



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

CONSULTATION ON THE WHITE PAPER
ON PROCEDURES AND CRITERIA RELATING
TO DELEGATION OF AUTHORITY
& RESPONSE TO STAKEHOLDER FEEDBACK

REPORT

JULY 2017

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1 INTRODUCTION

The white paper addressed

- (1) Procedures and criteria for the determination of a request for delegated authority to make an award in respect of a programme or class of programmes
- (2) Procedures for the review each programme or class of programme of education and training of a provider to which authority to make an award has been delegated and the overall operation and management of that provider

QQI published its new procedures and criteria relating to delegated authority in January 2017. The new procedures and criteria are based on the white paper published in September 2016 and benefited from feedback from stakeholders on the white paper.

This report describes the process by which QQI consulted with stakeholders on the white paper; presents selections from the feedback received; and responds to that feedback with references to the new procedures and criteria.

The original feedback responses, where the authors have not withheld permission for QQI to publish, are appended.

1.1 DISCLAIMER

The QQI responses in this paper are made in good faith but they have no formal status regarding the interpretation of the procedures and criteria relating to delegated authority. The content of this report (including the QQI responses to feedback) is not part of QQI's procedures and criteria relating to delegated authority or any other kind of formal determination by QQI. This report is not an implementation guideline.

The established (published) *Procedures and Criteria Relating to Delegation of Authority* are the primary reference point for providers.

2 CONSULTATION

The white paper was published circa 9 September 2016 for public consultation with a 21 October 2016 closing date for responses.

2.1 BEFORE THE PUBLICATION OF THE WHITE PAPER

A preview of the white paper was shared with the HEA and the Department of Education and Skills.

2.2 CONSULTATION EVENTS, MEETINGS AND FEEDBACK

Two events were arranged

- » 5 October: QQI organised a briefing for ETBs at ETBI premises at Piper's Hill, Naas. The event was well attended.
- » 19 October: QQI also met a sub-group of IOT registrars to discuss the white paper and particularly the additional new arrangement concerning delegated authority (DA) at doctoral level.

In all, 15 written responses were recorded.

3 OVERALL RESPONSE TO THE WHITE PAPER

There was judged to be sufficient support for the adoption of the new procedures and criteria relating to delegated authority, based on the published white paper with certain changes motivated by the feedback received.

This view was informed by feedback collected at the meetings and events with groups of providers and other stakeholders where the white paper was explained and discussed. It was also informed by consideration of the written feedback.

4 ANALYSIS OF THE FEEDBACK

The following sections present a selection of extracts from the feedback organised under indicative headings along with QQI responses.

4.1 BROADLY THE WHITE PAPER WAS WELL RECEIVED

There was broad welcome of the principle of DA from the ETBs

“The delegation of authority by QQI to make awards is a great opportunity for the ETBs, it is part of the sector’s strategy in the medium term, to apply for delegation of authority. ETBs recognise the opportunity provided by delegation of authority in establishing an ETB award brand and the greater level of autonomy this process will give. ETBs understand fully that the delegation of authority to make awards will be accompanied by significant responsibility for quality assurance, and the establishment of robust quality assurance procedures and governance infrastructure addressing all the criteria as detailed in the white paper.

“ETBI acknowledges the detail and clarity provided in the white paper on the procedures and criteria pertaining to delegation of authority. The clarity provided in part 3, units 14 and 15 is welcomed, this section systematically and clearly details the criteria and evidence requirements which must be addressed in applying for delegated authority.” (ETBI)

“CDETb broadly welcomes the concept of Delegated Authority (DA) for ETBs.” (CDETb)

“The White Paper sets very clearly and in considerable detail, the legislative arrangements that supports the delegation of authority, and the proposed process and procedures for providers seeking to have delegated authority awarded to them. We note in particular, the underlying and consistent references, direct or implied, to the requirement for robust and appropriate corporate and academic governance and management structures within the provider. In particular, we welcome the detail provided in Part 3 of the white paper, where the criteria to be adhered to by a provider seeking delegated authority to make an award are set out clearly, with detail provided of the evidence required from the provider in support of their application. Cork Education and Training Board will welcome any opportunity to engage further with QQI on matters relating delegated authority, and in particular the further development of the processes that will support eventual application for this facility.” (CETB)

Other providers also welcomed the paper, for example:

“HECA welcomed this White Paper and thanks QQI for the opportunity to engage in consultation in respect of access to delegated authority. Any further developments that will open access to DA for non-statutory providers is actively encouraged by our members.” (HECA)

“Griffith College welcomes QQI’s white paper relating to ‘Procedures and Criteria Relating to Delegation of Authority’ and looks forward to making a request for Delegated Authority under section 52(2) once the regulations in section 52(8) have been made.

The College considers the white paper to be a helpful and comprehensive document addressing all aspects of the DA process. It welcomes the detail with which the expectations relating to DA are outlined.” (Griffith College)

“Teagasc have carefully considered the QQI White Paper - Procedures and Criteria Relating to Delegation of Authority – and carefully noted its procedures and criteria as proposed. Teagasc also note the White Paper’s particular relevance under section 52(2) of the Qualifications and Quality Assurance (Education and Training) Act 2012 to bodies/organisations such as Teagasc. In this regard Teagasc welcome the White Paper and view it as a positive development for the education sector.” (Teagasc)

4.1.1 Response

Broadly the responses were encouraging particularly in relation to the criteria.

4.2 NATIONAL VS. REGIONAL ETB AWARDS: IMPACT OF DA ON THE STATUS AND REPUTATION OF FET AWARDS

There were concerns about the prospect of the loss of a national brand.

“However, CDET B is of the strong opinion that diluting down current national awards into 16 ETB awards as would seem to be espoused within the White Paper³ would not enhance the status of FET⁴. CDET B would take the view that delegated authority should be taken to mean that ETBs are enabled to make national awards. This would mean that ETBs could still be providing programmes leading national awards for example a QQI Level 5 Award in Business Studies awarded by City of Dublin ETB under Delegated Authority.” (CDET B)

The TUI response was particularly concerned by the possibility of a negative impact:

“TUI is concerned that proposals to delegate authority for making awards to sixteen individual Education and Training Boards (ETBs) by Quality Qualifications Ireland (QQI) will impact negatively on the standing of the Further Education & Training (FET) sector, the standard of provision, and the value placed on FET awards under the aegis of ETBs. TUI is apprehensive that ETBs are not currently in a position to maintain and improve on the quality of service and national standard for awards, and would not be so, if ETBs were assigned responsibility for

validating their own programmes and issuing their own certificates, without being sufficiently resourced.

Whilst TUI acknowledges that Delegated Authority (DA) for accreditation may be interpreted as a sign of the maturation or evolution of the sector, it is clear to TUI (as the significant trade union representing education staff working within the Further Education sector) that ETBs are not adequately placed or prepared to take on delegated authority to make awards and are quite some distance from having the requisite infrastructure and resources in place to take on such authority as proposed in this White Paper.

It is envisaged that ETBs will not have to wait for QQI to develop new awards; and TUI recognises that delegated authority would give ETBs greater flexibility in allowing them to respond quickly to new needs identified, by facilitating the validation of new awards. However, the current rate of response in reviewing programmes inhibits ETBs from embracing delegated authority prematurely.

...

TUI is very concerned about the value and esteem that would be placed on the awards following delegated authority. The general public had just become accustomed to FETAC awards and the associated 'brand' when they were re-cast/transposed to QQI awards. If these are replaced by ETB Awards in 5 years' time, there is a danger that this new or revised accreditation will be seen as a further degradation, constituting lesser or local awards - resulting in learners turning to private provision, where they can continue to get QQI-branded awards. This is a very alarming aspect of delegated authority. TUI has been informed that post-delegated authority awards will not be national awards, rather National Framework Awards. TUI is not confident that learners, colleges or employers will understand or appreciate the difference under the proposals contained in this White Paper.

...

TUI believes that the more ETBs can do collaboratively, the better it is for the sector: however, only individual ETBs can apply for delegated authority under the legislation. It does not make sense, TUI asserts, to replicate validation and certification sections in sixteen ETBs. If QQI is not in a position to undertake this work, then TUI advocates that a national unit in ETBI, funded by SOLAS, could be established as part of a transitional arrangement. FÁS previously assigned very significant staffing to the development of new programmes and a centralised assessment unit. TUI contends that such an interim arrangement would be appropriate in this case also. TUI believes that a centralised and rigorous accreditation system would be more cost efficient than the unnecessary replication manifest, we believe, in the proposals in the White Paper.

...

At present, the Qualifications and Quality Assurance (Education and Training) Act, 2012, allows only for individual ETBs to apply for delegated authority; and while TUI understands that it is not possible at present, it could be possible in the future - through Ministerial/government legislation and regulation. TUI believes that the model of the National Universities of Ireland (NUI) as the awarding body - and individual universities as confederate institutions – should be explored fully as the most appropriate model in respect of the FET sector at present.

...

TUI urges serious consideration of the matters raised in this submission before delegated authority, as envisaged in the QQI dispensation, is expedited and put in place, and would very much welcome engagement with QQI in that regard. ”(TUI)

4.2.1 Response

The establishment of these procedures enables a *request* for delegated authority to be made by an eligible provider and determined by QQI. Delegated authority may be requested by an eligible provider when it considers itself ready; it is not imposed by QQI.

ETBs have been eligible to request DA since 2013. Though eligible, the ETBs are not yet ready for delegated authority. QQI and the ETBs recognise this. Nevertheless, having the procedures and criteria set out now is helpful for the ETBs because it clarifies what would be involved for them. This clarity helps identify the opportunities and challenges DA would bring to the ETBs and their stakeholders and assists with strategy and planning.

While a request for DA is made by a provider and the ETB group comprises sixteen providers, it would be possible and desirable for ETBs to agree on a common awarding brand under delegated authority. No change in legislation or substantial loss of individual ETB autonomy would be required to facilitate this.

It is noteworthy that while ETBs could use generic standards of the NFQ to validate programmes, we (QQI) would continue to maintain the Common Awards System (CAS) of QQI awards standards while there is a demand and these would be the first option for any ETB contemplating the development of a new programme.

We can foresee how delegated authority could work well for the ETBs in the longer term enabling them to be more dynamic and responsive, how consistent ETB programme standards could be supported, and how the difficulties identified by the TUI response can be avoided.

We would welcome engagement with the TUI and others to discuss the opportunities and challenges involved.

4.3 SUPPLEMENTAL REPORTS

Several providers have questioned how QQI would deal with supplemental reports

“The inclusion of the entitlement of QQI to exercise discretion in requiring additional independent evaluations into matters such as financial stability is understood. HECA recognises the need for QQI to be able to apply this discretion, and understands the challenge that prescribing when such discretion would be exercised could present. Notwithstanding this, transparency re when such discretion might be applied would provide greater assurance of parity of process and equity of access to DA for both statutory and non-statutory providers.”
(HECA)

“Clarity should be provided on the circumstances in which supplemental evaluation reports will be requested.” (Hibernia College)

“Greater transparency on the circumstances that may warrant QQI exercising the discretion to commission additional research to inform the DA process would improve confidence in the fairness of the process to be implemented.” (DBS)

4.3.1 Response

The commissioning of supplemental reports (see unit 6) would be a relatively new approach for QQI. It is difficult to say substantially more at this stage than what is included in the paper. The provider making the request for delegated authority will have access to any such report (see unit 6).

4.4 COMMERCIAL SENSITIVITIES

Some private HET providers asked about how commercial sensitivities would be accommodated.

“Consideration should be given to the commercial sensitivity of financial and other information in such supplemental reports and their subsequent dissemination and discoverability through freedom of information requests. ...

How are commercial sensitivities to be protected in the evaluation reports?” (Hibernia College)

“There are some concerns relating to the potential requirement to publish information which may be commercially sensitive. Mechanisms need to be implemented which will ensure providers can provide such information to QQI to enable effective decision-making whilst also maintaining confidentiality on the provider’s part. This extends to considering what is shared with panel members. Whilst mechanisms for avoiding conflicts of interest are in place, this alone doesn’t address the matter of commercially sensitive information.” (DBS)

4.4.1 Response

We recognise that commercial sensitivity is an important consideration and aspire to implementing the procedures in a reasonable way in this context as in all other contexts. Nevertheless, it is inevitable that there may be circumstances where the publication of information concerning failure to meet one or more criteria may have a negative commercial impact on a provider.

We (QQI) must rely on external expertise to inform our determinations and this requires providing these individuals with confidential information. Note unit 5.6 on confidentiality and the Freedom of Information Act.

4.5 COMPETENCE OF EVALUATORS

A number raised the issue of competence of evaluators. For example

“There is frequent reference throughout the document to the independence of evaluators. It is recommended this is further supported with reference to the competence of evaluators and indicators of what deems an evaluator competent. Under 6.1 it states “Typically evaluation groups will have expertise in the operation and management of providers with awarding authority comparable to that sought...” Assurance is invited on how this approach will ensure fair representation and appreciation of the unique aspects of independent and private higher education providers.” (HECA)

4.5.1 Response

We consider that the competence of evaluators is addressed adequately in section 6.1.

4.6 CRITERIA

HECA asked whether the criteria would be weighted.

“The criteria as presented are generally as would be expected. Clarification is sought on whether any or what weightings apply.” (HECA)

“In determining the outcome of the evaluation, clearer guidance on the weighting, if any, given to particular criteria and the definition of what is considered ‘minor’ is required to allow providers understand what is expected of them.” (NCI)

HECA also raised a general point about terminology

“Terminology was raised at a number of stages throughout the consultation discussions. Use of terms such as adequate is very open and doesn’t give a full sense of expectation and requirements as the actual implementation may be substantially different to what is understood from the current document.”

HECA and NCI raised a point about the generality of a few of the criteria

“There is some concern that the requirements in some areas, such as student support requirements in respect of clubs and societies, health care etc., may present a challenge for smaller or niche providers or indeed those with solely part time provision. HECA would encourage reconsideration of any factors that may indirectly prevent access to DA.”

“14.10 (5): The context of the provider, its size and its learner profile must be taken into consideration here. Notwithstanding the unknown nature of the regulations that will surround DA, not all contexts may require the type of provision of health care that may be provided within the traditional full-time sector. The definition of ‘access’ here and its reasonableness will need to be well understood.

14.10 (6): Again the provider context here needs to be considered. Part-time learners often do not wish to be involved in clubs and extra-curricular activities. The ability of a provider to allocate resources to services that are not being taken up is not sustainable.

14.13 (4): ‘The provider has adequate space for health, welfare, social and recreational purposes’. This implies that the provider must have a health centre, or is a first aid room considered ‘adequate’ where the size of the provider cannot sustain a full-time facility. Would ‘access to adequate space for health purposes’ a better articulation of this?” (NCI)

Hibernia College suggested adding risk management to 14.3

Hibernia College suggested adding student records to 14.7

4.6.1 Response

The criteria are not weighted. This means that if a request fails to meet any of the applicable criteria it may be refused.

Terms like 'adequate' will be interpreted by evaluators who will be selected by QQI and can be expected to be capable of interpreting these terms in a reasonably consistent way making due allowances for variations in disciplinary and professional expectations.

We have changed 'finance' to 'support' in 14.10(6). We consider 14.10(5) and 14.13(4) to be warranted.

An additional entry has been inserted in the list of evidence required for criteria 14.3-14.5.

Criterion 14.7 has been adjusted to make it clear that student records are included.

4.7 IMPACT OF DA ON ETB FUNDING OF PROVIDERS OF PROGRAMMES OF FET

One ETB sought clarification on the following:

“CDETB requires more clarity on what impact taking on DA would have in relation to other providers funded by CDETB.”

4.7.1 Response

The position on this point is determined by the legislation.

If an ETB is channelling funding to a particular provider where another awarding body is validating the programmes of that provider, requesting and being granted DA does not necessarily change the relationship between the ETB and that provider as long as the ETB is not involved in providing, organising or procuring the programmes.

We would be happy to discuss the details of the implications of this with the ETBs.

4.8 IMPACT OF REQUIRING VALIDATION AGAINST CURRENT CRITERIA

The white paper states

“Delegation of authority may be sought in respect of programmes or classes of programmes. It is preferable that any programmes concerned have been validated previously by QQI under the 2016 Policies and Criteria for the Validation of Programmes of Education and Training.”

Some providers have questioned whether the expression of a preference is appropriate in a document like this one.

Others have questioned the fairness of requiring programmes to meet the current criteria:

“This preference would not seem fair in terms of programmes which have undergone a programmatic review/re-validation process in 2015-16, meaning that they would first become eligible post-review in 2021.” (Open Training College)

“We note the distinction between DA for existing programmes and DA for new programmes. Whilst acknowledging the preference that programmes should be previously validated by QQI under the 2016 criteria for validation, the practicalities of same for providers who have recently undergone revalidation using the 2013 criteria is limited.” (NCI)

4.8.1 Response

The rationale for this is that the provider requesting DA must demonstrate that the relevant programmes meet the QQI validation criteria (see unit 15.1). This implies the *current* validation criteria. If this has not been demonstrated through QQI validation against the current criteria it falls to the DA evaluation process to determine this *ab initio* and that could be impractical where many programmes are involved. However, this may not always be possible.

“2016” will be replaced by “current” to future-proof the DA procedures and criteria.

4.9 ABSENCE OF MINISTERIAL REGULATIONS

That the absence of ministerial regulations leaves some uncertainty concerning the path to DA for providers not named explicitly in section 52(2) has been noted by some:

“Perhaps the most significant point of note for HECA members is the reference on Page 9 to the requirement for regulations in section 52(8) having to be made before requests from providers

referred to in section 52(2)(e) can be accepted. Without the full detail of these regulations being available it is not yet possible to determine whether Delegated Authority (DA) will be accessible to members. HECA would welcome clarification on a timeline for this. Furthermore, information on what parties and what information will inform the creation of these regulations is of particular interest. HECA welcomed the potential within the Act for non-statutory providers to apply for DA and this White Paper builds upon that further. However, without these regulations in place DA remains inaccessible to our members.” (HECA)

“DBS acknowledges reference to the requirement for regulations to be made to allow non-statutory providers to access Delegated Authority. The absence of these regulations at the point of consultation on this White Paper impacts the ability to give full consideration to the potential implementation of Delegated Authority as allowed for under the Act. Details on when the regulations can be expected would be welcomed. Further reference is made to what may be included in these regulations. Clarification is required in respect of the process and inputs into the establishment of the regulations. There is concern that as things stand it is not possible to determine whether or not DA will realistically be accessible to non-statutory providers.” (DBS)

The Open Training College has suggested conditions that might be used in regulations.

4.9.1 Response

We will liaise with the Department of Education and Skills after the new procedures and criteria are established.

4.10 PRESENTATION

Some providers commented on the presentation being challenging.

“It is felt that the White Paper as presented is significantly more challenging to digest, interpret and navigate than previous such documents coming out of QQI. This was less of a challenge for those familiar with the Act and other associated policies but the need to frequently refer to alternative documents in order to make sense of the White Paper was noted by a number of parties. Whilst recognising the complexity of the matter under consultation, facilitating effective engagement for all stakeholders is something that can only be of benefit for consultation activity as well as policy implementation.” (HECA)

“The Paper is extremely detailed and thoroughly documents the intended process and criteria to be applied. The inclusion of excerpts from the Act and frequent reference to sections and subsections made the paper difficult to read in parts and a challenge to follow for those who

would not consult similar such documents in the natural course of their duties. It was felt such documents should be more accessible to allow for confident engagement.” (DBS)

4.10.1 Response

The procedures and criteria are written for providers who are eligible to request delegated authority. They are not written for the general public.

We may consider adding an explanatory note for the general reader either to the document or to the QQI website.

4.11 IMPLEMENTATION

There is some anxiety about implementation:

“Finally, whilst DBS welcomes the White Paper and the intentions to open access to DA for non-statutory providers, there is some nervousness that the extent of difference between what is understood from the White Paper and the reality of implementation, as was seen in the case of the revised validation policy and guidelines, may be significant. Consideration of alternative and complementary consultation mechanisms to supplement the issuing of White Papers may reduce the potential for such mismatch of understanding at the consultation stage. This “implementation anxiety” is further compounded by the absence of the regulations which will open access to non-statutory providers.”

4.11.1 Response

The aim is to write policies, procedures and criteria clearly and implement them precisely as written.

4.12 DOCTORAL RESEARCH DEGREES

The response of THEA addressed research degrees:

“Thank you for meeting with the THEA Registrars sub-group on Quality on 19 October to discuss the recently published draft criteria and procedures for delegation of authority. As noted at the meeting, the primary interest for the institutes of technology in the White Paper relates to the new provisions for extending Level 10 delegation across all disciplines to institutes that already have an established track record of operating DA at Level 10.

There was consensus at the meeting regarding the principle that such an extension should only apply where DA has been in operation in an institute in several disciplinary areas, and this is to confirm that THEA supports this approach. We also welcome the proposal that QQI will have further discussions with the group ahead of making a final decision on the number of disciplines that an institute would have operated DA in at Level 10 before acquiring the extension to all disciplines. At the meeting there was general view that this would be in the region of 2-3 disciplines. This is to confirm that our Quality Group will be happy to work with QQI to examine practice with regard to how the sector is operating Level 10 DA both with regard to the nature and number of the disciplinary fields in use and also in relation to the throughput of doctoral graduates. We anticipate that this work will be helpful in our future discussions on these matters and, ultimately, in informing QQI ahead of its final determination of the policy.”
(THEA)

4.12.1 Response

We welcome the prospect of further discussions with THEA on this.

Further consultation with stakeholders is required to determine suitable values for **M** and **N** before unit 15.9 (Doctoral programmes in unspecified discipline-areas) is activated.

Incidentally, for additional clarity, we have added an additional line (4) in the evidence requirements for unit 15.8 (Doctoral programmes in a particular discipline-area).

4.13 QQI CAPACITY TO IMPLEMENT THE PROCEDURES AND CRITERIA RELATING TO DA

A number have questioned whether QQI has capacity to implement the procedures

“Throughout the White Paper is reference to the evaluation process as well as variances to this where it is deemed necessary, at QQI discretion, or in response to further additions. HECA is concerned that QQI may not have the resource capacity to undertake this potential scale of activity and to do so in a timely manner.” (HECA)

“DBS is mindful of the extension in validation timeframes now in place in QQI as compared to its predecessor agencies as a result of various factors including level of demand. There is concern about the potential within QQI to fulfil its obligations in respect of DA as outlined within this Paper and to do so in a timely manner in the context of the potential scale of activity. A linked concern is whether fulfilling these obligations will then impact on the provision and timelines of other activities of QQI.” (DBS)

4.13.1 Response

These concerns are justified to some degree. It is noteworthy that validation activity will reduce after authority is delegated so in the longer term DA may result in a reduced load on QQI resources (on account of lower validation and certification activity) but getting to that point will be a challenge.

4.14 ETB RESOURCES FOR DA

A number of responses noted the resource implications for ETBs, for example,

“Developing the quality assurance infrastructure in the sector to support the delegation of authority will take time and resources. ETBs are committed to this goal and will work through the new FET Directors Forum to map out a collaborative approach and process to phase the progression to delegated authority. It is important that all the key stakeholders, including SOLAS and the DES, share the strategic goal of delegated authority for the sector and understand the investment required to realise this goal and sustain delegated authority.”
(ETBI)

4.14.1 Response

The requirements extend beyond quality assurance infrastructure to governance and management.

A collaborative approach by the ETBs seems eminently sensible.

4.15 CONTINUED ACCESS TO PROGRAMME VALIDATION FOR COMMUNITY PROVIDERS

The CDETB response included the following:

“CDETB requests the assurance that ensuring continued access to programme validation for community providers is a priority. This will involve discussions and strategies agreed with community providers on how they can be organised and supported to meet the evolving quality assurance requirements to access programme validation. QQI in this instance would continue to make the awards to which those validated programmes lead.”

4.15.1 Response

This is not a DA matter. QQI has published policies and criteria for access to validation and for the validation of programmes of education and training. Any provider that can meet these criteria can have a programme validated by QQI.

5 WRITTEN RESPONSES RECEIVED

Written responses from the following have been recorded:

1. City of Dublin Education and Training Board (CDETb)
2. Cork Education and Training Board
3. Dublin Business School
4. Education and Training Boards Ireland (ETBI)
5. Fingal ICTU Centre for the Unemployed
6. Griffith College
7. Hibernia College
8. Limerick and Claire Education and Training Board (LCETB)
9. Mary Immaculate College
10. National College of Ireland
11. Open Training College
12. Teachers' Union of Ireland
13. Teagasc
14. Technological Higher Education Association (THEA)
15. The Higher Education Colleges Association (HECA)