QQI
Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

SECTION 1

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

FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the content of this proposed Policy Document please use the *Questions and Comments* area which appears immediately after it.

PLEASE NOTE:

7 JUNE 2013

CLOSING DATE FOR SUBMISSONS

SECTION   1

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

1.1   The Establishment of QQI

The Qualifications and Quality Assurance (Education and Training) Act 2012 (hereafter the 2012 Act) was commenced on 5 November, 2012. Quality and Qualifications Ireland (QQI) was established on 6 November, 2012. QQI is the successor to the National Qualifications Authority of Ireland (NQAI), the Further Education and Training Awards Council, the Higher Education and Training Awards Council (the three bodies established by the 1999 Qualifications (Education and Training) Act) and the Irish Universities Quality Board (IUQB) (established in 2002 by the Irish universities to carry out certain functions under the 1997 Universities Act). This amalgamation fulfilled a policy decision announced by the Government in October 2008. When introducing the Bill in September 2011 the Minister for Education and Skills told the Seanad that the reason for amalgamating the agencies was to bring about a more efficient and integrated service in "*a strong single organisation prioritising the needs of learners and delivering quality service to providers*".

The purpose of the set of Green Papers introduced in this document is to inform discussions about the issues that arise in carrying out this task of integration. The consultation process will seek the views of our stakeholders on these issues prior to preparing detailed policy proposals.

1.2   Continuity and Change

Many of the functions of QQI are transferred directly from its predecessor bodies. Notably it takes over custodianship of the National Framework of Qualifications (NFQ) which was launched in 2003. It also takes over the external quality assurance (QA) and awarding functions of the FET and HET Awards Councils, the NQAI and the IUQB. The 2012 Act includes sections that guarantee the continuity of these functions in the transition to establishing QQI. This means that learners can be assured of the continuing recognition of

their qualifications and providers can continue to rely on the processes of external QA that had been in place.

While the 2012 Act maintains substantial continuity it also introduces a variety of new features that were not present in the 1999 Act, which it replaces. These include an international education mark (IEM), a national database of programmes and awards, and a variety of uses of the concept of awards recognised within the NFQ. Moreover, bringing the four bodies together requires significant changes in the way in which functions are implemented. Even where the previous legislation prescribed similar functions; the way in which these were implemented varied across the bodies. For the new body to act in the integrated way to which the Minister aspires, we, and our stakeholders, must examine how we should implement all of these functions.

A fresh approach to implementing these functions is also necessary if we are to achieve the efficiencies which are so important at this time of public service reform.

> *"Services to the citizen can be enhanced as staffing numbers reduce if the manner in which they are delivered is reformed according to the following strategies that have proved successful outside the public service. These include:*
> - *moving to risk based compliance;*
> - *filtering of applications;*
> - *use of trust relationships to obtain data; and*
> - *greater use of self-service including online facilities."*
>
> - (National Recovery Plan, 2011 – 2014)

This Green Paper is part of QQI's public discussion of its approach to implementing the 2012 Act. In June 2013 QQI expects to publish (also for public consultation) a draft Strategy Statement that will address the Mission, Vision, Values and Goals of QQI. The eventual approach taken to the comprehensive implementation of our functions will clearly be guided by this Strategy. However we have generally tried to avoid pre-empting those strategic choices in this suite of Green Papers, in some cases by presenting as wide a range of options as possible within the provisions of the 2012 Act, and in other cases by simply raising issues for comment.

1.3   The Range of QQI's Relationships

QQI has a diverse range of functions and relationships. These are set out in the 2012 Act which runs to 81 pages. The principle relationships with the main groups of stakeholders are illustrated in Figure 1 below. There are important differences in how the specific functions apply to different groups of providers. The NQAI, IUQB, FET and HET Awards Councils all had different relationships with stakeholders including those established through ACELS, Qualifax and the Internationalisation Register.
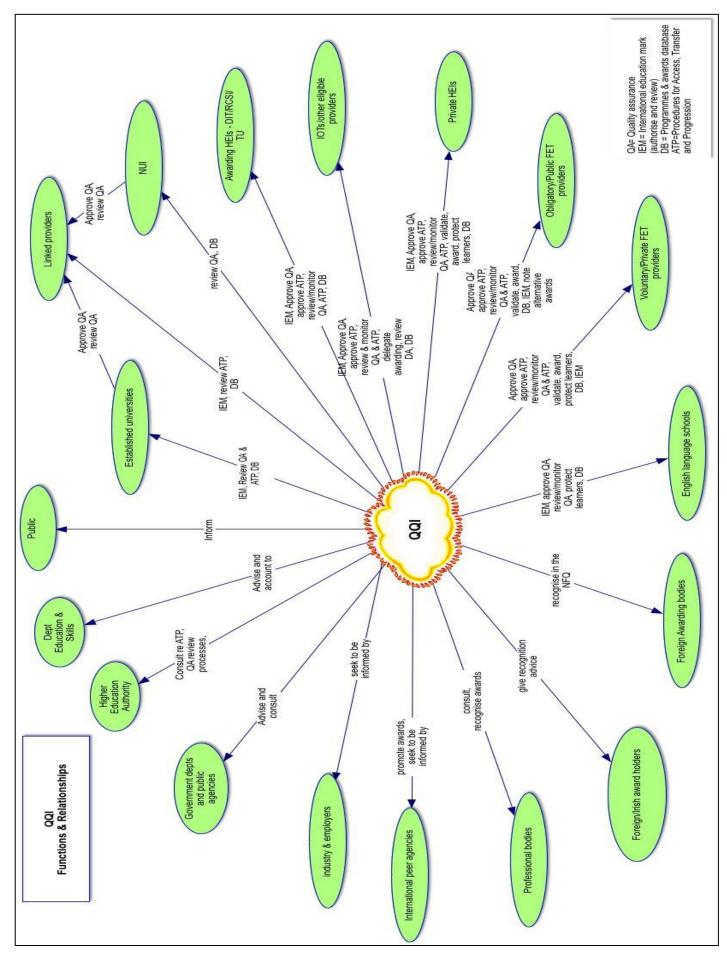
Currently QQI has relationships with the following FET, HET and ELT providers:
- 33 Vocational Education Committees
- 4 Public statutory FET Providers
    - FÁS
    - Teagasc
    - Fáilte Ireland
    - Bórd Iascaigh Mhara
- 110 Recognised schools
- 667 non-statutory FET providers

- 10 Designated Awarding Bodies (DABs)
    - Dublin Institute of Technology
    - The National University of Ireland
    - The Royal College of Surgeons in Ireland
    - 7 Universities
- 13 Institutes of Technology with Delegated Authority (DA)
- 41 non-statutory HET providers

- 94 ACELS (recognised English Language Teaching Organisations)

Some individual providers are included in more than one category.

The organisational context in which QQI is planning its work is one in which we continue to provide services to all the providers recognised by the predecessor bodies as well as other client groups. As a result of public sector cutbacks staff numbers have fallen by approximately 25% since the amalgamation was announced in 2008 and no new staff members have been recruited. Our operational budget has been reduced and we have also

incurred costs in relocating and restructuring. The close and supportive nature of the relationships between the predecessor bodies and providers will be difficult to sustain in these circumstances. Moreover the nature of these relationships will need to be examined in the context of emergent QQI strategy.

Figure 1: QQI's Relationships with its stakeholders

QQI Functions & Relationships

QA= Quality assurance
IEM = International education mark (authorise and review)
DB = Programmes & awards database
ATP=Procedures for Access, Transfer and Progression

QQI

Linked providers
NUI — Approve QA, review QA
Awarding HEIs - DIT/RCSI/TU
IOTs/other eligible providers
Private HEIs
Obligatory/Public FET providers
Voluntary/Private FET providers
Established universities
Public
Dept Education & Skills
Higher Education Authority
Government depts and public agencies
Industry & employers
International peer agencies
Professional bodies
Foreign/Irish award holders
Foreign Awarding bodies
English language schools

Approve QA review QA
review QA, DB
IEM, Approve QA approve ATP, review/monitor QA ATP, DB
IEM, Approve QA approve ATP, review & monitor QA & ATP, delegate awarding, review DA, DB
IEM, Approve QA approve ATP, review/monitor QA ATP, validate, award, protect learners, DB
Approve QA, approve ATP, review/monitor QA & ATP, validate, award, DB, IEM note alternative awards
Approve QA approve ATP, review/monitor QA & ATP, validate, award, protect learners, DB, IEM
IEM, review ATP, DB
IEM, Review QA & ATP, DB
Inform
Advise and account to
Consult re ATP, QA review processes,
Advise and consult
seek to be informed by
promote awards, seek to be informed by
consult, recognise awards
give recognition advice
recognise in the NFQ
IEM, approve QA, review/monitor QA protect learners, DB
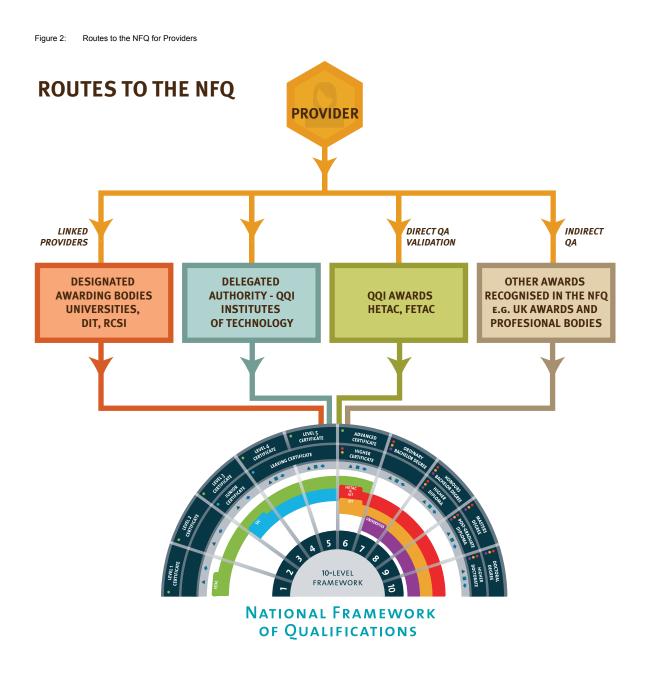
1.4   The National Framework of Qualifications

Since the NFQ was introduced in 2003 all of the qualifications made by the national awarding bodies in Ireland (the State Examinations Commission, the universities and institutes of technology, FET Awards Council, and HET Awards Council) have been recognised within it. The NFQ is playing an increasingly important role in various aspects of QA. These include helping to link the provision of education and training and the learning outcomes achieved with the purposes for which qualifications are used, notably in relation to employment. Qualifications frameworks have been introduced in many countries in recent years and the Irish framework has been referenced to the European Qualifications Framework for Lifelong Learning and the Qualifications Framework of the European Higher Education Area. A feature of the Irish framework has been its openness to making formal connections with other national frameworks and to exploring methods of recognising a wide variety of qualifications while still maintaining robust QA.

Public education and training providers, bodies authorised by law to make awards in the state and professional recognition bodies have an obligation to engage with QQI in relation to their awards; private providers can seek to engage QQI to make their awards or can seek to have their awards recognised by QQI within the NFQ. There is a clear link between awards being assigned to a level in the NFQ and the process of ensuring that the intended learning outcomes are being achieved.

The link between framework qualifications and the QA behind these qualifications is paramount and requires QQI to deliver a coherent and holistic approach to qualifications and quality assurance as it develops its suite of policies and associated procedures. Figure 2 illustrates the various routes that providers may take in order to have their programmes lead to awards that are recognised within the NFQ.

Figure 2:   Routes to the NFQ for Providers

1.5   Provider Lifecycle of Engagements

The concept of a Provider Lifecycle of Engagements model is introduced to identify, organise and communicate the range of engagements between QQI and an individual provider. It is a concept which is articulated in these Green Papers and informs many of the issues and options set out in them.

As described above there is a diverse range of providers that have relationships with QQI, from small providers choosing to seek access to QQI awards for the first time to previously

established universities. There are also many kinds of interactions between QQI and providers based on the functions set out in the 2012 Act. Each kind of provider will have a particular set of obligations and entitlements based on their particular status and services sought from QQI.

The Provider Lifecycle of Engagements model is intended to highlight the provider's wider responsibilities as a member of the national education and training community.

We have developed indicative models of Provider Lifecycle Engagement for two broad categories of provider; designated awarding bodies (figure 3) and providers seeking access to QQI awards (figure 4). Other models could be developed.

Figure 3: The Designated Awarding Body Lifecycle of Engagements:
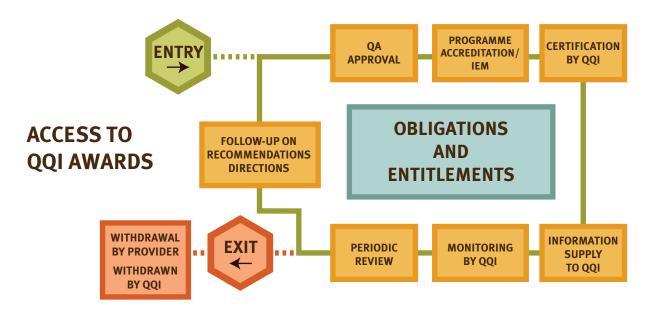
DESIGNATED AWARDING BODY

Figure 4: The Lifecycle of Engagements of a Provider Seeking Access to QQI Awards:

The key QQI QA processes must be linked to the Lifecycle of Engagements with QQI by education and training providers. Prospective providers must see a clear path from recognition to certification (where applicable). The costs and benefits of engagement with QQI must be clear in terms of the fees charged for services. The cost of continued engagement with QQI and the process for and consequences of disengagement with QQI based on incapacity or poor performance must also be clearly signalled to prospective and existing providers.

1.6   Learner Centeredness

In fulfilling our functions, we hope to foster trust and public confidence in qualifications, the quality of the learning environment and the learner experience. This ethos of prioritising learner needs underpins the interactions between QQI and providers, and is reflected in these Green Papers.

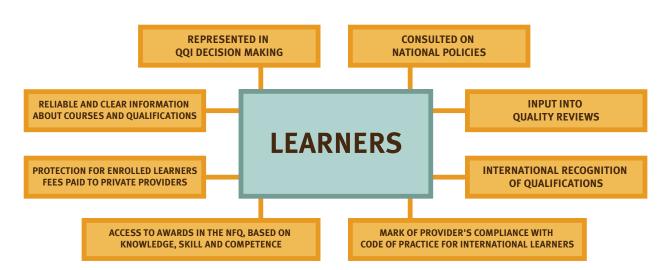Figure 5 outlines the intended benefits to learners resulting from this approach.

Figure 5: QQI's Learner Centred Approach

1.7   Policy Development and Consultation: A two-track approach

Effective and efficient consultation is both a legal requirement and a good practice. It is also an organisational necessity as QQI seeks to maximise the opportunities arising from the amalgamation to address a number of complex inter-related issues. In doing so it needs to draw upon external knowledge and expertise. The importance of developing good relationships with individual providers and representative bodies is of great importance because of the changing landscape envisaged in the national Higher Education Strategy and the changes in the FET space indicated by the proposed transition from FÁS and the VECs to SOLAS and the Education and Training Boards.

When the Qualifications and Quality Assurance Bill was published in July 2011 both the FET Awards Council and HET Awards Council recognised that it would have major implications for the way in which the functions they carried out would be implemented in the future and in particular how they interacted with providers. Both Councils announced the suspension of access to 'registration', the term both Councils used to indicate the agreement of a provider's QA procedures. Providers that were already registered by the FET Awards Council and/or the HET Awards Council continue to have access to certification for their learners. QQI does not refer to providers with access to its awards as 'QQI registered providers' as QQI has such a wide variety of relationships with different providers. Given the time that has elapsed since the publication of the Bill, QQI considers it important to establish policies that would allow new providers the opportunity to apply for access to its QA services and certification for their learners at the earliest opportunity. This is outlined in the Green Paper on Provider Access to Accreditation (Section 2).

Our policy suite must be developed in the context of QQI's conceptual understanding of the qualifications system and the maintenance and further development of the framework (for further reading, see QQI discussion document *Qualifications Systems and Related Concepts*). QQI's new policies must ensure that the qualifications and awards in the framework are sufficiently robust and substantial that they withstand periodic external re-examination. The framework must continue to recognise learning and permit access, transfer and progression through the qualifications system.

The QQI comprehensive policy development programme approach has enabled us to address, in a short period of time, a wide range of considerations. This has inevitably resulted in some stylistic differences between Green Papers. Some are more explorative in

nature and others express more detailed policy options. Furthermore, a number of topics have been deferred for further development at a later stage or are under consideration elsewhere. These include appeals, complaints, QQI governance, recognition of qualifications gained abroad and international liaison functions of QQI.

1.7.1 Green Papers

For the purposes of the Comprehensive Policy Development Programme, we have developed a suite of Green Papers dealing with particular policy areas and processes. These are divided into a number of Sections as follows:

Section:	Title:
1	Green Paper on the Comprehensive Implementation of the Functions of Quality and Qualifications Ireland
2	Green Paper on Provider Access to Programme Accreditation
3.1	Green Paper on Protection for Enrolled Learners
3.2	Green Paper on Fees for QQI Services
4.1	Green Paper on Awards and Standards
4.2	Green Paper on Certification
4.3	Green Paper on Recognition of Qualifications within the National Framework of Qualifications
4.4	Green Paper on the International Education Mark
4.5	Green Paper on Access, Transfer and Progression
4.6	Green Paper on the Provision of Information for Learners
4.7	Green Paper on the Recognition of Prior Learning
4.8	Green Paper on Monitoring and Dialogue
4.9	Green Paper on Reviews
4.10	Green Paper on Quality Assurance Guidelines
4.11	Green Paper on Provider Risk and Proportionality
4.12	Green Paper on Data
4.13	Green Paper on Programme Accreditation
4.14	Green Paper on the Re-engagement of Legacy Providers with QQI and Future Access to QQI Awards

1.7.2   Timelines

We have identified a subset of policy areas that are required to commence Provider Access to Programme Accreditation for new providers. We are offering a set of issues and options in relation to these policies in **Section 2**. We request feedback on these no later than **7 June 2013**. Our intention is to develop draft policies based on feedback for publication and consultation at the end of July and to finalise these and commence implementation in September 2013.

The 2012 Act alters the legal requirements on certain providers for the protection of enrolled learners. It also specifies which activities we can charge fees for, subject to approval by the Minister for Education and Skills. With a view to addressing these areas, QQI is also presenting a range of policy approaches and issues in relation to these areas in **Section 3**. Feedback on these areas is also sought by **7 June 2013**.

The 2012 Act sets out a wide range of other functions which we are required to develop policy on. We present a range of issues, options and considerations for policy development on these areas in **Section 4**. We are requesting feedback on this Section by **13 September 2013**. Detailed policy proposals in these areas will be developed in due course. We have published Section 4 at the same time as Sections 2 and 3 so that the latter can be seen in the broader context of comprehensive implementation of the functions of QQI. We have also published at this time a background paper on the concepts underpinning the qualifications system (see *Qualifications Systems and Related Concepts*). QQI's draft strategy statement is due to be published for consultation in June 2013.

Questions and Comments

CONSULTATION QUESTIONS

SUMMARY OF PRINCIPLES CONTAINED IN THIS GREEN PAPER:

This Green Paper proposes five principles on which we are seeking your feedback.

1. *That QQI will have a consultative approach to implementing its functions.*

2. *That QQI will adopt a holistic approach to qualifications and quality assurance.*

3. *That the NFQ will be a central organising feature in the design of QQI policy.*

4. *That QQI will use a Provider Lifecycle of Engagements model.*

5. *That the functions of QQI are designed to prioritise the interests of learners.*

Q1.A What are your views on the principles contained in the Green Paper?

Q1.B What are your views on the two-track approach to policy development?

Q1.C Do you have any other views/comments on the issues raised in this paper?

» You can choose to save this document and return to add further comments.

» When you have finished commenting please submit your comments by going to the last page and clicking the *Submit* button. Thank you.

Are you finished commenting?

Please provide the following details.

Which sector do you work in?

If other please describe here

Contact email address

If you are satisfied with your comments please send them to us now by clicking the *Submit* button below.

You can also give feedback
to QQI at: consultation@qqi.ie

Thank you for your time!