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## ABSTRACT

A 1993 study examined the range of opportunities that Open College Network (OCN) accreditation offered to learners with learning difficulties and disabilities in Great Britain. It examined OCN quality processes, including recognition panels, moderation, and internal quality systems. Information was gathered from the National Open College Network, OCNs, and centers; 6 OCNs were selected as case studies; and staff and learners from 12 centers were interviewed about their provision. OCN accreditation offered a wide range of opportunities at all levels in the full range of program areas. Learners with learning difficulties and disabilities, users of the mental health services, and learners with profound and multiple disabilities were able to access OCN accreditation. OCN accreditation was offered for a number of reasons: its range and flexibility; learner centeredness; potential for credit accumulation and transfer; national recognition; potential to promote an inclusive approach; and opportunity to access Further Education Funding Council funding. In comparison with other awarding bodies, OCN quality processes were found to be equally or more rigorous. The low profile of OCN accreditation and its currency and credibility were issues that could be improved by better use of OCN-supporting information. The different approaches to assessment at entry level in terms of the apparent variation between OCN practices opened OCNs to criticism and challenged their credibility. (Appendixes include a list of key issues and questions.) (YLB)

# Getting the credit: OCN accreditation and learners with learning difficulties and disabilities

Sally Faraday

Volume 1 Number 7



# F E M A T T E R S

FEDA paper

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Getting the credit:

OCN accreditation and learners with  
learning difficulties and disabilities

Sally Faraday

**F E M A T T E R S**

**FEDA paper**

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# Contents

Executive summary	3
1. Introduction	5
2. Methodology	6
3. Findings	7
OCN accreditation offered	7
Reasons for offering OCN accreditation	10
Discrete learning programmes or inclusive approaches	11
Progression	11
The value of OCN accreditation	13
Quality issues: submission, preparation and internal processes	15
How OCNs could better meet accreditation needs	18
4. Summary	19
The main strengths of OCN accreditation	19
The main weaknesses	19
Summary of recommendations	20
5. Conclusion	23
References	24
Appendix 1 Key issues and questions	25
Appendix 2 Schedule 2 to the Further and Higher Education Act 1992 and FEFC's associated criteria	27
FEDA publications	28

## Executive summary

This issue of FE Matters is based on research undertaken in 1995 which investigated the wide range of opportunities Open College Network (OCN) accreditation offers to learners with learning difficulties and disabilities. The study examined OCN quality processes including recognition panels, moderation and OCN internal quality systems. In comparison with other awarding bodies, OCN processes were found to be equally or more rigorous. However, OCNs are aware of the need to continue to improve quality and benchmark best practice between themselves. Given the national debate and criticism of verification and moderation processes, OCNs will need to demonstrate rigour and to be responsive to national developments.

The study also identified the potential for proliferation of programmes and the need for a bank of nationally recognised units of assessment to be established.

There has been rapid growth in OCN accreditation for these learners and the reasons for its increased popularity include its range and flexibility; learner centredness; national recognition; accessibility of the assessment regime; improvement in the quality of the curriculum; and the benefits of staff development. OCN accreditation can be used as a vehicle for promoting an inclusive approach and to access Further Education Funding Council (FEFC) funding when programmes fall within Schedule 2 of the Further and Higher Education Act (1992).

## Key messages

- There are progression paths to qualifications in the national framework, but there is a strong case for recognising horizontal progression. Entry level provision is learner referenced. It recognises that learning outcomes will be achieved with assistance at entry level.
- Differences in approach to entry level between OCNs have been identified and

the National Open College Network (NOCN) is examining the issue.

- With there being no national standards for any awards at entry level, OCNs will need to be prepared to respond to national developments following Sir Ron Dearing's review of qualifications.
- There are variations in the currency of and value attributed to OCN accreditation. Although it is highly valued by some staff and students and has currency in promoting internal and external progression in some cases, OCNs need to increase the currency and profile of OCN accreditation.

# 1. Introduction

There are a number of learners who are unable to access the existing academic and vocational qualifications framework. It is important that there are opportunities for progression for these learners and that their achievements are recognised. OCNs are increasingly filling the accreditation gaps as FE colleges are increasingly making use of them to meet the accreditation needs of learners with learning difficulties and disabilities. College staff and funding bodies wish to ensure that learners are offered learning programmes which both meet their learning needs and offer a credible form of accreditation.

FEDA's project on OCN accreditation and learners with learning difficulties and disabilities aimed to:

- explore the forms of OCN accreditation available to learners with learning difficulties and disabilities, and the reasons for offering OCN accreditation
- consider the currency of OCN accreditation, the options for progression and links to other forms of accreditation and qualifications
- examine the assessment regimes, how standards are maintained and quality assured
- evaluate the overall strengths and weaknesses of OCN accreditation for learners with learning difficulties and disabilities

The findings are of particular interest to staff in FE colleges, adult and community education providers and OCN staff. It may also be of interest to other centres offering or considering offering OCN accreditation, the FEFC inspectorate and the FEFC Committee on Learning Difficulties and Disabilities.

## 2. Methodology

The first phase of the project involved information gathering from NOCN, OCNs, and centres. Discussions were then held to identify the key issues for investigation. These were examined and developed through an invitation seminar, and a framework for the case study interviews was devised by the project team. The interview schedule was piloted with an OCN and a centre.

Six OCNs were selected as case studies, because they covered a range of areas and stages of development. The OCNs all had experience of accreditation for learners with learning difficulties and disabilities and had expressed an interest in the issue. Staff and learners from 12 centres were interviewed about their provision. The aim was to represent two centres offering OCN accreditation from each OCN in the sample, and included FE colleges, adult education providers and independent specialist colleges.

Following an analysis of the case study material, a further reference group seminar was held to examine critically the findings and to formulate action points and recommendations. The findings were also reported, tested and discussed at a number of other events including credit accumulation and transfer (CAT) network meetings, staff development sessions and OCN forums.

### 3. Findings

#### OCN accreditation offered

##### *Programmes*

There is a wide range of OCN-accredited programmes on offer to learners with learning difficulties and disabilities at all levels, from entry level to level 3 to access to higher education (HE). Some programmes for adults who are mental health services users are accredited by OCNs. The entry and level 1 programmes designed primarily for learners with learning difficulties fall into five groups:

- key skills of communications, literacy, numeracy and IT
- personal development skills, including creative activities
- independent living skills
- preparation for work
- pre vocational

At level 3, there are examples of both generally available and specially designed access to HE courses. These are undertaken by learners with physical disabilities and sensory impairments.

Royal National College for the Blind offers Access to Higher Education certificates in science and social work for blind and partially sighted students. The programme will be submitted for OCN Access validation at levels 2 and 3 for 1996-7. The number of learners undertaking this programme has risen from 3 in 1993-4 to 8 in 1994-5. The first learners through this programme have just completed their HND courses.

At South Nottinghamshire College several students with learning difficulties and disabilities have undertaken the general college Access programme and two hope to be taking up university places in autumn 1996.

There is no consistent pattern of what is offered across the sample in this project and it seems to depend entirely on local initiatives. Some centres offered two or three programmes and others more than 50. However, all OCNs and

centres reported on the rapid growth in the number of programmes being developed and available.

It was reported by one OCN that frequently the development and maintenance of coherent programme relies on the commitment and goodwill of tutors who often receive inadequate levels of support. The whole pattern of this provision seems not to reflect policy but the fact that staff are committed.

A NOCN survey of 52% of its members and 25% of associate members reported that 204 programmes for students with learning difficulties and disabilities were available in 1994-5 and that the 1995-6 session will substantially exceed this number.

There is a low level of redundancy of approved programmes. Programmes no longer run for two main reasons: programmes are replaced with improved versions and the staff who developed them have moved on.

##### *Learners*

The number of learners undertaking such programmes and receiving awards is likely to expand rapidly from a relatively low base.

The NOCN survey recorded approximately 3,630 learners registered in 1994-5. This figure should be treated with some caution, since it is based on programmes primarily designed for learners with learning difficulties and disabilities and does not account for learners undertaking general programmes. For these statistics to be included, OCNs would need to ask centres to report on the increasingly large number of learners on generally available programmes. The new OCN monitoring system for 1994-5 requires information to be recorded about learners and includes information about those who are registered disabled, or who are self declared as needing additional support. This should provide a means of collecting more accurate information.

Some respondents expressed concern about how appropriate OCN accreditation is for learners with profound and multiple disabilities, for whom progress will be

exceptionally slow and may be erratic. Learners with profound and multiple disabilities are described as people who:

- are unable to be responsible for almost any aspects of their lives
- are not in any way self-sufficient. They may need to be fed, washed, cared for and kept from danger by others
- are largely unaware of themselves, others or the physical environment and therefore unable to make decisions or choices
- often have no adult roles within the community or the family

(adapted from *Learning for Life*, FEU, 1994)

There is a consensus that where learning occurs, however slow, OCN accreditation may be used. The main issue is the learners are entitled to have their learning recognised. This does not necessarily indicate that learners will be able to progress to higher levels of achievement. While this is not a concern for OCNs, it does have implications for FEFC funding and will mean that these learners cannot be funded through schedule 2(j) (see Appendix 2 for Schedule 2 of the FHE Act 1992 with FEFC's associated criteria). Provision for these learners is highly specialised and few staff in FE have sufficient expertise to meet their needs. Where staff do exist, they require support and resources for this development work.

### *Changes and developments*

In addition to the reported increase in the numbers of programmes being prepared for submission, there is a growing trend of centres submitting larger and more strategic unitised frameworks. There is a range of interesting developments involving the collaborative development of unitised programmes.

OCN accreditation for school students and school link provision was a widely reported development. It is described as having an important role in assisting transition and improving school/college relationships.

West and North Yorkshire Access Network is promoting the collaborative development of units by a number of providers, within a strategic framework. A scheme of approximately 40 units at entry and level 1 has been developed, initially by four colleges, as a pre-vocational foundation course. It has now expanded to include seven participants who 'moderate' each other internally and act as a steering and development group.

A consortium of providers across North Wales, supported by a project co-ordinator, has developed a pre-vocational network which comprises an extensive range of units, available to schools and colleges in the consortium. More than 70 learners from five colleges will be awarded approximately 200 credits in 1994-5, the first year of OCN accreditation.

Mackworth College, Newark and Sherwood College and Linden School worked together to develop a vocational transition programme of 39 units, which will be undertaken by approximately 150 learners.

Within the Central Access Network, two colleges have produced a framework of previously disaggregated units into coherent programmes and other colleges are now accessing units via a unit transfer agreement.

### *Simultaneous recognition through NOCN*

At the time of writing there are 40 programmes which have received simultaneous recognition through NOCN, of which 17 are running. None of these are specifically designed for learners with learning difficulties and disabilities.

Simultaneous recognition means that centres, other than the one where a programme was developed, may offer the programme without it having to go through the submission process locally. The programme will still be subject to the moderation and quality assurance procedures of the local OCN. Any OCN programme could receive simultaneous recognition, but there are substantial costs in terms of staff time and materials to create the necessary documents to support a simultaneously recognised programme.

Although a keen interest was expressed in having a range of recognised, 'off-the-shelf' units available, all respondents said they would

wish to retain the option of developing their own programmes. There were some reservations expressed about such units. One of the most important features of OCN accreditation is that learners needs are to the fore when developing programmes and concern was expressed that this could be lost with off-the-shelf units.

The process of producing and submitting units is in itself developmental. The experience of centres which have purchased and used the Chesterfield package, which consists of a range of programmes designed for learners with learning difficulties, is that although it provides a useful starting point, tutors need to modify it to match their own needs. It has to be modified to meet new OCN criteria and therefore cannot be used off the shelf. Consequently, a mixture of both off the shelf units and locally developed programmes was preferred. In practice, unit sharing between OCN programmes is already happening. However, these units must be located in a programme for credit to be awarded. The receiving OCN must ensure that the new centre is able to provide adequate support in an accredited programme for units to be transferred from other OCNs.

Respondents requested units in the following areas: key skills; personal development skills, including advocacy and assertion, and creative activities; independent living skills; vocational preparation including introduction to world of work; preparation for life in college units of GCSEs and A levels. Several respondents suggested that a national database of such units would be helpful.

NOCN could develop a database of programme titles, but since neither OCNs nor NOCN 'own' the programmes they accredit, their role would be to activate centres which hold programme details. However, given the number of units already existing and the rate of recognition of new programmes, the staff resource required for data entry would make it impractical. Where local unit transfer agreements exist, these could be fed into a NOCN register for national transfer of units.

## *Perspectives on sharing*

OCNs operate through collaborative approaches while colleges work in a highly competitive market. Consequently, centres may be unwilling for units or programmes they have developed and accredited to be made available freely to other providers, particularly those locally which are in direct competition. The following points were made by centres:

- several respondents from centres stated that there must be some recognition of their development costs if programmes are to be made more widely available
- centres are willing to swap with establishments further away and not in direct competition

Where centres had negotiated agreements to swap programmes, it was not always possible to do so in practice. In some cases, the content was not appropriate for the learners or applicable another centre. Some centres expressed reservations about contributing to banks of units, since they felt that they would be unlikely to get out as much as they put in. However, unit transfer presents less of a problem in a competitive environment. The major concerns arose from the development costs of programmes, in terms of staff time. College managers expressed particular concerns that their investment in developing programmes should not be given freely to competitors. However, most felt it was a waste of time and resources for everyone to be developing their own programmes.

The most effective approach reported was where consortia of centres worked together to develop a series of programmes which they could all deliver. OCNs have taken an active role in promoting these consortia. Consortium approaches and unit sharing are both cost-effective methods of development and accreditation.

## Reasons for offering OCN accreditation

A number of reasons have been given for offering OCN accreditation. Some of the most commonly identified were:

- OCN offers the only accreditation which can be designed exactly to the requirements of individual learners. OCN accreditation recognises and gives credit for the achievements of learners in any programme area and at all levels. Entry level is particularly valuable in enabling access. In that OCN accreditation recognises abilities and achievements rather than disabilities or failure, it is a positive experience for the learner
- OCN provides achievable accreditation for learning which mostly falls within the scope of Schedule 2 and therefore attracts FEFC funding
- OCN accreditation is part of a national system which may be undertaken by any learner, not just those with learning difficulties and disabilities
- the OCN processes of submission and moderation act as a powerful source of staff development and the rigour involved improves the professionalism of the staff and the status of both learners and staff
- OCNs encourage collaborative developments. A number of OCNs have forums or networks of staff working with learners with learning difficulties and disabilities which act as a focus for staff and curriculum development. In some cases, this has in part filled the gap caused by the demise of local authority advisory services
- OCN accreditation assists in the development of inclusive progression pathways, by requiring submissions to identify the pathways and by filling gaps, especially at entry level

Other factors mentioned were:

- the use of OCN accreditation to support college developments towards an inclusive approach, especially through the involvement of staff from vocational programme areas
- OCN accreditation is particularly useful with mixed ability groups
- creative activities which may play a major role in developing a range of personal attributes such as confidence and communication skills, have disappeared with more mechanistic, competence-based approaches. OCN is one of the few means of accrediting creative activities, and of using creative activities as the means for promoting intellectual development

## *OCN and other forms of accreditation*

Most colleges have examined a range of alternative forms of accreditation, and most are currently offering a number of awards. For some learners, a programme with some GCSEs and units of GNVQs and NVQs is appropriate, but for most learners with learning difficulties, centres report that GCSEs and GNVQs are inappropriate because they are at too high a level, are delivered too quickly and have forms of assessment which present barriers for these learners.

Several centres are moving towards OCN as the main form of accreditation for a number of groups of learners. The main reason for this is to rationalise the range of awards and awarding bodies being used. OCN offers a suitable alternative for most learners. Despite this rationalisation, most will continue to offer a variety of other awards for specific purposes. *Access to Accreditation* (FEDA, 1996) provides further information on this. Local initiatives allow progression from OCN units to other awards as required.

## Discrete learning programmes or inclusive approaches

OCN accreditation follows the policy and approach of institutions. It can lead to a proliferation of discrete provision or it can support an inclusive approach. It is particularly helpful in promoting an inclusive approach by offering clear points of access and progression pathways. It can involve mainstream vocational staff in developing units and increases the status of the learners.

There are examples of where colleges have used OCN accreditation positively to promote a more inclusive approach.

With the Welsh Pre Vocational Network, it is thought that the learners will be able to integrate and progress only if units are based on national standards, and if the programmes and assessments are similar to those of programmes leading to other nationally recognised qualifications. This requirement must be taken into account at the point of writing the unit.

At Barnfield College vocational units are offered to learners with learning difficulties and disabilities. They were developed by vocational staff with the support of the learning support co-ordinator and are being delivered by eight vocational tutors from a range of areas across the college, alongside mainstream learners in nearly all cases. Learners with learning difficulties and disabilities are thus included within mainstream programmes.

## Progression

### *Progression within OCN*

Some OCNs require all entry level units to be available at level 1. This offers a clear progression in terms of level. One centre with several years' experience of OCN accreditation commented that although most learners with learning difficulties achieve credits, relatively few progress to higher levels. It will be important to monitor this to see if it is a general trend.

Many centres reported that learners may have horizontal progression routes. That is, where they increase the breadth of their learning, at the same level. At entry level it is possible to make progress in small steps at the same level. There was some uncertainty over whether this met the requirements for funding purposes of Schedule 2 (j), independent living and communication programmes for those with learning difficulties which prepare them for progression to other courses in Schedule 2. This has been interpreted to mean that the programmes must be designed to lead to other specified courses and that evidence is necessary that some learners have progressed in this way. It does not mean that every learner will progress or aims to progress through the whole range of levels.

While OCN accreditation does not require progression to be demonstrated, FEFC funding requires evidence of vertical progression.

### *Evidence of achievement and progression*

For many centres OCN accreditation is at too early a stage of implementation to have evidence of progression patterns. However, there are examples of individual learners, from more established centres where OCN accreditation has been offered for several years, who have progressed to the full range of opportunities including GNVQs, NVQs, BTEC, City and Guilds Craft Programmes, Word and Number Power, Youth Training and degree programmes in HE. To date, there is conflicting evidence about the number of learners who have progressed in this way.

A major barrier to progression to general, mainstream programmes identified by centres was that other tutors in the college did not recognise the courses for learners with learning difficulties and disabilities as meeting the entry criteria for progression. The structuring of recognised entry routes and the involvement of staff from all programme areas across the college have been cited as ways in which barriers have been removed.

South Nottingham College has developed a pre-GNVQ programme and has a college-wide agreement or compact with the GNVQ deliverers that if learners achieve the prescribed OCN units they will gain automatic admission to GNVQ programmes.

Barnfield College involved vocational programme staff in developing OCN units in their own programme areas. This will increase the range of staff working with learners with learning difficulties and the aim is to open up access generally.

The Pre Vocational Network development in North Wales also involved staff delivering vocational programmes in developing the units and in attending panels. This promoted a positive sense of ownership.

Practitioners claim that OCN accreditation has sharpened up practice and ensures learning is purposeful. There is emerging evidence that OCN accreditation is halting the 'recycling' which occurred, particularly with adults with learning difficulties who have drifted through courses from year to year, receiving no record or recognition of their learning and achievements. There is evidence that OCN accreditation can assist in developing an accredited strategic curriculum framework which is accessible to a wide range of learners.

A major factor in determining both access to provision and progression within it, is the strategic planning of the curriculum by the organisation. Flexibility is the key and where providers have a modular or unitised approach, access is improved.

OCN accreditation also has helped some learners gain access to employment.

North Herts College has links with an employment scheme which offers employment placements to people with learning difficulties and disabilities. A staff member from the employment scheme sat on the recognition panel and believes that the 'World of Work' unit helps in the employment placement.

In terms of external progression, Access programmes provide a recognised progression route to HE for people with disabilities for whom other routes present barriers and there is evidence that growing numbers of learners with disabilities are using this route.

### *How OCN accreditation helps and hinders progression*

Respondents claim that OCN accreditation assists progression for learners with learning difficulties in that it:

- helps structure an inclusive curriculum framework
- builds in progression routes
- assists progression by providing clarity about learning outcomes and evidence of achievement to support internal progression within the organisation, or external progression to HE and employment
- offers national recognition
- requires a rigorous approach

There are concerns that OCN accreditation could hinder progression if:

- entry level becomes equated with learners with learning difficulties and stigmatised as a result
- the potential transferability and national recognition is not fully realised
- it fails to develop currency both within and beyond education due to the perceptions, by those unfamiliar with OCN accreditation, of inconsistencies and weaknesses in quality assurance

Some centres have chosen OCN accreditation precisely because it offers better opportunities for progression than other forms of accreditation.

### *Monitoring progression*

Colleges are developing centralised systems for collecting destination data and monitoring progression. In some cases, community education providers have greater difficulties in monitoring as this information is held by

individual tutors rather than centrally. OCNs collect records of learners and awards but have tended not to monitor progression patterns as a matter of course. Submissions are required to identify progression routes, but no evidence of actual progression is collected.

Moderators are required to include progression in their reports but this will not necessarily reveal longer term patterns as they emerge.

## The value of OCN accreditation

### *Learners, their parents and carers*

Although the evidence is largely anecdotal, it appears that learners are generally delighted to receive accreditation and value it highly. For many learners this will be the first time that they have received nationally recognised accreditation.

It is less clear whether learners appreciate OCN accreditation in particular, or whether any form of certification would be equally well received. Some respondents believe that the learning outcomes and assessment criteria make the learning/achievement clearer to learners, parents and carers. Students with disabilities undertaking access programmes reported that they valued the fact that OCN is a proper, externally validated form of accreditation.

One trend noted by West and North Yorks Access Network, was that in areas of personal growth including the development of confidence, learners may demonstrate their new skills in environments outside the classroom — at home for example. Work is being done to ensure that parents and carers are able to help with the assessment, where learning is evident at home, but not visible to the tutor. In this way learners can still receive credit for their achievements.

In Scarborough, tutors will introduce parents or carers to accreditation and will explain what will be assessed, in order to include them in monitoring. Engaging parents in this way can help to change attitudes, especially where there is a tendency to overprotect. Care is taken to ensure that this involvement is seen to be supportive to both learner and parent rather than 'policing' learning.

While interviewing learners in the course of this project, it became evident that tutors may not always fully explain the nature of OCN accreditation to the learners. In one case, learners were enthusiastic about the certificates they had received in the past, but were concerned that they had not received certificates for the current term. It emerged that they were due to receive OCN accreditation which would take longer to process than the college certificates they had previously received, because of the external moderation and quality assurance requirements.

### *Tutors and other education staff*

There is considerable variation in the value tutors attribute to OCN accreditation. Some have greeted it enthusiastically and value it highly, while others may not have heard of it or do not understand it.

Generally those who do not value OCN accreditation or see it as the soft option are those who have not been closely involved with it. It appears that it is becoming more highly valued with familiarity and first hand experience of the rigour with which it is implemented. There is little tangible evidence about value and currency apart from the increasing numbers of submissions.

OCNs are inevitably involved with centres who do value OCN accreditation. Several OCNs report approaches from LEA staff who have developed large-scale county-wide submissions, with an increasing interest being expressed by the school sector.

### *Funding bodies*

FEFC currently recognises OCN accreditation as long as it meets the requirements of Schedule 2. Following a series of meetings between the NOCN and FEFC, agreement has been reached over a new set of codes for the qualifications aims database, which will allocate cost weighting factors to OCN-accredited programmes in 1995-6. NOCN and FEFC officers have also put forward proposals to the FEFC Tariff Advisory Committee for a credit-based funding model which would take all

OCN awards out of the load bands and onto the qualifications database. A research project to develop a credit-based funding methodology for OCN accredited programmes is currently being devised by NOCN and FEFC.

The primary aim of the project will be to establish whether a broadly stable relationship exists between OCN credit values and the guided learning hours currently attributed to OCN-accredited programmes. Sixteen OCNs will take part in the project and each will identify four or five member colleges for inclusion; FEFC will collect data on guided learning hour allocation for identified programmes from each college and compare with data on level and credit value provided by the OCN.

The position with TECs is variable. There are examples of TECs which do not recognise OCN accreditation at all and others which are involved in collaborative developments.

London TECs have already made substantial collective commitment to credit in the capital through their funding of the CAT consultancy which undertook much crucial development in the past 18 months. Individually, too, TECs are supporting CAT initiatives in a number of ways: City & Islington College will receive Development Funding for credit-based work through CILNTEC, while at AZTEC a successful SRB bid has enabled funding for CAT-related TVEI activity.

The Training and Strategy Directorate of the former Department of Employment agreed that OCN accreditation can be eligible for output-related funding, providing no suitable NVQ exists. The Department offered clarification in a letter of 17 January 1995 from Alex Sutherland, which stated:

*'...current policy is to move to paying only for NVQs and not forerunners from April 1996, except where there is no appropriate NVQ. Where there is no appropriate NVQ, TECs will remain as free to use OCN accreditation as they are now.'*

There is still some way to go before OCN accreditation is recognised as providing appropriate learning outcomes for TEC funding purposes. OCN accreditation could provide learning outcomes for pre-vocational work at pre-NVQ Level 1.

## Employers

The need to market OCN accreditation both locally and nationally with employers was commonly reported. Generally, awareness of OCNs by employers is very low.

However, some local authorities and health authorities as employers have become involved. There are examples of colleges developing OCN-accredited staff development programmes.

The early stages of the CAT project were supported by contributions from Sainsbury's and the nine London TECs. London First, London Together and the TECs have now been successful in obtaining further funding from Courtaulds, the TSB and the Woolwich Building Society.

Leeds and North Yorks LEAs both accredited in-service training programmes through WNYAN. The programmes are for staff working with pupils with learning difficulties, disabilities and multisensory impairments and include an introduction to the use of MAKATON sign system.

South Nottingham College has been operating an OCN accredited IT staff development programme for the last two years. Fourteen units are offered in the programme at level 1 and currently a submission for accreditation at level 2 is being developed.

## Other organisations

Social services departments in some areas are using and have paid for OCN accreditation. Where it is well understood, as in Wales where the units have been developed for use in schools, colleges, and with Work Opportunity and Community Living Services, it is highly valued. Professionals from these groups have been involved in consortium developments and it is intended that the Network will be delivered in partnership with those services. This will take place in 1995-6.

It would appear that more work needs to be done to inform careers and employment services, including those dedicated to people with learning difficulties and disabilities, about OCN accreditation.

## **Quality issues: submission, preparation and internal processes**

### *Support in developing assessment criteria, methods of assessment and evidence requirements for submissions*

All OCNs have produced or are developing written guidelines for centres. They also run forums, workshops and training events. Panels have a developmental role in improving submissions. The main and most important source of help from OCNs is the personal support of development officers.

In most establishments, a team or consortium approach was used. In some centres which have a substantial OCN programme, there is a college OCN co-ordinator who supports staff, but where this is not the case, team approaches are favoured. For staff who have not been through the processes of external validation, the learning curve is steep and requires substantial support.

### *Internal approvals panels*

A number of colleges have internal validation panels which vet submissions before they go to the external panel, or which are concerned with revalidation. Internal panels have two useful functions: critically examining the submission so that it is better prepared for the recognition panel; and in doing so, senior managers and other senior staff are informed about provision for learners with learning difficulties and disabilities and the achievements of staff and students.

## *Internal quality assurance processes*

Most colleges have a clearly defined and in some cases well-established range of quality processes including course reviews, which are applicable to all college courses including OCN programmes. Moderators' reports are usually included in this review.

Concern was expressed by one respondent about quality where a provider does not have the institutional support and quality processes available to staff in FE colleges. Another reported that there are good and bad examples of quality assessment systems in colleges, as well as in community education or voluntary organisations.

## *Key features of OCN accreditation*

### **Providing evidence**

Respondents were clear that direct learner evidence is provided wherever possible, which should be examined during moderators' visits. Centres are finding creative ways of providing evidence, including videos, photos, audio tapes, displays, artifacts and skills demonstrations. Several respondents stated that it is important that moderators go into the learning situation and treat the learners as an integral part of the moderation process. Where it is hard to get tangible evidence, for example where there are no products, centres could provide tutor and learner assessment checklists.

The potential to provide evidence in a variety of ways matched to learners rather than in prescribed formats is considered to be a major strength of OCN accreditation.

At an OCN forum organised by NEMAP, attenders agreed to bring and share examples of their standard and more unusual assessment materials, in order to spread good practice across colleges and other centres in the region.

Caution was expressed about over-assessment and requiring learners to repeat activities without purpose other than to collect evidence. The best approach is to ensure that the evidence

requirement is integral to the learning experience. Some respondents were particularly concerned about the danger of over-assessment in unitised programmes.

### **Learner referencing**

Learner referencing at entry level involves measuring individuals' progress against their own starting points and their own learning aims.

The approach to entry level requires consistency of interpretation, or else its validity is left open to challenge; but it is more difficult to provide evidence for this. In order to judge whether learners have made progress and whether that progress is sufficient for the award of credit, it is essential for there to be a thorough initial assessment process. Thus, OCN accreditation has forced some centres to evaluate and improve their initial assessment processes for all learners. To ensure that programmes remain sufficiently flexible and matched to individuals' needs, a range of learning outcomes may be developed of which the learner needs to achieve a specified number. Learner referencing takes different forms and there is variable practice across OCNs. Two OCNs are currently working on a comparison of their different approaches to entry level accreditation as a part of the NOCN review process and NOCN has organised a staff development event on this area.

### **Entry level**

The issues related to entry level are complex and there is an ongoing debate with OCNs and NOCN at a national level. One feature of entry level is that learners are likely to require assistance. In defining 'with assistance' at entry level, the issue is to establish what is acceptable in terms of how much and what form of assistance may be given to a learner. The extent to which the form of assistance is specified varies. A clear definition of the type and quality of assistance required would help to ensure consistency, rigour and credibility. Entry level descriptors permit different levels of assistance to be offered to learners, providing the individual learning outcomes in their

individually negotiated learning plan recognise this. This would be consistent with the description for entry level and the notion of learner referencing.

The consortium submission in North Wales offers descriptors for the forms of support. These were developed by the consortium for use with OCN and NPRA. Levels of support:

- 4 = hand over hand
- 3 = occasional physical prompt
- 2 = occasional verbal, signed or gestural support
- 1 = independently

Where a learner requires a physical prompt or physical assistance, it is particularly important to provide evidence that the learning outcome really has been achieved. Where support assistants are employed, it is crucial to ensure that they are not offering too much assistance. In one college, a training programme for support assistants focuses on helping them to understand the nature of empowering learners, which includes allowing them to experience some failure. Panels provide the most important mechanism for defining the notion of assistance, but the potential for different interpretations remains. OCN respondents indicated that different OCNs define 'with assistance' with varying degrees of precision. The methods of assessment can be different at all levels and the test is to find what is appropriate and effective for measuring achievement.

The use of 'notional time' for the award of credit presents difficulties with learner referencing at entry levels. How much learning is required for the award of credit at entry? The definition of volume of learning for credit at entry level requires further work.

Differences in the approach to assessing entry level achievement between OCNs were evident in this project. One OCN does not specify criteria at entry level, but awards entry level credits for achievement demonstrated which is working towards, but does not meet, level 1 criteria. Other OCNs specify assessment criteria at entry level. There are no existing national

standards for entry level, but members of the project team consider that the issue will arise in the context of the review of national qualifications

## *OCN quality processes*

### **OCN panels**

In terms of the constitution of panels, all OCNs require some external members who are not making submissions to be present. The number of external members required varies between OCNs. The inclusion on panels of staff from other mainstream programmes and from organisations such as the careers service, employment service, social services and special schools, was highly valued. At least one OCN requires that other sectors are represented. In general, the fact that panel members are very knowledgeable about the learners and programme area was thought to be particularly important. Although OCNs do have criteria for the selection of panel members, OCNs have different practice and some centres are unaware of the rules for the constitution of panels.

A difficulty was reported in finding panel members to cover the whole curriculum range in large submissions was reported. Panels may need to refer to specialists for comment in these cases. The other difficulties are in trying to balance the panel with sufficient subject specialists and those who are knowledgeable about the learners and their particular requirements. It is particularly difficult to include subject specialists when they are part-time staff who are only paid for their teaching time.

There was a range of views about the consistency of panels. While some panels were reported as being very hard and rigorous, there were respondents who thought that some programmes should not have been approved without modification. Overall, respondents thought that panel consistency was alright and was improving. It was reported by those newer to OCN processes that OCN staff and experienced panel members were more consistent. This has implications for panel membership, ensuring that a balance is

achieved between experienced members and staff for consistency and newer members who are still learning. Many panels report that the process of networking through panels was thought to be more helpful in providing clarification and reaching a common understanding than written guidelines could ever be.

In order to improve or ensure consistency, the following suggestions were made:

- OCNs could offer advice based on the outcomes of previous panels in similar curriculum areas
- the most effective panels have an experienced chair and members who are trained and experienced
- the number of submissions dealt with at any panel should be limited
- the timing of panels is important to ensure that equitable amounts of time are devoted to the assessment aspects at the end of the submission
- panel reports need to be improved. Their function needs to be clarified
- documents could be circulated earlier and substantive comments/ criticism made to the chair of panel in advance of the meeting

### **Moderation**

Some moderators look at the teaching and learning in progress as well as examining the learners' work. This is thought to be particularly important for learners with learning difficulties.

Some OCNs will not allow reciprocal moderation. Some respondents indicated that reciprocal arrangements would have the potential for either collusion or, in the case of competitors, a lack of impartiality, although respondents were confident that this did not occur.

Respondents suggest that moderators are tough and rigorous and examples were cited of moderators being critical. Indicators of how rigorous the moderation process is, in reality, include the frequency of critical comments in OCN reports and the number of occasions on

which moderators do not recommend the award of credits.

OCNs all offer moderator training and support. Other strategies to ensure that the moderation process meets the quality standards include cross-moderation and moderators' forums in which moderators meet to examine evidence from a range of centres, but it is equally important to moderate the moderators, in order to check consistency.

There is an increasing trend for OCNs to rely more on the centres' internal quality assurance systems. In such cases, centres must prove that their internal processes are sufficiently robust, rigorous and reliable. Many colleges are able to meet such criteria, but concern has been expressed about smaller voluntary or community organisations which may not have appropriate systems in place.

OCN moderators are not required to hold TDLB assessor or verifier awards, although an increasing number of college staff do hold them or are working towards them. While most respondents felt that these awards would not improve the standards of moderation, they are useful for comparative purposes. Where respondent OCN moderators were also assessors and verifiers for other awards, there was a consensus that OCN processes are equally or more rigorous than the requirements of alternative forms of accreditation or other awarding bodies (GNVQs, NVQs, CPVE and BTEC were cited).

### **Effective OCN quality assurance procedures**

Although OCN staff were very critical of their own practice in order to improve it, they felt that OCN quality assurance processes, including panels, moderation and external review, compared well with other awarding bodies. Senior college managers and quality managers who have been involved in OCN panels and processes have expressed surprise at their rigour. NOCN and OCNs have yet to exploit fully these favourable reactions, to counter perceptions of lack of rigour.

OCNs are able to develop their own practice rather than relying on directions from NOCN or

any other national source. This enables best practice to be benchmarked to ensure continuous quality improvement. OCNs are concerned that diversity is not mistaken for inconsistency in their approach. It is important though that OCNs continue to monitor and improve their consistency. Some concern was expressed by OCNs of the danger in growing too quickly and the strains that places on them in keeping control over the submission and moderation processes.

### **How OCNs could better meet accreditation needs**

Respondents identified the following items which they thought would enable OCNs to be more effective in meeting the needs of learners with learning difficulties and disabilities:

- improve marketing and hence the credibility, value and currency of OCN accreditation — one person suggested relaunching OCNs nationally as awarding bodies
- target those both within and without education, who do not know or understand OCN accreditation
- increase the profile, in relation to rigour and quality assurance, to dispel the view held by those who are unfamiliar with OCN processes that it is a 'soft option.'
- improve the speed at which awards are given
- ensure that paperwork and administration are kept to a necessary minimum
- develop or identify a recognised series of common or stand alone units, to provide a framework across institutions
- provide a national database of these units as they receive simultaneous recognition
- improve consistency and understanding of criteria and assessment at entry level
- promote collaborative work nationally
- offer guidelines and clearer national criteria where local variations exist
- promote staff development initiatives

## 4. Summary

### The main strengths of OCN accreditation

The flexibility of OCN accreditation is one of its major strengths: its learner centredness allows programmes to be tailored for individuals; it has a range of levels; and matches the assessment to the learner and allows credits to be accumulated over a period of time. It offers accreditation to learners who would otherwise be unable to achieve accreditation.

Programmes within Schedule 2 are recognised by the FEFC for funding purposes and practitioners indicated that OCNs offer value for money when compared with other awarding bodies.

OCNs offer nationally recognised accreditation which can promote progression within FE and to HE and employment.

The process of developing and running OCN programmes is in itself a challenging one, which improves the purposes, rigour and quality of provision for learners. It can provide a focus for developing teams and promoting inclusive approaches.

The OCN approach encourages collaborative ventures through recognition panels which are attended by a range of staff from different organisations and agencies. OCNs also often run forums and workshops for staff who no longer have local advisory services to turn to.

### The main weaknesses

The paperwork and administrative processes vary from region to region and some are thought to be cumbersome. OCNs are well aware of the need to reduce paperwork and are constantly refining their systems to assure quality with the minimum of administration. The OCN registration process, length of submission process, and speed of making awards are all slow, which may prevent some centres using OCNs, although it is suggested that OCNs are quicker than other awarding bodies.

The low profile of OCN accreditation and its currency and credibility, especially with employers, is an issue. It could be improved by better use of OCN-supporting information.

There is concern among those involved with OCN accreditation, that their colleagues who are not involved, perceive it to be an easy option which lacks rigour.

The different approaches to assessment at entry level in terms of the apparent variation between OCN practices opens OCNs to criticism and challenges their credibility.

## Summary of recommendations

This summary lists recommendations in the order in which they appeared in this report. They are not in order of priority.

### *NOCN*

- Disseminate information about accreditation for learners with more complex requirements, e.g. profound and multiple disabilities and users of the mental health services
- explore the potential for a national register of approved units of assessment, available for transfer, but:
  - limit the total numbers to help ensure manageability and quality
  - ensure coverage of the most common curriculum areas at all levels
- improve marketing nationally of OCN accreditation to enhance credibility value and currency. Target TECs, employers, careers services, employment services, and those in education who are unaware of OCN accreditation
- promote a consistent approach to entry level, consensus about 'with assistance' and examine the application of notional time for the award of credit, at entry level
- promote consistency in panel membership between OCNs by agreeing specified minimum requirements
- co-ordinate the production of a common format for standard guidelines and procedures covering all aspects of recognition and moderation processes including a common framework for moderation reports
- publish a pack of exemplar materials at all levels, across all curriculum areas
- prepare to respond speedily to the outcomes of current education reviews, e.g. Dearing, Tomlinson, Higginson and Kennedy

- continue current negotiations to safeguard funding for OCN accreditation in the FEFCs' funding methodologies

### *OCNs*

- Support the development of accreditation for learners with more complex requirements, e.g. those with profound and multiple disabilities and users of the mental health services
- improve local marketing of OCN accreditation to enhance credibility value and currency. Target TECs, employers, careers services, employment services, and those in education who are unaware of OCN accreditation
- actively promote consortia or collaborative development of programmes
- co-ordinate and promote inter-agency collaboration to develop units for use in schools, colleges and social services settings
- agree consistent procedures for moderation including:
  - avoidance of 'reciprocal' moderation
  - requiring observation of the teaching and learning process as well as inspection of learners' work
  - improving standardisation procedures
  - introducing a compulsory minimum attendance requirement at initial training and updating events for moderators
  - checking that staff are familiar with the levels of assistance specified in the submission document
  - checking that within entry level, the level of assistance is clearly specified in individual students' learning outcomes

- encourage centres to use the widest possible range of assessment methods appropriate to the learners
- agree, with other OCNs through NOCN, common minimum specifications for the constitution of approval panels
- ensure that panels have an experienced chair and that trained, experienced panel members outnumber newer members who are gaining experience
- check that all approval panels include some 'neutral' members, that is, members who are not submitting programmes
- monitor the outcomes of panels to ensure consistency in panel decisions
- limit the number of submissions to any panel and ensure that sufficient time is devoted to all parts of submissions including the assessment aspects which are presented at the end of the report
- circulate submissions in advance of panels and invite pre-panel notification of substantive comments and criticisms
- consider circulating submissions in advance of panels in order to overcome the problem of obtaining sufficient subject expertise on large, wide-ranging submissions
- promote the practice of including FEFC inspectors on panels
- develop a strategy for evaluating the effectiveness of centre's internal quality assurance systems and ensure that they are adequate before becoming more reliant on them
- increase awareness of the rigour of OCN quality processes to dispel the view held by those who are unfamiliar with OCN processes that it is a 'soft option'
- continue to review procedures to improve the speed of awards and keep administration to a minimum
- contribute to the development of a common format for standard documentation across OCNs

## Centres

- Work collaboratively with other agencies such as schools and social services day and residential provision to develop a common programme for delivery in a range of settings
- explore the potential of OCN accreditation for school link programmes and transition plans
- in devising programmes, consider the relationship of learning outcomes to national standards and how to prepare learners for the assessment regimes of other national qualifications, in order to facilitate progression
- map progression from OCN programmes onto the other nationally accredited programmes available
- use OCN accreditation as a vehicle for promoting an inclusive approach and guard against the proliferation of discrete programmes
- monitor progression of learners both within and between levels, on to other programmes or into employment, employment schemes or HE
- ensure that OCN programmes are designed to meet internal entry requirements by agreeing entry criteria or by making internal 'compacts', in order to overcome any barriers to progression presented by internal gatekeepers
- raise awareness of senior managers of the benefits of flexibility and modular or unitised approaches to improving access for learners with learning difficulties and disabilities
- ensure that learners are fully informed at entry, and subsequently, about OCN accreditation, when and how credit will be awarded and when certificates will be available. Check learners' understanding throughout the programme

- design the learning programme so that assessment is integral and clearly distinguish between practice, formative assessment and formal assessment for the award of credit
- ensure that the level of assistance given at entry level is clearly specified in individuals' learning outcomes
- provide guidance and training to ensure that both teaching and support staff are familiar with the levels of assistance which may be given
- consider OCN accreditation for staff development which falls within levels 1-3

## 5. Conclusion

OCN accreditation offers a wide range of opportunities at all levels, from entry to level 3, in the full range of programme areas. Learners with learning difficulties and disabilities, users of the mental health services and learners with profound and multiple disabilities are able to access OCN accreditation. OCN accreditation is offered because of its:

- range and flexibility
- learner centredness
- potential for credit accumulation and transfer
- national recognition; improvement of curriculum quality and staff development benefits arising from OCN processes
- potential to promote an inclusive approach
- opportunity to access FEFC funding

Although the process of producing submissions is itself developmental, there is a real danger of proliferation of endless numbers of locally devised programmes. Consideration should be given to developing a bank of nationally available, quality-assured units of assessment which centres can use in developing their learning programmes. There are no existing national standards at entry level but OCNs will need to respond to developments in the national qualifications framework.

The currency and value of OCN accreditation varies. It is highly valued by many students and those who are familiar with it and there are clear examples of internal currency where it promotes progression internally offering access to other national academic and vocational programmes and externally to HE or employment. A key issue for OCNs to address is that of currency, particularly with employers. OCN quality processes compare with those of other awarding bodies but given the national debate and criticisms surrounding all forms of internal and external verification and moderation, it will be necessary to continue to improve and demonstrate rigour. If OCNs are to establish and develop their niche alongside

other awarding bodies, the profile of OCN accreditation will need to be raised.

Overall, OCN accreditation offers an opportunity to accredit the learning and achievement of all learners, matched to their individual learning needs, within a national framework. The future development of OCN accreditation for learners with learning difficulties and disabilities will depend on the capacity of OCNs to respond to the recommendations of the review of qualifications undertaken by Sir Ron Dearing and the FEFC's Higginson, Tomlinson and Kennedy committees.

## References

Further Education Unit (1994) **Learning for Life**  
FEU

Further Education Development Agency (1996)  
**Access to Accreditation** FEDA

Her Majesty's Stationery Office (1992) **Further  
and Higher Education Act**, HMSO

# Appendix 1. Key issues and questions

## 1. OCN accreditation offered

Is OCN accreditation appropriate for learners with profound and multiple disabilities?

Are there existing programmes which have been developed for these individuals?

Have any of these programmes of delivery been OCN accredited?

Research suggests a range of programmes and/or units should be made available.

## 2. Simultaneous recognition

Centres would prefer a range of programmes or units to be made more widely available.

What are the issues and practicalities in developing and maintaining a national database for NOCN? OCNs? centres?

## 3. Perspectives on sharing

How would centres and OCNs respond to the following possibilities? What are the practicalities and implications of each?

- Any OCN programme could effectively receive simultaneous recognition. If quality assurance and consistent procedures are effective, this should be possible
- Centrally co-ordinated development of commonly used units which would receive simultaneous recognition through NOCN
- A national database of approved OCN units
- A consortium approach with shared development which is available only to consortium members, but this can conflict with the current competitive environment. Consortia exist but dissemination on an inter-regional basis is not yet sufficiently developed

- A market approach either trading or buying units nationally, regionally or locally

## 4. Progression within OCN

Should the following recommendation be made to FEFC:

In order to enable the requirements of schedule 2 to be met and progression to be funded for learners with learning difficulties and disabilities, the definition of progression should include progress which broadens and widens skills as well as progress to higher levels.

Some respondents have expressed a view that entry level is too broad. Since a wide range of learning can be accredited at entry level, should there be a range of sub-levels, which would recognise vertical progression within entry level? Is this necessary or appropriate?

Can sub-levels or interim steps be accommodated within existing systems?

Can learners be accredited for incremental progress within entry level? If so, how?

Does it apply to other levels?

The inclusive nature of entry level acknowledges personal achievement located within the broad level through learners' own records. An example of how steps within entry level may be recognised is seen in the NW Access Network Further Accreditation in Maths & English (FAME) programme.

Are there any other systems for recognising achievement?

## 5. Monitoring progression

Should OCNs, NOCN and centres, including community centre providers, monitor progression patterns? If so, how? Centres are asked to monitor progression patterns through evaluation and review procedures, although data is difficult to collect.

How can the resulting information be accessed and used to inform planning?

## 6. The value of OCN accreditation

### For centres

How can learners best be informed at the beginning of the programme, about the processes of OCN accreditation, what the achievement of credits will mean and how they may be used? Submissions should indicate how learners and others will be informed, supported and guided.

### For OCNs

How can OCNs check that learners are informed? What should the role of moderators be in checking that learners know of and understand the requirements?

**Recommendation** — that OCNs ensure that moderators check and report learners' responses to accredited programmes.

There may be a role for consortia/forums of moderators to raise issues on a regional basis.

## 7. Quality assurance

What is the role of NOCN in ensuring consistency of practice? The circulation of good exemplar materials through regional OCNs?

## 8. Entry level

What is the nature of assessment at entry level?

What level of definition of 'with assistance' is appropriate?

What form of words could helpfully be offered to describe the different forms of assistance provided? How could OCNs offer training guidance to support centres with the nature of assessment and delivery of entry level programmes?

## 9. OCN panels

How can adequate staff development for all panel members be ensured?

How can more use be made of the links between local OCNs and college internal quality assurance panels? Many OCNs do work with centres to ensure that quality assurance procedures are as closely integrated as possible.

## 10. Moderation

How frequently are moderators reports critical? One respondent indicated that a higher percentage of OCN reports are critical than previous experience as a BTEC moderator suggested.

How many reports contain some criticisms or suggestions for improvement and how many contain substantial criticisms?

How often do moderators refuse to recommend the award of credits?

Although moderators often do meet learners with learning difficulties and disabilities, should this be a requirement?

How can OCNs ensure that all moderators operate consistently?

NOCN has an agreed set of moderation standards. Should there be a commonality of criteria for moderators' reports nationally?

## 11. Improving OCN accreditation to better meet the needs of learners

Respondents identified items which they thought might enable OCNs to better meet the accreditation needs of learners with learning difficulties and disabilities (pp 20-21). Should such developments be encouraged? If so, who should be responsible? OCNs, NOCN, FEDA?

## 12. Addressing the weaknesses

If the weaknesses reported on page 24 are valid, what action can be taken to address them? By NOCN, OCNs and centres?

# Appendix 2. Schedule 2 to the Further and Higher Education Act 1992 and FEFC's associated criteria

Schedule 2 paragraph reference	Summary description of course	Criteria for eligibility for funding by FEFC
a.	vocational qualification	approved the Secretary of State
b.	GCSE or GCE A/AS level	leads to an examination by one of the GCE/GCSE examining boards
c.	'access' course preparing students for entry to a course of higher education	approved by the Secretary of State
d.	course which prepares students for entry to courses listed in (a) to (c) above	(i) primary course objective is progression to a vocational course, GCSE, GCE A/AS level or an access course as outlined above; and  (ii) course includes accreditation which makes the students eligible to progress to courses (a) to (c)
e.	basic literacy in English	provides students with basic literacy skills
f.	teaching English to students where English is not the language spoken at home	improves the knowledge of English for those for whom English is not the language spoken at home
g.	basic principles of mathematics	course designed to teach the basic principles of mathematics
h.	courses under this part of Schedule 2 (courses for proficiency of literacy in Welsh) will be the responsibility of the Welsh Funding Council	
j.	independent living and communication for those with learning difficulties which prepare them for entry to courses listed in (d) to (g) above	
<p>The following notes may be of assistance in determining whether a course falls within the scope of Schedule 2.</p> <p>Sections (a) and (c) An updated list for 1996-7 of the vocational qualifications and access courses approved by the Secretary of State will be available from the Department of Education and Employment.</p> <p>Section (j) The Council will expect evidence of assessment procedures to be available; acceptable evidence of a course ensuring a progression route to courses which fall under sections (a) to (c) or (d) to (g) includes student destination data or the student's achievement of a qualification which enables progression.</p> <p>Section (f) The Council's duty extends to the home population of England. It does not have a duty towards foreign students if they are temporarily resident in England solely for the purpose of study.</p> <p>(Reproduced from <i>How to apply for funding 1996-7</i> with kind permission of FEFC)</p>		

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