Feedback on White Paper on QA Guidelines

The Cpl Institute largely welcomes the clear concise guidelines in respect of the system of Quality Assurance to be employed by training providers in the Further Education and Training sector. The guidelines support continuous improvement and evaluation which is welcomed as well as supporting substantial improvement in communication to all stakeholders.

The Cpl Institute anticipate compliance in full with the guidelines as required by the 2012 Act but do recognise our unique position in the marketplace when compared to smaller providers particularly in terms of PEL requirements for which realistically a financial bond will be required to support both initial and revalidation of programmes.

While honest transparent reporting and evaluation is merited, it should not remove commercial advantage or innovative process of any provider to the significant advantage of other providers.

Communication from QQI to the training provider is welcome at all stages but should not reflect the provider in a poor light if this is to be communicated externally to learners or other providers.

Policy on Quality Assistance Guidelines, December 2015 Feedback

QA Context Principle

Quality systems are context dependant; scale and scope of a provider's provision will impact on QA. Demonstrate quality publicly.

Feedback: How is it envisaged that this can be applied? If provider's scope is pre- determined how can provider diversify into different fields of study as the market/ client/legislation dictates?

Externality Principle

Appropriate use of external personnel who are independent of the provider and who are expertly qualified to make relevant national and international comparisons.

Feedback: This is unfeasible. Suggestion is to include an external panel when revalidating a programme who are independent to the company. Cost? International knowledge?

Public Confidence Principle

All outputs of the internal quality assurance system should be published.

Feedback: Published where? Control of IP? League tables? Potential to manipulate data to make the data more palatable towards the organisation? Automatic for companies like CMIT where once finished results are automatically submitted into QBS for certification so at a disadvantage. Commercially sensitive information? Initial outlay for development burden supported by one organisation and copied by everyone else?

White Paper for Consultation

Section 1

Section 1.3 Provider Owned Quality Assurance (Internal QA)

Point 7: "Continually and systematically self monitoring and reviewing critical indicators and promptly remedying any serious deficiencies identified."

Feedback: Training providers unlikely to be critical of their process and it seems unlikely that they would want to be reviewed ion a negative light as having serious deficiencies in need of remedy.

Point 9: "Proactively making national and international comparisons-benchmarking and using self assessment and peer review to support continuous improvement"

Feedback: Difficult to see where the benchmarking internationally is comparable in the Irish context for all fields. Unfeasible for small providers. Continuous improvement should be supported at all time but will have a cost attached to peer review process.

Point 12: "Publishing the results of Internal Quality evaluations together with quality improvement responses to further action required."

Feedback: Gives unfair advantage to other providers by displaying the enhancements within our organisation to other organisations who may not have looked at the process as proactively but rather waited for everyone else to submit their enhancements and cherry pick to suit their organisation.

1.5 External Quality Assurance Oversight-The Agency and 2.9.3

Point 5: " Publishing quality review reports , including the outcomes of programme, provider , thematic and whole of system reviews and requiring providers to do the same."

Feedback: Negative reviews may have a serious consequence for the provider despite the good intention of learning by mistakes of others which is the premise on which this has been established. This may impact on the desire of the learner to join a course or not join a course and may impact on how the organisation is reviewed nationally.

Section 2

The Core Quality Assurance Guidelines

2.1.1 Governance

Academic decision making is independent of commercial considerations

Feedback: Impossible to separate commercial considerations as programme needs to make economic sense.

2.3.1 Programme Development and Approval

"Programmes are designed to enable smooth progression for learners within and between programmes"

Feedback: Difficult to achieve depending on programme structure as designed by component specification and programme outline as specified by QQI.