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**19 February 2014**

**Presentation on behalf of QQI to Oireachtas Joint Committee on Education and Social Protection**

Quality and Qualifications Ireland, which I will refer to as QQI in the rest of this presentation, would like to thank the Joint Committee on Education and Social Protection for its invitation to attend today. I would like to extend my apologies to the Committee on behalf of the Chief Executive of QQI, Dr Padraig Walsh, who is Chairing a board meeting today of a European quality assurance association of which he is President. Dr Walsh will be attending the meeting with the Joint Committee to be held on 26 February on the future of community education and vocational education.

QQI was established as a result of the amalgamation of the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the National Qualifications Authority of Ireland (NQAI) and the Irish Universities Quality Board (IUQB). It is now the single national body responsible for the external quality assurance of further and higher education and training. It is also an awarding body. As an amalgamated entity it interacts with all parts of the education and training and qualifications system; this includes the universities and institutes of technology, the newly established Education and Training Boards, private providers that operate in the areas of further and higher education and training and in English language training, and the community and voluntary sector.

While the scope of the new organisation’s responsibilities is wide, it also presents significant opportunities. At the centre of how QQI approaches its work is the National Framework of Qualifications (the NFQ) which emerged in 2003 and has become part of the language of education and training. While the Framework is owned nationally, it is the responsibility of QQI to safeguard it. It intends doing so by ensuring that it represents more than the association of a level with a qualification. As its implementation continues, it must be a genuine symbol of the standard and quality of the qualification which a learner has attained; regardless of where within our diverse education and training system it was achieved. The link therefore between qualifications and quality assurance is of paramount importance. We must also ensure that the ten-level Framework and the policies underpinning it keep the learner in focus and act as an enabler for individuals to successfully pursue the learning pathways of their choosing.

On the establishment of QQI in November 2012, the organisation proactively sought to meet with education and training representative bodies. In the community and voluntary sector, it met with Aontas and with the Community Education Network (CEN). During these discussions and via the submissions received by the community sector to the consultation undertaken around our Comprehensive Policy Development Programme, we had the opportunity to engage with the sector and to understand further its concerns on a range of issues. These included the charging of fees by QQI; the range of State funding streams upon which the sector is largely dependent; and the concerns on the part of some community providers of the association of this funding with the requirement for learning to lead to qualifications, and thus to a relationship with QQI. While it would not be appropriate for QQI to express an opinion on the extent to which validation of programmes should remain a condition of public funding for the community sector, it is a discussion to which QQI would be very willing to contribute.

In addition to the challenges routinely faced by the community sector, in which training is often only one part of its service to the community, the shifting environment which all actors in education and training are currently facing is a further concern. The further education and training environment has seen the establishment of the Education and Training Boards (ETBs); FÁS training centres are being moved into the ETBs; SOLAS has been established. How all of this will impact on the community sector is unclear and will hopefully become clearer in the Further Education and Training (FET) Strategy to be presented to the Minister for Education and Skills next month.

The establishment of QQI under the 2012 Qualifications and Quality Assurance (Education and Training) Act also represents change. The legislation identifies that any provider of education and training programmes must be able to demonstrate the capacity to quality assure its provision, and to validate a programme, before it is recognised by QQI[[1]](#footnote-1). Assured and consistent quality of education and training is therefore the objective that underpins QQI policy. All providers will need to satisfy QQI that their capacity and quality assurance arrangements are appropriate to their provision. Providers that transitioned to QQI from the organisations that amalgamated will thus all need to have their quality assurance procedures approved by QQI. In accordance with the extensive consultation process that the organisation has committed to, a Green Paper was published on this subject in May 2013. A White Paper will be published for consultation shortly with the details of how we propose to undertake this re-engagement process. The continued effectiveness of providers’ agreed quality assurance arrangements will be monitored and externally reviewed by QQI.

In carrying out these legislative responsibilities the first priority of QQI is thus to provide reasonable assurances to prospective and current learners, to the public, to society, to employers and to international parties, regarding the quality of any provider that has access to the privilege of State awards. In implementing this external role in the interests of public confidence, it would be neither feasible nor appropriate for QQI to provide support for individual providers to meet the quality assurance standard required. Having completed this quality assurance transition process, QQI hopes to invest more of its time and resources to working collaboratively with agencies such as SOLAS and the Higher Education Authority on continually improving quality and on facilitating providers to come together to share good practice and expertise.

The charging of fees to providers is enabled by the 2012 Act and is integrally linked with how QQI intends implementing its quality assurance and quality improvement role. The development of adequate internal and external quality assurance systems incurs costs. QQI has adopted a fee schedule in part on the basis of the cost of engaging with a provider. Some of these costs are fixed, regardless of the scale of a provider’s provision. For example sending a reviewer to visit a provider’s facility incurs travel costs. The current fee schedule[[2]](#footnote-2) has been developed for an initial number of agreed policies and will be extended as further policies are agreed through the Comprehensive Policy Development Programme. The fees to date have been approved by the Board of QQI with the consent of the Department of Education and Skills and the Department of Public Expenditure and Reform. It is important to note that from a learner perspective a certification fee was previously applied by FETAC. Where waivers of this fee were granted by FETAC this practice has continued in QQI. This has resulted in a blanket exemption in learner certification fees at levels 1-3 of the NFQ; exemptions for holders of medical cards; and exemptions for certain provider centres, including Youthreach and VTOS centres.

The most impactful fee for providers to date is related to programme validation. To reduce costs, QQI is seeking to incentivise providers to make a number of applications for validation in one submission. In addition to reducing costs, this aims to encourage providers to think strategically about their programme requirements.

In imposing fees on providers, the principles of consistency and equity must also be applied. Higher education providers were subject to fees by QQI’s predecessor bodies. In addition, within further education and training, private providers are offering the same programmes as those offered by some providers in the community sector; these include qualifications in Childcare and Train the Trainer. In the light of this, it would be inappropriate for QQI to determine a fee schedule which would subsidise one part of the education and training system over another.

This is the first time that any fee has been levied at providers in the further education and training sector by QQI or by its predecessor body FETAC and in the context of the uncertainty the community sector is experiencing on a number of fronts it is not surprising that it has reacted negatively to this development. By its nature, community sector providers often have relatively small numbers of learners. This is not a negative comment on the importance of the community sector to those individuals or on the continued need for this provision. However, it does raise questions regarding the multiple small providers that QQI is interacting with in the community sector and the proliferation of quality assurance systems that will be operating to support this provision. In 2012 approximately 150 providers categorised as ‘community and voluntary’ sought certification for learners from QQI; that represents 20% of all of the providers in the further education and training sector that QQI made awards for in that year. The number of learners for which certification was sought was approximately 5% of the certificates issued to learners across the further education and training sector[[3]](#footnote-3).

With decreasing resources across the public sector, the reference made in the ICTU report *Downsizing the Community Sector* (2012) to the sector working alongside public services in the face of the cumulative impact of cuts in spending is important. In this regard, QQI would welcome the opportunity to work centrally with the ICTU Community Sector Committee, with Aontas and any other community sector representative body to establish the feasibility of providers reconfiguring themselves into networks or consortia that can introduce and sustain quality assurance systems at this level, instead of allocating resources to the development, implementation and review of a multiplicity of quality assurance systems at an individual provider level. This would appear to be consistent with the view of Aontas, submitted to QQI as part of the consultation on its draft Strategy Statement, that collaborative linkages between providers and the sharing of good practice will be important [Aontas response to QQI draft Strategy Statement 2013]. The establishment of networks of providers may also provide an effective means of boosting the quality assurance capacity of the community and voluntary sector, increasing the level of quality assurance oversight within and external to the sector, and potentially reducing the overall cost of programme validation. Such a reconfiguration would also require discussion with SOLAS in the context of the statutory FET Strategy and how it envisages the on-going development of the community and voluntary sector[[4]](#footnote-4).

QQI has undertaken in its Strategy Statement 2014-2016[[5]](#footnote-5) to carry out its regulatory and quality improvement functions collaboratively with providers and with government agencies. With the level of change being experienced by providers in the community and voluntary sector, we would suggest that it is in the absolute interest of learners that the relevant parties would come together to constructively consider the impact of these changes in as comprehensively a manner as possible.

1. The legislation also differs from the previous 1999 Act in its treatment of not-for-profit providers. These providers, along with for-profit providers, are now expected to ensure that safeguards are in place for learners to complete their studies in the event that the provider is unable to facilitate them in doing so. This matter is addressed in QQI’s policy Protection of Enrolled Learners. [↑](#footnote-ref-1)
2. This has been included in the information provided to the Joint Committee [↑](#footnote-ref-2)
3. Confirmed figures for 2013 will be published by QQI over the coming period. [↑](#footnote-ref-3)
4. Section 9(5)(c)(i) of the FET Act singles out the community education sector as a stakeholder in the formulation of FET strategy. [↑](#footnote-ref-4)
5. This has been included in the information provided to the Joint Committee [↑](#footnote-ref-5)