOP study cited in the introduction, QQI's model looks like Model (a) (centralised certification) but also has much of the character of Model (c) (self-regulated certification) (CEDEFOP, 2015, p. 64). What is, in fact, centralised by QQI is the printing of the certificates.

A two-part approach to summative assessment with centralised written exams on some widely studied subjects (such as mathematics) combined with provider-set examinations on vocational subjects is a way that some have tried to 'resolve the tension between the two approaches' (CEDEFOP, 2015, p. 67).

The mechanisms above that are designed to help support consistency are of limited efficacy relative to centralised or external assessment. That said there is scope for further gains to be had, especially from benchmarking and external authentication. As already noted, the capacity of awards standards to bring consistency is often over estimated owing to the limitations of what can be captured in statements about learning outcomes.

We (QQI) are not angling to become involved in centralised assessment or its promotion. Rather, we need to consider whether there should be an expectation that providers would collaboratively establish arrangements to help calibrate local summative assessment. Benchmarking assessment results against those in comparable third-party examinations is one potentially useful device. An example of a promising initiative of the ETBs is the Maths for STEM programme's use of a shared centralised online assessment tool for part of the summative assessment.

Perceived ambiguities in the regulations

A principle of QQI validation policy and this Green Paper is that providers must establish MIPLOs and MIMLOs that are consistent with the relevant QQI awards standards and it is the MIPLOs (or MIMLOs) (which are approved by QQI when it validates a programme) that must be achieved before an award can be recommended in respect of a programme (or module).

The minor awards specifications state:

“Programme validation will require providers to map each learning outcome to its associated assessment technique. All learning outcomes must be assessed and achieved in accordance with the minimum intended module learning outcomes set out in the validated programme”.

The intention of this paragraph is the same as the first paragraph of this subsection, but it is not as clear and might be open to other interpretations.

Micro-management by regulation

The current QQI guidelines on assessment dive into minute details in some parts. For example:

- » Dealing with the setting of deadlines;
- » Taxonomy of assessment techniques

These guidelines were intended to be helpful, but they run the risk of getting in providers' way and encouraging an excessively rules-based approach to assessment that does not afford due latitude to providers and teachers. Controls are necessary, but many of those controls are best established locally, where they can be situationally optimised, rather than centrally, where they cannot. Quality is, frankly, harmed by excessive control from the centre.

Patchy guidance not better than no guidance

Appendix 5 in the current QQI guidelines is presented as a source of “examples of assessment criteria”. It is not really such a source. Indeed, QQI is not best placed to provide such examples in a general guideline. However, examples would be useful. There is an extensive literature on effective practice in assessment. Providers would be better tapping into this than looking to QQI for guidance at that level of detail. Ways also need to be found to stimulate the emergence of instructive examples of effective assessment in the Irish FET context.

CAS implementation

There are assessment-related implementation problems with the CAS. Currently we (QQI) calculate the grade for a compound award based on the results for the component awards—there are historical reasons for this. Our involvement is problematic because achievement of the components is not necessarily a valid or reliable indication that the compound's ELOs have been achieved. The 2012 Act is clear that assessment is the provider's responsibility and the calculation of the grade is part of assessment and therefore the provider's responsibility.

9 HIGHER EDUCATION AND TRAINING ISSUES

In this section we identify sector-specific issues for discussion with colleagues in the HET sector. These add to the general issues presented in sections 7 and 13-16. If we miss any that you consider important, please let us know. Recall that the principal purpose of this Green Paper is to facilitate discussion of issues concerning assessment.

Designated awarding bodies (currently comprising the universities, Royal College of Surgeons in Ireland and DIT) in Ireland are guided by QQI's quality assurance guidelines, which address assessment in outline only. They assess their own students and they all use external examiners in the quality assurance of assessment (this Green Paper does not address external examining in the context of research degree programmes, which is a completely different function). Standards of NFQ awards they make are expected to be consistent with the NFQ. There are no national level guidelines (i.e. ones that apply to all) on the classification of those higher educational awards nor on external examining in higher education institutions.

Providers of programmes of higher education and training leading to QQI awards and those that make awards under delegated authority also set their own summative assessments. In this they are guided by the following QQI documents:

- » Assessment and Standards, Revised 2013 (this includes guidelines, conventions and protocols)
- » Effective Practice Guidelines for External Examining, Revised February 2015

According to Assessment and Standards, summative assessment supporting certification is expected to be criterion referenced. The emphasis in Assessment and Standards is on the establishment and support of threshold standards (expressed as minimum intended programme learning outcomes) for named awards. This emphasis is consistent with the current QQI validation policy and criteria.

QQI HET awards and those made under delegated authority may be, and generally are, classified and, while there are indicators for the classifications, they provide a relative basis for differentiating classifications rather than defining measurable thresholds. There is a tacit expectation that those

thresholds would emerge through other processes involving communities of practice reaching consensus on the norms to be followed.

The practice of classifying awards is not unique to QQI (and was not unique to its predecessor HETAC) and this is one of the reasons why HETAC was not more explicit about the criteria for how awards are to be classified. It is tempting to suspect that in practice, award classifications in higher education may sometimes be tacitly norm referenced to some extent.

There are five parts to Assessment and Standards:

- 1) Principles,
- 2) Guidelines,
- 3) Sectoral Conventions,
- 4) Reference Protocols,
- 5) Glossary

The principles and guidelines are macro-level quality assurance guidelines. The conventions and protocols are meso level and were established by mutual consent between HETAC and providers. Mutual consent was considered necessary because they address topics where both HETAC and providers had responsibility but where an agreed national approach was of mutual interest to promote fairness, consistency, and learner mobility within the higher education system.

9.1 ISSUES FOR DISCUSSION

AWARDS STANDARDS, ACTUAL LEARNING OUTCOMES (ALOS) AND CLASSIFICATIONS

We suspect that the way higher education students are assessed allows for a spectrum of standards to be maintained for major awards. A move to a system where assessment is absolutely valid and reliable

for the purpose of maintaining nationally agreed threshold standards might have consequences that would be uncomfortable for society if it demonstrated a wide spread around mean standards and identified those programmes where the standards were below the mean (i.e. half of all programmes should the distribution be symmetrical).

- » If we pick two first class honours bachelor degree qualifications from different institutions but in the same subject should we expect them to be equivalent? If so, what do we mean by equivalent?
- » Is there an 'A list' group of providers whose qualifications are significantly more valuable in some sense? Would we, as a society, be happy to have a tiered system where qualifications from 'A list' providers are much harder to get than those from 'B list' providers (recognising that that might be due partly to selective enrolment)? Are we already in that state?

2009 Sectoral Conventions for Assessment

The current sectoral conventions were established over eight years ago and much has changed in the interim. We need to consider:

- » What has been the experience of operating with these conventions for nearly a decade?
- » What specific changes are required to the conventions for providers whose HET programmes are validated by QQI or who have DA from QQI to make HET awards?
- » What if anything ought to replace the conventions for the institutes of technology that become designated awarding bodies?

Integrated assessment

Modularisation is firmly embedded in higher education. It benefits administrators and institutions and can be of benefit to learners by, for example, enabling them to match their education to their specific needs.

Modularisation when taken to extremes can be problematic (but see section 7.5). But there is also a risk with any modular programme that the overarching intended programme learning outcomes are not given due prominence in teaching, learning or assessment.

- » What can be done to help ensure that the overarching intended programme learning outcomes are given due prominence in teaching, learning and assessment?

Over assessment and manageability of assessment

We have already raised some topics relating to over assessment. Here we take a slightly different perspective. In January 2017, the National Forum published a report on assessment practices in higher education based on 30 randomly selected undergraduate HE programmes (National Forum for the Enhancement of Teaching and Learning in Higher Education, 2017).

It found, among other things, that approximately the same number of assessments were set per module in both 5 ECTS credit and 10 ECTS credit modules. While that finding prompts questions about whether the absolute load is proportional to the credit rating because the effort involved in completing the assessments may differ, it does, nevertheless, seem plausible that increasing the number of modules comes with at least a greater assessment overhead and therefore a greater overall load. This prompts questions about the impact of modularisation of curricula on assessment load. This topic cannot, of course, be considered in isolation from other factors that influence how curricula are modularised in the context of an institution (or group of institutions).

- » How can programme designers approach the optimisation of the modularisation of programmes to ensure that an appropriate balance is struck between optimising opportunities for effective learning and optimising the use of the provider's resources, recognising that there are trade-offs involved?

Repeat for honours convention (this applies to programmes leading to QQI awards and those made under delegated authority)

Sectoral Convention 4 from Assessment and Standards includes

“Honours classification, or any classification higher than ‘Pass’, shall be made based on first attempt grades. Necessary procedures to allow consistent treatment of a repeat grade as a first attempt grade, where exceptional mitigating circumstances exist, shall not compromise this principle.

Accordingly, the existing approach to repeat for honours (it is not to be offered) shall be maintained, pending discussions between other awarding bodies (including universities and Dublin Institute of Technology), with a view to finding an agreed national approach. This position

shall be reviewed within 12 months of the commencement of the Conventions.”

We understand that different practices are employed across the IoT sector in relation to this. This means that learners are treated inconsistently. The conventions were established to avoid inconsistencies. This prompts two sets of questions:

- » Is the restriction on repeat for honours still warranted? If not, should learners be allowed to keep repeating examinations until they achieve their desired result? Are examinations designed for first-attempters valid and reliable for repeating students? If there is to be a penalty for those who must repeat, what should it be?
- » Is the concept of sectoral conventions workable in practice? If not, what alternative mechanisms might be considered to help QQI ensure that assessment procedures are consistent in matters where providers have a degree of autonomy?

Assessment literacy

Concerns are sometimes expressed about the preparedness of some learners to transition to learning strategies that are compatible with higher education and training.

- » What supports need to be put in place to assist learners make the transition and, particularly to help them to engage with the modes of assessment of learning employed in HE and to avoid hazards associated with these?

Assessment as and for learning

- » What can be done to promote assessment as and for learning?

Assessment strategy

The concept of an assessment strategy was set out in Assessment and Standards. We have seen many different approaches to the presentation of assessment strategies in the programmes submitted to us for validation. We think that perhaps providers could make more of their assessment strategies at the programme level.

- » What should a programme assessment strategy address?
- » What should the purpose of a programme assessment strategy be?

Engaging learners as partners in assessment

Learners can be engaged as partners in assessment (see for example (Healey, et al., 2014) and the resources published by the National Forum).

- » What can be done to further engage learners as partners in assessment of, for and as learning?

10 ENGLISH LANGUAGE EDUCATION ISSUES

In this section we identify additional sector-specific issues for discussion with colleagues in the English language education (ELE) sector. If we miss any that you consider important, please let us know.

Recall that the principal purpose of this Green Paper is to facilitate discussion of issues concerning assessment.

A notable characteristic of English language education (ELE) in the context of this Green Paper is that it may not necessarily be intended to lead to an NFQ qualification. That is independent of whether language learning is the primary end, or it is only a means to another end: e.g. entry to an English-medium-of-instruction (EMI) programme of education.

Assessment in the English Language Education (ELE) field is often articulated by a provider in terms of an institutional assessment framework that incorporates an over-arching understanding of how language competence develops. It defines an assessment strategy that includes a range of formative and summative assessment types and both qualitative and quantitative elements with suitable grading / scoring schemes. There also rules governing who produces, monitors and maintains records of assessments of learner progress and achievement.

We note that a level of assessment literacy and competence is required on the part of the assessment writers to produce purposeful assessments that are valid and reliable. This is especially important when the results of these assessments have a high-stake value to learners, e.g., entry to a programme of study or formal recognition of proficiency at a level in the Common European Framework of References for Languages (CEFR).

ELE providers often issue learners with certificates of achievement at the end of their enrolment at a school, stating the level of proficiency that they have achieved. These are usually expressed using the Common European Framework of References for Languages (CEFR) Proficiency scale. It is generally expected that an ELE provider can demonstrate, as part of their institutional assessment framework, an alignment between the CEFR bands and descriptors and the competences being assessed. It is also

expected that their assessment scheme is comprehensive in evaluating both progress and achievement in acquiring the relevant competences as expressed in the ILO.

Many in the ELE sector currently find it difficult to conceptualise their English language education activities (especially their short courses) in terms of defined programmes of education and training having specified target learners and specified processes by which a cohort of learners would achieve specified intended learning outcomes. In that context it is not currently envisaged that QQI's programme validation processes will be widely used in the ELE sector for the regulation of most language education courses. An institution-level approach is more likely for language schools. Validation will, however, be used for specialised, focussed ELE sector programmes such as teacher training and international foundation year programmes.

As English has increasingly developed as the international language of communication, there has been a growing demand for external proficiency tests. A significant proportion of ELE assessment is carried out by commercial organisations e.g. Cambridge English Language Assessments (CELA) in the UK; ETS in the US; IDP/ BC / CELA in Australia and UK. Such organisations frequently align their proficiency tests with the CEFR bands. External proficiency tests are widely used, for example, by immigration authorities, higher education access offices and employers. It is notable that they not designed with a specific programme of education in mind. They can, in principle, be integrated into a specific programme. They are normally produced to an established set of test specifications that aims to enable consistent versions to be produced as required.

10.1 ISSUES FOR DISCUSSION

External proficiency tests

- » How can fitness of an external proficiency test (e.g. IELTS) for a given purpose be determined?
- » Is it possible to coach people to pass proficiency tests in a problematic way (mere teaching to the test) rather than prioritising skills required by learners to communicate effectively through English in their contexts?

- » What criteria can be used to determine whether an external proficiency test is valid and reliable?
- » What criteria can be used to determine whether an external proficiency test is worth having (e.g. not only valid and reliable for its professed purposes but widely recognised and respected as such)?
- » What do test users need to know before selecting any external proficiency test?
- » What responsibilities should any external proficiency test provider be required to accept?

CEFRL

- » Is it possible to align English language external proficiency test grades (specifically the standards they signify) onto the current Irish National Framework of Qualifications (NFQ) (currently it a system of ten levels addressing generalised levels of knowledge, skill and competence)?
- » Would this be desirable? Explain why/ why not.
- » Would it be useful to incorporate the CEFRL into an expanded NFQ? Explain why/ why not. There is a QQI project currently exploring this question.
- » Is it valid to align external proficiency test results with general CEFRL levels? Why/ why not?

Provider assessment systems

- » What are the challenges for ELE providers when designing their own internal assessments? What can be done at different levels to help address these challenges?
- » What kinds of grading systems are effective for use in internal ELE assessments and why?
- » Can an ELE provider rely exclusively upon external proficiency tests for assessment? Why/ why not?

Assessment of English proficiency for access to higher education and other high-stake purposes

- » Where can providers go for guidance on high stake assessment of English language proficiency? What more can be done and by whom?
- » What are the pitfalls and points that should be taken into consideration when using external proficiency tests for this type of purpose? What are the advantages and disadvantages of external proficiency tests? What are the alternatives? What do the institution and the test taker need to know about an external proficiency test? How can any problems be alleviated?
- » Are any external proficiency tests sufficient to determine whether an applicant's English language proficiency is suitable for participation in programmes of higher education? Why/why not?

Assessment in the context of the International Education Mark (IEM) for ELE providers

- » Anticipating the introduction of the IEM, do you think that there is a need for any ELE specific guidance on assessment for ELE schools with the IEM (to add to the general guidance in QQI's quality assurance guidelines)? If so what should such guidelines address?

11 APPRENTICESHIP ISSUES

In this section we identify additional sector-specific issues for discussion with colleagues with an interest in apprenticeship. If we miss any that you consider important, please let us know. Recall that the principal purpose of this Green Paper is to facilitate discussion of issues concerning assessment.

The discussion here concerns emerging approaches to apprenticeship (post 2015) as well as the established approaches. Not every point necessarily applies to every apprenticeship.

Some of the new approaches to apprenticeship have introduced innovations that may help address some of the challenges we identify, for example, the apprenticeship programme leading to an Advanced Certificate in Culinary Arts (Commis Chef Apprenticeship) recently validated for provision by a group of ETBs, headed up by Kerry ETB, as coordinating provider has made provisions for providing workshops for workplace mentors. We recognise such innovations but will not enumerate them here.

11.1 ISSUES FOR DISCUSSION

General points

There are indications of lack of sufficient consistency in the approaches to assessment (e.g. type, structure, methodology) across different employers. While uniformity is not required it is important that apprenticeship programme learning outcomes that are intended to be achieved in the workplace are assessed consistently and fairly across all employers.

We (QQI) have noted from previous applications for validation that there can be a lack of sufficient integration between on- and off-the-job training and assessment. Viewing on- and off-the job assessment as being independent can be problematic because it runs the risk that the apprentice will lose opportunities to integrate their different learning experiences and develop integrated competence.

Workplace assessment is generally undertaken by mentors who are active practitioners in the occupation concerned. This is one of the major advantages of this kind of programme. But there are indications that mentors require more support than they currently receive to assess learners consistently.

Assessment tools and technologies

Apprenticeships can be expected to employ the full gamut of assessment techniques. There are some particular methods and technologies that, from our experience, warrant comment here especially in the context of on-the-job learning.

Portfolio of work: In the context of an apprenticeship it is to be expected that the portfolio will be evidence-based and linked to on-the-job training.

Reflective journal: This is for an apprentice to document their own learning. It is primarily for self-development and perhaps to help inform formative feedback. It may only be of limited use in assessing competence-to-practise.

Virtual learning environments (sometimes called e-Learning platforms) are widely used in all kinds of programmes of education and training at all levels in the NFQ. Apprenticeship is no exception. These kinds of platforms are particularly useful for apprenticeships because of their flexibility for apprentices and for enabling the coordinating provider to efficiently monitor evidence of progress among other things.

Intended learning outcomes

It is important that MIPLOs and MIMLOs are clear to all concerned so that they can actually be delivered. MIPLOs must neither be too vague to have practical application nor too detailed to be a comprehensible indication of what the apprentice is expected to become as it were.

It is important that MIPLOs (minimum intended programme learning outcomes) are consistent with the relevant occupational profile and the relevant NFQ Professional Award-type Descriptors. The assessment arrangements must be properly aligned with the MIPLOs. In practice, many providers find it challenging to think in terms of programme-level outcomes and to demonstrate the necessary consistencies and alignments.

Competence assessment issues in the apprenticeship context

See for example (Mulder(ed.), 2017, pp. 607-648) for a discussion of this topic.

Some questions

- » What can be done to enhance capacity for developing and using MIPLOs and MIMLOs?
- » In general terms, what are the challenges in developing integrated approaches to the assessment of apprentices that avoid them taking a silo-based approach to developing understanding of theory, practice skills and role/context competence? What can be done to help and by whom?
- » What can be done to help increase the reliability and validity competence of assessment in the workplace?
- » What can be done to encourage industry to become more involved in discussions about approaches to assessment?
- » What can be done (and by whom) to help support professionals in industry who are responsible for mentoring and assessing apprentices? What can be done to ensure that assessment in particular is suitably consistent while allowing for necessary workplace diversity?
- » Should workplace assessment results be graded as distinct from being reported as successful/ unsuccessful without gradation? Why/why not?
- » Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?

12 EMERGING ISSUES

New issues are emerging all the time. If we have missed any issues concerning assessment that you consider important and noteworthy please let us know.

13 ACADEMIC INTEGRITY IN THE CONTEXT OF ASSESSMENT

As noted earlier, assessment relies on trust. Trust relies on people acting with academic integrity. We use the term academic here in an inclusive way and take academic as meaning ‘of or relating to education or training’.

In this section we address all sectors and programme types. It applies to Irish FET (further education and training), HET (higher education and training) and ELE (English language education) communities and their stakeholders.

If we have missed any noteworthy topics that you consider important, please let us know. Recall that the principal purpose of this Green Paper is to facilitate discussion.

13.1 INTRODUCTION

This section will discuss the academic integrity of students, teachers and others involved in activities relating to education or training.

We would like to be able to begin this section by stating that most students never engage in breaches of academic integrity. Unfortunately, the literature indicates the contrary in countries where this has been researched. On the other hand, not all breaches are equally serious, and we would like to believe that students are generally far more inclined towards integrity than misconduct.

Academic integrity is a hot topic in education internationally and for good reason. Academic integrity problems in higher education, research and in schools have, in recent years, led to international news

stories, high-profile resignations and such like. Of course, further education and training and ELE are no less susceptible to such problems and breaches can attract national news media coverage.

Earlier (in section 3), it was noted that qualifications rely on trust. Academic integrity, particularly in the context of assessment of learning, helps support that trust. Challenges to academic integrity, academic malpractice, dishonesty and poor academic practice by teachers or learners undermine trust and consequently qualifications.

Our Green Paper has been informed on this topic by a reading of the Handbook of Academic Integrity (Bretag(editor), 2016), which is a collection of review papers relating to the subject. We recommend it to all and particularly to the HET sector. While the literature on academic integrity that has informed this Green Paper is mostly about higher education and training, many of the recurring themes and the main principles of effective practice that can be gleaned translate readily to FET particularly at the higher NFQ levels.

Our (QQI's) Core QA guidelines, which apply to all providers, address academic integrity in general terms, touching upon it in the context of governance and assessment. This Green Paper, being concerned with assessment, addresses academic integrity in more detail than the QA guidelines, especially from the assessment perspective. It focusses on academic integrity in the context of mainly taught (as distinct from research) programmes of education and training, the institutions that provide them, the learners that enrol in them and other actors that can be involved.

To understand why academic integrity is germane to assessment, consider that assessment normally involves among other things:

- 1) the setting of tasks designed to enable assessment of learning;
- 2) the performance of the task by the assessee; and
- 3) the inference of learning from the aggregated evaluations of the assessee's responses to the tasks.

We are sure that you will agree that (1), (2) and (3) clearly depend, to a degree, on the academic integrity of:

- » individuals including assessors and assessees;
- » institutions including providers of programmes of education and training and related services; and
- » others.

There are uncountable ways to corrupt assessment. It can be undermined by factors ranging from poor practice to deliberate cheating. Some examples of breaches in academic integrity are:

- » Making assessment submissions that include plagiarised material;
- » Collaborating with other learners where not permitted (collusion in cheating);
- » Engaging in contract cheating (where a learner arranges for another person to produce an assessment response on their behalf (e.g. an essay mill, another learner, a friend, a parent; this is a breach by both the learner and the person providing the illicit assistance);
- » Using technical aids (including e.g. artificial intelligence) in assessment where not permitted;
- » Fabricating or falsifying (e.g. data) in assessment responses;
- » Making disclosures concerning assessment tasks that purport to be unseen (e.g. hints from the teacher on what is going to appear on an exam paper);
- » Setting easy-to-predict examinations that purport to be difficult-to-predict;
- » Teaching to the test while purporting to do otherwise;
- » Falsifying or fabricating assessment results (by the assessor or their institution).

In higher education, Ireland is recognised as a country that takes academic integrity seriously. In an article “European Perspectives of Academic Integrity” (Glendinning, 2016) that studies academic integrity across 27 EU countries, Ireland’s ‘academic integrity maturity’ in higher education is placed in the top 5 or 6—the UK is regarded as the most mature. Prevention is among the areas where there is room for significant improvement in Ireland. Further, when presented with a scenario describing serious plagiarism, 20% of teachers’ responses from Ireland were not sure whether it was plagiarism (in contrast all teachers from Germany recognised the scenario as either plagiarism or serious plagiarism).

Glendinning's article (Glendinning, 2016, p. 69) makes the general point (not specifically about Ireland) that:

“One characteristic of institutions where policies are effectively and systematically applied ... is that the number of proven cases of misconduct...will tend to be considerably higher than in institutions with less maturity and consistency in policies. There has been an unfortunate tendency for the press to seize on such statistics, wrongly interpreting high rates of misconduct as evidence of poor control rather than being a characteristic of honest transparency in a process of continuous improvement”.

13.1.1 RESEARCH INTEGRITY

This Green Paper will not address research integrity or academic integrity in the context of research degree programmes. This is a more specialised topic and a very important one. However, the topic has been well addressed in the Royal Irish Academy policy statement entitled “National policy statement on Ensuring Research Integrity in Ireland” (RIA, 2014). This statement was developed by the Irish Universities Association (IUA) in collaboration with a range of organisations including QQI. The policy statement sets out agreed good practice in promoting and ensuring research integrity and it is endorsed by us (QQI). **All institutions providing research degree programmes are expected to comply with this policy.**

Incidentally we note here the existence of the **National Forum on Research Integrity** that was established in 2015 aiming to “to ensure continual development and adoption of good practice towards a strengthened approach to research integrity in Ireland.” (IUA, 2017)

13.2 TYPES OF MISCONDUCT INVOLVING LEARNERS

It is important to be reasonably precise when defining misconduct not only to help clarify expectations concerning academic integrity but also for the purposes of enforcement. Institutions that apply poorly-crafted policies and procedures to high stakes assessments are likely to be confounded by legal challenges.

We note, by way of context, that the National Policy Statement on Ensuring Research Integrity in Ireland (RIA, 2014) defines the most serious kinds of misconduct (in the context of research) as:

- » Fabrication of data i.e. making up results and recording or reporting them.
- » Falsification of data i.e. manipulating research, materials, equipment or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
- » Plagiarism i.e. the appropriation of another person's ideas, processes, results, or words without giving appropriate credit, including those obtained through confidential review of other's research proposals and manuscripts.

Of course, in the wider context of research for which these are intended the types of misconduct listed above don't just involve misconduct by learners notwithstanding our title here (section 13.2). Fabrication and falsification can arise in taught programmes e.g. where part of the programme requires that the learner engage in research or data collection.

13.2.1 PLAGIARISM

To determine whether a submission includes plagiarized material it is helpful to have a precise definition. Teddi Fishman's (Fishman, 2009) proposed definition is useful:

“Plagiarism occurs when someone

- 1) Uses words, ideas, or work products
- 2) Attributable to another identifiable person or source

- 3) Without attributing the work to the source from which it was obtained
- 4) In a situation in which there is a legitimate expectation of original authorship
- 5) In order to obtain some benefit, credit, or gain which need not be monetary”

See (Carroll, 2016) for a further discussion of Fishman’s definition and its application to dealing with cases of suspected deliberate plagiarism. It is important to appreciate that plagiarism does not only involve textual material.

13.2.2 COLLUSION

In the context of academic integrity in higher education the term ‘collusion’ is used in diverse ways according to McGowan (McGowan, 2016), who offers the following definition:

“Collusion between students, constituting a breach of academic integrity, occurs where:

- 1) One or more students interact in the completion of an assessment item;
- 2) The nature and/or extent of the interaction is not authorised ...for that ...assessment item;
- 3) The situation is where there is a legitimate expectation that such interaction would not be acceptable; and
- 4) The nature and/or extent of the interaction means that the assessment item submitted results in any one of the following:
 - a) A misrepresentation of the competencies (in the assessed learning outcomes) of any of the students involved in the interaction;
 - b) The inability to legitimately determine or judge the competencies (...) of any of the students involved in the interactions; and
 - c) An unfair advantage to any of the students involved in the interaction, relative to other students completing that assessment item.”

This definition is a little unwieldy and could be expressed more plainly but it is nevertheless useful.

13.2.3 ILLICIT USE OF THIRD-PARTY SERVICES

Newton and Lang (Newton & Lang, 2016, p. 251) have classified the third-party services that are on offer (and provider-specific examples). Their categories are:

- 1) Academic custom writing,
- 2) Online labour markets (to enable writers to bid for student work),
- 3) Prewritten essay banks,
- 4) File-sharing sites,
- 5) Paid exam takers.

Access to the internet means that a student can relatively easily contract a third party to do their academic work, whether it is a short essay required as part of continuous assessment, or a major research thesis. Such productions can be an original work of the third party, and when a student submits such purchased material as their own work they are plagiarising.

Current plagiarism detection software is not likely to detect original contracted work of a third party as plagiarised by the person submitting it. An experienced teacher may be able to detect it by recognising the stylistic inconsistencies or by discussing the submission with the learner.

Third parties functioning as essay mills may masquerade as providers of study aids (e.g. providing 'example' essays) and issue warnings to their customers that they must not submit the purchased material as their own work for academic credit. To enforce regulation, the question of intent of the third party is important and some US legislation only requires that the third-party providers should reasonably have known the purpose of the contracted work. See (Newton & Lang, 2016, p. 259).

Students can also be compromised by being convinced to submit their original work to contract cheating services.

An essay mill can be based anywhere because it can conduct its business online. Essay mills can be difficult to suppress.

13.3 TYPES OF MISCONDUCT OR NEGLIGENCE INVOLVING PROVIDERS OR TEACHERS

Providers of programmes of education and training and teaching staff are susceptible to engaging in similar kinds of misconduct to learners as well as some additional kinds that reflect the opportunities provided by the roles of providers and teaching staff in education and training. Again, the focus here is on assessment.

In the context of individuals responsible for assessment some examples are:

- 1) Unwarranted bias in making assessment decisions;
- 2) Revealing information about examination questions to students where this is supposed to be unknown by students in advance;
- 3) Accepting bribes to influence assessment decisions;
- 4) Invalidating an assessment by teaching to the test;
- 5) Failing to exercise due diligence in checking for and investigating or (when appropriate) referring breaches in academic integrity.

In the context of institutions some examples are:

- 1) Enrolment of learners who cannot reasonably be expected to complete the programme.
- 2) Enrolment of learners where the provider can reasonably be expected to know that the learners are not likely to seriously engage with the programme but wish, rather, to secure other benefits of enrolment (e.g. a student visa).
- 3) Failure to provide a programme as validated.

The following section elaborates on one dimension.

13.3.1 FAILURE TO GRADE TO REASONABLE STANDARDS

Failure to grade to reasonable standards is a breach of academic integrity. Note that grade inflation as such is not necessarily attributable to breaches in academic integrity.

There are two concerns involving grading to standards. The primary concern is the maintenance of the overall standard for Framework awards. The MIPOs for a programme leading to a Framework award should be consistent with the relevant NFQ award-type descriptor and the award standard established by the relevant awarding body (e.g. QQI, a designated awarding body or (anticipating expected developments) a listed awarding body).

A secondary concern is the award grade or award classification. Grades are important, especially because they are sometimes used to filter candidates competing for jobs or enrolment in programmes of education and training. If an institution awards unduly high grades relative to the norm then it is giving its students an unfair advantage and undermining trust in qualifications generally.

Grading is further complicated (in both higher and further education) by the lack of generally agreed standards for awards classifications coupled with the practice of using grades as if the same grade from two institutions indicates the same level of learning. Readers may object and cite definitions of classifications based on percentage marks or grade-point averages. Numerical definitions are not as precise as they might appear because there are no standard mechanisms for generating the underpinning numbers.

The New Zealand Qualifications Authority administers a relatively new system (2014) of ‘consistency reviews’ to explicitly address the consistency of qualifications at levels 1-6 in its 10-level framework of qualifications (New Zealand Qualifications Authority, 2017). These are roughly comparable to the Irish NFQ’s levels 1-6. Consistency reviews are distinguished from quality assurance of learning or assessment. This approach would seem to warrant further exploration to see what might be learnt from the NZ experience.

For a deeper discussion on grading standards the reader is referred to (Foster, 2016).

13.4 PROMOTING AND SUPPORTING ACADEMIC INTEGRITY

13.4.1 WHAT PROVIDERS CAN DO

Providers need to take academic integrity seriously. They cannot afford to take it for granted and need to create conditions where integrity can thrive.

The literature on academic integrity and how to support it is extensive. Providers should keep abreast of it and learn from it.

Providers need to understand what motivates breaches in academic integrity. Brimble (Brimble, 2016) reviewed the literature in the context of higher education and identified seven categories to help understand motives:

- 1) Changing attitudes (to academic dishonesty),
- 2) Education, training and learning (e.g. development of necessary academic skills, competence of teaching staff to provide the necessary formation),
- 3) Curriculum design,
- 4) Situational factors (e.g. institutional culture),
- 5) Life of a modern student (e.g. lack of time, pressure to achieve, perceptions about relevance...),
- 6) Life of a modern academic,
- 7) Individual student characteristics (e.g. age, language skills, ...).

There are many positive things that providers can do to promote, support and maintain academic integrity and, in doing so, improve the quality of the education and training that they provide. This Green Paper is drafted to promote discussion rather than to provide guidance to providers. The following paragraphs aim to indicate the kinds of things providers might do. See, for example, *The Handbook of Academic Integrity* (Bretag(editor), 2016) for a relatively comprehensive treatment.

First of all, providers must not fall into the trap of thinking that academic integrity problems are just about a few bad apples. The literature does not support that view.

Nor is it enough to install plagiarism detection software and leave it at that. This kind of software is necessary and makes an important contribution to supporting academic integrity, but it is not sufficient.

Providers need to create environments that encourage academic integrity. There is support for viewing academic integrity as concerning not only detecting and addressing instances of cheating by learners but also the ‘integrity of educational institutions, practices and cultures’ (Fishman, 2016).

Students need to be properly inculcated into their disciplines within their programmes. They should be taught the disciplinary norms for expression through the media of their discipline and for respecting and citing the work of others. The skills of academic expression need to be developed and honed and will not be acquired without concerted effort and guidance. Learners entering HET or FET from schools cannot be assumed to have these skills.

Providers should also consider whether they can usefully help support learners in developing the ability to solve relevant ethical problems e.g. using case studies.

The learning environment should provide students with role models and examples of good practice. Exposure to poor academic practice by trainers, teachers, lecturers or other learners all affect learners.

Prevention of breaches in academic integrity should also be a priority for providers. Incompetence in assessing learning, complacent ‘anything goes’ approaches to creating learning environments, over working/stressing learners, admission of learners who are not capable of completing their programmes and failing to make academic integrity expectations clear are all examples of things that can help create conditions where academic integrity is more likely to be weakened. Providers should make expectations clear continually. In so far as feasible, curricula and assessment should be designed to be as immune as possible to fabrication, falsification and plagiarism. Students should be allocated sufficient time to complete any course work and it should be recognised that making excessive demands on learners’ time

can increase the motivation to cheat. Providers also need to ensure their programmes are up to date and suited to the modern learner. Nowadays, anybody with access to the internet can almost instantly access information on a vast range of topics—programmes of education and training should help learners to make responsible and discerning use of this wonderful learning resource.

High stake assessment, e.g. determination of professional competence, always needs to be robust against breaches in academic integrity.

Providers need to have mechanisms for detecting breaches in academic integrity. This also acts as a deterrent and an indication that the institution takes breaches seriously.

Providers need transparent procedures for investigating breaches in academic integrity and clear and effective (as deterrents) sanctions for proven breaches. There also needs to be clarity about when an investigation must be escalated to a higher level within the institution for investigation.

Essay mills are one of the problems ‘of the moment’ in the area of academic malpractice. In a few years artificial intelligence might be the challenge of the day for academic integrity. Information and communication technology is probably neutral in the context of academic integrity—it makes it easier to cheat and it makes it easier to detect cheating. The more important impact of technology in this context is the way in which it is opening up access to information to everybody who has access to the internet and to information processing. The pace of change in ICT can be quite rapid and it is having a significant impact on society; curricula and providers that do not track and respond to that change can easily run into trouble quickly.

13.4.2 WHAT WE (QQI) CAN DO

13.4.2.1 PROMOTING ACADEMIC INTEGRITY

Working with learners, providers, professional bodies and other stakeholders we (QQI) could:

- » help promote academic integrity by highlighting progress made by providers through our quality assurance activities and by providing a forum for discussion of the topic through our quality enhancement activities;
- » include academic integrity as an explicit theme in QA reviews and annual dialogues with providers;
- » consider taking academic integrity as a topic for a thematic review to identify examples of effective practice;
- » consider proposing questions for inclusion in the ISSE³⁵ and perhaps consider sponsoring surveys of FET students.

It may also be useful to consider:

- » whether academic integrity might be made explicit in the NFQ competence indicators;
- » whether we should sponsor empirical work on academic integrity in Ireland.

13.4.2.2 TACKLING THE PROBLEM OF ESSAY MILLS

QAA³⁶ in the UK recently published a report on the ‘growing threat’ of ‘essay mills’, what motivates them and what can be done to combat them (QAA, 2016). QAA have identified 8 actions to combat the problem (ibid.):

- 1) “We will submit a formal complaint to the Advertising Standards Authority, using a test case of a sample of UK-based essay writing services websites.
- 2) We will approach advertising companies and each of the main search engine companies asking them not to accept advertisements and to block such sites from search engines.
- 3) We will work with the Government and other agencies to discuss the feasibility and potential efficacy of a range of regulatory and/or legislative solutions, looking at the approach taken in New Zealand, for example.
- 4) We will work with our partner agencies across the globe through bilateral communications and ideas sharing and through the established networks of which QAA is a member: the European Association for Quality Assurance in Higher Education (ENQA) and the International

35 ISSE stands for Irish Survey of Student Engagement.

36 QAA means the Quality Assurance Agency for Higher Education that is based in Gloucester, England. <http://www.qaa.ac.uk/en>

Network for Quality Assurance Agencies in Higher Education (INQAAHE). We will ask universities and colleges to be alert to essay writing companies that operate on campus to promote their services (for example, by handing out leaflets to students).

- 5) We will explore with the sector ways in which assessment design can reduce the opportunity for unacceptable academic practice, and share existing good practice.
- 6) We will work with universities and colleges to identify and share existing good practice in the detection of custom essay cheating and in promoting more explicit and consistent approaches to punishing its use.
- 7) We will work with the National Union of Students and universities and colleges to develop guidance that can be readily used by higher education providers, with links to their own support services, academic regulations, and guidance and initiatives on assessment and good academic practice.
- 8) We will work with professional, statutory and regulatory bodies (PSRBs) to develop a shared understanding of the implications of custom essay cheating and the consequences for students in relation to membership of or practise in particular professions.”

These actions could in principle be adopted also by QQI. An action equivalent to QAA action (3) is already being pursued by QQI.

13.4.3 WHAT OTHERS CAN DO

The Government of Ireland plans to introduce legislation to tackle contract cheating. While this will surely not eliminate the problem of contract cheating in Ireland, it will make it more difficult for essay mills and such like to operate, help send a clear message that contract cheating is unacceptable, and help deter students from engaging in this kind of cheating. New Zealand has introduced such legislation³⁷.

³⁷ See part of 292E of the NZ Education Act 1989 as currently amended <http://www.legislation.govt.nz/act/public/1989/0080/latest/DLM3988805.html> (31/10/2017)

We have addressed some things that providers and QQI could do, we suggest that all readers of this Green Paper reflect on what they can do to promote and support academic integrity and we hope to receive feedback on what can be done, for example, by:

- » Learners
- » Professional bodies
- » Occupational regulators
- » Employers

13.5 PROTECTED DISCLOSURES ACT 2014

We note that this legislation may be relevant in some cases.³⁸

13.6 CONCLUDING REMARKS ON ACADEMIC INTEGRITY IN THE CONTEXT OF ASSESSMENT

The latter four QAA actions could usefully be extended to supporting academic integrity more generally and adopted by QQI.

14 TOWARDS GENERAL PRINCIPLES AND GUIDELINES FOR ASSESSMENT OF LEARNING

We (QQI) are privileged to work with three distinct parts of Ireland's educational system: FET, HET and ELE. Different paradigms apply in each part and this has substantial implications for procedures for the assessment of learners.

Nevertheless, there is, we propose, a core set of principles and guidelines that might apply across the board at least to relevant providers of QQI validated programmes or with delegated authority to make awards.

Stakeholders are invited to address the following questions:

- » Would it be useful for QQI to publish general principles and guidelines for assessment?
- » What should the principles and guidelines address?
- » To whom should the general guidelines apply (should they extend, for example, to all providers and awarding bodies quality assured by QQI or only to providers with DA or QQI validated programmes)?

15 TOWARDS SECTORAL CONVENTIONS AND REFERENCE ASSESSMENT PROTOCOLS FOR FET AND FOR HET SECTORS

The two sectors of particular interest for the purposes of establishing conventions and protocols are the HET sector (possibly excluding the DABs but not necessarily, especially concerning conventions on classifications of awards) and the FET sector (in the context of programmes leading to QQI awards or ones that would be made under DA in due course).

Sectoral conventions and reference protocols are already explicitly established in the HET sector for providers with DA or who rely on QQI for validation. They need to be reviewed and updated. They are published in *Assessment and Standards* (QQI, 2013).

Sectoral conventions and reference protocols are not explicitly established in the FET sector though many of the relevant topics are regulated through QQI guidelines (QQI, 2013).

The motivation for conventions and protocols stems from a recognition that, while each relevant provider is responsible for assessing their learners, sectoral agreement between QQI and providers on how certain matters pertaining to assessment are handled benefits all concerned by providing for consistency where otherwise there might be confusing divergence. These would be matters that would go beyond the principles and guidelines discussed earlier in section 14 where providers would otherwise have partial or total autonomy.

Grading schemes and award classification rules are among the topics that could be addressed through conventions and protocols mutually agreed between QQI and providers in consultation with other stakeholders. See *Assessment and Standards* (QQI, 2013) for an indication of the possible scope or sectoral conventions and reference protocols for assessment.

Before considering the question on a sector-by-sector basis it may be helpful to consider where the natural division lies between the different layers/zones of control. It is useful to reflect on where to find the optimal balance between regulation, guidance, agreed conventions and protocols (macro) and provider-specific (meso) and programme-specific (micro) arrangements for assessment: which topics should be addressed at each level?

15.1 HIGHER EDUCATION AND TRAINING

What changes to the protocols and conventions in Assessment and Standards are required?

Are there particular conventions that should be agreed across the whole HET sector (e.g. on classifications of awards)?

15.2 FURTHER EDUCATION AND TRAINING

What might usefully be addressed by sectoral conventions?

What might usefully be addressed by reference assessment protocols?

What changes are required to the implicit protocols and conventions in Quality Assuring Assessment - Guidelines for Providers?

16 GENERAL GUIDELINES ON EXTERNAL MODERATION OF SUMMATIVE ASSESSMENT FOR NFQ QUALIFICATIONS (EXTERNAL EXAMINING AND EXTERNAL MODERATION)

Stakeholders are invited to comment on these principles considering the following questions:

- » Would it be useful for QQI to publish general guidelines on external moderation mechanisms (external examining and external authentication)?
- » To whom should the general guidelines apply?

What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?

17 SUMMARY OF ISSUES PROPOSED FOR DISCUSSION

We would be grateful for responses on any of the Green Paper's content or on any matters concerning assessment. The following is a summary of some of the main issues proposed in the paper for discussion.

17.1 GENERAL ISSUES CONCERNING ASSESSMENT

These issues are for all providers.

Please comment on the conceptualisation of assessment as set out in this paper and the general issues that have been identified. The following questions may help remind you of some of the issues raised in section 7.

What can be done, and by whom, to help build expertise in expressing learning outcomes and suitably aligning assessment with them at module level and especially at programme level? (Section 7.2)

Do you agree that disciplinary communities have an important role in supporting the consistent interpretation of learning outcomes? How do such communities exert influence on educational and training programmes? Are there opportunities for improvement? (Section 7.3)

What more can be done to build expertise in the use of statements of learning outcomes in teaching, learning and assessment? (Section 7.4)

Do you agree that all programmes should include a programme-specific assessment strategy as indicated in this Green Paper? What are the obstacles to implementing programme assessment strategies as envisaged here? What else, beyond what we have indicated, should be addressed by a programme assessment strategy? (section 7.5)

Please comment on the accommodation of diversity. (section 7.6)

Do you agree that the burden of summative assessment for certification might be unsustainable by some organisations that might be otherwise capable of providing programmes of education and training?

What are the implications? (section 7.7)

Do you agree that RPL assessment should be reserved to those who can specialise in this kind of assessment? What are the implications? (section 7.8)

Do you think that all awarding bodies should publish indicators of minimum knowledge, skill and competence required for each of their awards, i.e. threshold as distinct from typical standards? (section 7.9)

Would it be reasonable, for purposes of simplicity and transparency, for all awarding bodies making awards that are recognised within the Framework, to be expected to set and maintain threshold standards for their own awards having regard to the NFQ?

Do you agree that it is not sufficient only to assess discrete skills (i.e. follow an atomistic approach) when evaluating competence for occupational practice? Do you agree that generic skills cannot effectively be taught and assessed out of context in vocational programmes? What are the implications? (section 7.10)

Do you agree that well-intentioned but non-strategic arrangements for assessment can hinder the achievement of intended programme learning outcomes? (Section 7.11)

Do you agree that teachers and programme designers can sometimes struggle to address all the dimensions of the NFQ (knowledge, skill and competence) adequately in teaching and particularly assessment? What are the implications? (section 7.12)

What applications can you think of for norm referencing in the context of assessment? (section 7.13)

What are your views on the purpose and necessity of grading in the context of assessment for/of learning? (section 7.14)

Do you think award classifications practices are consistent? Do you think, when considered at the national level, they are fair to all concerned? What are the implications? (section 7.15)

Is award classification worth the trouble? What should an award classification signify? Is consistent classification practical? Is it desirable? How might it be possible to get a shared understanding of classifications?

What can be done to support consistency in the actual standards of achievement that must be demonstrated and assessed to qualify for Framework awards?

How do institutions manage competing interests to ensure that they retain a balance of competences (in assessment in particular) suited to the needs of their enrolled learners? (section 7.17)

What do you think are the main challenges involved in remote assessment? (section 7.18)

Do you think there is a significant risk of some professional bodies or professional regulators imposing requirements on programmes of education and training that conflict with effective assessment practice? (section 7.19)

How can/do professional bodies help support the validity and reliability of assessment in the context of professionally oriented programmes?

Do you agree that persons responsible for assessment need to maintain regular contact with the relevant communities of practice (e.g. scientific communities)? (section 7.20)

What can be done to further engage learners as partners in assessment of, for and as learning? (section 7.21)

What principles do you think should underpin the quality assurance of assessment in the workplace? (section 7.22)

What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?

17.2 FURTHER EDUCATION AND TRAINING ISSUES

Recognising that providers are responsible for establishing assessment procedures, please comment on how best QQI might help support them.

In the context of programmes leading to CAS awards, should the provider be required to assess candidates for the compound award and then inform QQI of the grade for the compound award? The mechanism for calculating that grade would be approved by us (QQI) at validation and might be expected to include a contribution from the components' results.

Please respond to the commentaries on the issues raised in section 8.1, viz.:

- » The unitisation of assessment.
- » The sustainability of the burden of assessment on providers.
- » Centralised versus distributed assessment.
- » Perceived ambiguities in the QQI regulations.
- » Micro-management of assessment through regulations.
- » Patchiness of current guidelines.
- » Assessment in the context of the QBS implementation for the Common Awards System.

Please comment on the questions posed in section 14.

Please comment on the proposal to establish conventions and protocols as set out in section 15. The idea is that, in the interests of consistency, these would be developed collaboratively with FET providers, recognised by QQI and used by all FET providers. What topics should be addressed by the meso-level FET sectoral protocols and conventions? In addressing this please be specific.

Please comment on the guidance on external moderation of assessment in QQI's Effective Practice Guidelines for External Examining (QQI, 2015) having regard to the questions posed in section 16 (i.e. consider whether the guidance could usefully be generalised to all moderation).

Please raise any other issues that need to be considered.

17.3 HIGHER EDUCATION AND TRAINING ISSUES

Recognising that providers are responsible for establishing assessment procedures, please comment on how best QQI might help support them.

Please respond to the commentaries on the issues raised in section 9.1, viz.:

- » Awards standards, actual learning outcomes (ALOs) and classifications.
- » 2009 Sectoral Conventions for Assessment.
- » Integrated assessment.
- » Over assessment and manageability of assessment.
- » Repeat for honours convention (this applies to programmes leading to QQI awards and those made under delegated authority).
- » Assessment literacy
- » Assessment as and for learning
- » Assessment strategy

- » Engaging learners as partners in assessment

Please comment on the questions posed in section 14.

Please comment on the conventions and protocols as set out in section 15.

Please comment on the guidance on external moderation of assessment in QQI's Effective Practice Guidelines for External Examining (QQI, 2015) having regard to the questions posed in section 16.

Please raise any other issues that need to be considered.

17.4 ENGLISH LANGUAGE EDUCATION ISSUES

Recognising that providers are responsible for establishing assessment procedures, please comment on how best QQI might help support them.

Please respond to the commentaries on the issues raised in section 10.1, viz.:

- » External proficiency tests
- » CEFRL
- » Provider assessment systems
- » Assessment of English proficiency for access to higher education and other high-stake purposes
- » Assessment in the context of the International Education Mark (IEM) for ELE providers

Please comment on what if anything QQI can do by way of supplementary assessment related guidelines to support ELE schools.

Please comment on the questions posed in section 14.

Please comment on the conventions and protocols as set out in section 15 (with reference to QQI validated programmes only).

Please comment on the guidance on external moderation of assessment in QQI's Effective Practice Guidelines for External Examining (QQI, 2015) having regard to the questions posed in section 16 (i.e. consider whether the guidance could usefully be generalised to all moderation).

Please raise any other issues that need to be considered.

17.5 APPRENTICESHIP ISSUES

What can be done to enhance capacity for developing and using MIPLOs and MIMLOs?

In general terms, what are the challenges in developing integrated approaches to the assessment of apprentices that avoid them taking a silo-based approach to developing understanding of theory, practice skills and role/context competence? What can be done to help and by whom?

What can be done to help increase the reliability and validity of competence assessment in the workplace?

What can be done to encourage industry to become more involved in discussions about approaches to assessment?

What can be done (and by whom) to help support professionals in industry who are responsible for mentoring and assessing apprentices? What can be done to ensure that assessment is suitably consistent while allowing for necessary workplace diversity?

Should workplace assessment results be graded as distinct from being reported as successful/unsuccessful without gradation? Why/why not?

Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?

Please raise any other issues that need to be considered.

17.6 MACRO, MESO AND MICRO

This paper aims to stimulate discussion not only about what we (QQI) might do but also about what might be done by others involved. We invite you to share your views on this. We plan to publish the outcomes of the discussions on the Green Paper including suggestions about opportunities for others to contribute to enhancing assessment practice.

We suggest that you consider what kinds of things might be done at the macro level (in our case these might be quality assurance guidelines, validation policies and criteria, sectoral conventions and reference protocols established jointly with providers); meso level (at institutional level e.g. ETB, university, college) and micro level (e.g. school/centre, programme, module) to help regulate and support assessment of, for and as learning. What can QQI do to help?

Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so what do you think such guidelines should address?

Do you think that there should be any conventions agreed across the whole HET sector (e.g. on degree classifications)?

Please comment on the need or otherwise for macro-level assessment principles and guidelines on assessment. What should any such principles and guidelines address?

17.7 EXTERNAL EXAMINING AND AUTHENTICATION

External examining and authentication are widely used in higher and further education respectively.

What purposes do you think they serve? How can they better serve those purposes?

Do you think that external examining and authentication reliably ensure that NFQ awards of the same type awarded to learners in the same discipline in different institutions are of a similar standard to one another? Please comment on the guidance on external moderation of assessment in QQI's *Effective Practice Guidelines for External Examining* (QQI, 2015) having regard to the questions posed in section 16 (i.e. consider whether the guidance could usefully be generalised to all moderation).

Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?

Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.

17.8 GENERAL ISSUES CONCERNING ACADEMIC INTEGRITY (ALL SECTORS FET, HET AND ELE)

Please comment on the presentation of the issues (section 13).

Recognising what is already being done, please indicate what additional actions you think should be taken, and by whom, to help support academic integrity in general and in your sector in particular.

18 ACKNOWLEDGEMENTS AND NOTE

In this Green Paper we have drawn upon (and used material from) previously published QQI, HETAC and FETAC documents.

The Green Paper has benefited from contributions from several individuals who kindly agreed to comment on earlier drafts.

We do not necessarily agree with all the views expressed in the sources cited in the bibliography, footnotes or appendices.

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APPENDIX 1³⁹

GLOSSARY

1 INTERPRETATIONS

This Appendix is largely taken from QQI's Assessment and Standards because the interpretations in that document are self-consistent and broadly consistent with QQI's current QA, awards, standards and validation policies.

We invite comments on these interpretations. If you disagree with any of them, please explain why and offer an alternative.

The Interpretation explains the usage of certain key terms in this document and elaborates on some areas that are closely linked to assessment, such as feedback and learning theory.

Academic Committee: A top-level deliberative committee with overall responsibility for the governance of academic affairs.

Appeal: Appeal of an assessment result by a learner.

Approved Programme Schedule: This is a term that is used in QQI's validation policy. The approved programme schedule provides an overview of the validated programme. The details provided include: the name of the programme, the

name of award, the NFQ⁴⁰ level of programme and the total number of credits (using HET, FET or ECTS units). For each stage of the programme, the schedule lists the credit available for each of the modules and the contribution to the grade of each of the modules' components. It also specifies the requirements for learners to progress from one stage to another and to complete the programme successfully. The approved programme schedule is attached to the certificate of validation, and is deemed to form part of the assessment regulations applying to the programme. Without diminishing the importance of the approved programme schedule, it is but a summary of some of the information that should be addressed by the programme assessment strategy.

Any special assessment conditions (such as modules that cannot be passed by compensation) should be included in the approved programme schedule. Such conditions must not contravene any Sectoral Conventions for Assessment.

Assessment:

Learner assessment (specifically assessment of learning) means inference (e.g. judgement or estimation or evaluation) of a learner's knowledge, skill or competence by comparison with a standard based on appropriate evidence. Self-assessment is included in this. Assessment has many purposes.

Assessment criteria:

Assessment criteria are the standards or tests by which a learner's performance in an assessment task is judged. See also grading scheme.

Assessment grade: A label which quantifies the learner's level of performance of an assessment task. Communication of the grade to the learner may be accompanied by qualitative feedback.

Assessment instrument: Any assessment task and criteria, along with procedures for its conduct, together with the explicit grading scheme (i.e. grading rubrics).

Assessment procedures: All assessment-related activity and the ways in which it is conducted and undertaken.

Assessment task: A task designed to be completed by the learner who is to be assessed (as defined above) on the basis of performance of this task.

An assessment task could be, for example, a written or oral examination, coursework, project work, the writing of a thesis, dissertation or similar work, or other such forms of performance as may have been approved in relation to a validated programme of higher education and training.

Assessor: A person who assesses a learner.

(External) Assessor: An external assessor is an assessor who is external to the provider. An independent external assessor of a research thesis is traditionally called an external examiner. His/her role is different from the external examiner for a taught programme.

(Internal) Assessor: An internal assessor is a member of the provider's staff who is an assessor.

Authenticity: Authenticity is related to validity. Authentic assessment involves using assessment tasks that resemble the kinds of professional tasks that arise in

the relevant community of practice. The assessment task must appear authentic to the learner and to professional practitioners. Examples include the use of a poster presentation or the writing of a short research article as part of the assessment task for a final-year investigative project. These are authentic because they are typical communication channels for researchers.

Award: An award which is conferred, granted or given by an awarding body and which records that a learner has acquired a standard of knowledge, skill or competence.

Award Standard: Award standards are the expected prior learning required to qualify for an award. See QQI's Policy for Determining Awards Standards for a definitive interpretation.

Awards standards and award type descriptors are structured and presented under the three main strands: Knowledge, Know-how, and Skill and Competence; currently these are further divided in the NFQ into eight to eleven sub-strands (depending on the award-type). The National Framework of Qualifications (NFQ) defines these terms.

Awards standards describe the required learning for awards at specified levels in the NFQ⁴¹ in specified fields of learning. Higher education awards standards⁴² are (ideally) concise texts that normally cover broad-fields of learning. However, professional qualification-specific award standards may also be determined where appropriate.

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Please refer to the foreword of the HETAC standards documents for a complete description.

⁴² 'Named awards' is a term used: National Qualifications Authority of Ireland (2003) Policies and Criteria for the establishment of the National Framework of Qualifications. p.33. [Internet]. Available from: <http://www.nqai.ie/docs/publications/11.pdf> [Accessed: 13th June 2008].

CAS awards standards are substantially more granular than other QQI awards standards. See QQI's Policy for Determining Awards Standards for detailed information.

Together with the award type descriptors of the NFQ, the awards standards describe the learning, in terms of knowledge, skill or competence that is to be acquired by learners before specific awards may be made. QQI awards standards describe the learning required to pass.

Broadsheet of results: This is a higher education term for a device for reporting results to QQI for certification purposes.

Capstone: A capstone module is one that provides an opportunity for a learner to integrate accumulated learning and make the necessary connections in the context of a particular discipline. Examples of award-stage capstone modules include a dissertation and a project designed to demonstrate holistic professional competence.

Capstone assessment aims to measure cumulative learning at a particular stage, including at the award stage. It is particularly important for award-stage capstone assessment tasks to be authentic.

Compensation: In certain conditions, a learner who has not failed outright a particular assessment task in a particular stage may be granted a pass by compensation for that task. The marginal result is compensated by a satisfactory performance in another assessment task or tasks in the same stage. A justification for compensation is that there is always the possibility of an assessment error in modules that are not failed outright. The likelihood of a false negative result is expected to be highest near

grade boundaries.

Compensation does not change the original result. Instead, it enables progression and allows the allocation of credit.

Competence (NFQ): ‘Competence is the effective and creative demonstration and deployment of knowledge and skill in human situations. Such situations could comprise general social and civic ones, as well as specific occupational ones
Competence draws on attitudes, emotions, values and sense of self-efficacy, as well as on declarative and procedural knowledge. Competence outcomes can thus be stated in the form, “In a specified range of circumstances, a learner will be able to ...”’.

Complaint: In the context of the assessment of learners, a complaint is an expression of a concern that a particular assessment procedure is unfair or inconsistent or not fit-for-purpose.

The QAA code of practice ‘defines a “complaint” as the expression of a specific concern about the provision of a course/module, or a programme of study, or a related academic service’.⁴³

Consistent assessment: The meaning of consistent assessment is set out in Section 2.2

Criterion-referenced: A criterion-referenced assessment is one ‘that allows its users to

Assessment: make grade interpretations in relation to a functional performance level, as

distinguished from those interpretations that are made in relation to the performance of others' (SEPT⁴⁴, 1985). Note that 'assessment user' is distinct from 'the person sitting the test' and is normally the provider in the present context.

Criterion-referenced assessment based on learning outcomes is inconsistent with norm-referenced assessment (they are not interchangeable).

Diagnostic assessment: The ERIC Digest (its URL follows) defines diagnostic assessment as 'an intensive, in-depth evaluation process with a relatively detailed and narrow coverage of a specific area. The purpose of this is to determine the specific learning needs of individual students and to be able to meet those needs through regular or remedial classroom instruction'. Diagnostic assessment is a special case of formative assessment.
(<http://www.ericdigests.org/pre-9213/terms.htm>)

ECTS: European Credit Transfer and Accumulation System. This is defined in the current ECTS Users' Guide (available online).

Error (Assessment): Assessment errors arise, for example, when a learner who has actually achieved the minimum intended learning outcomes is failed or vice versa

External examiner: An external examiner is an independent expert who is a member of the broader community of practice within the programme's field of learning and whose accomplishments attest to his/her likelihood of having the authority necessary to fulfil the responsibilities of the role.
The External Authenticator in FET fulfils a similar role.

In research degree programmes, the term ‘external examiner’ is used to refer to an ‘external assessor’. The functions of the research degree external examiner are different from those of the external examiner for other types of programmes.

Fair: See Section 2.1

Fair assessment: See Section 2.1

Feedback: Feedback is a term that has been borrowed from engineering; there it means that a function of the output of a system is returned back to the input to be processed (i.e. processes benefit from experience). A critique on coursework delivered by a teacher (or assessor) to a learner is an example of feedback. Personal reflection on the outcome of some action also involves feedback.

Feedback is a response of the learning environment to the learner and is essential for learning. It can come from a teacher, from other learners, or from other sources. Feedback may affect a person’s emotions and motivation as well as his or her knowledge, all of which affect learning. Receptivity to a particular piece of feedback depends on prior learning, among other factors.

A learner’s perception of feedback can be ‘meaningfully understood in terms of three dimensions: developmental, encouraging, and fair feedback’ (Lizzio and Wilson, 2008). Developmental feedback is most strongly associated with that which learners perceive to be effective. Assessors ‘seeking to provide developmental feedback should seek to balance “assignment-specific” comments with more “transferable” feedback’. (This paragraph derives from Lizzio and Wilson [2008] which presents additional

evidence-based implications for practice.⁴⁵⁾

Communicating feedback to learners should be regular, timely, beneficial, and matched to their assessed learning needs.

Bandura (1986) concludes that the importance of formative feedback is that it ‘connects directly to the emotional and attitudinal factors relating to students’ self-esteem, beliefs about self-efficacy, motivation and engagement’.

McKeachie (1999)⁴⁶ suggests five feedback conditions that result in improvement.

1. ‘Feedback needs to convey information that is understood by the recipient.’
2. ‘Feedback is not helpful if one does not know what to do to improve.’
3. ‘Feedback is more likely to be helpful if it can be generalised.’
4. ‘Feedback is more helpful if it not only facilitates learning a helpful concept, theory, or strategy but also helps the individual develop skills or strategies that will facilitate further learning.’
5. ‘Feedback may help if we are motivated to improve.’

45 Lizzio and Wilson, 2008, Feedback on assessment: students’ perception of quality and effectiveness. *Assessment & Evaluation in Higher Education* Vol. 33, No. 3, June 2008, pp 263-275.

46 McKeachie, W.J. (1999) Commentary Feedback and reflection in facilitating further learning in Messick (1999) pp57-61

Hounsell (2003) identified three specific areas for improving feedback to students. These are:

1. 'More specific criteria and the use of assignment proformas.'
2. 'Greater student involvement using self and peer assessment.'
3. 'Greater use of collaborative assignments, presentations, posters etc. bringing assessment and feedback into a more public domain.'

Knight (2002) suggests the feedback needs to be 'interactive, purposeful, relative to criteria, developmentally useful, understood, timely and appropriate to students' conceptions'.

There may be a trade-off between feedback-delay and feedback-detail (i.e. early feedback based on a cursory analysis may be more effective than delayed feedback based on profound analysis).

Formative feedback is any feedback that is relevant to learning needs and which furthers the progress towards attainment of the intended programme learning outcomes. A teacher's formative feedback is based on his/her inference through assessment of a learner's learning needs: hence the term formative assessment.

For more recent literature relating to feedback see, for example, (Evans, 2013), (Nicol, 2010), (Nicol, 2014), and (Sadler, 2010)

Formative assessment: Please refer to our interpretation of "feedback" (the preceding item) before considering this.

Formative assessment aims to generate or inform individualised feedback to a learner to help improve their competence to achieve intended learning outcomes (ILOs) or to inform adjustments to teaching strategies to support a learner or a group of learners to achieve intended learning outcomes. It is not only concerned with whether the ILOs are being achieved but learners' competence to achieve them.

Nitko (1996)⁴⁷, for example, identifies four basic uses to which formative continuous assessment is put:

1. 'Sizing-up a group.'
2. 'Diagnosing individual students' learning needs.'
3. 'Diagnosing the group's learning needs.'
4. 'Planning instruction.'

See also, for example: (Evans, 2013), (Nicol, 2010), (Nicol, 2014), and (Sadler, 2010).

'Formative assessment is concerned with how judgements about the quality of student responses (performances, pieces, or works) can be used to shape and improve the student's competence by short-circuiting the randomness and inefficiency of trial and error learning' (Sadler, 1989).⁴⁸

47 Nitko, A.J. (1995) Curriculum-based continuous assessment: a framework for concepts procedures and policy *Assessment in Education*, 2(3), 321-337 (in Harlen W. (2008) *Student Assessment and Testing Volume 2 Sage Library of Educational Thought and Practice London: Sage* 289-306

48 Sadler, D. R. (1989) Formative assessment and the design of instructional systems *Instructional Science*, 18 (1989):119-144. (in Harlen W. (2008) *Student Assessment and Testing Volume 2 Sage Library of Educational Thought and Practice London: Sage* pp3-28)

See also National Forum definition and graphic⁴⁹.

Formative feedback: See feedback.

Grade (v): This means the same as to mark. For example, in the HET context it means to award percentage marks to or to assign an alphabetic grade (to an assessment response or a learner).

Grade (n): This means the same as a mark. For example, in the HET context a grade may be a number in the percentage scheme or an alphabetic grade symbol in the alphabetic system.

Grading rubric: The same as a grading scheme.

Grading scheme: A written specification of how to grade a response to an attempted assessment task. For an essay, this might take the form of a matrix describing different performance thresholds for each of the criteria being used to assess the essay.⁵⁰

Grading system: A grading system is an a priori set of rules for reporting and combining grades for assessed modules. Because the grading system provides rules for how module results may be combined, it may impact on how a programme may be partitioned into modules.

49 <https://www.teachingandlearning.ie/wp-content/uploads/2017/03/Sectoral-insight-web-ready.pdf>

50 For a constructive critique of rubrics consider Popham, W.J. (1997) What's wrong—and what's right—with rubrics, *Educational Leadership*, October 1997, 72-75. (in Harlen W. (2008) *Student Assessment and Testing Volume 2 Sage Library of Educational Thought and Practice* London: Sage 207-313)

Intended Learning

Outcomes:

The intended learning outcomes represent the educational goals. They describe the learning outcomes that the teacher intends that learners will attain as a result of teaching and learning activities. (See minimum intended programme learning outcomes.)

Intended learning outcomes must always include the minimum intended learning outcomes.

Actual learning outcomes achieved by a learner should include at least the minimum intended learning outcomes; they will typically include additional outcomes.

Popham (1987) provides five experience-derived guidelines on writing learning outcomes.⁵¹

1. 'Educational evaluators should formulate or recommend educational objectives so that the degree to which an objective has been achieved can be objectively determined.'
2. 'Educational evaluators should eschew numerous narrow-scope educational objectives and, instead, focus on a manageable number of broad-scope objectives.'
3. 'Educational evaluators should employ the Taxonomies of Educational Objectives only as gross heuristics, not fine-grained analytic tools.'
4. 'If measurement devices are required to ascertain an educational objective's

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Popham, W.P. (1987) Two-plus decades of educational objectives *International Journal of Educational Research*, 11(1), 31-41. (in Harlen W. (2008) *Student Assessment and Testing Volume 4 Sage Library of Educational Thought and Practice London: Sage 319-331*)

attainment, educational evaluators should employ criterion-referenced rather than norm-referenced measures.’

5. ‘Educational evaluators should keep separate the behavioural focus of educational objectives from the performance levels expected of students.’

Programme designers will find it useful to keep the intended learning outcomes under review, not only to keep the programme up-to-date but also to obtain greater clarity.

Know-how and Skill (NFQ):

‘The exercise of a skill is the performance of a task that in some way responds to or manipulates the physical, informational or social environment of the person. Know-how underpins the skill but is not identical to skill. Know-how, or *savoir faire*, is the procedural knowledge required to carry out a task.’

Knowledge:

‘Knowledge is the cognitive representation of ideas, events or happenings. It can be derived from practical or professional experience, as well as from formal instruction or study. It can comprise description, memory, understanding, thinking, analysis, synthesis, debate and research’ (NFQ definition). More information about the meaning of knowledge, skill and competence is contained in Policies and Criteria for the Establishment of the National Framework of Qualifications (2003) (NFQ).

Learner:

See learning.

Learning:

Learning refers to the processes by which a sustainable change in someone’s knowledge, skill or competence occurs as a result of experience (of phenomena). Experience includes everything that affects the learner.

Knowledge that is neither innate nor inferred from existing knowledge derives from phenomena. Phenomena are the objects of observation — for example, a lecture, images on the pages of a book etc. A learner constructs a ‘cognitive representation’ from phenomena by a process which involves, links and modifies existing knowledge, skills and competences, each of which influences the interpretation of phenomena. Mere observation of phenomena will not necessarily result in learning.

Learning is an activity that involves not only the brain but also the rest of the body; it changes one or both. The physical characteristics of the learning environment are instrumental.

Learning actively involves the learner: ‘we learn in and through our interactions with others and the world’.⁵²

A ‘learner has to be seen as an active processor and modifier of information, from which follows that personal motivations and attributions, beliefs and expectations, perceptions of efficacy and effect as person-related control processes will play a crucial mediating or monitoring role in learning’.⁵³

Learning activities: Learning activities are diverse. Examples include study, writing, practise, discussion, enquiry, experience, group work, problem-solving, performing, game-playing, designing, composing etc. Both learners and teachers can set learning activities.

Effective learning activities are purposefully directed towards attainment of

52 Brown, J. S. (2006), Relearning Learning-Appling the Long Tail to Learning [Internet]. Available from: <http://mitworld.mit.edu/video/419/> [Accessed: 15th March 2008].

53 Note: the quotations are examples rather than definitions. Their use here should not be taken as indicating any special endorsement of the text from which they have been copied. Steiner, G. (1997), Educational Learning Theory in Tennyson, R.D., Schott, N.M., Seel, N. and Dijkstra, S. (eds.), “Instructional Design International Perspective” (Chapter 6), Vol 1, pp. 89, 90. Theory, Research and Models. Lawrence Erlbaum Associates, Mahwah.

the programme's educational goals⁵⁴ (minimum intended programme learning outcomes) and build on (connect with) prior learning.

The learner's engagement with any assessment process, including the reception of feedback, is a learning activity.

Learning environment: Learning environments are diverse. Teachers and other learners are part of a learner's learning environment as are workplace colleagues if applicable. Learning environments have both physical and social structures. Learners interact with the learning environment; the environment responds to the learner, and the learner to the environment.

Learning outcome: A learner's knowledge, skill and competence change as a result of learning. The learner changes.

In principle, learning outcomes may describe the change in knowledge, skill or⁵⁵ competence in an individual (differential form). They may also mean the cumulative result of all learning, including prior learning at the time of entry to the programme (integral form). Award standards and award-type descriptors are generally cumulative. The outcomes expected at level N are those specified at that level in addition to the sum of those at lower levels.

Learning theory: Every teacher and learner uses a learning theory but not always consciously – it may be tacit, informal or eclectic. Some might think of this as their educational philosophy. Formal learning theories (and learning models can contribute to the understanding of learning and the design of effective learning environments.⁵⁶ Epistemologies (theories of knowledge) may vary

54 Constructive alignment (Biggs and Tsang 2007) is one example of an approach that tries to achieve this.

55 "Or" should be interpreted to mean and/or.

56 Information about learning theories (reviews, critiques, comparisons, summaries, categorisations) is widely available (much of it online). The various theories that exist can be regarded as approximations to some, as yet unknown if knowable, grand theory (i.e. a pattern that relates all relevant observations).

with the field of learning.

Mark (v): This means the same as grade — i.e. to award marks to or to grade (an assessment response, a learner etc.).

Minimum Intended Programme Learning Outcomes (MIPLOs): The minimum achievement (in terms of knowledge, skill and competence) that the learner is certified to have attained if he/she successfully completes a particular programme (i.e. passes all the required assessments). The minimum intended programme learning outcomes define the minimum learning outcomes for a particular programme at the programme level. These must always be specified by the provider. If the programme allows substantial choice, there may need to be variant forms of the minimum intended programme outcomes — e.g. a programme might allow a person to choose from a number of specialisations.

A learner who completes a validated programme is eligible for the relevant award if he or she has demonstrated, through assessment (including by recognition of prior learning), attainment of the relevant minimum intended programme learning outcomes.

In addition to minimum intended programme learning outcomes, the programme provider may aspire to describing other ‘intended programme learning outcomes’ beyond the minimum. In this document, ‘intended learning outcomes’ refers to all or any of the intended outcomes, including the minimum ones. ‘Minimum intended learning outcomes’ refers exclusively to the minimum ones. The minimum intended programme learning outcomes identify the principal educational goal of the programme — effective assessment helps learners to attain that goal. Minimum intended programme

learning outcomes are developed and maintained by providers. Programmes are designed to enable learners to achieve minimum intended programme learning outcomes. Minimum intended learning outcomes are specified for each of a programme's constituent modules.

The number of learning outcomes in a statement of intended learning outcomes is variable (depending, for example, on the semantics and the level of explicitness used). This is not a proxy for credit.

Teachers and learners may strive for additional learning outcomes that are beyond the minimum. In addition to 'minimum intended programme learning outcomes', providers may describe other levels of intended programme learning outcomes beyond the minimum.

See also intended learning outcomes.

Module:

A programme of education and training of small volume. It is designed to be capable of being integrated with other modules into larger programmes. A module can be shared by different programmes. Some modules are designed to lead to minor or special-purpose awards

In describing the educational formation provided by an independent module, it is sufficient to specify: (i) the learning outcome; and (ii) the assumed (i.e. minimum) prior learning (prerequisite learning). Assumed prior learning is sometimes specified by listing prerequisite modules.

Certain parameters are often used in the description of a module. These include an indication of the stage in the programme at which the module is offered and sometimes where feasible the module's NFQ level (e.g. the level of the MIMLOs on the NFQ where the module is designed to lead to a minor

award) and of the average (entry qualified) learner effort required to complete the module successfully (normally represented using ECTS or FET credits).

Note that it is not always feasible (or even meaningful) to assign an NFQ level to a module particularly for lower volume modules at higher levels in the NFQ.

To validate a programme, all of its modules must be considered together. Piecemeal validation (in isolation) of constituent modules within a larger programme cannot validate the larger programme. This is because the piecemeal process is blind to the joint effect of the modules, as well as to the ‘integration of learning and teaching’ that may be required.

Note also that learning acquired through a sequence of modules depends on the order of the sequence.

Named Awards:

Within an award type (e.g. honours bachelor’s degree), the particular awards that are named with respect to a field of learning (e.g. honours bachelor of science degree).

Standards for named awards often include reference to knowledge, skill and competence within a specific field of learning (the standards may be expressed by the MIPLOs approved at validation where a generic QQI award standard is used).

Norm-referenced:

A norm-referenced test is ‘an instrument for which interpretation is based in the comparison of the test-taker’s performance to the performance of other people in a specified group’ (SEPT,⁵⁷ 1985).

Pass by compensation: See compensation.

Programme Board: A dedicated committee established by the provider with overall responsibility for that programme, including the programme assessment strategy.

Prior learning: The totality of a person's learning at a particular time. It may also be referred to as prior knowledge. It is time dependent.⁵⁸

Programme: A programme of education and training refers to any process by which learners may acquire knowledge, skill or competence. It includes courses of study or instruction, apprenticeships, training and employment.

A programme offers learners the learning opportunities by which they may attain particular educational goals (expressed as the intended programme learning outcome) by learning activities in a learning environment.⁵⁹

A programme is normally comprised of modules.

A major award programme will normally require some kind of 'cohesion generating' process which integrates constituent modules so that the minimum intended programme learning outcomes are supported. The cohesion generating process should establish the epistemological and cultural identity of the programme. It should also coordinate alignment of activities with the minimum intended programme learning outcomes and introduce learners to the broader community of practice to which they aspire.

58 See for example Dochy, J.R.C., Moerkerke, G. and Martens, R. (1996) Integrating Assessment Learning and Instruction: Assessment of Domain-Specific and Domain Transcending Prior Knowledge and Progress Studies in Educational Evaluation 22(4) 309-338. (in Harlen W. (2008) Student Assessment and Testing Volume 1 Sage Library of Educational Thought and Practice London: Sage 209-238)

59 Ibid. This is based on the idea that 'Instruction involves offering certain persons a learning opportunity to reach certain educational goals by RLTs delivered by a RLE'. [RLE, RLT mean reconstructed learning environment, task.]

Provider: A ‘provider of a programme of education and training’ is a person who, or body which, provides, organises or procures a programme of education and training.

Reasonable accommodation: Reasonable accommodation is defined by the Equal Status Act 2000 2004. A reasonable accommodation is any means of providing special treatment or facilities if, without such accommodations, it would be impossible or unduly difficult for the person to avail of the service provided by the educational establishment.

A reasonable accommodation is a support provided to a candidate with a disability or specific learning difficulty. It acknowledges that a particular assessment instrument may place barriers in the way of a candidate seeking to demonstrate his/her learning. (For example, a visually impaired candidate may need to use specialist technology to complete his/her examination.) Reasonable accommodation recognises the impact of a disability in an examination or assessment situation. It enables the candidate to use an alternative assessment method (where necessary) to demonstrate his/her attainment of the required standards.

Re-check: Re-check means the administrative operation of checking the recording and the combination of component scores for a module and/or stage.

Recognised Institution: The institutions specified in section 24 of the Qualifications (Education and Training) Act 1999.

Reliability: An assessment’s reliability is the confidence one can have in the result or how informative it is. Inference in the assessment of learning may be inductive, in the sense that observing particular instances of a trait or quality may be used to infer the presence of that trait or quality. Inference may be deductive, in the

sense that the existence of a particular trait may be deduced if associated traits are observed. Inference is subject to error. If a fully reliable assessment were possible, it would return a result with complete certainty. A simple measure to increase reliability is, for example, the double grading of essays (i.e. two examiners grading each essay independently). This is likely to reduce the variability in grading that is due to the examiners. The choice of assessment task, given the intended outcome and the learner, is another important source of variability. Using a diversity of assessment tasks to measure an outcome can increase reliability but at the expense of learner and assessor effort.

Results: A set of grades (or marks), normally for a stage of a programme. In the singular, the grade for a particular assessment task.

Review: The re-consideration of the assessment decision, either by the original assessor or by other competent persons.

Rubric: The same as a grading scheme.

Skill: See know-how and skill.

Stage (in a programme): Conceptually, a stage is a rung on a progression ladder. Many programmes are organised in either semester-based or year-based stages. However, it should be stressed that other kinds of stages may be established. Even in cases where there is no temporal structure to the programme (i.e. a learner is only required to pass modules to progress), the stage concept may be used by the programme assessment strategy to group modules, taking the pre- and co-requisites into account.

Summative assessment: Aims to determine if (or sometimes the extent to which) a set of specified learning outcomes has been attained by a person and (typically) their entitlement to academic credit.

It normally contributes to learner's results for a module or a programme. It includes results from continuous assessment, project work, oral assessment, written examinations etc.

See also National Forum definition and graphic⁶⁰.

Teaching: The endeavour to provide an opportunity for learning — i.e. for acquiring knowledge, skill and competence — in a planned, arranged setting. Teaching also implies that the teacher intends to teach a certain individual with the aim that this person attains certain intended learning outcomes. Self-teaching means that the teacher and learner are the same person.⁶¹

Threshold: Minimum intended programme learning outcomes are an example of a pass threshold. Other thresholds can be defined.

Validation of a See QQI's current (2016) validation policies and criteria.

Programme: Providers of validated programmes are responsible for, among other things, establishing fair, consistent and fit-for-purpose assessment procedures.

Validity: Validity essentially means fitness-for-purpose. A valid assessment: (i) allows inference of the attainment of the learning outcomes it purports to address; (ii) assesses the person it purports to assess; and (iii) is appropriate for informing the decisions that it purports to inform. Condition (iii) is required

⁶⁰ <https://www.teachingandlearning.ie/wp-content/uploads/2017/03/Sectoral-insight-web-ready.pdf>

⁶¹ This point paraphrases text in Schott, F. and Driscoll, M. P. (1997) "On the Architectonics of Instructional Theory", in Tennyson, R. D., Schott, F., Seel, N., and Dijkstra, S. (eds.), *Instructional Design: International Perspective*, Vol. 1, p. 143. Theory, Research, and Models. Lawrence Erlbaum Associates, Mahwah.

because an assessment may be valid for informing one decision but invalid for another.

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