



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

## QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

# REPORT

## GENERAL THEMES EMERGING FROM PHASE 1 CONSULTATION PROCESS

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**SECTION 1** Green Paper on the Comprehensive Implementation  
of the Functions of Quality and Qualifications Ireland

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**SECTION 2** Green Paper on Provider Access to Programme Accreditation

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**SECTION 3.1** Green Paper on Protection for Enrolled Learners

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**SECTION 3.2** Green Paper on Fees for QQI Services

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# 1 Introduction

Quality and Qualifications Ireland (QQI) was established on 6 November 2012 under the Qualifications and Quality Assurance (Education and Training) Act 2012. QQI is the successor to the National Qualifications Authority (NQA), the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC) and the Irish Universities Quality Board (IUQB). Whilst QQI has taken over many of the functions of the predecessor bodies, the 2012 Act also introduces new functions and responsibilities for the new body. QQI has commenced the process of bringing the functions of the previous four bodies together and is developing a comprehensive set of policies to implement its functions in an integrated way. QQI is committed to ensuring that this comprehensive policy development is undertaken in an open and transparent manner, in consultation with its stakeholders. QQI's Consultation Framework<sup>1</sup> outlines the process underpinning the approach to consultation.

The first phase in the Comprehensive Policy development programme was to consult on a range of Green Papers that deal with particular policy areas and processes. Having concluded the Green Paper stage of development, some policy areas will continue to Stage II - the production of draft policy papers (White Papers). These White Papers will be subject to a further consultation phase and will result in the introduction of policy in September 2013. These White Papers will include policies that will enable providers who do not currently have a relationship with QQI, to have access to external quality assurance and awards.

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<sup>1</sup> For Consultation Framework see: [http://www.qqi.ie/Downloads/QQI\\_Consultation\\_Framework.pdf](http://www.qqi.ie/Downloads/QQI_Consultation_Framework.pdf)

## 2 The Consultation Process

The consultation process on Phase 1 commenced on 13 May 2013 with publication of a suite of Green Papers;<sup>2</sup> the Papers were published on the QQI website and a notification inviting response was issued to over 5,000 stakeholders on the QQI stakeholder database. The Green Papers are grouped into four sections. Phase 1 of the consultation for Sections 1, 2 and 3 closed on 7 June 2013, submissions for the Green Papers in Section 4 are being accepted up to the 13 September 2013.

To facilitate stakeholder engagement a consultation feedback form was developed for each Green Paper. This allows respondents to submit their views online, providing feedback to specific questions and also general comment/feedback. Stakeholders can also submit their feedback and views to a dedicated email address [consultation@qqi.ie](mailto:consultation@qqi.ie)

Two consultation events were held on 20 May in Dublin and 28 May in Cork. The events were open to all stakeholders who had an interest in participating in the consultation process. Feedback received from these events was documented and reviewed as part of the consultation process.<sup>3</sup>

Two focused consultation seminars were also held on 30 May in Dublin and 6 June in Tullamore with potential applicant providers who had been in touch with QQI and who are interested in seeking access to programme accreditation. Feedback received from these sessions has been documented and reviewed as part of the consultation process.

### 2.1 CONSULTATION SUBMISSIONS

A total of 105 submissions were received on Sections 1, 2 and 3 of the Green Papers.

Of these 84 or 80% were made through the online feedback form, the remaining 21 or 20% were emailed directly, some of these were made as written submissions without the form, and other stakeholders submitted directly but used the online form as the template. This indicates that the majority of respondents used the online submission process.

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2 For Green Papers see: <http://www.qqi.ie/Consultation/Pages/default.aspx>

3 For Feedback Reports see: <http://www.qqi.ie/News/Pages/Feedback-from-Consultation-Events.aspx>

Submissions received from providers or provider representative organisations accounts for 69% (72 submissions) of the feedback received.

An overview of the 105 submissions by respondent category is provided in the table below.

CATEGORIES	COUNT
Community and Voluntary Sector	10
Education Consultants	1
English Language Training Providers	7
Employer and Industry	3
Government Department or Agency	6
Individuals	1
Private Provider NFQ Levels 6-10	13
Private Provider NFQ levels 1-10	3
Private Provider NFQ Levels 1-6	19
Public Provider NFQ Levels 1-6	9
Public Provider NFQ Levels 6-10	5
Regulatory and Professional Bodies	7
National Representative Organisation	3
Provider Networks/Representative Organisations	6
Universities and Designated Awarding Bodies	5
UK Awarding Bodies	3
UK University	2
UK National/Regulatory Body	2
Total	105

## 2.2 REVIEW AND ANALYSIS

A thematic analysis of all submissions was conducted. The submissions were read in their entirety by an internal review team and by the individual policy area managers. Each reviewer individually identified the main themes raised by the submissions. The themes were identified within the context of the specific questions and/or options posed in the Green Papers. These themes are considered and responded to as part of the White Paper development process.

## 3 General Feedback – Emerging Themes

Whilst the submissions provided feedback on a wide range of issues relating to the specific Green Papers, other themes also emerged from the thematic analysis undertaken.

The main themes that emerged are;

- » Consultation Process, Timing and Duration
- » Learner Involvement and Representation
- » Information and Communication

the key issues raised within the context of these themes and QQI's response is outlined in this document.

### 3.1 CONSULTATION APPROACH AND PROCESS

The majority of submissions explicitly welcomed the consultation process, the '*centrality of consultation*' and the opportunity to engage with QQI on its comprehensive policy development programme. The following extracts very much reflect the views of stakeholders on the proactive engagement being undertaken.

*"We very much welcome QQI's collaborative public discussion approach with all its stakeholders and believe that it is going to make a fundamental difference to the success of and the engagement with the new policies."*

*"We support QQI's approach in going back to first principles and operating a genuinely open and transparent consultation looking for stakeholder feedback."*

*"(We)...welcome the identification of consultation as good practice and are encouraged by the depth of consultation in this instance."*

One stakeholder proposed that;

*"A clearer definition/outline of the consultative approach would be beneficial i.e. what the process is – is it paper driven, face-to-face, sectoral? What is the schedule for briefings/meetings etc.?"*

Another stakeholder was concerned about the resources required to undertake consultation and the impact on other QQI services.

*“We welcome the consultation process but have some concerns about whether the organisation is resourced adequately to undertake such an elaborate consultation process and maintain core services as well. The long delay in restoring activity such as development of awards and access to accreditation is of concern to us as a small business affected by the dissolution of FAS and the transition to the CAS.”*

The importance and need for ongoing consultation was highlighted by a number of stakeholders in their submissions;

*“There must be an ongoing formalised consultation process that provides for meaningful improvements as the accreditation model evolves. This consultation process must be mindful of the practical operational experiences of educationalists delivering the programmes and reflective practice must be initiated and acted upon if credibility and integrity is to be maintained.”*

## **TIMING AND DURATION OF THE CONSULTATION**

The timing and duration of the consultation for Sections 1, 2 and 3 was highlighted by a large number of stakeholders as problematic. Whilst the urgency in proceeding with policy development on these sections was noted, this has also caused problems and some respondents highlighted the fact that they had not been able to engage in broader internal consultation within their organisation for Phase 1 in such a short timeframe.

*“(We are)... of the opinion that the first period of consultation does not allow for due consideration of the wealth of issues raised in these green papers. Consultation and response requires internal consideration through processes already established within organisational quality approaches..... It has not been possible to carry out this consultation within the first period. (We)..regret the lost opportunity for consultation.”*

*“The consultation deadlines do not allow for feedback from staff and learners as it coincides with summer holidays.”*

*“The timelines are tight bearing in mind the summer break for many people. This has prevented appropriate consultation that would result in a comprehensive organisational response....But the 3 policy areas for initial consultation, followed by the other policy areas by September, helps as does the publication of all the policies so that there is an overall view of the full policy proposals. I also like the green paper leading to the white paper process.”*

### 3.1.1 QQI'S RESPONSE

QQI acknowledges the tight timelines for consultation on the Green Papers in Sections, 1, 2 and 3. These Green Papers were concerned with a specific set of policies which are required to enable QQI to develop and implement policies to enable Provider Access to Initial Programme Validation in September 2013. This process is not currently available to providers who did not have quality assurance agreement in place with one of the legacy bodies. QQI recognizes that the delay in implementing this policy restricts access for these providers and their learners.

QQI's Consultation Framework<sup>4</sup> commits the organisation to working with stakeholders in an open and transparent way and QQI is committed to proactive engagement with all stakeholders. The website will continue to be the key tool for consultation; for Phase II of the consultation process, QQI also plans to conduct focus group meetings with key stakeholders including, providers, practitioners and learners on the development of White Papers in specific policy areas.

The functions that QQI is consulting on are enshrined within the legislation; which itself was subject to detailed consultation.

## 3.2 LEARNER INVOLVEMENT AND REPRESENTATION

The majority of submissions welcomed and supported the learner centred approach being proposed by QQI in Section 1. Within the context of consultation and engagement a number of submissions highlighted the need for learner involvement in QQI Consultation and Governance structures.

*“We would recommend having learner representatives at all levels of governance (up to and including board level) within QQI, a practice that is common for many providers and that is built into our own QA frameworks.”*

*“QQI will need to have a mechanism for consulting with learners to discover what the interests of learners are.”*

*“There is no evidence of how learners are being consulted on national policies...how the learner will be represented in QQI decision making.”*

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4 For Consultation Framework see: [http://www.qqi.ie/Downloads/QQI\\_Consultation\\_Framework.pdf](http://www.qqi.ie/Downloads/QQI_Consultation_Framework.pdf)

### 3.2.1 QQI RESPONSE

The Board of QQI consists of 10 members, including the Chief Executive. The members of the board, other than the Chief Executive, are appointed by the Minister. In appointing the members, the Minister ensured that at least 2 people are representative of learners, one of whom is nominated by the Union of Students of Ireland. This ensures that learners are significantly represented within QQI decision making and Governance structures. The members of QQI board are available at <http://www.qqi.ie/About/Pages/Authority.aspx>

Through its consultation process, QQI is committed to engaging and working with learner representative to promote proactive engagement

## 3.3 INFORMATION AND COMMUNICATION

A number of submission sought clarity and information in relation to business continuity and as to whether the current arrangements in place, which were agreed with the legacy bodies, would remain valid and for how long. Some provider respondents queried whether there would be a need to reapply for quality assurance and whether continued access to Certification for learners.

The need to ensure communication and information is provided in plain language was highlighted by some stakeholders. One stakeholder felt that:

*“All too often information is not set out in “plain language” too much use of jargon, abbreviations and “big words” can make it difficult to work out what you’re actually saying. It is totally unnecessary. A lot of training providers that are experts in their field are not familiar with your working world in government organizations. They are good trainers and technical experts, but not masters of language as others may be. All explanations and guidance must be simplified so that the development of good relationships with individual providers and representative bodies can be achieved. Making it possible for all the staff of training providers to be able to consult with QQI guidelines, procedures and policies and fully understand what is required in the shortest time possible when required.”*



### 3.3.1 QQI'S RESPONSE

All providers and education and training institutions that had a quality assurance relationship with one of the legacy bodies have transitions to QQI. The current Agreements and associated processes will remain in place until such time as QQI implements its own policies and procedures.

QQI's Consultation Framework commits the organisation to minimum standards in the preparation and publishing of documents for consultation. Where feasible, QQI aims to avoid the use of jargon or technical language, however, in some instances technical terms and language are necessary. Where necessary, meanings will be clarified and a glossary of terms provided. All policy documents will be subject to a *Plain English* proofing.

QQI will engage with other national agencies and bodies to improve the accessibility of documents on an ongoing basis and will explore options for publishing final policy documents and guidelines in different formats to enhance accessibility to different sectors and stakeholders.

QQI acknowledges the need to provide up to date information and communications in the period of transition to the new body. We have endeavoured and will continue to do this through our website, eZine publication and email notifications to stakeholders.