



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

SUBMISSIONS

GREEN PAPERS

GREEN PAPER ~ SECTION 4.1

on Awards and Standards

GREEN PAPER ~ SECTION 4.2

on Certification

GREEN PAPER ~ SECTION 4.3

on Recognition of Qualifications within
the National Framework of Qualifications

GREEN PAPER ~ SECTION 4.4

on the International Education Mark

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on Access, Transfer and Progression

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on the Provision of Information for Learners

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on the Recognition of Prior Learning

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on Monitoring and Dialogue

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on Provider Risk and Proportionality

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on Programme Accreditation

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on the Re-engagement of Legacy Providers
with QQI and Future Access to QQI Awards

1 ONLINE SUBMISSIONS

Response Tables to the Green Papers can be viewed at the links below.

SECTION 4.1

GREEN PAPER ON AWARDS AND STANDARDS

Submissions made to this section can be viewed by clicking [here](#)

or by pasting the following URL into your browser

<https://formscentral.acrobat.com?d=QA1lRoEtOITXgozUhFWWLw>

Responses were submitted to this Green Paper by the following organisations.

| | |
|---|--|
| All Hallows College | The Learning Institute |
| Aontas | Local Government Management Agency |
| City and Guilds | Longford and Westmeath Education and Training Board |
| Coaching Ireland | National Adult Literacy Agency |
| Community Workers Cooperative | National Association of VTOS Co-coordinators |
| Construction Industry Federation | National Examining Body in Occupational Safety and Health (Nebosh) |
| Cork Education and Training Board | National University Ireland Maynooth |
| CPA Ireland | North Wall Community Development Project |
| Daughters of Charity Community Service | The Open University |
| Dublin Adult Learning Centre | Royal Institute of Architects in Ireland |
| Dublin and Dunlaoghaire Education and Training Board | Saint James Hospital |
| Dunlaoghaire Further Education Institute | Scottish Qualifications Authority |
| Federation of Irish Complementary Therapy Association | Seda College |
| Further Education Support Service | Skillnets |
| Institutes of Technology Ireland | Trinity College UK |
| Irish Congress of Trade Unions | University College Cork |
| Irish Register of Herbalists | University College Dublin |
| Irish University Association | |
| Landbased and Environmental Industries | |

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.2

GREEN PAPER ON CERTIFICATION

Submissions made to this section can be viewed by clicking [here](#)

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<https://formscentral.acrobat.com?d=VzoFBzqdEmFcAZtfoJ6bkA>

Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

City of Dublin Education and Training Board

Clanwilliam Institute

Coaching Ireland

Cork County Council

Digital Skills Academy

Dublin and Dunlaoghaire Education and Training Board

Dublin College of Advanced Studies

Dunlaoghaire Further Education Institute

Egan, David John (Individual)

Federation of Irish Complementary Therapy Association

Institutes of Technology Ireland

Irish Congress of Trade Unions

Irish Small and Medium Enterprises Association

Irish Universities Association

The Learning Institute

Local Government and Management Agency

Longford and Westmeath Education and Training Board

National Adult Learning Agency

National College of Ireland

National Examination Board in Occupational Safety and Health (NEBOSH)

National University of Ireland Maynooth

Saint James Hospital

Seda College

Skillnets

Trinity College UK

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.3

GREEN PAPER ON RECOGNITION OF QUALIFICATIONS WITHIN THE NATIONAL FRAMEWORK OF QUALIFICATIONS

Submissions made to this section can be viewed by clicking [here](#)

or by pasting the following URL into your browser

<https://formscentral.acrobat.com?d=5y9RjUm4njEl7q6sHYCEQ>

Responses were submitted to this Green Paper by the following organisations.

| | |
|--|---|
| Accounting Technicians Ireland | The Learning Institute |
| All Hallows College | Local Government Management Agency |
| Certification Partners | Longford and Westmeath Education and Training Board |
| City of Dublin Education and Training Board | National Examination Board in Occupational Safety and Health (NEBOSH) |
| Coaching Ireland | The Open College Network Northern Ireland |
| Community Workers Cooperative | The Open University |
| Dublin and Dunlaoghaire Education Training Board | Saint James Hospital |
| Dublin Institute of Technology | Scottish Qualifications Authority |
| Dunlaoghaire Further Education Institute | Seda College |
| Federation of Irish Complementary Therapy Associations | Skillnets |
| Global Body for Professional Accountants | Society for Chartered IT Professionals in Ireland |
| Institutes of Technology Ireland | Trinity College UK |
| Irish Small and Medium Enterprises Association | University College Dublin |
| Irish Universities Association | |
| Land Based & Environmental Industries | |

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.4

GREEN PAPER ON THE INTERNATIONAL EDUCATION MARK

Submissions made to this section can be viewed by clicking [here](#)

or by pasting the following URL into your browser

<https://formscentral.acrobat.com?d=IkSvtzD1iUGKukpF4hDVFA>

Responses were submitted to this Green Paper by the following organisations.

| | |
|--|---|
| All Hallows College | Irish Universities Association |
| Champlain College | The Learning Institute |
| City of Dublin Education and Training Board | Longford and Westmeath Education and Training Board |
| Clanwilliam Institute | Marketing English In Ireland |
| Digital Skills Academy | Modern Education Training Centre |
| Dublin and Dunlaoghaire Education Training Board | National College of Ireland |
| Dublin College of Advanced Studies | NEBOSH (The National Examination Board in Occupational Safety and Health) |
| Dublin Institute of Technology | NED Training Centre |
| Dunlaoghaire Further Education Institute | Saint James Hospital |
| Education Consultants | Seda College |
| IES Dublin | Skillnets |
| Institutes of Technology Ireland | Swan Training Institute |
| International Business School | Trinity College UK |
| Irish Council for International Students | University College Cork |
| Irish Small and Medium Enterprises Association | |

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.5

GREEN PAPER ON ACCESS, TRANSFER AND PROGRESSION

Submissions made to this section can be viewed by clicking [here](#)

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<https://formscentral.acrobat.com?d=82ECwAaGFoZ7N2ImTW2ZXw>

Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

City of Dublin Education and Training Board

Coaching Ireland

Community Workers Cooperation

Community Workers Cooperation

Dublin and Dunlaoghaire Education and Training Board

Dublin Institute of Technology

Dunlaoghaire Further Education Institute

Equality Authority

Federation of Irish Complementary Therapy Associations

Institute of Technology Tralee

Irish Congress of Trade Unions

Irish Small and Medium Enterprises Association

Irish Universities Association

Local Government Management Agency

Longford and Westmeath Education and Training Board

Lyons, Alan (Individual)

National Adult Learning Agency

National College of Ireland

Scottish Qualifications Authority

Skillnets

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.6

GREEN PAPER ON THE PROVISION OF INFORMATION FOR LEARNERS

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<https://formscentral.acrobat.com?d=xopYLPbNEDZoFOg1SU9qEw>

Responses were submitted to this Green Paper by the following organisations.

All Hallows College

City of Dublin Education and Training Board

Clanwilliam Institute

Dublin and Dunlaoghaire Education Training Board

Dublin Institute of Technology

Dunlaoghaire Further Education Institute

Federation of Irish Complementary Therapy Associations

Institutes of Technology Ireland

Irish Small and Medium Enterprises Association

Irish Universities Association

The Learning Institute

Local Government Management Agency

Longford and Westmeath Education and Training Board

National Adult Learning Agency

National College of Ireland

Seda College

Skillnets

Trinity College UK

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.7

GREEN PAPER ON THE RECOGNITION OF PRIOR LEARNING

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Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

City of Dublin Education and Training Board

Clanwilliam Institute

Construction Industry Federation

Dublin and Dunlaoghaire Education Training Board

Dublin Institute of Technology

Dunlaoghaire College of Further Education

Federation of Irish Complementary Therapy Associations

Institutes of Technology Ireland

Irish Congress of Trade Unions

Irish Small and Medium Enterprises Association

Irish Universities Association

The Learning Institute

Local Government Management Agency

Longford and Westmeath Education and Training Board

Lyons, Alan (Individual)

National Adult Learning Agency

National College Ireland

Royal Institutes of Architects of Ireland

Scottish Qualifications Authority

Seda College

Skillnets

Trinity College UK

University College Dublin

Waterford Institute of Technology

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.8

GREEN PAPER ON MONITORING AND DIALOGUE

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Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

City and Guilds

City of Dublin Education and Training Board

Clanwilliam Institute

Cork County Council

Dublin and Dunlaoghaire Education Training Board

Dublin Institute of Technology

Dunlaoghaire Further Education Institute

Federation of Irish Complementary Therapy Associations

Institutes of Technology Ireland

Irish Small and Medium Enterprises Association

Irish Universities Association

The Learning Institute

Local Government Management Agency

Longford and Westmeath Education and Training Board

Modern Education Centre Dublin

National Adult Learning Agency

National College of Ireland

The Open College Network Northern Ireland

Scottish Qualifications Authority

Seda College

Skillnets

Trinity College UK

University College Cork

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.9

GREEN PAPER ON REVIEWS

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<https://formscentral.acrobat.com?d=KIYUhcofws-ILUQrPPmHEQ>

Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Athlone Institute of Technology

City of Dublin Education and Training Board

Clanwilliam Institute

Digital Skills Academy

Donegal Education and Training Board

Dublin and Dunlaoghaire Education Training Board

Dublin College of Advanced Studies

Dunlaoghaire Further Education Institute

Institutes of Technology Ireland

Irish Small and Medium Enterprises Association

Irish Universities Association

Local Government Management Agency

Longford and Westmeath Education and Training Board

National Adult Learning Agency

National College of Ireland

Seda College

Skillnets

Trinity College UK

University College Cork

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.10

GREEN PAPER ON QUALITY ASSURANCE GUIDELINES

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Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

City of Dublin Education and Training Board

Clanwilliam Institute

Cork County Council

Cork Education and Training Board

Dublin and Dunlaoghaire Education and Training Board

Dublin Institute of Technology

Dunlaoghaire Further Education Institute

Equality Authority

European Quality Assurance in Vocational Education and Training

Further Education Support Services

Institutes of Technology Ireland

Irish Small and Medium Enterprises Association

Irish Universities Association

The Learning Institute

Local Government Management Agency

Longford and Westmeath Education and Training Board

Modern Educational Centre

National Adult Learning Agency

National College of Ireland

The Open College Northern Ireland

The Open University

Respond Housing Association

Skillnets

Scottish Qualifications Authority

Trinity College UK

University College Cork

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.11

GREEN PAPER ON PROTECTION FOR ENROLLED LEARNERS

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<https://formscentral.acrobat.com?d=x7nolx2-Kyioyu-YSC3MDA>

Responses were submitted to this Green Paper by the following organisations.

Acupuncture Foundation

All Hallows College

City of Dublin Education and Training Board

Dublin and Dunlaoghaire Education and Training Board

Dublin Institute of Technology

Dunlaoghaire College of Further Education

Federation of Irish Complementary Therapy Associations
(FICTA)

Global Body For Professional Accountants

Institutes of Technology Ireland

Irish Small and Medium Enterprises Associations

Irish Universities Association

The Learning Institute

Local Government Management Agency

Longford and Westmeath Education and Training Board

National Adult Learning Agency

The Open College Network

Scottish Qualifications Authority

Seda College

Skillnets

Trinity College UK

University College Cork

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.12

GREEN PAPER ON DATA

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<https://formscentral.acrobat.com?d=oUyGel1aq-iRyXCp2yq9qQ>

Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

Central Statistics Office

City of Dublin Education and Training Board

Cork County Council

Dublin and Dunlaoghaire Education and Training Board

Dublin Institute of Technology

Dunlaoghaire Further Education Institute

Equality Authority

Higher Education Authority

Institutes of Technology Ireland

Irish Small and Medium Enterprises Association

Irish Universities Association

The Learning Institute

Local Government Management Agency

Longford and Westmeath Education and Training Board

National Adult Literacy Agency

National College of Ireland

National Examination Board in Occupational Safety and Health (NEBOSH)

Scottish Qualifications Authority

Seda College

Skillnets

Trinity College UK

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.13

GREEN PAPER ON PROGRAMME ACCREDITATION

Submissions made to this section can be viewed by clicking [here](#)

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<https://formscentral.acrobat.com?d=uJFQj5GJREBrhVNaUkB7Nw>

Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

City of Dublin Education and Training Board

Construction Industry Federation

Dublin and Dunlaoghaire Education and Training Board

Dublin College of Advanced Studies

Dublin Institute of Technology

Dunlaoghaire College of Further Education

Health Service Executive

Institutes of Technology Ireland

Irish Universities Association

Local Government Management Agency

Longford and Westmeath Education and Training Board

National Adult Learning Agency

National College Ireland

The Open College Network Northern Ireland

Scottish Qualifications Authority

Seda College

Skillnets

Trinity College UK

University College Dublin

ONLINE SUBMISSIONS [CONTINUED]

SECTION 4.14

GREEN PAPER ON THE RE-ENGAGEMENT OF LEGACY PROVIDERS WITH QQI AND FUTURE ACCESS TO QQI AWARDS

Submissions made to this section can be viewed by clicking [here](#)

or by pasting the following URL into your browser

<https://formscentral.acrobat.com?d=V9d6csW7TUVUAmIJH4cNDA>

Responses were submitted to this Green Paper by the following organisations.

All Hallows College

Aontas

City of Dublin Education and Training Board

Clanwilliam Institute

Community Workers Cooperation

Dublin and Dunlaoghaire Education and Training Board

Dublin College of Advanced Studies

Dublin Institute of Technology

Dunlaoghaire Further Education Institute

Headway

Institutes of Technology Ireland

Irish Universities Association

The Learning Institute

Local Government Management Agency

Longford Westmeath Education and Training Board

Modern Educational Centre

National Adult Learning Agency

National College of Ireland

Scottish Qualifications Authority

Seda College

Skillnets

Trinity College UK

A GUIDE TO VIEWING THE RESPONSE TABLES

As some responses submitted online are quite lengthy it may prove somewhat cumbersome scrolling through the columns of the tables.

QQI would like to draw your attention to a facility called ‘Record View’ to improve your experience where these responses occur.

By choosing ‘Record View’ individual responses can be seen in their entirety in a separate window.

HOW TO DO THIS....

1. Select ‘View’ icon (marked in ORANGE below)
2. Select ‘Row Details’ (marked in RED below).
3. The details of the current row will be displayed in a separate window (marked in GREEN)
 - a. This window can be expanded if desired to fit the entire screen (using the icons in the top right of the window marked in PURPLE) or by clicking and dragging the the left hand side of the window.
 - b. Type size can be increased/decreased using the viewing scale in the bottom right of the table (marked in BLACK)
 - c. Responses can be tabbed through using the row number buttons (marked in BLUE below), rather than returning to the table and selecting another row.

The screenshot shows the FORMSCENTRAL interface for 'Green Paper - Section 3.1'. The main table displays questions and responses. A 'Record View' window is open on the right, showing the full text of a response for question 3.1.A. The interface includes a menu bar (File, Edit, Insert, Table, View, Help), a toolbar with icons for view, row details, and zoom, and a footer with a page indicator (1 of 62) and a zoom control (100%).

| Time Submitted | 3.1.A Does PFEL, as a label, communicate the extent and limitations of the coverage afforded to learners? | Q3.1.B Are there other options that have not been considered in this Green Paper? | Q3.1.C Are there advantages and disadvantages that have not been identified for each option? |
|--------------------|---|---|---|
| 26 June 2013 11:48 | The term is clear, but it would need more explanation and guidance. The terms and conditions would need to be clear so providers are aware of their responsibilities and to provide learners with confidence when signing up for a course. However, providers should not be allowed to use a publicly-funded PFEL scheme as a way of evading responsibilities to learners in the event of unavoidable course termination. As a UK awarding body we have course provider agreement which includes this clause: "In the event of an unavoidable course termination, the Provider agrees to provide reasonable advance notice to Students including any Candidates and the awarding body, and will continue to provide Tutor support and Examination facilities at the Venue (appropriate to the Qualification) for a minimum of two standard Examination sittings following the course end date, or arrange for the transfer of Students to another Accredited Course Provider with the same method of course delivery, at no additional cost to the Student or the awarding body." | No comment | No comment |
| 26 June 2013 11:47 | Yes it is an appropriate label as even if it being extended to learners under THE arrangements it is still relevant. | | Have the rights and protection of offshore learners been considered? CEVEC would willingly suppo |

SELECTED RESPONSE IN TABLE

SELECTED RESPONSE VIEWED IN SEPARATE WINDOW [RECORD VIEW]

Time Submitted: 26 June 2013 11:48

3.1.A Does PFEL, as a label, communicate the extent and limitations of the coverage afforded to learners?
The term is clear, but it would need more explanation and guidance. The terms and conditions would need to be clear so providers are aware of their responsibilities and to provide learners with confidence when signing up for a course. However, providers should not be allowed to use a publicly-funded PFEL scheme as a way of evading responsibilities to learners in the event of unavoidable course termination.

As a UK awarding body we have course provider agreement which includes this clause:

"In the event of an unavoidable course termination, the Provider agrees to provide reasonable advance notice to Students including any Candidates and the awarding body, and will continue to provide Tutor support and Examination facilities at the Venue (appropriate to the Qualification) for a minimum of two standard Examination sittings following the course end date, or arrange for the transfer of Students to another Accredited Course Provider with the same method of course delivery, at no additional cost to the Student or the awarding body."

Q3.1.B Are there other options that have not been considered in this Green Paper?
No comment

Q3.1.C Are there advantages and disadvantages that have not been identified for each option?
No comment

Q3.1.D Do you have any preferences among the options?
We would support this approach. Our policy is to step in when one of our providers has been unable to support its learners to find an alternative provider and organise tuition and examinations sittings where necessary. SQA's regulatory principles require approved awarding bodies to have policies and procedures in place for dealing with this eventuality in order to protect learners. Our policy applies within and outside the UK.

Q3.1.E Do you have any comments on the issues raised in the Green Paper?
Awarding Body

Sector:

other sector:

Email:

2 SUBMISSIONS by EMAIL

QQI received submissions by email
from the stakeholders listed below.*

- » Accredited Bowen Therapists Ireland (ABTI)
- » Adult Education Officers Association (AEOA) ~ *Submitted by Donegal ETB*
- » Association Montessori Internationale (AMI)
- » Cavan Institute
- » Certification Partners
- » Chartered Accountants Ireland
- » Dublin City University
- » Federation of Irish Complementary Therapy Associations (FICTA)
- » The Heritage Council
- » Higher Education Colleges Association (HECA)
- » Irish Course Providers Association
- » Irish Institute of Medical Herbalists (IIMH)
- » The Institute of Certified Public Accountants in Ireland (CPA Ireland)
- » Institute of Physical Therapy and Applied Science
- » International School of Business, Dublin
- » Longford Women's Link
- » Maurice Fitzgerald
- » National Council for the Blind of Ireland (NCBI)

CONTINUED ON NEXT PAGE

SUBMISSIONS by EMAIL [CONTINUED]

- » National Learning Network
- » National University of Ireland
- » National University of Ireland, Maynooth
- » One Family
- » Pearson
- » Scottish Qualifications Authority
- » Society of Chartered Surveyors Ireland
- » St Patrick's College, Drumcondra
- » South Westmeath Employment, Education and Training Services Limited (S.W.E.E.T.S)
- » Trinity College Dublin (TCD)
- » University College Dublin
- » University College Dublin, Supplemental Response
- » US Study Abroad Community Joint Response

**Please note the responses on the following pages appear as received and have not been proofed/edited in any way.*

SUBMISSION BY:

Accredited Bowen Therapists Ireland (ABTI)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

ACCREDITED BOWEN THERAPISTS IRELAND (ABTI) are pleased with this opportunity to participate in QQI's consultation on the development of short term policy positions in determining awards and standards. They are relevant to everyone – learners, professional bodies, associations, regulators and providers.

4.1.2 Agree that QQI's policy suite must be agile and adaptable as well as portable.

4.1.3 In the short term any 'minor amendments' made be published.

4.1.4 It is important that awards are fundamentally 'fit for purpose'. Reliance on awards as an indication of 'fitness to practice' is insufficient. Verification of qualifications is essential for 'fitness to practice' however regulators and regulation have a broader reach and responsibility than that.

4.1.5 ABTI expects the reinstatement of HETAC's "Interim Standards for Complementary Therapies". Considerable time and costs have already being expended by HETAC in their development. It would be difficult to justify any further spend.

4.1.8.1 All points made in this section are relevant in particular resistance to over-standardisation. Also QQI's recognition that standards do need to be broad enough to allow for diversity, adaption and innovation.

4.1.8.3 A clearer definition of 'stable and mature' community of practice is needed so that no discrimination may be applied.

4.1.8.6 The development of sectoral frameworks would be useful when applied to particular sectors.

4.1.8.7 Agree with subject guidelines as outlined.

4.1.8.12 The views concerning occupational standards Vs education are well considered and further exploration of the highlighted distinctions is welcomed.

4.1.8.15 The more detailed matters to be addressed are all relevant. However conflict between educations providers, assessment of learners, etc is not always obvious and can be difficult to address.

4.1.8.16 The option that QQI act as a kind of 'central bank' and delegate authority has merit. The establishment of an independent regulator to deal with grievances and appeals would be necessary.

4.1.8.21 New policy development should consider the questions listed.

SUBMISSION BY:

Adult Education Officers Association (AEOA)

~ Submitted by Donegal ETB

*Please note this response appears as received
and has not been proofed/edited by QQI.*

DONEGAL EDUCATION AND TRAINING BOARD

The Adult Education Officers' Association wish to make the following comments in relation to Awards and Standards.

Major V Minor Awards

There is considerable confusion at present among employers and learners as regards major and minor awards. There needs to be a clear distinction between these with the minor forming a component towards the major award. This is a particular problem at the higher levels.

Delegated Authority

While recent legislation will enable ETBs to work under a possible DA relationship with QQI in the future, there is much work required before any such arrangement would be possible. The issue of quality needs to be addressed, supported and resourced in many ETBs nationally. There needs to be much more rigorous scrutiny of programmes relating to quality issues.

Quality

There needs to be ongoing and systematic quality checks of all provision. These checks can form internal checks but there needs to be substantially externally checks and moderation within the system. For checks of quality to be solely based internally raises significant issues relating to conflict of interest. Additional resources need to be provided to support quality in all ETBs. If QQI are to develop broad standards relating to awards there needs to be a greater scrutiny of programmes being developed.

Work Experience

The work experience element of major awards at the higher levels needs to be considerably enhanced and perhaps incorporate many of the successful components of the apprenticeship system. Employment placements must become embedded into awards and form a substantial component of awards leading to employment entry.

Integration of FAS and ETBs

Following the integration of FAS into the ETB structures, a common template needs to be developed to form new ETB Quality Assurance Agreements with QQI. There should be one quality assurance agreement in place for each ETB that is sufficiently broad to reflect and accommodate all provision.

Martin Gormley
President Adult Education Officers' Association
Donegal Education and Training Board

Dr Martin Gormley
President Adult Education Officers' Association

SUBMISSION BY:

Association Montessori Internationale (AMI)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

ASSOCIATION MONTESSORI INTERNATIONALE (AMI)

RESPONSE TO CONSULTATION ON GREEN PAPER – SECTION 4.3 RECOGNITION OF QUALIFICATIONS WITHIN THE NATIONAL FRAMEWORK OF QUALIFICATIONS

Q 4.3.A Do You Have Any Comments On The Issues Raised In This Green

Paper? The Association Montessori Internationale (AMI) considers the Green Paper on

Recognition of

Qualifications within the National Framework of Qualifications (4.3) informative and comprehensive and endorses the statements contained within it. The Association also recognises that the NFQ is to remain an inclusive and comprehensive framework.

AMI was established in 1929 and has delivered Montessori Courses in Ireland continuously since

1934. It has affiliated societies in 19 countries and 55 teacher training centres around the world in which approximately 2000 students are undertaking courses.

AMI's awards are considered to be unique and are recognised as representing the global standard. All programmes are offered with integrity in respect of Montessori philosophy and pedagogy. The Association recognises the value to its graduates, particularly the Irish graduates, of being included within the NFQ. It also recognises that alignment within the NFQ is imperative for both current students and graduates now that the DCYA is relying on the framework to specify level and volume of learning associated with qualifications in order to meet eligibility criteria for subvention grants for childcare services.

We look forward to receiving the revisited requirements for quality assurance (4.3.5) and being invited to participate, as an International Awarding body, in the consultation of Issues 1-6 (4.3.7).

Q.4.3.B Do You Agree With The Principles Set Out In Issue 6?

All points mentioned in Issue 6 are relevant and require deliberation. AMI acknowledges that awards for which alignment is sought need to have defined standards of knowledge, skill and competence and that awarding bodies, programmes and candidates undertaking the award are reliably and validly assessed against specified criteria.



Executive Director
Association Montessori Internationale

SUBMISSION BY:

Cavan Institute

*Please note this response appears as received
and has not been proofed/edited by QQI.*



Feedback on

QQI Comprehensive Policy Development Programme

Section 4 Green Papers

September 2013

Submitted by:

Ann Marie Lacey

Director, Cavan Institute

12th September 2013

Introduction

Cavan Institute formed a review group in early May 2013 to examine the Green Paper Documents set out by QQI as part of a comprehensive policy development programme. A link to the Green Papers on the QQI website was emailed to staff at the Institute (over 100) and comments were invited and provided to the review group. The group has met several times to review the Green Papers and the feedback from staff, and this submission provides a summary of that feedback, divided into the relevant policy areas as set out in Section 4 Green Papers.

4.1 Green Paper on Awards and Standards

Cavan Institute agrees that Further Education and Training is a misnomer for all learning from Level 1 to Level 6 on the National Framework of Qualifications. Levels 1 to 4 constitutes initial basic education and should be identified as such, whereas levels 5 and 6 should be designated as Further Education and Training.

We agree that small providers should never have dominant control of summative assessment of their learners.

An opportunity for delegated authority within the Further Education and Training sector would be welcomed by the Institute and this should be offered to centres who operate at a scale of 1000+ learners.

Where relevant, the naming of qualifications and awards at levels 5 and 6 should be aligned to occupations.

4.2 Green Paper on Certification

Cavan Institute accepts that FETAC is a well-known brand but believes that, in future, certification for learners should reflect the QQI brand. There is a renewed opportunity to build credibility through this brand.

Hard copy parchments together with a system of electronic authentication would be preferable to ensure that learners have the necessary paperwork needed to apply for further study or work, while industry and academic institutions have the capacity to authenticate the veracity of the qualifications they present.

4.3 Green Paper on Recognition of Qualifications within the NFQ

Providers in the FET sector on occasion may choose to deliver courses leading to industry standard certification, such as those provided by CISCO, CCNT or CompTIA. Such certification should be aligned to the NFQ, it should be recognised for grant purposes and such courses should be authorised and recognised by the Department of Education and Skills. To date funding has been based on vertical progression through the NFQ, which does not necessarily reflect the re-skilling needs of those seeking employment.

The promotion of FET awards as a mechanism for progression in HE awards is necessary, as is the collaboration between FET and HE providers towards creation of programmes that will facilitate this progression.

4.4 Green Paper on the International Education Mark

Has consideration been given to providing the IEM mark to FET providers? If so, the costs associated with this should not be prohibitive. Perhaps a different pathway could be offered to such providers.

4.5 Green Paper on Access, Transfer and Progression

While we agree with the premise of linking funding in the FET sector to completion and certification rates, we disagree with linking future funding to employment as progression to employment is dictated by the labour market, and is a factor that is largely out of the control of the provider. Of course, the Institute endeavours to run courses based on a labour market justification, but to have our funding predicated on graduate uptake of jobs is not feasible. Additionally a considerable number of students choose to progress from FET to HE awards and this has not been cited as a possible funding basis.

QQI should facilitate seamless progression of learners up and across the NFQ and encourage the development of relationships with industry and employers to ensure that graduates at all levels are ready for the demands of the workplace.

Cavan Institute proposes that the document *Cavan Institute's Strategic Plan 2011–2016* might aid the development of an FET strategy for the sector as a whole.

Standards Development Groups for awards at levels 4 to 10 should be led by HE Institutions in the future, with representation from FET providers, private providers, industry representatives and bodies and others to ensure that there is a seamless continuity of progression opportunities for learners when moving between the levels.

4.7 Green Paper on Recognition of Prior Learning

Cavan Institute believes that as custodian of the NFQ, QQI must join up QA and RPL. Consideration needs to be given to what will constitute evidence for the purposes of RPL, for example, how could life experience be presented and evaluated as evidence; could learners avail of partial exemptions based on the achievement of particular learning outcomes; how will RPL be graded – i.e., pass, merit or distinction – and will credits be allocated to RPL which may be used by learners when applying to the CAO on the basis of FETAC certification.

4.8 Green Paper on Monitoring and Dialogue

Cavan Institute agrees that FET monitoring is too light at present and would welcome a more robust system. A mix of monitoring methods would be preferable, however monitoring should be closely integrated with QA to ensure that it does not become an extra level of work on the sector. Training for monitors/ authenticators and providers is essential in this area.

4.10 Green Paper on Quality Assurance Guidelines

Clear, sector-specific QA guidelines should be developed and provided to ensure consistency in the approach of all providers. There should be a move away from the checklist system previously operated by FETAC in favour of a more holistic QA approach which takes account of all of the core policy areas, presented and evidenced in a format appropriate to the provider.

4.12 Green Paper on Data

Cavan Institute agrees that the development of a central database is a necessary part of the QA relationship between QQI and providers and would consider that this needs to be pursued with urgency. QQI should seek to influence the national co-ordination of certain data and any register established should be an integrated one on a national basis, from initial set-up.

4.13 Green Paper on Programme Accreditation

Cavan Institute believes that the development of national programmes in the FET sector was a good short-term measure. However, in the medium term, it is considered important that providers at level

5 and 6 be able to put forward their own programmes for validation based on local and national industry needs and demands. This would ensure consistency in programme

accreditation from levels
5 to 10.

QQI fees for programme accreditation and validation should be appropriate to the level of the programme and validation timelines should be kept to a minimum to allow providers to respond in a timely fashion to industry needs.

4.14 Green Paper on the re-engagement of Legacy Providers with QQI and Future Access to QQI Awards

We believe that awards standards and QA provision are sufficient at this time and that no additional arrangements are required during the restructuring of the sector. However, it is our view that all voluntary Legacy Providers should be required to undergo a full accreditation process as if they were New Applicant Providers in order to ensure QA standards across all sectors are consistent, into the future.

General Comments

Level 6 programmes should be offered on a collaborative basis between FET providers and Institutes of Technology

There are thousands of FET providers who currently have or wish to develop a relationship with QQI. Does QQI have the capacity to engage with these and is it sensible to do so? An amalgamation of smaller providers or collaboration between these small providers and larger providers could possibly offer economies of scale and more rigorous QA processes. The proliferation of level 5 and 6 FETAC programmes is currently delivered in premises that are not fit for purpose and under timeframes that are not commensurate with the learning time appropriate for awards at these levels.

A requirement for teachers to be registered with the Teaching Council exists for some FET providers (e.g., PLC Colleges). However, this is not a requirement for all those organisations who offer level 5 and level 6 programmes. Cavan Institute believes that a system of teacher registration is necessary in order to improve the quality of teaching, learning, assessment across the sector.

SUBMISSION BY:

Certification Partners

*Please note this response appears as received
and has not been proofed/edited by QQI.*

CERTIFICATION PARTNERS

Dear Consultation at QQI:

Following are my comments regarding Green Paper 4.3., which is available at the following URL:

<http://www.qqi.ie/Downloads/Consultation/Green%20Papers/Green%20Paper%20-%20Section%204.3.pdf>

My comments follow each of the questions you have asked at the bottom of the page:

Q4.3.a

Do you have any comments on the issues raised in this Green Paper

In regards to Issue 1, I believe it is vital for the QQI to recognise outside certificates. However, the QQI should not re-invent the wheel, here. As far as Information Technology programs are concerned, quality certificate programs such as Microsoft, Cisco, LPI and CIW are readily recognizable, even though vendor-specific programs should receive extra scrutiny concerning their motives. It is important to carefully differentiate between valid best practices, truly best of breed software and useful hardware and programs that simply belong to a popular brand.

Should you wish to go further in regards to recognizing quality, consider the quality assurance procedures that are amply outlined by ISO (e.g., ISO 17024).

However, I don't feel it is advisable to require full adherence to programs such as ISO 17024. Full compliance is extremely expensive.

Programs that adhere to ISO 17024 can often become too interested in adhering to processes rather than keeping up with current best practices and technologies.

It occurs to me that you would be able to find a middle ground, here. In other words, you could suggest adherence to certain standards, but use an employee (or group of employees) or third party to monitor certificate programs to ensure that they meet certain minimal standards.

You would not find it particularly difficult to find individuals who could monitor quality.

This approach would allow you to task an (existing or new) employee to monitor certificate quality without having to resort to having providers police each other, as you indicate in section 4.6.5.3.

You would experience far too many issues by asking providers police each other.

Issue 2:

Yes, there should be degrees of recognition within the NFQ. Your proposed tiered approach makes sense, as long as the approach is well-documented and open. Too often, the process for recognizing programs is based on undue influence or the reputation of a vendor, rather than the true quality of the program.

In my experience, there is often a vast difference between the quality of a vendor's product (e.g., a software application or operating system) and their certification. I have found in some cases that the software is of questionable quality, whereas the certification is of high quality.

Sadly, I have also found the reverse.

Issue 3:

How can the integrity of the NFQ be maintained where different routes to the NFQ are subject to radically different quality assurance arrangements?

Adopt a process based on a recognized standard such as ISO 17024, but do not require slavish adherence to it. Otherwise, you will find yourself subject to multiple inquiries about the burdensome nature of such overbuilt requirements.

Issue 4:

Programmes should be quality assured based on:

- * The procedures used to determine the body of knowledge concerning the program.
- * The skills taught in the program, as opposed to the reputation of the brand.
- * The attention programs take to training and certifying affiliated instructors.

Issue 5:

Yes. The awards should be processed and recognized within the NFQ and processed under QQI policy and procedures for programme validation.

Issue 6:

Do the following principles indicate some of the issues that need to be considered before an award is recognised?

The following statement makes sense to me under one condition:

"The awarding body itself is recognised and quality assured by QQI or by a body recognised by QQI for this purpose.

The condition is that you strictly control the "body recognised by QQI for this purpose." Too often, countries and companies will delegate this task to a vendor. This vendor too often has affiliations, tendencies, biases, and "experience" that tend to prejudice this outside body against adopting the correct programs.

I have, for example, seen several companies offer services to provide an unbiased review of courseware over the years. Yet many times bias does in fact exist. As a result, additional factors over and above the courseware influence the score. Sometimes the factors include simple inconsistency on the part of the reviewer. Other times, the inconsistencies are due to the publisher's reputation, or the reviewer's perception of the publisher. The same could easily be the case with certification.

If you use an outside body, this body should be subject to your override. This override should come from an individual or group from within QQI who is an expert at qualifications in the particular area (e.g., IT, nursing), or who can retain individuals with adequate subject matter expertise to understand when undue bias has occurred.

Periodic review of five years makes sense. Much sooner, and you would be conducting reviews constantly.

I would like to learn more about what the "provider accreditation process" is, here. Once again, the accreditation process may become so burdensome to the QQI that it won't be continued or even followed. On the other hand, the accreditation process could become too burdensome for vendors, who may ignore the program. If such issues occur, students will be the victim, here.

Which sector do you work in?
Awarding body
Certification provider (CIW)

SUBMISSION BY:

Chartered Accountants Ireland

*Please note this response appears as received
and has not been proofed/edited by QQI.*

CHARTERED ACCOUNTANTS IRELAND

Dear sir

Many thanks for giving us the opportunity to respond to this consultation. We were unable to use the on-line web response tool. The responses provided reflect my personal opinion and views rather than the considered views of Chartered Accountants Ireland.

Paper 4.1:

At this time I have no comments to add to Paper 4.1, and detailed comments will be provided as appropriate in later papers.

Paper 4.2: Green paper on certification

Are there other options?

I am not aware of any.

Are there additional advantages and disadvantages?

None to add

Preferences re options

4.2.4.1: Option 3

4.2.4.2 Option 3

4.2.4.3 Option 1

4.2.4.4 Option 2

Additional comments?

None

4.3 Recognition of Qualifications within NFQ

Should QQI establish policies and criteria for each of the various groups?

Suggest a common set of principles be established for all with perhaps greater prescription for some groups as appropriate.

Q4.3A

Possible degrees of recognition (Issue 2)

Given the range of potential arrangements both national and international it may be difficult to develop an approach which does not have some range of degrees of recognition. Any such development should be aligned or support not just national but European contexts.

How can different QA regimes be handled? (Issue 3)

It is going to be a challenge given the different approaches across countries and different systems within countries. In general a broad range of principals should be presented and all be required to demonstrate how they comply against this.

Issue 4: No comments

Issue 5: It would be difficult for QQI not to adopt a consistent approach.

Issue 6: The identified principles are clear.

Paper 4.4: International Education Mark

Issue 1: Should there be a single or multiple version of IEM?

Ideally a single version would be attractive but may prove unworkable so a three version model may be needed.

Issue 2: When should IEM be available?

Suggest option C this would incentivise bodies to go through the necessary reviews. If there is a sufficiently large bottleneck then option B might be the next best option.

Issue 3: Areas to be included?

As a starting point I would suggest that the requirements in the 2012 Act be mandated. Additional areas can be added over time rather than requiring a full compliance on day one. If there are areas which have proven to be problematic in the past I would suggest these should be added.

Issue 4: The code should be based on high level principles.

Issue 5: Should QQI carry out a review of compliance with code?

I would suggest this should be covered as part of the QQI reviews with periodic confirmation of compliance.

Issue 6: No comments

Paper 4.5: Access Transfer and Progression

Q4.5a: The existence of different approaches which can conflict is far from desirable. Suggest that the existing approaches be adopted as is with a clear indicative and realistic date by which any anomalies can be removed.

Q4.5b: Timelines:

The timeline adopted will depend on the level of stakeholder consultation required etc.

Q4.5c: No comments

Paper 4.6: Provision of information to learners

This paper appears to be comprehensive. In terms of a preferred approach I would suggest that the provision of information should be a condition of engagement and this can be reviewed as part of any review. In the interim period periodic confirmation to QQI of continued compliance might be sought on say an annual basis. This would avoid the creation of a one site full database which would be unwieldy and hard to manage.

Paper 4.7: Recognition of prior learning

Issue 1: It may be preferable in the short to medium term to have a policy for this area. This should identify clear principles to be used in this area. I would imagine some variety of practice so flexibility will be needed.

Issue 2: Whilst a national RPL policy is desirable it will take significant time to develop and agree it is suggested, so to hold back and wait its development is likely to be unsatisfactory.

Issue 3: Direct application for QQI awards

A realistic approach is needed here with a level of subsidiarity where possible. All should be required to explain and justify approach adopted, any review of this can be considered at the time that the award is assessed.

Issue 4: No comments

Issue 5: Issue on data for RPL

It will be important that where data on RPL is to be gathered that a clear indication of what data is needed and how often is highlighted to allow the compilation in a timely manner. Periodic reporting will help assess whether there is sufficient volumes to justify a greater oversight or systemisation.

Issue 6 (4.75f): No comment

Section 4.8 Monitoring and dialogue

In any approach to monitoring and dialogue it will be preferable for any approach to be “evidenced based” with consideration being given to risks and proportionality. As far as possible an on-going dialogue with stakeholders should be on the basis of appropriate principles with a “comply or explain” approach. This would give sufficient flexibility.

Section 4.9: Green paper on reviews

The range and scope of areas to be addressed by QQI is potentially daunting. A reasonably balanced approach is needed with some carrots (recognition) and sticks (specific downsides of non-engagement) being in place. In terms of work we have done we would recognise that mature well established organisations will be well able to demonstrate a good process. As such some form of self assessment is likely to be needed to provide evidence of compliance and avoid the waste of resources where compliance is unlikely. Having a single approach has certain merits in that this becomes well understood and a pool of experts familiar with its needs evolves. This may not be practical however. Any approach needs to be broader than a pure higher education approach.

Section 4.10 QA Guidelines

Issue 1: The identified list seems comprehensive

4.10c: By agreeing a list of principles rather than detailed rules should assist in having a level of stability.

4.10d: Suggest a high level set of principle guidelines be developed.

4.10e: No comment

4.10f: Existing documentation should assist but will need to be within a common and consistent framework with consistent terminology etc

4.10g: QQI should establish clear principles with the providers being required to justify how they comply.

4.10h: No comment

4.10i: A periodic review is likely to be needed and should be planned for to capture experience in implementation and also on-going developments

4.11j: It should be possible to have a consistent structure which all who subscribe to the recognition of QQI approach sign up to and confirm a commitment to the QQI approach.

4.10k: Policies outline what is expected with guidelines detailing how the policies can/should be complied with.

Section 4.11: Risk and proportionality

The approaches identified appear to be comprehensive. Given the range of different bodies and award makers in the Irish environment at this time a one size approach appears to be unrealistic and hence Option 3 which seeks to have a unified approach with a proportional approach is probably realistic.

Section 4.12: Data

In terms of QQI's role and oversight it is difficult to imagine that there will not be some data collection and assessment role by QQI. It will be important that any data is collected on a specific need basis and the costs and challenges of this process are recognised. How this data will be used and how it can inform policy decisions will be an important aspect of this and allow for a learning across all bodies. It should also inform QQI in its regulatory role.

The provision of data should be considered as part of any review and applicants should confirm a willingness to share same.

QQI should play a role in agreeing an agreed national data set.

4.12d: Some form of short terms solution is needed with a longer term strategy beyond this. I have no views on the preferences of options 1 or 2

Section 4.13 Programme Accreditation

The establishment of QQI provides an opportunity for fresh thinking and approaches. Equally it needs to consider the legacy of FETAC etc. So a balanced phased approach to this area is probably needed. A consistent approach across the FETAC and HETAC approaches should be adopted over time. Programme duration is probably less of an issue if a learning outcome approach is adopted which emphasises what can be done rather than how long was spent acquiring the skill etc.

Given the demands on QQI over resources any approach needs to strike a balance in being efficient and cost effective whilst upholding standards. The points raised under issue 4 should be avoided.

Appropriate fees are needed to underpin this process.

Section 4.14: Reengagement with legacy providers etc

As noted elsewhere in this response the QQI range of bodies and legacies is significant. Some incentives are needed to get the bodies engaging (perhaps through an initial acceptance of each – subject to a review being done within a specified period) and moving towards a consistent approach. Some form of compliance (on a self assessment basis) may be needed with sanctions for breaches unless action is put in place to address known deviations. Where a body has not responded or provided appropriate information then action can be taken.

These comments are hopefully of benefit. I would be happy to develop or amplify on these as needed.

Kind regards

Ronan O'Loughlin

Ronan O'Loughlin

Director of Education and Training

Chartered Accountants Ireland

Chartered Accountants House

47-49 Pearse Street

Dublin 2

SUBMISSION BY:

Dublin City University

*Please note this response appears as received
and has not been proofed/edited by QQI.*

DCU Response - QQI Green Papers x 14 - September 2013

| # | Green Paper | DCU Comments and answers to specific questions |
|-----|----------------------|--|
| 4.1 | Awards and Standards | <p>4.1.a Do you have any thoughts, comments or concerns raised by the issues outlined in this paper? One useful suggestion in the paper is that of a new policy for minor awards (p.18) which would address the potential ‘double’ certification issue, a factor which has been a difficulty within the sector for some time. However, there is some concern that there are few references to Level 8 and above programmes, as much of the paper seems to refer to FETAC and HETAC awards at lower levels. It will be important for policy purposes to ensure that the higher level awards, particularly 8-10 are addressed. Any policy developed could also possibly provide an opportunity to address the ‘clumping’ of awards at higher levels and perhaps allow a graduate diploma to be awarded at a different level from a masters level award.</p> <p>The issue of subject guidelines also raises a number of issues:</p> <ul style="list-style-type: none"> • Insofar as they risk pointing to a common curriculum, this may reduce the capacity of institutions to play to distinctive strengths • In 4.1.4, it is stated that “Universities may be concerned that subject guidelines would be unduly intrusive or prescriptive and infringe on institutional responsibility to determine standards for their awards.” A major concern, however, may not be about <i>standards</i> but rather <i>approaches</i> • Universities tend to be at the forefront of emerging disciplines, combinations of disciplines and learning approaches. The need to adhere to subject guidelines may inhibit these innovations <p>Also, in regard to the Common European Framework of Reference for languages (CEFR), it would be useful to explore the possibility of integration between the National Framework of Qualifications (NFQ) and the CEFR, as the CEFR is frequently used to indicate the level of foreign language classes for the information of exchange, study abroad and Irish students as well as to prospective employers. This would be particularly relevant if efforts to link the NFQ and the CEFR go ahead.</p> <p>Finally, the idea that there may be a role for <i>non-framework certification</i> (p.11) offered by providers is welcomed.</p> |
| 4.2 | Certification | <p>4.2.a Are there other options that have not been considered in this Green Paper? It may be confusing for learners and employers to retain AC (Awards Councils) in the abbreviation of Further Education & Training and Higher Education & Training when QQI is now the awarding body, as proposed in option 1. The suggestion that HETAC and FETAC are now considered adjectives may not work well from an international learner or employer’s perspective. An alternative option for branding is to use the words <i>Further Education and Training Awards by QQI</i> and <i>Higher Education and Training Awards by QQI</i>.</p> <p>4.2.b Are there advantages and disadvantages that have not been identified for each option? Advantages and disadvantages appear comprehensive apart from other comments provided within this response.</p> <p>4.2.c Do you have any preferences among the options? The NFQ is a well established framework recognising awards and levels of all Irish HEI offerings, many of which issue their own parchment. Referencing the NFQ on some parchments and not the awarding body QQI could lead to a lot of confusion about the status and purpose of the NFQ. Reference to the NFQ forms part of the Diploma Supplement document issued to graduates by all HEIs and perhaps should not be confused with an awarding status. Therefore Options 3 and 4 are not favoured. Preference for Option 1 (with alternative wording as in comment under 4.2.a above), or Option 2.</p> <p>4.4.d Do you have any comments on the issues raised in the Green Paper? In regard to 4.2.4.2: <i>Authorisation of Parchments</i>, it is suggested that the same approach is applied for both HET and FET awards, and Option 2 if preferred. This is consistent with the approach in universities that have associated / linked colleges i.e. signatures of the Directors/Presidents of the linked colleges are not included on the parchments.</p> <p>In regard to 4.2.4.3: <i>Ownership of Parchments after Issue</i>, it is suggested that a quality assurance process be devised to approve all learners for award prior to a request being submitted to QQI for the parchments. Option 1 is preferred but a combination of Option 1 and 2 might be considered i.e. where an agreed period of time has lapsed following requests for the return of the parchment, Option 2 is then also implemented.</p> |

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| | | <p>In regard to 4.2.4.4: <i>Format and Authentication of Certificate</i>, Option 3 is preferred. It is our experience that the paper parchment is a very important document for international students. We have had some dialogue over the years with the Dept of Foreign Affairs regarding authentication requests from overseas. If this option is seriously considered it is recommended that liaison with the DES takes place in advance of a final decision.</p> <p>General observations:</p> <p>(a) There is no reference to joint awards in this green paper e.g. HET awards from QQI and another HEI (either existing or future). Some consideration should be given to how these types of awards will be designed, approved, and processed in connection with the issues arising within green paper 4.1.</p> <p>(b) There may be a potential or perceived conflict in regard to QQI having both roles of awarding body and quality assurance of awarding bodies</p> |
| 4.3 | Recognition of Qualifications within the National Framework of Qualifications | <p>Q4.3.a Do you have any comments on the issues raised in this Green Paper?</p> <p>There is reference in the green paper to Section 79 of the 2012 QQAI Act indicating that QQI will establish a database of information on awards recognised within the NFQ. There is also reference made to Section 67 regarding the provision of information to learners. In Section 4.6 of the green paper options are set out for the development of a database of providers, programmes and awards. It is not clear what the link is between the Act and the proposals in the green paper. An integrated or single database would seem to be the most appropriate approach.</p> <p>It is also important to note in this context that the accumulation of credits is not necessarily the same as the completion of an accredited academic programme.</p> <p>Re Issue 1: It is useful to review current policies with a view updating and adapting to new requirements, but there is value in what is currently provided so it would not be appropriate to change everything all at once.</p> <p>Re Issues 2 and 3: There are some concerns about having ‘degrees’ of recognition and this approach could result in a lack of clarity in what ‘recognition’ means when granted. The question in Issue 3 is challenging but it is important that each institution ensures the provision, adoption and implementation of individual quality assurance standards and policies. Once that is in place for all in the sector we argue to increase standards elsewhere if required.</p> <p>Issues 2 and 3 are in fact closely linked: if the integrity of the NFQ is to be maintained (Issue 3), then it can only be done in the context of differing degrees of recognition (Issue 2).</p> <p>Re Issue 4: It may be appropriate for this issue to come in advance of the previous one. As already outlined we have quality standards for learning outcomes and awards. Development of the quality assurance methods which measure these standards would have to be expanded to allow quality assurance of the programmes.</p> <p>Re Issue 5: Awards recognised should be processed under procedures consistent with QQI programme validation procedures, but it would be important to know and understand these procedures and guidelines so that further exploration of the implications can take place.</p> <p>Q4.3.b Do you agree with the principles set out in Issue 6? (issues that need to be considered before an award is recognised)</p> <p>The principles as outlined here are supported, but we would advocate an additional point or a modification of the fourth bullet “The award for which alignment is sought certifies a minimum specified volume of learning, or credit, comparable to other awards included in the NFQ.” An issue that is not addressed within these bullets is the minimum time period over which the volume of credits is acquired; this should be consistent with Bologna provisions and take account of the number of credits that can reasonably be acquired in that modality of learning, e.g., 30 credits per annum on a part-time programme, no more than 60 credits on a full-time programme, etc.</p> |
| 4.4 | International Education Mark | <p>4.4.1 Should there be a single or multiple versions of the IEM?</p> <p>DCU’s preference would be for more than one version of the IEM, up to three as stated in (c)</p> <p>4.4.2 When should the IEM be made available?</p> <p>We suggest option (d) is the best one to allow immediate authorisation to a subgroup of providers. Third level institutions are under increasing pressure individually and as required by Ireland’s International Education Strategy 2010-15 to increase the number of international students. A quality mark such as the</p> |

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| | | <p>International Education Mark is crucial for branding and marketing to prospective partners, students, parents and employers.</p> <p>4.4.3 What areas should be included in the Code of Practice? All authorised providers should be required to establish arrangement for the protection of enrolled learners. It is likely that public institutions already make the provisions referred to in this section. It is recommended that the Code includes all the additional areas listed with some of those outlined combined within an overall heading of student experience.</p> <p>4.4.4 What level of prescription and detail should be included in the Code of Practice? Preference is for option (c): The Code should be based on a combination of high level principles and detailed criteria</p> <p>4.4.5 How should QQI carry out a review of compliance with the Code? Preference is for option (b): A review of compliance with the code should be integrated with other statutory reviews provided by QQI e.g. review of effectiveness of provider’s quality assurance procedures</p> <p>4.4.6 In which countries should the Code be applicable? (a) Given the restricted interpretation of an international student in the 2012 Act, should providers be restricted from using the code and the IEM in promoting their off-shore provision? Preference is: No</p> <p>(b) Should review of compliance with the code extend to the off-shore provision of relevant providers? Preference is: Yes</p> <p>Other comments / queries on this green paper:</p> <ol style="list-style-type: none"> 1. Clarification on the amount and payment details of the application fee and annual charge is required. 2. Some issues regarding the IEM have been raised by a number of Study Abroad Programme Providers located in Ireland and it is important that these are taken into account to avoid loss of international recognition, and income. 3. It is important that within IEM development process a co-ordinated approach takes place between the relevant government departments (e.g. DAF, DES, DJE ..) and the HEIs to avoid misunderstandings, duplication of effort as well as maximise the benefits of the IEM nationally and internationally. |
| 4.5 | Access, Transfer and Progression | <p>4.5.a How do the 2003 policies and criteria need to be modified, if at all, for use in an interim period? It is important that policies and criteria be updated to meet current legislation and structures. Transition arrangements should be available for a set period to accommodate those moving from the earlier phase.</p> <p>4.5.b What timeline and approaches should QQI adopt for the development of new statutory policies and criteria for ATP? It is important that there is vision and scope built into the new statutory policies and criteria to ensure some ‘future proofing’. Given the major shift in terms of the direction of the National Strategy for Higher Education and its implications for FET and HET, dedicated resources may be required across new Regional Clusters and within Institutions to allow for progression of ATP objectives. Following this, perhaps a one year consultation phase across regional clusters to allow for scoping of current policies and procedures and alignment of institutional strategies both at FET and HET level. This consultation phase could be also used to inform QQI regarding its development of new statutory policies and criteria for ATP which could be formalised at the end of this year. Perhaps then a three year implementation phase would be required to enact policy and practice in this area.</p> <p>4.5.c In light of the current national employment problems should QQI develop new policies or guidance in relation to employability even in advance of a comprehensive review of the 2003 policies and criteria, or are there other priority areas not addressed by the 2003 policies and criteria that merit such consideration? This is a difficult area to address as there are a lot of potential problems and concerns so it may be better to hold off formalising policies in the near future. That said there are a few comments that can be made:</p> <p>First, with regard to implementation of new policies and identifying priority areas which need to be addressed from the outset these appear to include; the current lack of transparency with regard to entrance pathways and progression, commonality of approach in terms of admissions and progression,</p> |

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| | | <p>difficulties with regard to standards / quality of FET qualifications and regulation of FET sector, lack of formal sectoral policies and criteria on APEL, no standardised national admission route for Adult Learners, insufficient provision of Level 6 courses at IOT/FET level and lack of standardised / fully accredited Bridge-to-education / Foundation programmes between the FET and HET sector.</p> <p>Second, in order to make substantive progress in this area, Level 7, 8 and 9 courses in particular need to be delivered more through on-line learning, distance education, blended learning and on a part-time / modular basis. Staffing levels in terms of academic and personal / professional development supports will need to be addressed here in addition to upgrading and properly resourcing IT infrastructure within the FET and HET sector in order to meet demand.</p> <p>Third, internships and work based learning can offer good learning opportunities for the student. However, the extent to which such opportunities prepare for the transition to employment can vary. Taking into account the dynamic nature and constantly changing face of employment, as already mentioned, any policies and criteria developed would benefit from being ‘visionary’ in nature.</p> |
| 4.6 | Provision of Information for Learners | <p>4.6a Are there other options that have not been considered in this Green Paper? The options presented are sufficient for consideration.</p> <p>4.6b Are there advantages and disadvantages that have not been identified for each option? The identified advantages and disadvantages are sufficient.</p> <p>4.7c Do you have any preferences among the options proposed? 4.6.5.4QOI concentrates on meeting its legislative responsibility to develop a register of programmes and awards and a database of providers as a means of communicating reliable information.</p> <p>4.7d Do you have any comments on the issues raised in the Green Paper? The objective to provide comprehensive information to learners in an accessible manner is very positive. To enable this it will be necessary to ensure that the responsibilities of the providers as set out in the Act are clearly communicated and a standard format for the data agreed with and communicated to providers. <i>Qualifax</i> is a well established and respected online source of information for undergraduate study. Most HEIs provide annual updates about programmes for inclusion in this resource. It is also a user-friendly site, and perhaps there might be potential for this to be further developed to include Post Graduate and other awards. Any decisions to develop and implement a register of programmes and awards and a database of qualifications recognised within the NFQ should not lead to duplication of records that could lead to a display of different versions of information. It is suggested that an integrated platform both in the short-term and long-term be developed.</p> <p>Note: The comments above also relate to the green paper on data - 4.12.</p> |
| 4.7 | Recognition of Prior Learning | <p>Q4.7.5.a Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative? As RPL is a complex area, it is essential rather than preferable to develop a particular policy in this arena instead of including it under ATP.</p> <p>Q4.7.5.b Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated? DCU’s preference would be that a national strategy on RPL be articulated before further promotion of RPL takes place. However, in taking this stance, we recognise that currently there are students who wish to utilise RPL, and DCU has undertaken a lot of work in this area to facilitate applications and admission of potential students. However it is important that standard RPL criteria in Irish education at all levels and standards be provided as soon as possible.</p> <p>The point made in reference to an earlier paper that the accumulation of a number of credits should not necessarily lead to the successful completion of an accredited programme is also relevant here.</p> <p>Q4.7.5.c Should QOI develop a procedure of direct application for awards? How else might it fulfil its obligations under 2012 Act? It is preferable that QOI does not manage a direct award process. As noted in the green paper it would not have the subject expertise. If QOI established standardised policy and criteria for use by the HEIs this should enable it to meet its 2012 QQAI Act obligations.</p> <p>Q4.7.5.d Should QOI reopen the process of agreeing RPL procedures with providers of FET</p> |

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| | | <p>Awards Council awards? No, we believe that reopening such procedures would be a retrograde step.</p> <p>Q4.7.5.e What measures can or should be taken to improve the collection of information on RPL activities by Irish providers and awarding bodies? Once there are standardised criteria and policies in place it should be straightforward to capture the relevant information a regular intervals.</p> <p>Q4.7.5.f How urgent is the reconciliation of national approaches to credit in FET and HET to the realisation of objectives for RPL? As mentioned already, currently there are students applying to HEIs or are already within the system. There is an urgent need to address historical issues and regularise the situation. DCU is currently addressing relevant RPL issues appropriate/t/u</p> <p>Q4.7.5.g What other issues in relation to RPL should be addressed at this stage? Issues regarding to human and financial resources needed to develop, implement and monitor a national RPL strategy.</p> |
| 4.8 | Monitoring and Dialogue | <p>Q4.8.5.a Are there other options that have not been considered in this Green Paper? Options as presented appear comprehensive</p> <p>Q4.8.5.b Are there advantages and disadvantages that have not been identified for the options described? Advantages and disadvantages appear comprehensive</p> <p>Q4.8.5.c Do you have any preferences among the options? (Please refer to the option numbers above in your response) Option 7 ‘Combinations of the above approaches to monitoring and dialogue’ is preferred as this option facilitates a number of perspectives to be taken into account and encourages on-going engagement by the sector in the process. However, ongoing resource constraints may have a significant impact on the final option(s) developed for use.</p> <p>Q4.8.5.d Do you have any comments on the issues raised in the Green Paper? There are an interesting range of options in this paper in relation to monitoring and dialogue which are helpful to review. However, one issue that is not addressed is that there are no suggestions forthcoming as to how any particular option might be resourced and funded and all options have resource implications for the sector.</p> |
| 4.9 | Institutional Reviews | <p>Q4.9.a Are there other approaches to institutional review that have not been considered in this Green Paper? Yes, there are other approaches and it is hoped that some of these will be addressed by the current ‘Review of Reviews’ process currently being undertaken by QQI with an expert panel in consultation with the sector.</p> <p>Q4.9.b Does the institutional review approach as discussed in this paper meet the needs of sectors outside of higher education and training, or should further consideration be given to developing significantly different approaches to reviews outside of higher education and training? Further consideration should be give to developing approaches to institutional review for sectors outside higher education and training.</p> <p>Q4.9.c Should QQI encourage, where possible, the practice of incorporating other reviews provided for in the legislation (IEM; DA; ATP) into institutional review? Yes, this should definitely be encouraged where possible so that quality assurance and strategy in a number of areas can be streamlined and work undertaken in parallel where appropriate.</p> <p>Q4.9.d Do you have any preferences among the options set out? At present Option 3 is preferable in theory as it allows the possibility of taking into account different contexts and prevailing environments for individual institutions. However it is hoped that the ‘Review of Review’ as already mentioned will present more refined options for analysis, and avoid a ‘one-size-fits-all’ recommendation.</p> <p>It will be essential, however, to actively manage the resources allocated to quality review and assurance activities so that they are not, and do not become, disproportionate to the core educational activities of</p> |

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| | | <p>HEIs. This point is especially relevant during the current extended period of declining resources, and applies to many of the green papers.</p> <p>Q4.9.e Are there advantages and disadvantages that have not been identified for each option identified in this Green Paper? These appear comprehensive as set out.</p> <p>Q4.9.f Do you have any other comments on the issues raised in the Green Paper? At the moment we have no further comments and await the consultation with the expert panel on the 'Review of Reviews'.</p> |
| 4.10 | Quality Assurance Guidelines | <p>Q4.10.a Is anything missing from this list? One suggestion would be to include 'articulation of standard assurance of education provided'.</p> <p>Q4.10.b Is there anything that shouldn't be on this list? One suggestion would be to remove 'prescribe detailed templates' as the purpose should be higher level rather than detailed by the provision of templates.</p> <p>Q4.10.c How can QA Guidelines remain a stable and effective basis for providers' QA procedures while reflecting the evolution of the education and training landscape and QA practices? In order for the QA Guidelines to remain effective for providers it is essential that providers are involved in their development.</p> <p>Q4.10.d Do you have any comments on the nature and scope of QA guidelines to be issued by QQI? High level guidelines, single if possible are preferred.</p> <p>Ref 4.10.4 (p.5) bullet point 1: is difficult to understand how it will be possible for QQI to determine the expectations of wider society? The next bullet point ends without being completed and other bullet points provided under this section are not clear.</p> <p>Q4.10.e What are the implications for a change in the scope of QA guidelines? Unknown at present depending on the change of scope proposed.</p> <p>Q4.10.f What should be the status of the quality assurance guidelines and criteria issued by HETAC, FETAC and IUQB/IUA currently in use in the various sectors? Could they be used as the basis for establishing new QQI QA guidelines? Existing IUQB guidelines already reflect extensive consultation within the IUA sector; evolution (e.g. toward single, higher-level, guidelines) should be backwards compatible.</p> <p>Q4.10.g Where is the balance of responsibility between QQI and providers for the development of QA guidelines? The question is slightly unclear as stated, but in general, we believe that providers must be involved from the earliest stages of drafting guidelines.</p> <p>Q4.10.h Are there representative structures in place for providers in the various groups to effectively contribute to development of QA guidelines? If not, how can QQI engage with individual providers? In the case of Universities, this engagement might usefully be mediated through IUA; but individual Universities will need to remain closely engaged with QQI.</p> <p>Q4.10.i Does QQI require a mechanism for continuous or periodic updating of QA guidelines? Guidelines should not change frequently or arbitrarily, so at the very least there needs to be clarity on the QQI approach to this.</p> <p>Q4.10.j For each of these functions, can QA guidelines serve as relevant criteria? Yes. It is also important to note that all opportunities for resource efficiency through integration of QA and similar (e.g. professional body accreditation) activities need to be exploited. As indicated previously, resources allocated to QA are resources lost to direct educational activity, so that must be proportionate.</p> <p>Q4.10.k What is the relationship between the QA guidelines as set out in 2012 Act and the policies currently under consideration in this policy development programme?</p> |

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| | | The relationship should be a close one in order to develop and implement comprehensive guidelines. |
| 4.11 | Provider Risk and Proportionality | <p>Q4.11.a Are there other approaches to regulation that have not been considered in this Green Paper? The approaches identified appear comprehensive, but others may emerge following the consultation process.</p> <p>Q4.11.b Are there advantages and disadvantages that have not been identified for each approach? Advantages and disadvantages appear comprehensive.</p> <p>Q4.11.c Do you have any preferences among the approaches? There is a continuum from Option 1 through 3 to 2. The preference is for something in the range between 1 and 3 – definitely not toward 2.</p> <p>Q4.11.d Do you have any comments on the issues raised in the Green Paper? The examples of bodies involved in the regulation of education and training are Scotland, England, Wales, Northern Ireland and Australia, all English speaking areas with predominately homogenous populations. It might be appropriate to look beyond these very similar nations and consider the use of a wider range of more diverse approaches.</p> <p>Risk assessment itself carries the risk of disproportionate and ultimately ineffective diversion of resources from core business into “meta-business”. In this context, any engagement with risk assessment by QQI should explicitly acknowledge the problems posed by “intrinsic uncertainties” i.e. identified risks with unknown probabilities or unknown impacts, and unidentified risks. These considerations may tend to favour option 3 over option 1. An alternative or complementary approach might be informed by the emerging concept of resilience assessment.</p> |
| 4.12 | Data | <p>Q4.12.a Do you agree with the principles proposed to underpin QQI’s relationship with data? (yes, no, comments) Yes. Certainly data is needed to inform growth and development and demonstrate compliance with policy and standards. However it will be essential to ensure that such data is protected. The possibility of some of the data being obtained by the media and used for ‘league’ tables could also be an issue.</p> <p>Also, complete information on all DCU programme provision including the level of awards and related data is already provided in a full and consistent manner by DCU to the HEA on an annual basis. It is important that any data collection undertaken by QQI would utilise, and align with, existing data sets held by other government agencies within the State.</p> <p>We are unsure of the relevance of the statement at the beginning of the paper proposing the view that: ‘the rationale for the introduction of these features is to contribute to realising synergies across the wider education and training statistical system...’</p> <p>We also believe that further consultation should take place before talks about sanctions are undertaken (also ref point made below under 4.12.2).</p> <p>Q4.12.b Do you agree that the provision of data should be considered part of the quality assurance relationship between QQI and the providers with which it engages? (yes, no) Yes</p> <p>Q4.12.c Is it your view that QQI should seek to influence the national coordination of certain data sets? Yes</p> <p>Q4.12.d Which of the short-term proposals for the realisation of a provider register and database of programmes and awards do you prefer and why? (separate, integrated, comments) Option2, Integrated.</p> <p>Q4.12.e Have you any observations in relation to the longer term approach? It would have been assumed that the scope of “data” in this green paper would not include any “personal” data (relating to an individual). In particular, student data would only be exchanged in aggregate forms. However, the mention of using PPSN to “facilitate data linking and matching across databases” appears to contradict this assumption, and should be clarified.</p> |

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| | | <p>There also appears to be significant potential overlap in data collection between QQI and HEA (in respect of the HE sector). This should be actively managed to eliminate redundancy. It would be helpful to see some explicit commitment to “open data” provision by QQI (in accordance with a general public sector approach to this issue).</p> <p>Finally, DCU would like to stress that the on-going consultation on the type and frequency of data provision and other relevant issues including confidentiality and potential sanctions is crucial for the successful development of policy in this area.</p> |
| 4.13 | Programme Accreditation | <p>Q4.13.a Do you agree that a new overarching approach to programme accreditation is preferable to continuing sectoral approaches?</p> <p>There are certain principles (e.g. articulation of criteria, clarifying balance of responsibilities) that are referred to in the Green Paper and that might reasonably be deemed to be common, in principle, across all sectors. It would be important, however (and notwithstanding the resourcing issues also referred to in the Green Paper) to ensure that existing good practice in any one sector (or indeed in any one organisation) would not be compromised by any overarching approach.</p> <p>Q4.13.b Do you have any comments on the issues raised in this Green Paper?</p> <p>It is unclear exactly how much of this Green Paper references the University sector. As the Universities function as awarding bodies in their own right (under the Universities Act), and this Green Paper does not refer to or affect the accreditation operations of such awarding bodies, then perhaps the paper is not as relevant to Universities.</p> <p>The point made in the paper about management of expectations is important, particularly in view of the need for speedy and flexible responses to requests for programme provision in certain circumstances. Another important issue referred to in the Green Paper is the desirability of avoiding situations where separate approval processes are held with respect to component awards.</p> <p>Finally, we would like to note that DCU has a well established, robust and rigorous accreditation process which works well and is highly regarded in the sector.</p> <p>Q4.13.c Are there other issues relating to programme accreditation that have not been raised in this Green Paper?</p> <p>None identified at this time.</p> |
| 4.14 | Re-engagement of Legacy Providers with QQI and Future Access to QQI Awards | <p>Q4.14.a Is any further differentiation required between the different DABs to clarify the effects of this transition?</p> <p>None identified at this time.</p> <p>Q4.14.b Are the standards of awards and QA provision sufficient at this time during the restructuring of the sector or are additional arrangements required? If so what? Do they need further legislation?</p> <p>Given the current HEA approach to restructuring the HE system, and especially provision both for clustering (which may bring some existing Universities and IoTs into new regionally based partnership arrangements) and the possible designation of some new so-called “technological universities”, there may be a need for deliberate articulation between QQI, HEA and affected institutions in relation to this. It’s not clear whether the reference in the green paper to “restructuring of the sector” includes reference to this specific HEA process.</p> <p>Q4.14.c Can the different statutory QA regimes that apply to these schools be integrated with each other, to reduce the burden on schools whilst securing the standard of QQI awards?</p> <p>Yes</p> <p>Q4.14.d What are the implications of VLPs no longer meeting the requirements to access QQI awards?</p> <p>Diminishing recruitment and potential closure.</p> <p>Q4.14.e What are the implications for providers who currently have access to FETAC awards only but now seek to access HETAC awards and vice versa?</p> <p>Human and financial resources will have to be found to undertake the process of applying for and accessing the relevant awards.</p> |

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| | <p>Q4.14.f Are there other options that have not been considered in this Paper? Are there further advantages & disadvantages? None identified at this time.</p> <p>Q4.14.g Do you have any preferences among the options? (Option 1, 2, 3 or 4) This is a matter for the VLPs and will need further discussion.</p> <p>Q4.14.h Do you have any comments on the issues raised in the Green Paper? All provided above</p> |
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Above response provided on behalf of DCU by Dr Sarah Ingle, Director of Quality Promotion, Sept. 2013
(sarah.ingle@dcu.ie)

SUBMISSION BY:

Federation of Irish Complementary Therapy Associations (FICTA)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Federation of Irish Complementary Therapy Associations

Submission: Green Paper 4.1 - Awards and Standards.

FICTA (Federation of Irish Complementary Therapy Associations) welcomes this opportunity to participate in the QQIs consultation on the development of short term policy positions for making awards and standards determination. The standards are and will be relevant to learners, professional bodies, associations, regulators (statutory and otherwise) and providers, in short, to all stakeholders.

In reference to "Qualification Systems and Related Concepts - a QQI background paper") and paraphrasing Kuhn's concept of a community of practice (COP), FICTA is a community/group of complementary therapists who share a concern *and* a passion for something they do, and learn how to do it better as they interact regularly. It is in effect, a 'laboratory' for workplace learning (see 4.1.8.14). FICTA appreciates Kuhn's recognition of the importance of considering the social dimension in which standards are agreed and with his contention that "... there is no standard higher than the assent of the relevant community."

FICTA agrees that some communities can be corrupted by the influence of a 'personality' or 'cult like' organisation and/or be pernicious. Perniciousness could also apply in any influence brought to bear on the QQI to refuse or obstruct its engagement with a particular profession or COP. Trust in the QQI will derive from trust in its agents and those it engages with.

Awards and Standards

The broad brush-strokes the QQI has used in the Green Paper on Awards and Standards is impressive. At first sight, it looks like there is something for everyone here. However, only time will tell if this is in fact the case.

4.1.2. The portability and comparability of awards is particularly important in the current recession which has resulted in the emigration of so many qualified people. Regretfully, school teachers are finding that their Irish qualifications are not recognised in Australia. Consideration might be given to including information on the current portability of awards in "Information for learners".

Subject guidelines could be useful to learners and in the development of generic awards which would not of themselves qualify a learner for any profession, but could instead be the basis for entry to higher level qualifications in a specialised field of learning where CAO involvement does not and could not apply.

4.1.3. Early publication of the 'minor amendments' the QQI has made to the inherited FET and HET policies and criteria for making awards would be helpful. Otherwise, awarding policy reform should evolve organically while keeping learners needs in mind and the agility, innovation and responsiveness the QQI aspires to.

4.1.4. Awards should be fundamentally 'fit for purpose'. While 'fitness to practice' includes the verification of qualifications, regulation and regulators have a broader reach and responsibility than that. Reliance on awards as a indication of 'fitness to practice' is defective regulation.

4.1.5. Now that standards activity has resumed, FICTA expects that the HETAC's "Interim Standards for Complementary Therapies" will be reinstated. Considering the time and costs already expended by

HETAC in their development, including consultation with experts and University Registrars; and QQI's reduced funding and staff, any further spend would be difficult to justify.

Nonetheless and as suggested in 4.3.5. of Section 4.3 it would be very useful to both QQI and the CAM sector if preliminary work was done with a representative group of CAM practitioners and providers on translating the standard descriptors into their discipline-area. It would also help to inform new policies and criteria for the recognition of Groups A, B, C and D (as defined by the NQAI).

The HETAC award which was issued to the Acupuncture Foundation of Ireland (AFI) and abruptly withdrawn should also be restored at no further cost to the provider or the QQI.

FICTA notes that standard development activity is being resumed on an *ad hoc* basis. (4.1.5.) and that both counselling and psychotherapy are included in this. As each of the named disciplines are quite distinct in learning and practice delivery it is to be expected that two different awards will be made.

Developed programmes should be published for the purpose of facilitating extensive consultation before they are validated. The appropriate naming of an award is also critical.

Indicative Policy Development.

Throughout the Green Papers, the QQI uses the word 'standard' in reference to both awards and the NFQ. Consideration might be given to reverting to the well known term 'NFQ Levels' as a means of positioning different types and standards of awards within the NFQ.

4.1.8.1. All of the points made in this section have merit and particularly resistant to over-standardisation. Further consultation will be required to hone the suggestions presented for the reform of policy on standards determination to ensure it is flexible and responsive to the changing needs of learners.

Resistance to over standardisation is agreeable, as is QQI's determination that standards need to be broad enough to allow for a healthy level of diversity, adaptation and innovation.

FICTA is strongly in favour of the involvement of CAM (Complementary and Alternative Medicine) COP of the sectors various disciplines in the development of standards across all levels of award, including any consideration given to adopting standards and awards made in other jurisdictions. Apart from the resources they can bring, the benefits to the sector of assigning a formal role to CAM professional bodies as collaborators within the qualification system cannot be overstated.

4.1.8.3. It remains to be seen how the QQI will define a 'stable and mature' (scientific and learned) community of practice. The inherent risk of discrimination must be considered.

4.1.8.6. The development of sectoral frameworks is a welcome and innovative suggestion when applied to distinctly identifiable sectors. Generic sub-frameworks would be useful for VECs and other schools such as those that exclusively serve the special needs of blind and deaf learners.

As stated, labels do matter and with the eventual removal of all reference to FET and HET, the incongruities referred to could be naturally resolved.

4.1.8.7. The advantages of subject guidelines as outlined in this section are agreeable.

4.1.8.9. Agree with the views expressed in this section.

4.1.8.12. The views outlined in this section concerning occupational standards v education and training standards are well considered and the highlighted distinctions are helpful.

4.1.8.14. The recognition of the workplace as the 'laboratory' for experiential vocational learning is welcomed. In professions where CPD (continuing professional development) is required, consideration must be given to how this obligation would be verified and by whom.

4.1.8.15. There is real risk of a 'conflict of interests' across all agencies involved in education programme delivery, assessment of learners etc. Such conflicted interests are not always obvious or identifiable and as such, can be difficult to address and resolve.

4.1.8.16. The suggestion that the QQI act as a kind of 'Central Bank' has merit. It could facilitate an automatic and systematic devolution of responsibility to other suitable agents. It would also provide for the establishment of an independent regulator to deal with grievances and appeals.

SUBMISSION BY:

The Heritage Council

*Please note this response appears as received
and has not been proofed/edited by QQI.*

1 Quality and Qualifications Ireland
26/27 Denzille Lane
Dublin 2
13th September 2013

Dear Sir / Madam,

The Heritage Council welcomes the opportunity to respond to Quality and Qualifications Ireland's call for opinions as it commences its work with a comprehensive unifying statutory remit. Firstly, QQI is to be commended for the comprehensive and detailed nature of the consultation documents it has prepared, which, whilst technical, are a clear introduction to, and useful information on, the new mandate of the authority. The consultation day in May was also very helpful in communicating the role of QQI to its stakeholders. It is only to be regretted that the workshop interface was limited (understandably by logistics) to two sessions – they were appreciated as an effective discussion forum.

Council's preoccupations regarding Qualifications relate to several strands of its activities and programmes. At all times and across all areas of heritage, it has promoted good practice in heritage management and conservation. Its statutory remit includes 'raising awareness and appreciation of heritage', a mandate which has involved it in many form of education and training. Through the grant schemes it has run, which demand a high standard and consistency in project evaluation, its staff has built up experience of quality assurance and standards. In addition, Council runs the following

the Museums Standards Accreditation Programme,

the 'Heritage in Schools' education programme, and

a bursary scheme for internships for specialist object and materials conservators.

Through the initiatives of members of staff and its extensive network of Heritage Officers in most local authorities, it provides informal training to raising awareness and appreciation of heritage generally, and building conservation skills in particular

The Architecture Officer is vice-chairman of the Heritage Contractors Registration Board, which establishes a standard for building contractors with experience in building conservation works.

The Planning Officer established an innovative and award-winning training programme, in partnerships with several other institutions, in Landscape Character Assessment.

Staff members regularly lecture in third level institutions.

However, Council is not primarily a training provider, but an advocate for the needs of the sector. It seeks to ensure that modern administrative structures and open and accessible frameworks are in place for state and voluntary sector action to protect and enhance heritage. With this point of view, its response to the QQI consultation process may not directly answer the questions as posed, especially where these 2

appear to be framed in relation to a dialogue with the training providers who may be QQI's principal stakeholders.

Council's views on the issues raised in the consultation process have been formulated principally by its recently-formed Traditional Building Skills Working Group. There is a perception that conservation is only a small sub-sector of the construction industry. However, a report on the *Economic Value of Ireland's Historic Environment*, published by Council in 2010, identified that 17,971 jobs are supported by the built heritage construction sector¹. The downturn has, however, revealed the importance of the Repair Maintenance and Improvement (RMI) component of construction firms' work, which has been recognised by the Construction Industry Federation. The utilisation of the resource of existing buildings, even before consideration of their cultural heritage value, underlines the importance of high-quality repair and maintenance skills for economic and environmental sustainability reasons.

1 http://www.heritagecouncil.ie/fileadmin/user_upload/Publications/Corporate/Economic_Evaluation_of_the_Historic_Environment_Ireland.pdf

2 See for example, the UK NHTG's recent mapping exercise, at

<http://www.nhtgskills.org/uploads/files/Resources/JUNE%202013%20Mapping%20UK%20Traditional%20Building%20Skills.pdf>

The NFQ is important for defining the status of an accredited training course, how it might fit into a learning career, and sometimes demonstrates the employability of a qualification-holder. Craft skill apprenticeships, for example, are assigned level 6 in the NFQ, the EDI Longford Traditional Skills training is at pre-apprentice level 5, whilst the newly launched Applied Conservation Skills Course in WIT is at level 7.

Our stock of historic buildings, especially protected structures (where a statutory duty to ensure that the structure is not endangered is imposed on the owner), will always need to be repaired and maintained. Nonetheless, building conservation, situated in the construction sector, is experiencing skills shortages, as work opportunities evaporated with the economic downturn. There are many components to the problem of meeting the RMI needs of the heritage building stock, one of which is a supply of skilled craftsmen and conservators. Council's approach to the repair and maintenance needs of our built inheritance is based on a conceptual division of the pedagogical agenda as follows:-

(a) Accredited skills training

Ensuring the greater availability of accredited training in building and related conservation skills. Council's role is not as a training provider, but as an advocate for the relevance and economic benefits for investment in skills training. Council is researching the training courses that it is aware of that are currently available² in order to provide a 'map' or overview of the sector. When completed, it will be promoted on Council's website so that it becomes an information resource for those interested in pursuing a career, or continuing learning and development in this sector.

(b) Raising awareness and appreciation

Raising awareness and appreciation of the value of craft skills for our built heritage, and quality of life. This is a function that is central to Council's role, and it has been involved in initiatives in this regard specifically relating to building craft skills through training projects supported in the past by its Education, Community and Outreach grant scheme, and occasional training days it or its affiliates have provided directly. It may become important in the future that low-intensity training initiatives such as these are recognised within the NFQ, and to allow for access and acquisition of skill in the conservation sector, transfer between interlinking educational opportunities, and progression in conservation. The career path from part-time or amateur interest to a more absorbing or professional approach should be facilitated by making an educational process composed of multiple small steps possible. For 3

example, they may become units of a larger educational programme, where credit accumulation is a valid component of an integrated and certified learning programme.

(c) Vernacular skills transmission

Council recognises, and wishes to foster, the concept of community-owned skills transmission, and has put in place a grant programme which includes this as an aim, the REPS 4 Traditional Farm Buildings grant scheme. This advocates effective means for the transmission of vernacular skills in accordance with international Traditional Environmental Knowledge principles, including the concepts in the 1994 ICOMOS 'Nara Document on Authenticity'. There may be no ethically-correct role for the expert or outsider in processes of tradition of skills transmission which is community-owned and regulated; however, the existence of such processes needs to be recognised and celebrated, even if the Heritage Council (and QQI) is excluded by its very nature from this type of learning process. Nonetheless, the State has identified a role and responsibility for such heritage objectives, often intangible, and its relationship with the superstructure of qualification will need to be explored.

High quality craft skills are needed to ensure that our stock of economically-important heritage buildings is maintained and utilised to the benefit of society. Through its conservation Management and Buildings at Risk grants programmes, Council has a wide interface with the sector, and has been made aware of the strengths and weaknesses in crafts skills availability in Ireland. However, the construction sector is experiencing structural change such as:

(a) the proliferation of micro-enterprises, with consequences for the capacity of the industry to self-regenerate through apprenticeships. Alternatives to the apprenticeship model may need to be developed which provide sufficient practical experience, but which rely on new or innovative training provision models, with new types of training bodies, which, in turn, will require validation and quality appraisal.

(b) changes in public procurement policy, which require transparency in specification including the amount and quality of resources like accredited craft skills that being priced for in tendering processes. This may create a greater demand for Recognition of Prior Learning, and 'master craftsman' type qualifications.

(c) the incipient professionalization and regulation of the industry which will result from the forthcoming changes to the Building Control regime, and the establishment of a Register of Builders. This may lead to an increased demand from the building sector generally for courses, programmes, and accreditation.

The continuing availability of accredited training is the headline concern. Each of these issues has an impact on the availability of courses, their content, their accessibility, and, in broad terms, the expectations that the sector may hold for QQI.

In this context, three of the 14 topics are of specific interest to the Heritage Council's Traditional Building Skills Working Group at this time: Awards and Standards (4.1), Recognition of Prior Learning (4.7) and Programme Accreditation (4.13). Reference has been made in passing above to Access, transfer and Progression.

4.1 Awards and Standards

"Longer term changes in policy on standards and awards might make it harder for small education and training providers to operate as independently as they do now" (para 4.1.4). This has implications for the informal 'awareness and appreciation' courses, seminars demonstration days 4

and workshops that are integral to the dissemination of heritage skills at present, and may prevent these from developing into accredited training programmes.

*It would seem that certain regulators have become over reliant on framework awards standards to select for **fitness to practise**. In effect, there is an implicit expectation that QQI can develop and maintain education and training standards that also serve as **occupational standards** for regulatory purposes. Professional recognition bodies who have a role in the approval of programmes may anticipate the possibility of collaborating with QQI in order to reduce the regulatory burden on providers without loss of rigour.* (para 4.1.4, emphasis added). The briefing document later makes a specific exception for apprenticeships from this perception. Many awards, which will be based on occupational competencies, will impact on job eligibility and progression, so employers should be consulted when they are being developed. There is no doubt that the state education providers need to have high and consistent quality and qualification standards. However, an overly bureaucratic and costly processes needs to be avoided when these standards and learning programmes are taken on by private sector specialist providers in industries like built heritage conservation. Unless a simplified system is available, with appropriate agreed standards, the sectors and industry groups will be forced to turn again to qualifications from abroad, including City and Guilds and other awards systems in Northern Ireland and the UK. The emerging level 3 Heritage skill cards and qualifications in the UK are led by sectoral groups, such as the Construction Industry Training Board, English Heritage, Historic Scotland etc. We have to look for, and demand similar opportunity for qualification awards in our jurisdiction. Resource scarcities notwithstanding, it would be encouraging if QQI expressed a pro-active and positive commitment to partnerships with employers, sector advocates such as the Heritage Council, and others, to develop such standards in Ireland.

4.7 Recognition of Prior Learning

Many of the skills that the conservation sector relies on are unaccredited. Recognition of Prior Learning, particularly for those currently involved in the built heritage sector, is most important to enable such people to gain appropriate recognition and certification. The increasing regulation of the construction sector creates a pressure to recognise these, in order to give status to the component sectors, to provide for pay levels commensurate with skill and experience, to establish levels of educational achievement and clarify appropriate next steps in career progression. In this context, appropriate standards criteria, tests and assessments should be made available for sectoral groups to prevent emerging new qualified entrants being given an inappropriate advantage over existing unqualified skills-holders. This will also help to identify skill gaps for necessary up-skilling.

4.13 Programme accreditation

The QQI has outlined a highly professional approach to the Further Education and Training sector. For justifiable reasons, there needs to be a considerable initial investment in curriculum development, a demonstration that the course can be provided sustainably, with protection for learners (the course must be sustainable through the completion of the pedagogical cycle from admission to award, etc.). Whilst this is to be broadly welcomed, it may impede the gestation and creation of new courses, for example, if it requires that a course is run successfully without immediately being able to offer QQI validated accreditation or certification. This militates against the conversion of short-term (day, two-day) courses that are now carried out with the purpose of 'awareness-raising' into more sustainable ones. It would be important to ensure that an organisation such as the Building Limes Forum Ireland, for example, would be facilitated and not hampered in getting accreditation for its educational and training activities, an integral part of its mission.

The consultation document refers to 'The range of practices in programme accreditation' (para 4.13.4), and that QQI may have to have a general umbrella policy on the various ways it will accredit programmes. Again, the current state of, and developmental needs of, the conservation skills sector 5

should be highlighted for QQI, so that these can be taken into account. And a pro-active policy of engaging with partner organisations to facilitate accreditation would be an important signal. For occupational competencies and standards needed in the workplace, work based courses and short blended courses need to have access to accreditation. There is concern that extended hours in class rooms will emerge as the key measurement for accreditation, which would be costly and unnecessary for industry groups. A compulsory time-serving approach is likely to be unproductive for the built heritage conservation skills sector and potentially unnecessarily costly to the state. In summary, Council's key suggestions are:

The professionalisation of education and skills acquisition should not become so bureaucratic that it becomes difficult access learning opportunities.

Within the context of an integrated learning programme, QQI should facilitate the step-by-step accumulation of credits for minor awards, especially for low intensity training currently provided in the heritage sector under the rubric of 'raising awareness and appreciation' that build up to major ones, to facilitate access to accredited qualifications.

Our stock of economically-important and statutorily-protected heritage buildings requires more and better quality craft skills to maintain it. The process of accreditation of training to provide for the particular structural characteristics of the sector and its skills needs should be facilitated by QQI through partnership, pro-active help and positive support.

The Heritage Council is, as stated above, actively interested in this area through its newly-formed Traditional Building Skills Working Group, and I, and my Architecture Officer, Colm Murray, are available to discuss further any of the issues raised above, and to collaborate in relation to any initiatives related to building conservation skills training. Please do not hesitate to contact me if you have any queries in relation to the above.

Yours sincerely
Michael Starrett
Chief Executive

SUBMISSION BY:

Higher Education Authority (HEA)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Response to the 2013 public consultation process of Quality and Qualifications Ireland (QQI)

The Higher Education Authority (HEA) welcomes the opportunity to respond to the Quality and Qualifications Ireland (QQI)'s public consultation process on the organisation's policy and organisational developments, as detailed in the published green papers, white papers and draft strategy statement for 2014–2016. The role of the HEA, as the statutory funding, planning and policy development body for the higher education sector is complementary to that of the QQI, as the statutory authority for quality assurance and qualification recognition. Furthermore, there is a potentially synergistic relationship between the new responsibilities with which the HEA is charged in the *National Strategy for Higher Education to 2030* in respect of the oversight of the sector and the functions assigned to the QQI in the Qualifications and Quality Assurance (Education and Training) Act (2012). Within this context, the 'close and symbiotic relationship' between the HEA and the QQI advocated in the *National Strategy* is imperative if the effectiveness of the State administration of higher education in Ireland is to be maximised.¹

The HEA and the QQI have much in common: both organisations are committed to enhancing the performance and quality of Irish higher education while upholding the principles of academic freedom and institutional autonomy that are enshrined in the State legislation on higher education. Both organisations aim to minimise the bureaucratic burden placed on higher education institutions while ensuring their full accountability to the State; and both are committed to operating in a transparent manner in partnership with institutions and other stakeholders. As Figure 1, 'QQI's Relationships with its Stakeholders', within the 'Green Paper on the Comprehensive Implementation of the Functions of Quality and Qualifications Ireland' illustrates, there is a very high degree of commonality between the stakeholders with whom the HEA and QQI liaises, which include employers and industry representatives, as well as private higher education providers. The HEA endorses the values, identified in the QQI's draft strategy statement, of learner-centredness, independence, professionalism and improvement (incorporating accountability, effectiveness, responsiveness and efficiency), collaboration, and integrity; and shares the QQI's vision of 'high-quality education and training opportunities with qualifications that are widely valued nationally and internationally'. A central role for the QQI as a quality body is providing public assurance about standards while also supporting continuous improvement.

As per the Higher Education Authority Act (1971), the HEA's statutory responsibilities include the allocation of funding provided by the Oireachtas to universities and other designated higher education institutions; furthering the development of higher education;

¹ Department of Education and Skills, *National Strategy for Higher Education to 2030* (Dublin: DES, 2011), 94, http://www.heai.ie/sites/default/files/national_strategy_for_higher_education_2030.pdf.

assisting in the coordination of State investment in the sector; promoting an appreciation of the value of higher education and research; and promoting the attainment of equality of opportunity in higher education. In addition, as per the Universities Act (1997)—and in furtherance of the HEA’s general functions—the organisation’s role encompasses reviewing universities’ strategic development plans, and equality policies. The Institutes of Technology Act (2006) expanded the remit of the HEA to include the institutes of technology and Dublin Institute of Technology, and also added to the list of functions of the HEA ‘promoting the attainment and maintenance of excellence in learning, teaching and research in higher education’

In recognition of the ‘strong central oversight’ role required for the successful delivery of the strategic reform of the sector, the *National Strategy* prescribes a ‘revised remit’ for the HEA which embraces engaging in strategic dialogue with higher education institutions to ensure the alignment of institutional strategies and national priorities, and to agree key performance indicators (KPIs) against which to measure institutional performance.² It also charges the HEA with the introduction of a performance-related element into the allocation of core funding to institutions in order to ‘incentivise good performance’; and with the enhancement of data-collection and analysis to strengthen the evidence-base for higher education policy-making.³ More broadly, as the State agency with responsibility for the development of the sector, the HEA has a key role to play in the implementation of the recommendations of the *National Strategy* in respect of the three interconnected core roles of higher education—teaching and learning, research, and engagement—as well as in relation to the enhancement of internationalisation. The assignment to the HEA of ‘an inter-agency coordinating function in support of the Department’s leadership of the interdepartmental committee’ reflects the breadth of this ‘revised remit’.⁴

There are therefore strong synergies between the separate and distinctive roles of the HEA and QQI. The QQI’s policy advisory role on quality assurance and enhancement, and its responsibilities to determine policies and criteria for access, transfer and progression; to establish a code of practice and education mark for the provision of education to international learners; and to establish and maintain a database providing information on recognised awards will all be supported by the current remit of the HEA, and will in turn support the achievement by the HEA of the objectives set out in the *National Strategy* and in governing legislation. (It will be important to ensure that the QQI’s development of a database of recognised awards does not entail duplication of data-collection by the QQI and HEA.) Accordingly, the *National Strategy* envisages close cooperation between the HEA and QQI ‘in relation to monitoring and evaluation of higher education and in ensuring consistency of standards nationally’, and ‘in developing and implementing policies on access, transfer and progression’.⁵ Acknowledging the separate but complementary roles of the HEA in relation to institutional funding and performance, and of the QQI in quality assurance and qualifications, it recommends that the HEA should take account of the findings of the QQI’s reviews within the process of strategic dialogue. Specifically it suggests that the QQI’s ‘reviews of specific disciplines [...] might inform proposals for re-alignment of

² *Ibid.*, 89–90.

³ *Ibid.*, 91.

⁴ *Ibid.*, 90.

⁵ *Ibid.*, 94.

provision to improve quality'; and that the QQI's 'reviews of the needs of and expectations of external stakeholders [...] might inform both national objectives and considerations related to strategic dialogue'.⁶

Since the publication of the *National Strategy* in January 2011, a number of milestones have been reached in its implementation by the HEA which are of direct relevance to the work of the QQI. The structural reconfiguration of the sector, as detailed in the Minister for Education and Skills' letter of 30th May 2013;⁷ the establishment of a performance evaluation framework for Irish higher education; the initiation of the process of strategic dialogue with higher education institutions; the establishment of the National Forum for the Enhancement of Teaching and Learning; and the piloting of a national employers' survey and of a national students' survey are all advances that relate directly to the QQI's work. The HEA and QQI have worked in partnership in initiating this range of initiatives. In addition, the reform of the transition from second-level to higher education, as outlined in the *Supporting a Better Transition from Second-Level to Higher Education* report (March 2013), will make an important contribution to the enhancement of the first-year undergraduate learning-experience, increasing the focus on learning outcomes.⁸

A key issue that arises in respect of the coordination of the work of the QQI and HEA is how best to ensure that the QQI's institutional and thematic reviews inform and complement the HEA's strategic oversight of the sector, and specifically the process of strategic dialogue. The establishment of a performance evaluation framework for the sector, and the introduction of an element of performance-related funding, provide an opportunity to support quality enhancement that is cognisant of the findings of the QQI's reviews while also advancing the strategic development of the sector. Furthermore, the roles of the QQI and HEA intersect very directly in relation to the crucial issue of the sustainability of higher education provision, and the maintenance and enhancement of quality in an equitable system which is responsive to the diverse learning needs of a wide range of students as well as to the emerging skills needs of employers. As the structural reconfiguration of the Irish higher education system commences, with the concomitant rationalisation of programme provision to enhance effectiveness, reduce fragmentation of provision and improve the quality of the student experience, the importance of ensuring that adequate arrangements are in place for the protection of enrolled learners is paramount.

Cooperation between the QQI and the HEA is imperative in order to ensure that accountability and quality enhancement go hand-in-hand, and in particular that enhanced performance evaluation, and the introduction of performance-related funding, does not discourage the openness, self-appraisal, and self-disclosure of difficulties on the part of institutions which is vital to effective quality assurance processes. In respect of quality assurance in higher education, the HEA is supportive of a risk-based approach to compliance, both by the QQI and by higher education institutions, which recognises that

⁶ *Ibid.*, 94

⁷ See <http://www.education.ie/en/Publications/Policy-Reports/HEA-Report-to-the-Minister-for-Education-and-Skills-on-Irish-higher-education-Response-Letter-.pdf>

⁸ See DES, HEA, *et al*, *Supporting a Better Transition from Second-Level to Higher Education: Key Directions and Next Steps* (March 2013), <http://www.education.ie/en/Publications/Policy-Reports/Supporting-A-Better-Transition-From-Second-Level-To-Higher-Education-.pdf>.

different types of programme provision should be monitored with a range of quality assurance mechanisms. There should be greater emphasis on quality *assurance* for new providers and on quality *enhancement* for established providers.

The HEA welcomes the QQI's stated intention to prioritise the needs of learners in the organisation's policies and actions and in its relations with stakeholders, and we recommend that, in the adoption of a learner-centred approach to quality assurance, the QQI should be mindful of the potential impact on learner-fees of the fees charged to institutions by the organisation. In respect of enhancing the student-learning experience, the HEA recognises that the evaluation of teaching quality poses a particular challenge which the further development of the National Framework of Qualifications (NFQ) and the development of subject guidelines can help to address. In addition, the development of a quality framework for Ph.D. education would assist in supporting and evaluating institutions' graduate education and research performance. The academically led National Forum for the Enhancement of Teaching and Learning provides a valuable resource for addressing these challenges.

Ensuring equity of access to higher education is another important area in which the roles of the HEA and the QQI intersect. Recent feedback from the Advisory Group of the HEA's National Office for Equity of Access to Higher Education on the QQI's green papers indicates that higher education institutions, as well as other educational partners, would welcome further clarification on the distinct and complementary roles of the QQI and the HEA in this space—particularly in respect of the requirements of both agencies for access policies from higher education institutions. The HEA's national access plan sets system-level targets against which progress in ensuring equity of access to higher education for under-represented groups is measured; and the HEA reviews and supports the implementation of a diverse range of institutional access plans, rooted in and appropriate to the distinctive missions of a range of diverse institutions, which play an important role in the delivery of these key system-level objectives. The HEA's national access plan provides a platform for coordinating the work of all stakeholders concerned with improving access to higher education. A new plan is being developed for 2014 onwards and this presents an opportunity to co-ordinate the complementary roles of the HEA and QQI in this area.

The development of the NFQ, with which the QQI is charged, has great potential to enhance access, transfer and progression across Irish further and higher education, as well as to underpin the enhancement of the student-learning experience by increasing the focus on learning outcomes. The growing importance of minor, supplemental and special purpose awards in facilitating Continuing Professional Development (CPD) and lifelong learning—especially within labour-market activation programmes such as Springboard—should be recognised and supported within the context of the move towards broadening entry to full-time undergraduate programmes. The HEA also welcomes the QQI's call for the development, in consultation with all stakeholders, of a national strategy on the recognition of prior learning (RPL).⁹ Feedback from the National Access Office Advisory Group suggests that a more holistic integration of RPL policy into an overall strategy for access, transfer, progression should be considered. It is also recommended that the experience and

⁹ See <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2012:398:0001:0005:EN:PDF>.

perspective of learners on what works best should closely inform a future strategy for RPL and access, transfer and progression (ATP). While higher education institutions' different stages of development in respect of RPL and ATP policies should be borne in mind within the context of the reconfiguration of the higher education landscape, the provision of information on ATP policies to learners should be a prerequisite for the validation of all new and continuing programmes.

The amalgamation of the four legacy bodies into the QQI provides a timely opportunity to strengthen the interface between further and higher education in Ireland in order to promote a coherent, whole-of-education approach to programme provision. The HEA recommends that a national further education qualification should be developed as an immediate priority in order to support the transition between second-level and higher education, and ameliorate the fragmentation of provision that is currently a feature of the further education landscape. Such a qualification would serve to ensure that students develop the key generic skills that are essential for more advanced study, as well as for success in the workplace and for active citizenship.

As well as supporting the internationalisation of higher education institutions through the process of strategic dialogue, the HEA plays a direct role in advancing the internationalisation of Irish higher education through a range of activities. The HEA is the national agency for the European Commission's Erasmus+ programme, the national coordinator for the Brazilian 'Science Without Borders' initiative, and the administrator of the Government of Ireland's International Scholarships.¹⁰ The HEA strongly welcomes the plans to establish a code of practice for the provision of education to international learners and an international education mark (IEM)—developments which will play an important role in the enhancement of the internationalisation of Irish higher education, particularly if the usage of the IEM in promoting off-shore provision is enabled. In addition, stronger alignment of the 10-level NFQ with the 8-level European Qualifications Framework (EQF) would greatly enhance the international recognition of Irish qualifications, which is identified as a priority in the QQI's draft strategy statement.

The HEA welcomes the QQI's aim, detailed in the draft strategy statement, to 'promote coherence of the education and training system in collaboration with stakeholders' through 'joined-up approaches to quality and qualifications and to related policy initiatives'. An early priority will be to work towards the development of a memorandum of understanding between QQI and HEA. This will serve to underpin our continued close cooperation as we promote a coherent system of diverse higher education institutions with distinct missions which are internationally renowned for their quality.

¹⁰ See <http://www.eurireland.ie/>.

SUBMISSION BY:

Higher Education Colleges Association (HECA)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

HIGHER EDUCATION COLLEGES ASSOCIATION (HECA)

RESPONSE TO

QQI GREEN PAPER No. 4.1 – AWARDS AND STANDARDS

Question: *Do you have any thoughts, comments or concerns raised by the issues outlined in this paper?*

Comments:

4.1.1: Introduction: HECA is keen to ensure that the agreed policy for the making of awards, and determination of standards, is applied equally across the entire higher education sectors, i.e. Universities, other designated awarding bodies and private higher education providers. HECA would presume that this would also apply to any agreed or recognised subject guidelines or benchmarks (4.1.8).

4.1.4: Anticipated Stakeholder Expectations: HECA welcomes the fact that QQI is aware that some HECA private providers will be interested in securing delegated authority to make awards and looks forward to receiving relevant guidelines as they become available.

4.1.5: Continuity Arrangements: HECA presumes that this does not indicate a termination of joint award arrangements and awaits policy development which will allow joint award arrangements to continue into the future. HECA trusts that when reinstated, QQI will be mindful of providers' proven competence and maturity in implementing joint award arrangements.

4.1.6: Rationale: HECA is aware of the current difficulties posed by having two Level 6 awards, one FET and the other HET, and trusts that this anomaly will be resolved as identified under the review of the National Framework of Qualifications.

4.1.8: Indicative Policy Development Agenda and Approach: HECA would welcome clarification as to what is intended to be facilitated under "non-framework certification" as mentioned in **Paragraph 4.1.8.9, Page 11.**

4.1.8.11 – Engaging Employers on Skills Needs, HECA is glad to see QQI endorsing the need to ensure employers' requirements and views are expressed in award standards which is a concept already embraced by HECA members.

4.1.8.15: Awards Policy: HECA believes that dominant control of the summative assessment process has of itself inherent risks irrespective of whether or not a provider is large or small. The integrity of the summative assessment process must be linked to sound academic governance and robust academic regulations regardless of provider size.

4.1.8.16 QQI as Awarding Body: HECA would also like to draw attention to Paragraph 3, Page 16 where it states "*Changes in awards policy might require that smaller providers would need to become linked or quasi-linked providers to retain access to QQI awards*". Concern has been expressed as to the possible impact of such a development and HECA would welcome further consultation on this should this course of action proceed.

4.1.8.19 Delegating Authority: HECA looks forward to progress on the publication of the criteria to be fulfilled, and procedures to be followed, by providers seeking delegation of authority.

RESPONSE TO
QQI GREEN PAPER No. 4.3 – RECOGNITION OF QUALIFICATIONS
WITHIN THE NATIONAL FRAMEWORK OF QUALIFICATIONS

General Comment:

HECA members found this particular Green Paper extremely difficult to fully comprehend given the conflicting terminology used throughout. For example, the term “alignment within” was used in some instances and “recognition within” used in others. However, given the constraints of such lack of understanding, HECA has endeavoured to formulate a response as follows:

Issues for Consideration:

Issue 1: *Should QQI establish new policies and criteria for recognition of each of Groups A, B, C and D (as defined by the NQAI)?*

Response: HECA does not consider it necessary to establish new policies and criteria for those providers in Group A. However, it does consider it necessary to establish new policies and criteria for Groups B, C and D

Issue 2: *Should there be “degrees of recognition” within the NFQ?*

Response: HECA has serious concerns that “degrees of recognition” could devalue recognition. Quality Assurance and Programme Provision for education and training awarding bodies based in other jurisdictions but where provision and related qualifications are available in Ireland (Group C) are not subject to the same rigour as national providers which is why HECA believes that Groups C and D in particular will require new policies and criteria as mentioned in response to Issue 1. All providers recognised within the Framework should have to meet the same standards and criteria and if the consequence of that means that new policies and procedures have to be implemented, then so be it.

Issue 3: *How can the integrity of the NFQ be maintained where different routes to the NFQ are subject to radically different quality assurance arrangements?*

Response: The integrity of the NFQ cannot be maintained if different arrangements are in place, see response to Issue 2.

Issue 4: *In order for awards to be aligned with the Irish NFQ, how should programmes leading to these awards in Ireland be quality assured?*

Response: QQI will have to implement quality assurance of awards and programmes for all providers seeking recognition on the Framework irrespective of whether or not

they are Irish providers or are based in other jurisdictions. As stated on Page 2 of the Green Paper

“The 2012 Act applies the term “recognition within the framework” to awards and it is this usage that concerns this paper. In the past, the terms “inclusion of awards in the framework” and “alignment of awards with the framework” were used to express kinds of recognition within the NFQ”.

Given that statement from the 2012 Act, it is somewhat surprising to see reference to “alignment” in Issue 4 which appears to be at odds with QQI’s stated approach to abandon the concept of alignment. Clarification will be required relating to the terminology used.

Issue 5: *Should the recognition of awards within the NFQ be processed under QQI policy and procedures for programme validation?*

Response: Yes, definitely.

Issue 6: *Do the following principles indicate some of the issues that need to be considered before an award is recognised?*

Response: Yes, all the principles listed need to be considered before an award is recognised.

RESPONSE TO

QQI GREEN PAPER No. 4.4 – INTERNATIONAL EDUCATION MARK

Issue 1: *Should there be a single or multiple versions of the IEM?*

Response: (a) One version

Section 61 (1) of the Qualifications and Quality Assurance (Education and Training) Act 2012 clearly states that “The Authority shall specify an international education mark (in this Act referred to as the “international education mark”) to indicate that a provider is in compliance with the code of practice. Throughout Section 61 the international mark is consistently referred to in the singular and in no subsection of Section 61 does the Act envisage or authorise the Authority to specify multiple international education marks. HECA’s legal advice is that there can only be one IEM.

A quality mark should be an indicator of quality irrespective of what educational product is being delivered, Higher, Further or English Language. It was felt that more than one version would lead to fragmentation and could, ultimately, compromise the “mark”. Multiple versions could lead to just that, versions for every type of educational provision which would negate the value of the mark. Having to explain different versions would inevitably lead to a hierarchy being established within the “mark” which would be counter productive. Either the mark stands for something irrespective of the educational offering or it doesn’t.

Issue 2: *When should the IEM be made available?*

Response: Option C - Relevant providers reviewed under new QQI policies, and that have had their compliance with the Code assessed by QQI, should be authorised to use the IEM pending a satisfactory outcome of such review and assessment.

This was regarded as the best option on condition that providers currently meeting the existing Interim Criteria for Permission to use the “Education in Ireland” National Brand operated by Enterprise Ireland would be entitled to use the IEM, and that the transition to review under new QQI policies took place on a gradual basis over a three year period, so that providers would have a three year timeframe within which to comply with the new QQI policies.

Issue 3: *What areas should be included in the Code of Practice?*

Should all providers, including public providers, authorised to use the IEM be required to establish arrangements for the protection of enrolled learners under Section 65 of the 2012 Act?

Response: Yes

Are the suggested areas set out in the Green Paper for inclusion in the Code appropriate?

Response: Yes, subject to “Agents” being confined to control of information supplied by agents in respect of institutions.

Are there other areas that should be included in the Code?

Response: Yes, two additional areas should be included in the Code, they are Fee Refunds and Appeal Mechanisms

Issue 4: *What level of prescription and detail should be included in the Code of Practice?*

Response: (b). The Code should be based on a combination of high level principles and detailed criteria

Issue 5: *How should QQI carry out a review of compliance with the Code?*

Response: (b) A review of compliance with the Code should be integrated with other statutory reviews provided by QQI e.g. review of effectiveness of provider's quality assurance procedures

Issue 6: *In which countries should the Code be applicable?*

(a) Given the restricted interpretation of an international student in the 2012 Act, should providers be restricted from using the Code and the IEM in promoting their off-shore provision?

Response: No

(b) Should review of compliance with the Code extend to the off-shore provision of relevant providers?

Response: Yes. To prevent providers from using the Code in promoting their off-shore provision would be out of step with the present day development of on-line, off site modes of learning.

FURTHER COMMENTS:

While appreciating the finding of "Investing in Global Relationships", serious concern was expressed by the statement contained in Paragraph 4.4.7.1. which states:

"Visas will not be issued for study in institutions that do not have the IEM, nor will students attending such institutions from non-visa required countries outside the EEA be allowed permission to remain to study for courses of longer than three months' duration. Access to work will be limited to students attending institutions that hold the IEM. Only institutions that hold the IEM will be allowed to participate in national branding arrangements and in work with State bodies in the area of international education"

Not all HECA members will apply for or require the IEM; nonetheless, some may have a small number of non-EU students. The intention of the international strategy is to ensure that colleges who are recruiting non-EU students meet the IEM criteria, a policy which is to be welcomed. However, there are certain niche colleges that may be unintentionally disadvantaged due to the rigid application of the policy as stated above which could result in a bona fide student being penalised and unable to complete a programme of study.

RESPONSE TO

QQI GREEN PAPER No. 4.5 – ACCESS, TRANSFER & PROGRESSION

Issues for consideration:

Issue 1: Currency of the 2003 Policy and Criteria issued by NQAI

Q.4.5.A: *How do the 2003 policies and criteria need to be modified, if at all, for use in an interim period?*

Response: HECA believes that the 2003 policies and criteria continue to be adequate for use in the interim period. However, there are still areas addressed in NQAI documentation that are still not fully implemented and that continue to be important areas for development, e.g. transfer and progression routes; information provision, Lack of consistency in credit measurement with particular reference to FET and HET Level 6 is also a cause of difficulty and concern.

The NQAI document, “Policies, Actions and Procedures for Access, Transfer and Progression for Learners, 2003”, needs to be updated to reflect the changes that have occurred since 2003, e.g. the legislation quoted requires updating. Information on the NQF is also required.

Issue 2: The shifting landscape of publicly funded FET and HET

Q.4.5.B: *What timeline and approaches should QQI adopt for the development of new statutory policies and criteria for ATP?*

Response: As stated above, HECA believes that the 2003 policies and criteria continue to be adequate in the interim period but urges that all providers be consulted in any new policy development; transparency relating to any changes is considered to be critical.

Given the constraints identified, the process should be staggered to allow for ongoing emphasis on issues relating to ATP. Final statutory implementation of the “significant overhaul” should be delayed to ensure that all providers are consulted and that their input receives serious consideration.

Issue 3: ATP and employment

Q.4.5.C: *Should QQI develop new policies on progression from formal education and training into employment even in advance of a comprehensive review of the 2003 policies and criteria? Are there other areas not addressed by the 2003 policies and criteria that merit such priority consideration?*

Response: There were very divergent views among HECA members on exactly what this question sought to answer. Further clarity would be required before a considered response could be formulated.

RESPONSE TO

QQI GREEN PAPER No. 4.6 - PROVISION OF INFORMATION FOR LEARNERS

In endeavouring to comment on this paper, considerable difficulty was encountered in attempting to identify who is understood to be the provider. Is it a QQI provider, a non-QQI provider, or a QQI provider and a non-QQI provider? In the absence of resolving that dilemma, and the consequent limitations imposed by such difficulties of interpretation, HECA assumed the reference to providers to mean all providers and, on that basis, the following are HECA's observations:

Option 4.6.5.1: *QQI prioritises the monitoring of accurate information provision across all providers and dedicates a resource to this activity.*

This Option was considered to be the best Option of those presented. It was agreed that while QQI primarily has a duty of care to the learner, QQI should also have a duty of care towards its providers and should seek, in so far as possible, to protect them from unaccredited/unregulated competitors, some of whose activities adversely affect QQI providers.

Option 4.6.5.2: *QQI incorporates a condition into its engagement with other awarding bodies that have/wish to have awards recognised in the NFQ to police the information provision of their providers.*

This Option was only considered to be workable and reliable depending on the application of sanctions. It was agreed that if this Option were agreed, it would require very careful and time consuming policing by QQI and the awarding body with whom the provider had the relationship. If an awarding body is responsible for policing its own providers such an exercise would have to be conducted within a strict set of parameters and, should it fail to undertake its task, then its relationship with QQI should be terminated and appropriate publicity afforded to that.

Option 4.6.5.3: *QQI relies on the providers that it has a relationship with to assist it in policing the information provision of other providers.*

This Option was thought to warrant serious consideration for a number of reasons the most telling of which was that QQI providers would be motivated to police its own sector. This policing is already being carried out in a rather informal way and this Option would formalise such policing and make existing practice more professional, robust and accountable.

It was felt that the possibility of negative relationships between providers was not relevant. Providers would have an identifiable route to reporting issues regarding

information provision which they felt was misleading or incorrect and such information would then be the subject of an investigation by QQI.

Concern was expressed about the possibility of legal action because once a formal process was in place the QQI complainant could expect to have its identity revealed to the non-QQI provider.

Option 4.6.5.4: *QQI concentrates on meeting its legislative responsibility to develop a register of programmes and awards and a database of providers as a means of communicating reliable information.*

It was felt that this was a basic QQI function and not one that should necessitate QQI being less proactive in other fundamental areas of QQI responsibility.

It is hard to see why non-QQI providers should feel discriminated against by exclusion from what would essentially be a QQI register. There is a feeling that Qualifax is not widely used and so some other form of communication would have to be implemented in order to enable learners to receive information in a readily accessible manner.

Option 4.6.5.5: *QQI extends the content of its register of programmes and awards and database of providers to include any provider that fulfils its legislative responsibility for information provision.*

It is unlikely that this Option would be workable and, even if implemented, it would not be robust enough. There would also be the potential for serious confusion if providers included in and excluded from the NFQ were named in the same information source which could work to the detriment of QQI providers. The serious problems encountered in the Internationalisation Register would offer proof of this.

Option 4.6.5.6: *QQI develops a protocol for dealing with providers who do not provide accurate information to learners.*

This Option was seen as essential in addition to elements from other Options mentioned above. QQI should be the gatekeeper where accurate information is concerned and it is suggested that a simple pro forma template should be constructed, (see attached draft template), which all providers, QQI and non-QQI providers, would have to complete and have readily accessible on their websites. It was also felt that whatever protocol was adopted, there should be some protection offered to the complainant, . It was also suggested that QQI should get legal advice on whether or not it has an obligation to monitor non-QQI providers.

Additional Comments:

Concern was expressed at the statement on Page 3, Second Paragraph,

“The provision of education and training is not a licensed or regulated activity in Ireland”.

The question was posed, what entity in the State is ultimately responsible for this area?

Concern was also voiced about constant references to some services being non-revenue generating. It was felt QQI’s remit was to ensure quality and award qualifications and in doing so it was inevitable that not all activities could be expected to generate revenue; nonetheless, some non-revenue generating activities should be seen as an integral part of QQI’s function the cost for which should not be borne by QQI providers.

Furthermore, there was concern raised about a lack of understanding among some relevant QQI providers about what being “aligned” or “mapped” to the Framework means in the context of programmes validated by other awarding bodies such as ITEC. Green Paper 4.3 does not provide any such clarification; these terms require clarification as a matter of priority.

RESPONSE TO

QQI GREEN PAPER No. 4.7 - RECOGNITION OF PRIOR LEARNING

Issues for consideration:

Issue 1: RPL and ATP

Q4.7.5.a: *Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative?*

There is a need for a separate and comprehensive policy in the area of RPL. As identified in the Green Paper, RPL is a complex area which encompasses a wide variety of ATP issues and applies to a diverse range of learners. This complexity warrants separate policy development and documentation to assist both providers and learners. ATP policy development will be informed by the implementation of a robust RPL policy. Clarity is needed, and a separate policy would enable greater depth of discussion and provide users of this policy with detailed information on the scope of RPL in ATP. The extent of documentation already available on RPL, (as listed in the Green paper), demonstrates the need for a separate RPL policy.

Issue 2: National strategy on RPL

Q4.7.5.b: *Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated?*

No. RPL is an imperative for education providers in the immediate term. Learners seeking access, transfer and progression are becoming more diverse. It is typical in the current market for applicants to HET or FET to have some prior learning, whether that is formal, informal, or non-formal. Providers need to act now. The development of such policy will inform future national RPL strategy. Extensive research has been completed on RPL in education, (indeed some research has already been conducted into the area of RPL within provider organisations). Action is now needed and this in turn will promote further policy development in other areas.

Issue 3: Direct application to QQI for awards

Q4.7.5.c: *Should QQI develop a procedure of direct application for awards? How else might it fulfil its obligations under the 2012 Act?*

Yes, the procedure for direct application for awards should be re-examined and developed in the context of cooperation with existing providers. Input should be sought from providers with relevant expertise as the Green Paper correctly identifies the need for subject knowledge. While it is a costly process, a process is required. The costs associated with this process should be applicant funded and should reflect the total costs of the assessment. In the interests of equity as between different

applicants, there should be some attempt to standardise the fees payable by applicants for this service. At least an indication of the range of fees applicable should be provided.

Issue 4: RPL for access to FETAC awards

Q4.7.5.d: *Should QQI reopen the process of agreeing RPL procedures with providers of FETAC awards?*

Yes, this process should be reopened as significant numbers of learners will be disadvantaged without the availability of RPL across FET providers. This process should be subject to a number of conditions as follows:

- Recognise the breadth of FET provision and appreciate that this process will take considerable time
- Commence a roll out of RPL among FET providers, initially authorising larger FET providers with established QA procedures and experience in RPL
- Utilise the experience of these established FET providers to extend the provision of RPL to other FET providers

Issue 5: Data on RPL

4.7.5.e: *What measures can or should be taken to improve the collection of information on RPL activities by Irish providers and awarding bodies?*

There is a need to establish a template for all providers to record RPL practices. This information should be submitted and collated on an annual basis. Such a practice would allow QQI to develop a clear picture of RPL activities nationally, thus satisfying the European Council Recommendation on RPL. This could be developed through a consultative process with providers who currently have RPL procedures in place. Requests for submission of any RPL procedures already approved within providers QA policy would allow for an examination of existing RPL activities and identification of best practice/leadership in this area.

Such a template would likely encompass the following information on all RPL applications successfully processed by a provider:

- ECTS completed
- NQF/EQF levels
- Nature of prior learning (APCL/APEL)
- NARIC/Validating bodies

Providers could also establish practices for capturing RPL data such as:

- RPL applied for (i.e. what programme, what stage, what modules)?
- RPL result, (was RPL application approved by the Institution, establish reason codes for non-approval)
- Data on subsequent progression of successful RPL applicants, (exam results/progression rates, etc.). This would be particularly important for those given advanced entry.

Consideration could also be given to capturing the RPL effort/cost to providers and measuring effort by RPL applicants. This could include measurement of the time involved in typical RPL processes.

A final area which could be developed involved monitoring those RPL enquiries that don't result in an application being processed, for example:

- Number of RPL enquiries
- Number of RPL enquiries resulting in RPL application
- Reason codes for those not resulting in application (e.g. provider judged applicant would not be eligible, applicant decided to undertake the stage/module, applicant decided not to pursue due to effort involved/cost, etc.)

Issue 6: RPL and Credit

4.7.5.f: *How urgent is the reconciliation of national approaches to credit in FET HET to the realisation of objectives for RPL?*

This is a primary concern which must be addressed as soon as possible. Currently evaluations happen on a course by course basis. However, it is understood that this is a challenge not only nationally but internationally. The Tuning project (supported by the European Commission) “ECTS and ECVET, Comparisons and Contrasts” (2010), highlighted the difficulties in translating, (and, therefore, transferring), between the two credit systems.

Consistency in the FET domain in relation to credit is needed. In particular, the standards of different qualifications which are placed at the same level on the NQF should be consistent. This would include learner effort, contact time, etc. Once this is established nationally, an equivalency table could be developed which would allow for a clear translation from FET to HET credits, (with particular reference to Level 6). Reconciling approaches to credit will provide a clear platform for the development of further RPL procedures. This reconciliation would also bring positive benefits to providers and learners alike as it would offer clarity and facilitate ease of understanding of RPL and ATP issues.

QQI GREEN PAPER No. 4.7 - RECOGNITION OF PRIOR LEARNING

Issues for consideration:

Issue 1: RPL and ATP

Q4.7.5.a: *Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative?*

There is a need for a separate and comprehensive policy in the area of RPL. As identified in the Green Paper, RPL is a complex area which encompasses a wide variety of ATP issues and applies to a diverse range of learners. This complexity warrants separate policy development and documentation to assist both providers and learners. ATP policy development will be informed by the implementation of a robust RPL policy. Clarity is needed, and a separate policy would enable greater depth of discussion and provide users of this policy with detailed information on the scope of RPL in ATP. The extent of documentation already available on RPL, (as listed in the Green paper), demonstrates the need for a separate RPL policy.

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Q4.7.5.b: *Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated?*

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applicants, there should be some attempt to standardise the fees payable by applicants for this service. At least an indication of the range of fees applicable should be provided.

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- Recognise the breadth of FET provision and appreciate that this process will take considerable time
- Commence a roll out of RPL among FET providers, initially authorising larger FET providers with established QA procedures and experience in RPL
- Utilise the experience of these established FET providers to extend the provision of RPL to other FET providers

Issue 5: Data on RPL

4.7.5.e: *What measures can or should be taken to improve the collection of information on RPL activities by Irish providers and awarding bodies?*

There is a need to establish a template for all providers to record RPL practices. This information should be submitted and collated on an annual basis. Such a practice would allow QQI to develop a clear picture of RPL activities nationally, thus satisfying the European Council Recommendation on RPL. This could be developed through a consultative process with providers who currently have RPL procedures in place. Requests for submission of any RPL procedures already approved within providers QA policy would allow for an examination of existing RPL activities and identification of best practice/leadership in this area.

Such a template would likely encompass the following information on all RPL applications successfully processed by a provider:

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Providers could also establish practices for capturing RPL data such as:

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Consideration could also be given to capturing the RPF effort/cost to providers and measuring effort by RPL applicants. This could include measurement of the time involved in typical RPL processes.

A final area which could be developed involved monitoring those RPL enquiries that don't result in an application being processed, for example:

- Number of RPL enquiries
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Issue 6: RPL and Credit

4.7.5.f: How urgent is the reconciliation of national approaches to credit in FET HET to the realisation of objectives for RPL?

This is a primary concern which must be addressed as soon as possible. Currently evaluations happen on a course by course basis. However, it is understood that this is a challenge not only nationally but internationally. The Tuning project (supported by the European Commission) "ECTS and ECVET, Comparisons and Contrasts" (2010), highlighted the difficulties in translating, (and, therefore, transferring), between the two credit systems.

Consistency in the FET domain in relation to credit is needed. In particular, the standards of different qualifications which are placed at the same level on the NQF should be consistent. This would include learner effort, contact time, etc. Once this is established nationally, an equivalency table could be developed which would allow for a clear translation from FET to HET credits, (with particular reference to Level 6). Reconciling approaches to credit will provide a clear platform for the development of further RPL procedures. This reconciliation would also bring positive benefits to providers and learners alike as it would offer clarity and facilitate ease of understanding of RPL and ATP issues.

RESPONSE TO
QQI GREEN PAPER No. 4.8 – MONITORING AND DIALOGUE

Given that QQI is undertaking a comprehensive review of the legacy higher education institutional and quality assurance review models referred to as the “Reviews of Reviews”, HECA believes that a response to a paper on Monitoring and Dialogue would perhaps be more relevant and productive once the QQI’s Review of Reviews has been published.. However, notwithstanding that, HECA has considered the Green Paper and its response is as follows:

Q4.8.5.A *Are there other options that have not been considered in this Green Paper?*

Response: Below are comments on the various options:

Option 1. Using key indicators and metrics to underpin monitoring and dialogue activities

Although ESG and EQAVET were mentioned, it wasn’t explicitly clear if international best practice had been considered when formulating Option 1.

Whilst agreeing that is essential to have established minimum standards, it is equally important that they should not be overly prescriptive. A concern was also expressed about how metrics would be evaluated given the inevitable variation between sectors.

Option 2. Undertaking audits of the effectiveness of quality assurance of the provider

This was not regarded as an attractive option, particularly as no aspect of quality enhancement appeared to be involved.

Option 3. Devolving audit of the effectiveness of quality assurance of the provider

Devolution of audit would be welcomed but external accountability would still be required but through other mechanisms such as reviews.

Option 4. Employing review type approaches for monitoring and dialogue

Concern that this option could lead to multiple reviews which would be highly disruptive to programme delivery. However, this option would be welcomed if integrated with other reviews.

Option 5. Carrying out monitoring and dialogue activities on the basis of risk and proportionality

The option was not considered as it would depend on the risk and proportionality approach QQI decide to take which has not yet been determined.

Option 6. Using QQI’s legislative capacity to conduct quality reviews as a monitoring and dialogue tool

This option has elements that are attractive as it is more focussed on quality enhancement than audit but it is difficult to see how it could be implemented. One suggestion is that QQI should issue an annual report summarising observed good practice among providers which would aid quality enhancement. Such a report could also highlight perceived deficiencies.

Option 7. Combinations of the above approaches to monitoring and dialogue

This was seen as the most productive option given the very wide ranging and diverse nature of higher education providers. It would also provide scope for quality enhancement rather than focussing solely on auditing.

Q.4.8.5.B *Are there advantages and disadvantages that have not been identified for the options described?*

Response: See response to Q.4.8.5.A

Q4.8.5.C *Do you have any preferences among the option?*

Response: Option 7 incorporating a devolved approach, a focus on quality enhancement, a focus on review rather than audit, and clearly articulated and transparent standards and guidelines.

Q4.8.5.D *Do you have any comments on the issues raised in the Green Paper?*

Response: Reading through this Green Paper, QQI's own perspective on monitoring and dialogue wasn't readily apparent. However, this will, no doubt, become clearer once the Review of Reviews has been completed.

RESPONSE TO

QQI GREEN PAPER No. 4.9 – REVIEWS

Given that QQI is currently undertaking a comprehensive review of the legacy higher education institutional and quality assurance review models, (Review of Reviews), HECA suggests that a response to this paper on Reviews will be more relevant and productive once QQI's Review of Reviews has been published. However, notwithstanding that, HECA has considered the Green Paper and its response is as follows:

Q.4.9.A. *Are there other approaches to institutional review that have not been considered in this Green Paper?*

Response: Broad consideration to a variety of different approaches appears to have been considered.

Q.4.9.B. *Does the institutional review approach as discussed in this paper meet the needs of sectors outside of higher education and training, or should further consideration be given to developing significantly different approaches to reviews outside of high education and training?*

Response: Not in a position to comment.

Q4.9.C *Should QQI encourage, where possible, the practice of incorporating other reviews provided for in the legislation (IEM, DA, ATP) into institution review?*

Response: Very definitely yes. There should be no separate reviews relating to the IEM, DA or ATP.

Q4.9.D. *Do you have any preferences among the options set out?*

Response:

Option 1: A single Institutional Review model building on existing practice rolled out as providers mature

Discussion took place on the concept of being “review ready” and surprise was expressed that a provider might not be “review ready”. If a provider is not “review ready” is it not, therefore, at risk? Accreditation requires review; providers, therefore, should all be “review ready” when review cycles fall due. The current system does work but could be enhanced by opting for a more tailor-made approach

where appropriate bearing in mind the scale and scope of individual providers though always ensuring that the core principles of review are applied to all.

Option 2: A single Broad Generic Review Model not aligned to any particular current approach.

Difficulty in determining exactly what is envisaged in this model.

Option 3: Several Different Review Models

A single review model is definitely preferable to several different review models. However, a single review model must take cognisance of the great diversity of programme offerings from small, niche providers to large multiple programme providers.

Q4.9.E. *Are there advantages and disadvantages that have not been identified for each option identified in this Green Paper?*

Response: This question has been addressed in comments made above on the three Options.

Q4.9.F. *Do you have any other comments on the issues raised in the Green Paper?*

Response: The Option Profiles were confusing and somewhat unhelpful. It was not clear what precise information they were intended to convey. Irrespective of what Option, or combination of Options, QQI finally decides upon, it is critical that a “Core Review” is common to all providers.

HECA would also ask QQI to produce an Annual Report commenting on best practice observed among its providers so that quality enhancement could be facilitated by sharing that information.

QQI GREEN PAPER No. 4.10 - QUALITY ASSURANCE GUIDELINES

In the preamble to HECA’s response to Green Paper No. 4.3 – Recognition of Qualifications with the NFQ, it stated that there appeared to be considerable confusion and lack of clarity in the terminology used which made it difficult to submit a coherent and meaningful response. The same difficulties were encountered in this paper. However, within that constraint, HECA members’ response is detailed below. HECA is also of the view that the guidelines and procedures currently operated by HETAC with regard to Quality Assurance are, and continue to be, robust and fit for purpose.

QA Guidelines – Issues for Consideration:

Issue 1: The Nature and Purpose of QA Guidelines

Q.4.10.A *Is anything missing from this list?*

Response: We suggest “to ensure transparency” should be included in the list. Also suggest that the list includes what QQI itself considers the role of the QA guidelines to be:

“QQI considers that the role of the QA guidelines is, inter alia, to enable and/or facilitate all providers to establish and improve their own QA procedures and systems”.

Q.4.10.B *Is there anything that shouldn't be on this list?*

Response: Addressing each item in turn:

“To communicate the overall expectations that the wider society has of the education and training system (or sub-systems)”

This may be too ambitious. Wider society certainly has legitimate expectations that could be explicitly addressed somewhere in the Guidelines. However, the section on “The Nature and Purpose of QA Guidelines” may not be the correct place to do it. The term “QA Guidelines”, quite rightly, conveys different things to the layperson and to the professional and the needs of both sets of stakeholders should be separately addressed.

“To promote coherence in the system (or sub-systems) of the education and training”

This is a worthy ambition, but is it achievable in a document setting out QA Guidelines?

“To bring about efficiencies of scale by articulating a common model(s) for use by providers”

It is felt that there is no need to include this. “Outcomes” are different from “purposes” and whilst it would be beneficial if a desired outcome materialised, it should not be stated as a “purpose”.

“To provide guidance and support to providers in the development of their programmes and provision”.

This is certainly desirable and is also consistent with how QQI perceives its own role – see Para 4.10.2.4

“To provide benchmarks for reviews of effectiveness of providers' QA procedures”

The concept of benchmarks is not particularly useful suggesting minimum standards; the focus should be on quality enhancement.

“To furnish threshold criteria for providers to access QQI accreditation and to engage in other evaluative processes such as for the IEM”

To respond to this in any meaningful way, further clarification would be required on exactly what is envisaged in the use of the term “threshold criteria”.

To prescribe detailed templates for the international operational procedures for the governance, teaching, learning, assessment and learner support”

No. This is regarded as too prescriptive

Q.4.10.C *How can QA Guidelines remain a stable and effective basis for providers' QA procedures while reflecting the evolution of the education and training landscape and QA practices?*

Response: This can be achieved by inculcating a culture of continuous quality enhancement and by disclosing, sharing and propagating identified systems of best practice.

Issue 2: The Scope and Variation of QA Guidelines

Q4.10.D *Do you have any comments on the nature and scope of QA guidelines to be issued by QQI?*

"A single high-level set of guidelines"

The need for this is probably sufficiently well met at a European level by the ESG Guidelines. However, it also raises the question of whether or not there might be a risk of unnecessarily diluting the difference between "Principles", "Guidelines" and "Criteria". This latter point is also very relevant for some of the comments below.

"Multiple sets of high-level guidelines for different types of providers and purposes"

Differentiating between the different types of providers certainly seems to be a good idea. It may entail extra work at the drafting stage of the Guidelines, but it would greatly add to their overall level of understanding and acceptance, together with the powerful efficiency arguments associated with it. Expecting ELTOs to meet the same standard as DABS, and vice-versa, would be unrealistic. Different guidelines for different purposes also seem eminently sensible.

"A single set of detailed guidelines, covering all relationships to varying extents"

We suggest this is impractical and potentially very intrusive to operate

"Multiple sets of detailed guidelines, covering specific interactions between QQI and providers"

While detailed guidelines are not necessarily the preferred route for different types of providers and purposes, (see second option above), they are often found to be of immense practical benefit when they refer to processes of specific interactions between QQI and providers. For example, it makes every provider's job easier and more productive if detailed guidelines exist for the Provider Lifecycle of Engagements, including Institutional Review, Programmatic Review, Programme Validation, IEM etc.

"A modular suite of QA guidelines to reflect diversity and the varying purposes that QA guidelines may have in education and training"

This is an ideal aspiration but, given what would be involved in its implementation, it would not be considered practical at this stage.

Q4.10.E *What are the implications for a change in the scope of QA guidelines?*

Response: Changing the scope of QA guidelines incurs huge costs in both time, manpower, etc. for both QQI and providers, and the inevitable disruption to normal work-flow could be very significant. At this stage, the system should be mature enough to incorporate change slowly. However, when evaluating the underlying need for changing the scope of QA guidelines it should be remembered that, for most enterprises, the risk of entity failure (with a consequent loss in the case of education providers in protection for learners), can most often be attributed to a lack of breadth in the risk factors

monitored rather than insufficient detail or depth. A sizeable change in the scope of QA guidelines should only be considered if the current range of monitored risk factors is considered to be insufficiently broad as opposed to not being detailed enough.

Issue 3: Approach to Development

Q4.10.F *What should be the status of the quality assurance guidelines and criteria issued by HETAC, FETAC and IUQB/IUA currently in use in the various sectors? Could they be used as the basis for establishing new QQI QA guidelines?*

Response: Yes, absolutely. The existing QA guidelines and criteria for the legacy bodies should remain the core element of QQI's new guidelines.

Q4.10.G *Where is the balance of responsibility between QQI and providers for the development of QA guidelines?*

Response: Just as "responsibility for QA rests with each provider" so also responsibility for QA guidelines rests with QQI. Existing providers have taken the current guidelines and "made them their own". Each provider has already moulded the guidelines to the exigencies of its own situation and the legacy bodies have appropriately reviewed them. Therefore, the issue of consultation, input, development and ownership does not really arise in relation to QA guidelines.

Q4.10.H *Are there representative structures in place for providers in the various groups of providers to effectively contribute to the development of QA guidelines? If not, how can QQI engage with individual providers?*

Response: Commitment to consultation is always welcome by providers, particularly so in HECA's case which currently represents 12 HETAC providers and appreciates the opportunity to offer its views on the Green Papers. It is something of a disappointment that consultation was not sought when the Act itself was being drafted. Understandably, a small homogenous group is easier to access for consultation purposes but given the numbers involved in the FET sector, engagement with FET providers on a representative basis could be problematic.

Q4.10.I *Does QQI require a mechanism for continuous or periodic updating of QA guidelines:*

Response: Just as providers require mechanisms for the continuous monitoring and implementation of their QA policies, so also does QQI require similar mechanisms for the review of QA guidelines. However, there should be no need for alarm here as reviews do not necessarily have to lead to updates.

Issue 4: Relationship between QA guidelines QQI's regulatory functions:

Q4.10.J *For each of these functions, (Provider access to Accreditation leading to QQI Awards, Delegation of Authority to make awards, IEM), can QA guidelines serve as relevant criteria?*

Response: Yes, however, it would be regrettable if focus on the IEM superseded the value of QQI accreditation. There is a concern that the IEM (with its clear underpinning of policy) could become more significant/valued than QQI accreditation itself even in the domestic market. Because of this it is critical that smaller, niche providers are not excluded from application to the IEM.

Issue 5: Relationship between QA guidelines and other aspects of the Provider Lifecycle of Engagements.

Q4.10.K *What is the relationship between QA guidelines as set out in the 2012 Act and the policies currently under consideration in this comprehensive policy development programme?*

Response: All QA guidelines must be congruent and in harmony with the policies and procedures under consideration.

QQI GREEN PAPER No. 4.11 - PROVIDER RISK AND PROPORTIONALITY

HECA is committed and open to the concept of risk but that commitment is dependant upon the approach taken and on clarification of what is meant by “a formal evidenced based approach” as many models of risk evaluation and management are available. HECA is not entirely happy with the three options as outlined in the Green Paper and would welcome discussion on other possible approaches. However, that said, HECA offers the following on the options presented:

Q4.11.A *Are there other approaches to regulation that have not been considered in this Green Paper?*

Response: HECA acknowledges that a risk-based approach may reflect current best practice provided the focus is not unduly narrow and that the approach taken recognises that different providers will have different levels of ability and resources available to them to self evaluate and that internal and external risk factors can and will vary constantly.

Q4.11.B *Are there advantages and disadvantages that have not been identified for each approach?*

Response: A disadvantage not identified in the Green Paper is the fact that the very process of assigning risk is of itself highly fraught with risk because of the inherent subjectivity of such an exercise and particularly if the findings are to be made public.

Q4.11.C *Do you have any preferences among the approaches?*

Response: Whilst recognising the merits and value of Option 1:

“Formal Risk (evidence-based) Approach to Regulation”

HECA believes that at this stage of QQI’s development it would be more prudent to adopt Option 3:

“Uniform Approach to Regulation, with Proportionality Derived from Informal Risk Assessment”

with a view to moving in a slow and incremental manner to Option 1. This approach would allow QQI time to test and assess its ability to provide adequate guidance on the introduction of risk assessment and how this will function alongside its current quality assurance processes, before moving to a formal risk (evidence-based) approach to regulation.

Q4.11.D *Do you have any comments on the issues raised in the Green Paper?*

Response: To create an equal playing field for all providers, QQI might consider measures to increase provider competence in developing a robust risk culture that could work alongside its existing individual internal quality assurance procedures and processes, (i.e. programmatic review). For example, QQI might include training and nomination by QQI of a group of persons from which review panels could be drawn,

(applying equally to all provider institutions). Further examination of the conflict of interest between quality enhancement and quality assurance would highlight many other considerations, which would need to be addressed.

QQI GREEN PAPER No. 4.12 - DATA

Q4.12.A *Do you agree with the principles proposed to underpin QQI's relationship with data?*

Response: Yes, HECA is in agreement and supportive of QQI's guiding principles but would stress the importance of ensuring that QQI is covered for compliance with Data Protection legislation

Q4.12.B *Do you agree that the provision of data should be considered part of the quality assurance relationship between QQI and the providers with which it engages?*

Response: Yes

Q4.12.C *Is it your view that QQI should seek to influence the national coordination of certain data sets?*

Response: Ideally, yes. However, questions to be asked are whether or not private providers are covered to use the Public Service data set? Are they covered to share this data with QQI? When providers fail to return high quality, robust, comprehensive and timely data to QQI, what sanctions are proposed?

Regarding the choice of Options on pages 7 and 8, HECA would choose Option 2:

"Provide the Provider Register and the Programmes and Awards Database as an integrated entity"

as it believes that an integrated entity would be more efficient. HECA queries the Advantages and Disadvantages given under Options 1 and 2 as they are exactly the same. Is there an error here?

Regarding the long term approach to the development of the Provider Register and the Database of Programmes and Awards as stated on Pages 8 and 9, HECA is supportive of this long term approach but is unclear as to how it will be achieved.

Paragraph 4.12.5 offers 3 different Positions. Position 3 mentions unique identifiers such as PPSNs which will create serious issues for some on-line providers. The use of UNESCO standards for nationality and ISCED for discipline specific data should also be considered.

Having considered the Green Paper in some detail perhaps it would be more effective if QQI were to advance its ideal model, identify the impact which typically might affect each provider profile and then engage with providers to seek their feedback.

QQI GREEN PAPER No. 4.13 – PROGRAMME ACCREDITATION

Q.4.13.A: *Do you agree that a new overarching approach to programme accreditation is preferable to continuing sectoral approaches?*

Response: HECA would argue very strongly for a continuance of the overarching principles currently being applied as articulated by HETAC rather than the implementation of a new overarching approach to programme accreditation. Variances are inevitable, but overarching principles, with particular emphasis on quality assurance, are essential.

Q4.13.B: *Do you have any comments on the issues raised in this Green Paper?*

Response:

Issue 1: Scope and interpretation of validation concept

It is acknowledged that there is inconsistency in the language used and, where possible, this inconsistency should be addressed. While there may be differences in the approach to validate programmes, the overarching principles must remain consistent.

Issue 2: Programme duration

There should not be a link between duration and validation methods. Different expectations are required, but this should not prevent a set of standard procedures. A clear understanding of the differences between programmes at different levels, (duration, assessment, etc.), should be established, but best practice in validation should apply irrespective of programme level.

Issue 3: Number and range of programmes requiring validation

HECA very much support QQI in maintaining the integrity of the programme validation process. Given diminishing resources, HECA will work with QQI to streamline the procedure and to harness greater efficiencies. One option may include more intensive provider validation followed by more provider involvement in the process of programme validation. This could include increased provider input in areas such as panel formation, improvements to existing databases of panel members etc. and, in specific instances, using modern communication technology so that international experts need not be physically present at all times.

Issue 4: Validation of programmes leading to component rather than major awards

Component awards should only be validated within the context of a Special Purpose/Major Award. While providers may not in fact actually deliver the Major/Award, (due to lack of student demand), the provider should have the ability and the authority to deliver the relevant Major Award. This is consistent with the principles underscoring ATP.

Issue 5: Responsiveness of validation policy

QQI should be able to respond to market needs in a timely, transparent fashion. The establishment of deadlines and timeframes would be of great benefit to all stakeholders.

Issue 6: Validation Fees

Providers should be expected to bear validation costs; costs should be calculated in a transparent manner,

Q.4.13.C: *Are there other issues relating to programme accreditation that have not been raised in this Green Paper?*

This Green Paper has focussed on the HETAC and FETAC accreditation process. It is important that overarching principles apply to all providers including the University Sector and those with Delegated Authority. As the accreditation process includes validation, a harmonised approach to the naming of awards with clear guidance is necessary. All processes should be transparent and accessible; for example, the criteria for the selection of validation panels, and the process of applying for, and obtaining, devolved responsibility.

QQI GREEN PAPER No. 4.14

Re-engagement of Legacy Providers with QQI and Future Access to QQI awards

Q4.14.A *Is any further differentiation required between the different Designated Awarding Bodies to clarify the effects of this transition?*

Response: Yes. Differentiation should be made between Universities with, and Universities without, linked providers. Those with linked providers should clarify how such linked providers are quality assured.

Q4.14.B *Are the standards of awards and QA provision sufficient at this time during the restructuring of the sector or are additional arrangements required? If so, what are they? Do they need additional legislative underpinning?*

Response: No, they are not sufficient. It is noted that with the exception of Teagasc, none of the publicly established sectorial bodies with responsibility for training have been subject to statutory review. In so far as they are providers in their own right, such bodies must be subject to statutory review enforced with the same rigour as that applied to voluntary providers.

Q4.14.C *Can the different statutory QA regimes that apply to these schools be integrated with each other to reduce the burden on schools whilst securing the standard of QQI awards?*

Response: Yes, systems can be integrated where possible but, however achieved, schools with QQI qualifications should be required to meet the same standards as other voluntary providers.

Q4.14.D *What are the implications of voluntary legacy providers no longer meeting the requirements to access QQI awards?*

Response: Withdrawal of QQI recognition followed by an appeals process.

Q4.14.E *What are the implications for providers who currently have access to FETAC awards only but now seek to access HETAC awards and vice versa?*

Response: FETAC providers who seek access to HETAC awards must be subject to the review process applied to HETAC providers and that review process must be implemented with similar rigour and vice versa.

General Consultation Questions:

Are there other options that have not been considered in this Green Paper?

Response: None that is readily apparent.

Are there advantages and disadvantages that have not been identified for each option?

Response: These have been dealt with in answers to previous questions.

Do you have any preferences among the options?

Response: Option 4: – *The approach taken to re-engagement of voluntary Legacy Providers is proportionate to how close the provider comes to having demonstrably met the requirements of the QQI Provider Lifecycle of Engagements through prior statutory QA processes.*

SUBMISSION BY:

Irish Course Providers Association

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Irish Course Providers Association

4.2

Green Paper on Certification

4.2.4.1 Award Branding

We favour Option 1 where the interim arrangements are maintained.

4.2.4.3 Ownership of Parchments after issue

We favour Option 1 where QQI declares its ownership of the parchment and requires the provider to take all reasonable steps to recover it from the learner.

4.2.4.4 Format and Authentication of Certification

We favour Option 1 where QQI would maintain the current arrangements i.e. parchment certification allied with direct authentication when requested (if an employer or other body requests verification of a parchment 1 they can contact QQI directly and request that the details of the parchment be verified against QQI records.

Green Paper on Recognition of Qualifications within the National Framework of Qualifications

We have a general comment relevant to this section.

We have no reason to doubt the integrity of the process when bodies apply to have their programmes placed on the National Framework.

It is what happens after this that concerns us.

Who, if anybody is responsible for ensuring that the providers are adequately monitored because it is the experience of our members that as long as a provider pays the fees demanded by the awarding body there is at best only a minimum of supervision of that provider from the awarding body and very often far too little supervision/monitoring.

The evidence to support this can best be gauged by the extent of comments we receive on how much easier it is to deal with overseas awarding bodies than it is to deal with FETAC/HETAC.

International Education Mark

Again we have a general comment to make relevant to this section. We believe it is absolutely essential that any provider offering awards or even education to international students should have arrangements in place to protect all fees paid by students irrespective of the duration of a course.

We further believe that the premises to be used by such providers should be suitable for educational/training purposes and comply with all relevant legislation and that the provider should have adequate insurance policies in place.

4.4.11 Issues

We favour issue (c) where there would be three versions, one for further education, a second for higher education and a third for English Language Teaching providers.

Provision of Information for Learners

A general comment we feel that is relevant to this section is our view that the supervision of the provision of information to learners has not been consistent over the years resulting in serious discrepancies between all types of providers in the amount and even accuracy of the information they make available to potential learners.

When a private provider comes on the radar of FETAC/HETAC the provision of information by that provider to learners is generally comprehensively monitored but there have been notable inconsistencies in the approach adopted by the authorised personnel monitoring such activities.

There is ample evidence to confirm that such authorised personnel often demand specific information and details be put on a provider's website that they do not require of other providers.

It is our contention that where such requirements are specified they should be published and mandatory for all providers.

Where a provider, either private or public does not come on the radar of FETAC/HETAC there are very many examples where even basic, minimum information is not provided to learners.

The current situation of monitoring the information provided by providers especially on their websites is most unsatisfactory and would, in part, explain to a considerable extent the discrepancies in the furnishing of accurate information that is evident across different providers' websites.

4.6.5.1 QQI prioritises the monitoring of accurate information across all providers and dedicates a resource to this activity.

We are in favour of this approach

4.6.5.3 QQI develops a closer relationship with some providers or organisations who have a vested interest in ensuring proper and accurate information is made available to learners

We believe this would be the most cost effective way for QQI to approach this critically important topic.

4.6.5.6 QQI develops a protocol for dealing with providers who do not provide accurate information to learners

We believe this is urgently required and that QQI should publish its activities in this regard on its website with the providers names published and the issues identified.

4.7

Green Paper on Recognition of Prior Learning

4.7.S.d

We believe QQI should reopen, as soon as possible, the process of agreeing RPL procedures with providers of FETAC awards and that a target date of 18 months be set to establish this process.

Green paper on Monitoring and Dialogue.

General comment.

It has not been exactly obvious how FETAC selected a provider for monitoring. What protocols that did exist were not rigidly adhered to and this resulted in some providers being subjected to a high level of regular attention that subsequently proved unnecessary while other providers registered for many years were never monitored.

Another issue that has been identified is the inconsistencies in the approach adopted by authorised monitoring personnel.

We feel that the smaller the scale on which a provider operates (such as a one person operation) the more likely it is that there will be serious deficiencies in the quality of the course provision from that provider which suggests that either such small providers are monitored regularly or that a more in-depth examination is carried out of the provider and his/her capacity at the application stage to become a registered provider.

At the other end of the scale there are a few providers who clearly have a cash crisis and offer FETAC award programmes for as little as €75. At any level of scrutiny/monitoring the quality or lack of quality in the delivery of such programmes would become manifestly evident.

QQI might well see fit to establish an overall monitoring arrangement when such obvious below cost selling is taking place. Below cost selling, especially at a clearly unsustainable level should be a red flag warning that a provider has problems and ultimately the learner will suffer.

Option 7 Combination of different approaches to monitoring and dialogue

We favour this option but believe it will only gain the acceptance and goodwill of providers if the process and procedures adopted are discussed and agreed with stakeholders.

4.10

Green Paper on Quality Assurance Guidelines

We favour QQI issuing a variety of guidelines for distinct categories of providers, sectors or provision or groups within.

In that regard a multiple set of detailed guidelines for different types of providers and purposes would be desirable.

4.11

Green Paper on Provider Risk and proportionality

4.11.4 Options 2

Uniform Approach to Regulation

We favour this option.

4.12

Green Paper on Data

4.12.5 Potential Policy Positions

Position 1

We favour the adoption of this position where QQI has a coordinated intra-organisational approach to data collection and analysis.

4.14

Green Paper in Re-engagement of Legacy Providers with QQI and Future Access to QQI awards.

4.14.6 Options Option 2

We favour Option 2 where all voluntary Legacy providers are required to undergo a full access to accreditation process as if they were New Applicant Providers

SUBMISSION BY:

Irish Institute of Medical Herbalists (IIMH)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

IRISH INSTITUTE OF MEDICAL HERBALISTS (IIMH)

Reply Green paper on awards and standards

We welcome the opportunity to offer our opinion on the green papers. The IIMH would also like to point out that these comments are made taking account of the fact that the IIMH represents Medical Herbalists and the level of education and training of our members.

General comments

The Irish Institute of Medical Herbalists (IIMH) operates as a professional body and as such is anxious that its education and training programmes are validated by an independent body such as QQI. The IIMH has spent many years developing its professional training standards and competencies and would see that as an imperative on the grounds of professional competence and patient health and safety. We appreciate that much of the comments on the green papers are focused on short term continuity factors. However, there is a need to balance continuity with certainty and planning. The profession of Medical Herbalists has been left in limbo for a number of years due to the suspension of validation. This has led to the situation where students of the Herbal Science programme in Cork Institute of Technology having completed part 1 of their training had no progression to a validated clinical education. It is imperative that the way is open for the validation of education and training in this sector.

4.1.3 Legislative and Organisational Context

We appreciate that QQI has much to do at this time and many calls on its time and direction, however, we believe that it is important that smaller professions and institutions are not forgotten in the rush to reorganisation and cost saving.

4.1.4 Anticipated Stakeholder Standards

The IIMH would urge QQI to maintain a flexible approach and ensure that there is space to develop for small education providers. It would be a sad reflection if smaller and less developed providers were unduly constrained. Education and training in the area of herbal medicine and larger providers are not necessarily the best choice both in terms of student numbers and inflexibility of procedures. The IIMH would however like to explore the issue of professional recognition bodies (our understanding of Professional Recognition Bodies is in the role of CPD and has typically to date related to minor or special purpose awards) and their role in the approval of programmes in collaboration with QQI.

We very much appreciate your comments regarding of the confusion concerning academic learning and occupational standards (professional competence and fitness to practice). The IIMH would see its focus as setting professional competence and defining fitness to practice. The education and training is offered by independent colleges accredited by the IIMH in accordance with the professional competence and proficiency criteria. This approach is in accordance with recommendations from HETAC during the authorised provider and validation application in respect of the MSc. in Clinical Herbal Medicine.

The IIMH has always seen the role of validation as providing an independent verification of the standard of education and training offered. This again is important to the student (recognition and progression) undertaking the training and the patients of the graduate (health and safety). We are pleased to report that the Irish College of Traditional and Integrative Medicine (ICTIM) (formerly The Irish College of Traditional Medicine) has completed the accreditation process with the IIMH. We strongly support that this programme will complete the validation process and be able to offer the award of an MSc. in Clinical Herbal Medicine.

4.1.8.1 Determination of Standards

There has been much discussion within the IIMH and between professional organisations on the issue of awards, how as a professional body we see this working not just as initial education and training but with continual professional development (CPD).

The IIMH over the years has reviewed many 'framework standards' including those by the former awarding body (Higher Education and Training Awards Council (HETAC)) i.e. Complementary Therapies, Science and Nursing standards and the National Professional Standards and Standards of

Proficiency produced by the European Herbal and Traditional Medicine Practitioners Association (EHTPA). We note QQI's comments on these framework standards in 4.1.8.6.

IIMH considerations on (a), (b) and (c)

Therefore, we appreciate the value of such framework guidance documents especially to a developing profession such as ours. Nevertheless, we were already finding that to some extent they were restrictive as the IIMH/ Irish College of Traditional and Integrative Medicine strove to define education and training standards for Medical Herbalists.

On balance the IIMH are not unsupportive of the use of framework standards whether developed or adopted. However, we are not convinced that such standards are absolutely needed and may indeed cause more issues than they solve.

The IIMH is of the opinion that the third option that the awards should be recognised in their own right appears more in line with the recommendations of the **Review of Academic Programme Validation of certain Complementary Therapies published in September 2012. The IIMH would consider that within this context programmes seeking validation should come with a set of professional competence criteria from the accrediting body. Thus QQI has a set of criteria against which it can assess the learning outcomes of the programme (in liaison with the educational provider) while the professional body is still responsible for setting and maintaining professional competence and proficiency.**

Ultimately the IIMH as a professional body would seek to support validated programmes which are available to new and present members. That is our main focus. We are concerned that already this sector has been over two years in suspension awaiting a report and anticipating restoration of the validation process. In this respect we are in a unique situation and not a pleasant one.

4.1.8.3 Support for Standards

The IIMH would agree that there needs to be support for any standards produced. This we would argue is part of the reason that standards may not be the best way forward. For example standards of awards (education and training) for any sector becomes so generic (to the lowest common denominator) or so fragmented (covering each separate sub-group in the sector) that they have little meaning. Are radical new theories not to be covered by such standards unless accepted by the whole sector or will there need to be a delay until the next update of the standards? Of more concern would be what would be the result of a sector where there was a variety of opinion, each valid but different. How are different voices to be catered for?

Additionally, members of the IIMH already support the development of professional standards of competence and proficiency. We are unclear on the added benefit of an additional set of standards at this point. There is always the potential for conflict between the different standards.

The IIMH welcomes the invitation to work directly with other parties in the process. This is imperative and should be part of the process whether there are direct standards or not. We would also question whether all sectors reach a static maturity as appears to be envisioned by QQI. By their nature some sectors are ever changing and speak in contrasting and divergent voices. It is important that such sectors can be accommodated.

Finally, during discussion on the Report and the **Review of Academic Programme Validation of certain Complementary Therapies it was discussed that a homogenous approach is not necessarily required for validation of programmes.**

4.1.8.4 Capacity Distribution within the Qualifications system

The IIMH considers that these are very relevant questions which have been discussed within our professional body for a number of years now. We are aware of the considerable cost implications of developing and maintaining standards and guidelines and our members have supported us in this process. However, we are unclear as to the extent and involvement of professional bodies in this process, if as discussed above there is a demarcation between the profession bodies with their occupational standards (competency and proficiency) and education and training standards.

4.1.8.5 – 4.1.8.6

The IIMH welcomes the acknowledgement of the need for flexibility depending on breath and context of the sector and award. We would raise the possibility of using occupational standards as an

alternative to educational and training standards. The European Herbal and Traditional Medicine Practitioners Association (EHTPA) developed standards of Herbal Medicine and more recently standards of proficiency which could start as a basis.

Thus as discussed above, we are not convinced that standards are a necessary, both in terms of scope and context. In particular we welcome further discussion on the approach to awards for CPD.

4.1.8.7 - 4.1.8.8

Again the IIMH sees scope for flexibility and innovation on the awards for CPD. In regard to initial education and training the IIMH has been working towards an MSc. level of training with HETAC until the suspension of validation (Validation of the MSc. in Clinical Herbal Medicine was being progressed by the Irish College of Traditional Herbal Medicine (ICTM) with the support of the IIMH during the validation process).

4.1.8.9 Credit Accumulation and Credits

The IIMH differentiates between the education and training required initially and CPD. In the case of initial training the emphasis is to ensure that a certain level of competence and proficiency, consistency with the IIMH's standards of proficiency is attained. This we determined (following a review of work practices, level of practice, review of the HETAC award standards (Science, Complementary Medicine and Nursing) and National Framework Qualification and education and training across many countries including the UK, USA and Canada). Therefore, in this case we would support rules for combining modules to earn a major award.

There are, however, numbers of practitioners who have practiced for many years under a number of varying 'qualifications' most informal and unvalidated. We had proceeded on the basis of recognised prior learning and practice as advocated by HETAC. We are happy to explore other models but consider that this is a valuable approach that should be retained.

In relation to CPD we would see that other more flexible arrangements could work and could indeed provide better outcomes. Although we are not fully clear on what QQI means by 'non-framework certification offered by quality assured providers' and how these may differ from 'Professional Recognition Bodies' mentioned previously. We would welcome further discussion on possible models.

4.1.8.10 Validation and Standards

This again is one of the reasons that the IIMH is not convinced that standards are needed in all instances and specifically in our sector. As discussed above, it is more important that the learning outcomes (of any proposed programme) are consistent with the standards of competence and proficiency (of the IIMH as the professional body). Thus we are unclear what additional assistance award standards could bring when compared to the time, effort and financial commitment required.

4.1.8.11 Engaging Employers on Skills Needs

The IIMH can see advantages in exploring these issues but would but would not like to see these become prerequisites to the resumption of validation of programmes in Clinical Herbal Medicine.

4.1.8.12 Education and Training Standards vs Occupational Standards and the Roles of Regulators

The IIMH very much welcomes the comments and sentiments in this section and would be happy to work with QQI to explore this further.

4.1.8.13 Qualification and Licensing to Practice

The IIMH would generally agree with the comments as expressed in this section.

4.1.8.14 Learning to learn and Standards

Built into initial education and training and the basis for CPD is the ability to reflect on 'your' education and training and address deficiencies and explore new areas. This learning-to-learn and attaining target standard's is central to the education and training of Medical Herbalists.

4.1.8.15 Awards Policy

The IIMH appreciates the issues raised and can see the requirement for quality assessment of any programme including external assessors. The Irish College of Traditional Medicine had completed the requirement for Authorised Provider (for the MSc. in Clinical Herbal Medicine) prior to the suspension of validation where much of these requirements were built in.

4.1.8.16 QQI as Awarding Body

The IIMH welcome the consultative approach proposed by QQI. However, we are very concerned regarding the last paragraph and small providers retaining access to QQI awards. This needs to be carefully considered and sacrificing of small providers avoided.

4.1.8.21 Award-types and Credits

The IIMH would hold the view that different training needs could warrant different award-types and credits. For example initial education and training for us would warrant a major award where the programme modules are integrated building a coherent knowledge and skills base rather than the mere accumulation of credits. For others credit accumulation leading to a major award would be very practical and attractive to students and employers.

We would postulate that the award type favoured would have more to do with the institution answering the question rather than the merits of the different approaches. We would argue that a one size fits all could be as educationally unsound as complete variability. An assessment of the basics irrespective of the pathway should provide educationally sound programmes.

4.2 Certification

As the IIMH is not a provider of awards we have no specific points to make on this section.

4.3 – Green Paper on Recognition of Qualifications within the National Framework of Qualifications

4.3.1 Introduction

The IIMH would not typically see its role as related to Vendor awarding bodies but could see a role in relation to Professional Recognition Bodies. This is probably as much to do with the approach of professional bodies to education and training and the current emphasis on an arms-length approach. We offer the following comments taken from our perspective as a professional body.

4.4.3 – 4.3.4

The IIMH is anxious that its accredited programmes of education and training are validated and the awards are recognised/ aligned within the NFQ.

4.3.5 Anticipated Stakeholder Expectations

The IIMH is most interested in the reference to professional award type descriptors and would be anxious to liaise further in relation to this aspect.

4.3.6 Rationale

The IIMH recognises the myriad of approaches currently offered and the need to identify the best approaches in the future. As our sphere of influence is professional training we are most interested in this aspect and working with QQI in relation to recognition of awards for professional bodies.

4.3.8 Recognition within the NFQ

From the point of view of accreditation of professional programmes by the IIMH the issues discussed raise interesting points that at this junction we do not have a definitive answer. The IIMH already accredits graduates of programmes in the UK (validated university based programmes) offering effectively direct entry. However, it has different criteria for other programmes i.e. Australia where the applicant underwent various forms of assessment including an interview before acceptance to the profession body.

Issue 2

In this respect we can appreciate the necessity for different criteria depending on the degree of knowledge and oversight i.e. we have direct experience of the UK programmes and professional bodies, however, the Australian programmes are unfamiliar and it was unclear to us the level of proficiency of the graduates. Therefore, degree of recognition would appear appropriate. The question is could the process allow for movement from one group to another? We would not like to see the groups so rigid that there was never the possibility of movement.

Issue 3

Where the destination is the same could that ensure that consistent quality assurance. It is probably more difficult but the effort required in fitting all programmes into the same route if possible can't be less than ensuring that they all reach the end point.

4.4 – Green paper on the International Education Mark

The IIMH would have significant interest in these issues as students can train in many different countries and we get enquiries from graduates in different countries.

4.5 – Green Paper on Access, Transfer and Progression

The IIMH appreciates that it is not a direct provider however as a professional body we could be viewed as one of the end points for graduates of the provider. It is in this context that we present the following discussion.

Education and training are one (very important) criteria for access to the IIMH. Moreover, as our members are required to involve themselves in lifelong learning (CPD) as part of their professional lives we have an added interest in how their initial training will affect their access to CPD.

The question for us is how do we assess programmes in terms of access into and transfer across the profession. Is our focus narrow solely in terms of members' practice of herbal medicine or their practice within the broader healthcare area.

For example as our members have completed validated BSc. They can access MSc or post graduate main stream programmes in the broader area of medicine, nutrition and healthcare. We are aware of students who completed invalidated programmes and they are restricted in their access to CPD within or transfer to another associated profession.

4.6 – Green Paper on the Provision of Information from Learners

4.6.1 Introduction

The IIMH welcomes the potential for more certainty for learners that this offers.

4.6.2 Context

The IIMH wholeheartedly welcome these requirements which it believes should provide better protection to students and support for standards. To date unfortunately the herbal medicine sector has a considerable variability in programmes offered to students. It would be very valuable to perspective students to have reliable and accurate information available to them before commencing a programme.

4.6.3 Rationale

The IIMH agrees with the sentiments of this section.

4.6.5 Options for consideration

Of all the options offered the IIMH considers that 4.6.5.4 offers the best balance maximising the benefits and minimizes the disadvantages. It is imperative that students get clear and accurate advice on programmes offered and we agree omitted information is often far more important. A register/ database of programmes and providers with clear and accurate information on their programmes and awards will be advantageous to students. Good well defined programmes offering a clear award and transfer and progression to students can be differentiated from other programmes not on the register.

4.7 – Green Paper on Recognition of Prior Learning

General comments

Because of the diversity of training in the sector including formal and non-formal approaches RPL is viewed as an integral part of the education and training of Medical Herbalists. For some this will involve an assessment of entry into the programme for others it may also or alternatively come into play during the programme. The non-availability of RPL could significantly affect students of a programme in Clinical Herbal Medicine.

Therefore, we are most interested in the policy development of QQI on RPL and most importantly on the proposed time frame. How does QQI envision this will work? No validation of awards until the policy is formulated or awards without RPL?

4.7.5.a

The IIMH would see the award as part of access, transfer and progression. RPL provides a means to assess aspects of the award already attained either formally or informally. The policy on RPL can stand alone unless it was envisioned that different RPL policy requirements are required for access, transfer and progression.

4.7.5.b

How long would QQI envision this deferral would be? What is the effect on the learner of this waiting time?

4.7.5.c

Except for the financial consideration what reason is there not to provide direct applications?

4.7.5.d

Providers of FETAC awards would be better able to discuss the issues here.

4.7.5.e

Providers would better be able to comment on the specifics here.

4.7.5.f

Providers would better be able to comment on the specifics here.

4.8 – Green Paper of Monitoring and Dialogue

The IIMH does not have any specific comments to make on this issue, however, it would support measures which enhanced quality and assessment of QA procedures by providers.

4.9 – Green Paper on Reviews

The IIMH does not have any specific comments to make on these issues

4.10 – Green Paper on Quality Assurance Guidelines

To date the IIMH involvement with quality assurance guidelines and procedures was during the HETAC validation process for the MSc in Clinical Herbal Medicine. Our involvement was consultative during the validation process. No direct involvement was envisioned on completion of this process. The IIMH would be concerned with accreditation and review of the programme under that procedure.

However, the discussion on professional recognition bodies (if we have defined them correctly) would appear to open up more direct involvement in relation to CPD, although we are still unclear on this point.

4.11 – Green paper on Provider risk and Proportionality

The IIMH has no specific comments to make on this section.

4.12 – Green Paper on Data

The IIMH has no specific comments to make on this section

4.13 – Green paper on Programme Accreditation

The IIMH would welcome engagement in any discussion on accreditation and validation of programmes. Our current knowledge and understanding is directly related to the HETAC process, however, we would welcome discussion on other approaches that could facilitate the better functioning of procedures.

4.14 – Green Paper on the Re-engagement of Legacy Providers with QQI and Future Access to QQI Awards

The IIMH would ask where providers who were transitioning through the validation process stand at this point with QQI. Additionally, we would ask when there is going to be significant movement on the resurrection of the validation process for Clinic training in herbal medicine and associated nutrition. The whole complementary sector has been left in limbo for a considerable number of years and it is imperative that the process recommences.

SUBMISSION BY:

The Institute of Certified Public
Accountants in Ireland (CPA Ireland)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

The Institute of Certified Public Accountants in Ireland (CPA Ireland)

The Institute of Certified Public Accountants in Ireland (CPA Ireland) welcomes the opportunity to comment on this Consultation Paper Awards and Standards from Quality and Qualifications Ireland (QQI).

CPA Ireland is supportive of the idea to expand the framework by adding sectoral frameworks as referred to in 4.1.8.6 of the consultation document.

CPA Ireland welcomes in principle, the discussion and recognition of the role of PRBs in the maintenance of 'occupational' standards as referred to in 4.1.8.12. Additionally, the institute is available to contribute to the exploration of the divisions of responsibilities between, PRBs, regulators, QQI providers and professional associations.

With respect to section 4.2.4.1 CPA Ireland is supportive of Option 4 and is not convinced that an expensive publicity campaign would be required. It is the view of this institute that the reference to the level on the NFQ is of more significance to the user than whether the QQI, HETAC or FETAC brand is on the parchment.

With respect to section 4.2.4.2 CPA Ireland is supportive Option 3 (4.2.4.2).

With respect to section 4.2.4.3 CPA Ireland is supportive Option 3.

With respect to section 4.2.4.4 CPA Ireland's preference would be for Option 3. However, Option 2 is the next preferred option.

The Institute of Certified Public Accountants in Ireland (CPA Ireland) welcomes the opportunity to comment on this Consultation Paper Awards and Standards from Quality and Qualifications Ireland (QQI).

CPA Ireland welcomes the indication that some exploratory work on the translation of the '2011' descriptors might commence in 2013 as referred to in section 4.3.5.

CPA Ireland is of the view that QQI should have established policies, not necessarily new, but appropriate revisions of existing policies and criteria, for the recognition of each of Groups A to D as referenced in Issue 1 of section 4.3.8.

CPA Ireland is of the view that different degrees of recognition (Issue 2, section 4.3.8) should only be considered where QQI is able to clearly and concisely communicate the essential difference(s) to relevant stakeholders. Otherwise it is a waste of time, effort and could be misleading. Presently, it appears that there is very little understanding, outside QQI, as to the difference between 'alignment with' or 'inclusion on' the NFQ.

CPA Ireland is of the view that programmes leading to awards on the NFQ should be quality assured (Issue 4, section 4.3.8).

CPA Ireland is of the view that the recognition of awards within the NFQ be processed under the QQI programme policy and validation procedures (Issue 5, section 4.3.8).

CPA Ireland agrees that each of the principles in Issue 6 (section 4.3.8) need to be considered before an award is recognised. Bullet point three needs further teasing out.

CPA Ireland does not support the principle of an international education mark. The notion could suggest to many that those providers and awards without such a 'mark' are in some way inferior. Either an award should have the QQI 'quality mark' or not.

CPA Ireland is of the view that new statutory policies for access transfer and progression should be in place by the end of 2013. (see Issue 2, 4.5.b).

A fundamental aspect of the initial professional development of a professional accountant is work based training and competence development. This model could be adapted by other disciplines, such as the IT and engineering design, given the need to have ‘work ready’ graduates. (see Issue 3, 4.5.c).

CPA Ireland is supportive of the option in 4.6.5.2.

CPA Ireland is of the view that a policy should be developed in the area of RPL (see section 4.7.5.a).

CPA Ireland is of the view that any decision to develop a policy for the direct application of awards (see paragraph 4.7.5.c) should be considered in the light of approaches made to HETAC or FETAC in prior years. This is an area that may have a relatively low priority.

CPA Ireland is of the view monitoring and dialogue activities should be carried out by QQI on the basis of risk and proportionality (Option 5, paragraph 4.8.5)

CPA Ireland is supportive of Option 1 (paragraph 4.9.5).

CPA Ireland is supportive of Option 1 (paragraph 4.11.4).

CPA Ireland is supportive of Option 2 (paragraph 4.12.6).

CPA Ireland is supportive of the idea to expand the framework by adding sectoral frameworks as referred to in 4.1.8.6 of the consultation document.

CPA Ireland welcomes in principle, the discussion and recognition of the role of PRBs in the maintenance of ‘occupational’ standards as referred to in 4.1.8.12. Additionally, the institute is available to contribute to the exploration of the divisions of responsibilities between, PRBs, regulators, QQI providers and professional associations.

SUBMISSION BY:

**Institute of Physical Therapy
and Applied Science**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Input from Institute of Physical Therapy and Applied Science on Green Paper 4.5 – Access, Transfer and Progression

Prelude: Focus on the National Public Policy Context

The nature of education and training in Ireland is witnessing phenomenal change. This could be illustrated in a variety of ways, with the following quotations from “*An Action Plan for SOLAS*” being just two examples:

“The State is investing significant resources in further education and training (FET) programmes – more than €900m is being spent this year alone on the provision of 270,000 places to enhance the education and skills levels of many of our citizens.”

“SOLAS is being tasked with building the identity and values of a world-class, integrated further education and training system. The decision to establish SOLAS will see far-reaching changes to the FET sector on a scale not seen since the establishment of VECs in 1930.”

Against this backdrop, QQI is correct in noting in Paragraph 4.5.2.2 that

“The achievement of access, transfer and progression is the result of the activities of various players. It is, of course, very dependent on providers, but unlike other provider functions such as quality assurance, it is to some extent a property of the interaction between providers or emergent properties of the system.”

It is these emergent properties of the system that are of immediate relevance in the context of Access, Transfer and Progression. At times, it is all too easy to lose sight of the changes recorded to date, not to mind trying to predict and assimilate future changes. So when we talk about Access, Transfer and Progression, what precisely are we talking about “access” to? It is practically impossible for the various actors (prospective students, incumbent providers, regulatory authorities) to gain informed access to the education system given (i) the proliferation of new State Bodies, (ii) the multiplicity of new policy initiatives and (iii) the diversity of QQI’s existing relationships. These last three parameters are quite complex in nature:

Proliferation of New State Bodies: Para 4.5.2.3, *Anticipated Expectations*, lists some of the funding and strategic agencies. These include the Department of Education and Skills, the Higher Education Authority and the National Access Office it contains, FAS/SOLAS, Aontas, the National Adult Literacy Agency (NALA), the Expert Group on Future Skills Needs (EGFSN) and Leargas (the EU Lifelong Learning Programme funding agent in Ireland). However, this group also includes the 16 new Education and Training Boards, Intreo (also known as NEES or the National Employment and Entitlements Service), Jobs Ireland, JobsBridge and a host of other community, voluntary and State employment schemes.

Multiplicity of New Policy Initiatives: The intensity of Ireland’s unemployment situation certainly demands a series of focused policy initiatives. But what exactly do we know about the quantity and quality of the initiatives being tendered? The tables below are extracts from “*An Action Plan for SOLAS*”. When glancing through them, ask yourself what level of congruence exists between these training & education places and validated programmes offered by individual HECA providers? Of the 457,400 training and education places in 2012 (see Table 2), how many are formally recognized within the NFQ Framework? More specifically, how many of these 457,400 places were accessed via your own College, what was the learner experience as regards this access and onto which

programmes could learners then progress or transfer? Is this sustainable - to the extent that you want a similar amount (€900m) spent like this again next year?

| Table 1: 2012 Job Placement / Work Experience Initiatives | |
|--|---------------|
| Community Employment | 22,300 |
| Back to Work Enterprise Allowance Scheme | 12,000 |
| Back to Education Allowance Scheme | 25,000 |
| Jobs Initiative | 1,300 |
| Supported Employment | 4,500 |
| Job Clubs | 7,800 |
| Rural Social Scheme | 2,750 |
| TÚS | 5,000 |
| JobBridge | 5,000 |
| Total | 85,650 |

Source: "An Action Plan for SOLAS", Appendix E

| Table 2: 2012 Training and Education Places | |
|--|----------------|
| FÁS / SOLAS places | 75,000 |
| Training Education Support Grant (TESG) | 12,000 |
| Skillnets | 8,000 |
| Labour Market Education and Training Fund | 6,500 |
| Further education places | 180,000 |
| Third level places | 170,000 |
| Springboard | 5,900 |
| Total | 457,400 |

Source: "An Action Plan for SOLAS", Appendix E

Or, alternatively, do you think there is a distinct policy disconnect between some Government-funded education and training policies on the one hand and qualifications and quality on the other? It is noted from the National Skills Bulletin 2013, using data supplied by QQI and the HEA, that there were approximately 102,000 awards made in the further and higher education and training system in 2011. Of these, 59,000 were higher education awards and approximately 43,000 were further education and training (FET) major awards¹. Given this, can we now validly claim that the National Framework of Qualifications is the common thread running through the policy initiatives that are creating some 457,400 training and education places a year? The National Framework of Qualifications would be intrinsically devalued if a clear policy connect between Government-assisted employment schemes and the Framework itself cannot be established. This link has got to be open and immediately transparent to education users, providers and policy makers alike. It is all well and good to require each *individual* programme to specify its access, transfer and progression (ATP) routes as a pre-condition for validation but there must also be visibility regarding the data *in aggregate* – and the ATP bridge must straddle both the education and employment domains. From the learner's point of view, they must be able to see that the National Framework of Qualifications is the guide map for access, transfer and progression from education right through to all stages of employment. From the provider's point of view, they must be able to clearly see the incentive for adhering to the Framework and to submitting its quality procedures to public scrutiny. Much more critically, when it comes to designing new programmes, they must be given the opportunity of getting a top-down perspective on

¹ Awards data for universities and institutes of technology is for 2011; QQI-FETAC awards data is from 2013 and is provisional. Data does not include all awards made in the independent, private third level sector.

which programmes are available to address perceived and identified market need. Otherwise, the system will continue to churn out copycat programmes, to which access, transfer and progression will be easy but, ultimately, pointless.

Diversity of QQI Relationships: Currently QQI has relationships with approximately 972 different FET, HET and ELT providers. These are made up as follows:

| Provider Type | Number |
|--|------------|
| Vocational Education Committees | 33 |
| Public statutory FET Providers | 4 |
| Recognised schools | 110 |
| Non-statutory FET providers | 667 |
| Designated Awarding Bodies (DABs) | 10 |
| Institutes of Technology with Delegated Authority (DA) | 13 |
| Non-statutory HET providers | 41 |
| ACELS (English Language Teaching Organisations) | 94 |
| Total | 972 |

Source: QQI – Green Paper 1

The concept of access, transfer and progression is relatively easy to understand if you are looking at individual programmes or providers within a relatively homogenous sector. However, this diversity of providers must make ATP a tremendously complex network.

The information vacuum surrounding access and availability is at its most painfully obvious when Government employment programmes for prior years are being reviewed and when new ones are being planned. Much is made for instance of research completed each year by the Expert Group on Future Skills Needs (EGFSN) but, in reality, their ability to identify skills shortages seems to be very circumscribed by their knowledge of what is currently available. The “Service Plan for FÁS Training Provision 2013” is another case in point. Appendix 8, on “Job Opportunities 2013 & FÁS Programmes” (pages 114 to 123), breaks jobs opportunities within the broader economy into 10 different sectors or clusters. When it comes to listing examples of “new FAS Courses”, however, for half of these clusters, it had to resort to the generic answer that “A number of courses in this cluster were redeveloped in 2012 to meet newly published FETAC awards.” This simply is not sufficient for either learners, providers or policy makers.

Bottom Line: For those programmes that are subject to the full rigour of QQI validation, information on access, transfer and progression is available only on a micro basis. Aside from this, information about the system in aggregate is not at all readily accessible with a very detrimental impact on learner protection, programme design and policy formulation. Prior to xxx, all effort should be concentrated on addressing this deficiency. Once users become more familiar with the type of data that can be extracted from the system, they will be better able to devise appropriate policies and guidelines. It would be utter folly to proceed without this intermediate step.

Issue 1: Currency of the 2003 Policy and Criteria issued by NQAI

4.5.a How do the 2003 policies and criteria need to be modified, if at all, for use in an interim period?

As explained in the prelude above, the NQAI policies and criteria, with their focus on credit, transfer and progression routes, entry arrangements and information provision are an adequate basis for addressing the ATP needs of an individual programme. However, no attempt is made to address the needs of the education, training and employment systems in aggregate. To create sustainable

programmes, there must be a very transparent and coherent policy connect between academic programmes and employment policies. This policy connect must give:

- Learners a straight-through access pathway;
- Providers a framework for identifying the market need for new programmes; and
- Policy-makers an information system capable of reviewing programme effectiveness and sustainability.

Failing this, we run the risk of providing learners with adequate access, transfer and progression – but to programmes that they will never be able to apply in the workplace.

Issue 2: The Shifting Landscape of Publicly Funded FET and HET

4.5.b What timeline and approaches should QQI adopt for the development of new statutory policies and criteria for ATP?

In terms of approach, it is much too premature to start talking about new statutory policies and criteria – identifying a clearly articulated and agreed set of goals and objectives takes precedence. Caution should be exercised in the use of “legal authority”. In practice, this could lean too heavily on one particular group such as core providers or their representative organisations². After all, a number of state bodies have input in the broad area where education and employment policies intersect (e.g. FAS/Solas, ETBs, VECs, EGFSN, SLMRU, National Skills Database, IDA, QQI etc.). Indeed, this group is so diverse that a coherent policy approach may not be possible to devise without prior research activity by QQI.

ATP and employment

In light of the current national employment problems should QQI develop new policies or guidance in relation to employability even in advance of a comprehensive review of the 2003 policies and criteria or are there other priority areas not addressed by the 2003 policies and criteria that merit such consideration?

Point 1: New policies and / or guidance in relation to employability are premature at this stage. However, a readily accessible database of awards has been a long-standing basic requirement. This deficiency is being specifically addressed by the 2012 Act which assigns QQI responsibility to establish, maintain and develop a database providing information on awards recognised within the Framework and on programmes of education and training which lead to such awards. This should now be addressed as a matter of urgency. This database should be able to interface with databases on Government-funded Training and Education Places (as quoted in “*An Action Plan for SOLAS*”).

Point 2: Section 9 of the Act adequately sets out the functions of the Authority. It gives pride of place to promoting, maintaining, further developing and implementing the *Framework*. While non-formal and informal work-based learning opportunities are certainly gaining in importance, including them at this stage would dilute the focus on the Framework.

Point 3: Issue 3 correctly points out that:

“Progression is defined in the 2012 Act, as it was in the 1999 Act, in terms of progression to further programmes of education and training at a higher level.”

² Already, this is somewhat evident in the wording of “Issue 2”.

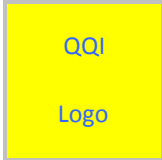
This is certainly true when progression is used in the context of "Access, Transfer and Progression". However, this does not rule out progression being interpreted as progression into employment elsewhere in the Act.

Summary Added Subsequently

However, I'm not really part of that consensus primarily, I think, because I disagree with how progression is defined by QQI. I believe viewing it as progression from one NFQ level to the next higher one is much too narrow and does a grave disservice to the (NFQ) Framework itself. Progression into the workplace has not only to be incorporated into the definition but also has to be the critical litmus test of effectiveness. Without this element, there is a danger that we build a series of lighthouses in a bog - each one brilliant in itself but all of them equally useless. In my way of thinking, there has to be a very high and transparent level of congruence between national employment objectives on the one hand and awards issued by awarding bodies on the other. This does not happen at present as evidenced by "An Action Plan for Solas" citing 457,400 Training and Education places being created in Ireland this year while, on the most recent figures, only 102,000 education and training awards were made. Surely the Government's training and education policies should be working in twin-step with the bodies giving education and training awards. If there are 457,400 training and education places being created, we should be ensuring that each and every one of them is subject to some element of up-skilling and training. If this was happening in practice, the number of learners getting awards each year should be closer to 457,400 than 102,000.

It simply is not sufficient for us to say that, at validation stage, we all have to prove our programmes are job relevant. If 457,400 people are getting education and training places and only 102,000 are getting awards, then the really, really smart people in this equation are the 355,400 people who are able to get a job without any training! It is in this respect that Government employment policies are not nearly as supportive of the Framework as they should be.

I'm not quite saying "No jobs without training!" but 355,400 of them without training is a fairly bitter pill for an education provider to swallow! A "micro" perspective on progression simply is not sufficient - it simply must have a "macro" perspective as well and this is blatantly missing at present.



Information Required under the Qualifications and Quality Assurance (Education and Training) Act 2012



Does this Programme Entitle the Learner to an Award?

Yes

No

If Yes:

Name of the Awarding Body

A dropdown menu could be provided as an option

Title of the Award

Is the Award Recognised within the NFQ?

Yes

No

If Yes:

The Level of the Award with the NFQ

Is the Award: Major?

Minor?

Special Purpose?

Supplemental?

A Statement covering QQI's Required Procedure for [Access, Transfer and Progression \(ATP\)](#) for this Programme is available

A Statement covering QQI's Required Procedure for [Protection of Enrolled Learners \(PFL\)](#) for this Programme is available

Thoughts from IPTAS on Green Paper 4.10

Issue 1: The Nature and Purpose of QA Guidelines

Q4.10.a: Is Anything Missing from this List?

Nothing immediately apparent. Paradoxically, however, it does not seem to adequately cover what QQI itself considers the role of the QA guidelines to be:

“QQI considers that the role of the QA guidelines is, inter alia, to enable and/or facilitate all providers to establish and improve their own QA procedures and systems.” (See Para 4.10.2.4)

Q4.10.b: Is there anything that shouldn't be on this list?

Taking them in turn:

To communicate the overall expectations that the wider society has of the education and training system (or sub-systems) – This may be too ambitious. Wider society certainly has legitimate expectations that could be explicitly addressed somewhere in the Guidelines. However, the section on “The Nature and Purpose of QA Guidelines” may not be the correct place to do it. The term “QA Guidelines”, quite rightly, conveys different things to the layperson and to the professional and the needs of both sets of stakeholders should be separately addressed.

To promote coherence in the system (or sub-systems) of the education and training - Too self-indulgent

To bring about efficiencies of scale by articulating a common model(s) for use by providers – No need whatsoever to include this. It would be great if this “outcome” materialized but it should not be a stated “purpose”

To provide guidance and support to providers in the development of their programmes and provision – This is certainly desirable. It is also consistent with how QQI perceives its own role – see Para 4.10.2.4

To provide benchmarks for reviews of effectiveness of providers' QA procedures – Intuitively, this sounds great. However, one could easily bite off more than one could chew by simultaneously trying to define the purpose of a guideline and also evaluate its effectiveness. Why not separate the two things? In one instance, you're trying to identify a target prior to a QA guideline and in the other you're trying to measure the outcome following its implementation.

To furnish threshold criteria for providers to access QQI accreditation and to engage in other evaluative processes such as for the IEM – Does the term “threshold criteria” conjure up an image of quantitative targets that must be met?

To prescribe detailed templates for the internal operational procedures for the governance, teaching, learning, assessment and learner support – This is both too ambitious and too intrusive. How could you devise detailed templates for QQI's self-proclaimed 972 relationships? (See Para 1.3 on “The Range of QQI's Relationships”

Q4.10.c: How can QA Guidelines remain a stable and effective basis for providers' QA procedures while reflecting the evolution of the education and training landscape and QA practices?

By inculcating a culture of continuous quality enhancement and by disclosing, sharing and propagating identified systems of best practice.

Issue 2: The Scope and Variation of QA Guidelines

Q4.10.d: Do you have any comments on the nature and scope of QA guidelines to be issued by QQI?

A single high-level set of guidelines – The need for this is probably met sufficiently at a European level by the likes of the ESG Guidelines. However, it also raises the question of whether we are unnecessarily diluting the difference between “Principles”, “Guidelines” and “Criteria”. This latter point is also very relevant for some of the comments below.

Multiple sets of high-level guidelines for different types of providers and purposes – Differentiating between the different types of providers certainly seems to be a good idea. It may entail extra work at the drafting stage of the guidelines but it greatly adds to their overall level of understanding and acceptance, not to mind the powerful efficiency arguments associated with it. Expecting ELTOs to wade through standards for DABs, and vice-versa, makes no sense. Different guidelines for different purposes also seems eminently sensible

A single set of detailed guidelines, covering all relationships to varying extents – Too impractical and too intrusive

Multiple sets of detailed guidelines, covering specific interactions between QQI and providers – While detailed guidelines are not necessarily the preferred route for different types of providers and purposes (see second option above), they are often found to be of immense practical benefit when they refer to processes or specific interactions between QQI and providers. For example, it makes everybody's job easier and more productive if detailed guidelines exist for the Provider Lifecycle of Engagements including Institutional Review, Programmatic Review, Programme Validation, IEM etc.

A modular suite of QA guidelines to reflect diversity and the varying purposes that QA guidelines may have in education and training – Is this a bit like saying “We all love Mama and apple pie”?

Q4.10.e: What are the implications for a change in the scope of QA guidelines?

Changing the scope of QA guidelines incurs huge costs (time, manpower, etc.) for both QQI and providers – and the disruption to normal work-flow can be quite staggering at times. At this stage, the system should be mature enough to incorporate change slowly. That said, when evaluating the underlying need for changing the scope of QA guidelines, it should be remembered that, for most enterprises, the risk of entity failure (with a consequent loss, in the case of education providers, in protection for learners) can most often be attributed to a lack of breadth in the risk factors monitored rather than insufficient detail or depth. **Bottom Line:** a sizeable change in the scope of QA guidelines should only be considered if the current range of monitored risk factors is considered to be insufficiently broad as opposed to not being detailed enough.

Issue 3 Approach to Development

Q4.10.f: What should be the status of the quality assurance guidelines and criteria issued by HETAC, FETAC and IUQB/IUA currently in use in the various sectors? Could they be used as the basis for establishing new QQI QA guidelines?

Absolutely – the existing QA guidelines and criteria for the legacy bodies should remain the core element of QQI’s new guidelines. There has been no call on anybody to reinvent the wheel.

Q4.10.g: Where is the balance of responsibility between QQI and providers for the development of QA guidelines?

Just as “*Responsibility for QA rests with each provider*”, so also does responsibility for QA guidelines rest with QQI. But, in practice, no issue arises here. Existing providers have taken the current guidelines and, in X-Factor lexicon, “made them their own”. Each provider has already moulded the guidelines to the exigencies of their own situation and the legacy bodies have appropriately reviewed them. The issue of consultation, input, development and ownership does not really arise therefore in relation to QA guidelines. Unfortunately, the exact opposite situation applies in relation to the 1999 and 2012 Acts where the need for consultation was demonstrably higher but virtually completely absent.

Q4.10.h: Are there representative structures in place for providers in the various groups of providers to effectively contribute to the development of QA guidelines? If not, how can QQI engage with individual providers?

Using QQI’s own method of classification, the various groups of providers can be segregated into 8 different groups, but giving a total of 972 different relationships. Within this, it would be difficult to envisage how the representative structure for the 667 non-statutory FET providers could be compared, for instance, with the one for the 41 non-statutory HET providers. Two very contrasting approaches to this could be adopted:

It may not be appropriate for us to comment – and neither may it be relevant. The litmus test after all is whether learners have protection rather than whether providers have representation.

It might be extremely naïve of us not to comment. A not-insignificant proportion of the 667 FET providers operate in more or less the same market space as the 41 HET providers. (Level 6 courses might be a good example). Both now come under the auspices of QQI. There would be understandable concern if the rigour with which QA guidelines were being applied differed between the two sets of providers. It’s the old “sauce for the goose and sauce for the gander” argument. If you were policing two different sets of populations, would you be able to apply equal scrutiny to the 41 and the 667 - especially if the 667 were so diverse that they did not have a single representative group?

Q4.10.i: Does QQI require a mechanism for continuous or periodic updating of QA guidelines?

Just as providers require mechanisms for the continuous monitoring and implementation of its QA policies, so also does QQI require similar mechanisms for the review of QA guidelines. But there should be no need for alarm here as reviews do not necessarily have to lead to updates.

Issue 4: Relationship between QA guidelines and QQI's regulatory functions

Q4.10.j: For each of these functions, can QA guidelines serve as relevant criteria?

Provider access to Accreditation leading QQI Awards (see Section 2).

Once again, in all three cases, there seems to be an attempt to disrupt the existing distinction between “principles”, “guidelines” and “criteria” and it is not clear why this approach is being adopted.

Delegation of authority to make awards (See Section 4.1).

I have no experience whatsoever in this area.

IEM (See Section 4.4).

If we like, we could refer this to Diarmuid Hegarty's group working on the International Education Mark but it would be preferable if we made a comment ourselves.

Issue 5: Relationship between QA guidelines and other aspects of the Provider Lifecycle of Engagements

Q4.10.k: What is the relationship between QA guidelines as set out in the 2012 Act and the policies currently under consideration in this comprehensive policy development programme?

That would be an ecumenical matter!

Re-Engagement, Resource Base and Financial Standing

QQI's focus on “Resources” and “Financial Standing” seems to be intensifying as the consultation process progresses. For example:

- **Green Paper 14** on the “Re-engagement of Legacy Providers with QQI and Future Access to QQI Awards” makes no mention at all of “resources” or “financial standing”;
- **Green Paper 2:** “Financial standing” and “Resources” get only minimal mention in Green Paper 2 on “Provider Access to Programme Accreditation”:

Financial criteria were only mentioned once and, in that context, as just one of 8 criteria upon which capacity would be assessed (legal, financial, structural, QA, PEL, programme design, assessment of learners and ATP – see bottom of page 5).

Equally, the fact that *resources* would be used as a measure of capacity was only mentioned once in the same Green Paper (Para 2.3.2.1, also on page 5);

- **White Paper:** The White Paper takes these 8 criteria a step further, according an elevated status to three of them – an established legal entity, sufficient resources and programme capability.
- **Progress Report:** The three criteria mentioned above are subsequently referred to as “high level criteria for capacity” in the “Progress Report: August 2013 White Papers”. The Progress Report also stated, in Para 5.3 (bottom of page 9), that “A number of substantial policy and structural decisions were made during the development of the White Paper” [on Provider Access]. These substantial policy and structural decisions had therefore not been

made at the time when Green Paper 14 on the “Re-engagement of Legacy Providers” was being drafted.

The concern now is that, in order to regain access to the NFQ Framework, legacy providers will have to satisfy QQI as to the adequacy of their resource base, their stability and their financial standing. Yet we do not know the precise metrics that will be used in this evaluation. For example, would a provider who was partly financed by borrowings be classified as being in good financial standing? If borrowings are a permissible form of working capital and finance, what is the maximum extent of these borrowings? Is it permissible for a provider to borrow against fees that are being set aside for the protection of learners?

These are all very substantive questions that affect the core stability of the entire third level education system. They were not mentioned in the Green Paper and only arose subsequent to the publication of the White Paper. The timeframe for adequate exploration and explanation is much too short and serves none of the stakeholders (learners, providers, QQI) well.

IPTAS Response to QQI Green Paper 4.11 on Provider Risk and Proportionality

Positives to be Welcomed

There are a number of reasons to welcome this paper:

- A discussion on risk and proportionality is to be warmly welcomed – even though it is not mentioned in the Act. Nowadays, it is an integral part of business continuity and should be firmly embedded in quality assurance and enhancement;
- Entities, either at a stand-alone or collective level, find it extremely difficult to self-witness themselves within the broader environment in which they operate. This is true of all stakeholders, be they individual providers, providers in the aggregate, regulators or policy makers. Each has a natural tendency to take the other’s inventory. Therefore, an attempt to develop a common framework for assessing risk and proportionality is a positive development; and
- It is encouraging that the Green Paper recognises the need to strike a balance between supporting innovation and diversity amongst providers on the one hand and acting to assure quality and standards in a way that inspires public confidence on the other.

Aspects that Need Refining

While the Green Paper is refreshingly honest in describing the notion of risk and proportionality as being just ‘introduced’, some aspects of the discussion need to be more fully fleshed out at an early stage in the process:

- It may be unsafe in this instance to talk about “*informal notions of risk*”. Risks are always very real – even when the contingent outcomes do not materialise. The literature gives a very diverse classification of risk types, processes and policies. ‘Informal risk assessment’ features amongst them - but ‘*informal notions*’ do not appear to be within the mainstream categories;

- Page 1, second paragraph, seems to confine the discussion to the risk associated with providers. This focus is much too narrow. The risk endemic in the whole system should be assessed. For example, the most dangerous risk is often systemic risk (as recently evidenced within the financial system in Ireland) and this cannot be assessed without looking at the risk associated with the education system in its entirety:
 - Systemic risks for the Irish education system over which we have minimal control could include, for example, a general decline in learner numbers associated with the Celtic Tiger fallout (caused by falling disposable incomes, reduced access to funding, the re-emergence of emigration, provider-financed learner payment plans, over-supply of programmes etc.);
 - There are also systemic risks over which we have some measure of control. A relevant example could be an abrupt rise in financial bonding requirements associated with Protection for Enrolled Learners. This could occasion a significant, non-reversible withdrawal of working capital from the education system as a whole. The contagious nature of this risk would accelerate very sharply with an even modest rise in provider failure as the proportion of fees set aside for protection would rise much faster than the proportion of fees available for operational spending.
- At times, the Green Paper gives the impression that risk management, rather than being embedded in quality assurance and enhancement, can be approached on an *ad hoc* basis, almost as the mood fits. Examples include:
 - *“None of the legacy organisations had formal policies in this area”;*
 - *“Perceptions of risk frequently informed decision-making”;* and
 - *“The working methodology incorporates an informal notion of risk (often based on local knowledge) that is not made explicit, and which may direct regulatory activity, though not in a transparent or consistent way. In reality, this is what happened to some extent in the FET and HET Awards Councils previously”.*
- There is a tendency within the Green Paper to view the Irish education system in a very hierarchical manner with each element of the hierarchy concentrating on the “child”, as opposed to the parent, relationships. This means that the bulk of the focus is on how QQI regulate providers. But if the real thrust of our concern is providing protection to the learner, all of the inter-relationships between the various stakeholders should be explored. Provider failure is not the only risk to the learner – they are equally exposed to (government or regulatory) policy error, inequality of access (especially given the absence of a State funding body), CAO, SEC or SUSI malfunction, etc. – and each of these is relevant to a discussion on risk and proportionality.

IPTAS Preferences

Q4.11.C asks for preferences among the approaches. In short, Option 2 simply is not a runner and the choice between Option 1 and Option 3 is unnecessarily difficult. The selection process could perhaps be best furthered by presenting a different stratification of risk methodologies in the next discussion paper.

Option 1

There are apparent conflicts in Option 1. The Green Paper begins by saying “QQI assesses the risk associated with providers”. It also says “This approach recognises that providers are in the best position to recognise their own business needs and the risks inherent to same,...”. So, if providers are in the best position to assess their own risk, why are QQI doing it? The Green Paper, unsuccessfully

in my view, tries to resolve this conflict by saying *“The risk associated with each and every relevant provider is determined on the basis of the provider’s own self-evaluation, cross-referenced against any relevant data and criteria QQI itself holds, and on that basis, a risk profile for that provider is assigned.”* It appears from this that QQI feels that it has additional material to bring to the table. As it describes Option 1 as a “Formal Risk (evidence-based) Approach to Regulation”, then this additional evidence (or at least the criteria or process for arriving at it) needs to be transparent and available. Otherwise, it does not fit the definition of evidence.

Therefore the idea that QQI have a “magic ingredient” to bring to the table is one reason to be wary of this risk-assessment approach. However, there is a more substantive reason to be wary. Fundamental and principled objections can be raised to the notion of a risk profile being assigned to providers. This is immediately resonant of (national or corporate) credit ratings by risk agencies such as Standard & Poors, Moodys or Fitch. At best, these are lagging or coincident indicators of risk – certainly, they can never be classified as leading indicators. At worst, and history unfortunately proves this to be the case, they are nothing more than self-indulgent odysseys, that attract bribery and corruption, and amount to nothing more than *post hoc* justifications of why an assigned rating should not be changed. Even if this were not the case, QQI’s current, well-trusted quality assurance process could be irretrievably and irrevocably damaged by building in an incentive for providers to be less than truthful about their own risk assessment.

So, while the approach has merit in principle, much greater care and subtlety has to be exercised in the detail of its execution.

Option 3

Option 3 has the drawback of referring to a methodology that incorporates the previously mentioned “informal notion of risk”. However, the description of the option used in the title – “Uniform Approach to Regulation, with Proportionality Derived from Informal Risk Assessment” – is more informative and meaningful. This may then be a safer Option in the short-term. However, it probably makes sense to transition over time to a more formal risk-based approach to regulation once the assessment methods are better defined.

Michael O’Sullivan
IPTAS
23rd August 2013

SUBMISSION BY:

International School of Business, Dublin

*Please note this response appears as received
and has not been proofed/edited by QQI.*

INTERNATIONAL SCHOOL OF BUSINESS

To whom it may concern

I write today with two hats – as director of the International School of Business, Dublin, a QQI recognised school and also as campus director of CEA Global Education, Dublin, part of the CEA Global Education group based in Phoenix, AZ, USA. I'm writing specifically in relation to the Green Paper on IEM.

From the outset let me state we are very supportive of this initiative which we believe will enhance the international students' learning experience in Ireland. As ISB is already QQI recognised there are no issues that arise. Our programmes are either already validated and recognised on the National Framework or soon to be validated (we have two programme pending since March). We fully intend applying for the IEM when it becomes available and are confident we will qualify.

However as campus director of CEA I am very concerned that the programmes we run for our visiting US students will not come under the IEM and therefore will have significant negative consequences for our American students in seeking permission to stay in Ireland beyond 90 days (our programmes are 14 weeks long). Our American programmes are validated by the University of New Haven, Connecticut, USA and the official transcript the student receives is awarded by New Haven (a very reputable university in New England).

CEA Dublin is not alone in this regard. There are a number of other providers who offer semester programmes to visiting US students and whose accreditation comes from outside of Ireland. The value and credibility of these accreditations are without reproach or question. But they are not on the National Framework.

We have been in this position before with the Internationalisation Register which specifically excludes programmes of less than one academic year (except language courses).

My recommendations are as follows:

Allow non-Irish accredited institutions to apply for the IEM subject to the usual conditions
Increase the 3 month limit to an academic semester (usually 14 – 16 weeks)

If, as is likely, the IEM becomes the standard used by the INIS in the issuing of visas and permission to stay beyond 90 days US students could find themselves excluded and this would most definitely impact very negatively on student enrolment.

I remain available should you require any further information.

Kind regards

Francis Kelly
ISB Dublin

SUBMISSION BY:

Longford Women's Link

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and has not been proofed/edited by QQI.*



Longford Women's Link Green Paper (Section 4) Submission to QQI September 2013

Provider Profile

Longford Women's Link (LWL) is a long standing provider of Community Education in Longford Town and County. Education and Training at LWL is delivered according to the principles of Women's Community Education (WCE). LWL is a women's centre based in Longford Town and has been in existence since 1995. We provide a wide range of services, including Education and Training (FETAC Centre), using our Integrated Service Model. In September 2011 we opened a dedicated WCE Facility at LWL and we are an Outreach Centre for the UCD Women's Studies Programme as well as NUI Maynooth. LWL's purpose is to link women with the resources to change their lives and transform their communities and we have a long history of promoting the transformative nature of WCE.

LWL's purpose-built WCE facility has provided a much needed resource to cater for the additional Education and Training needs of learners in Longford. In 2012, 277 students completed 45 courses/modules and 169 FETAC awards were presented. As an outreach centre for UCD, NUI Maynooth and the Irish Academy of Public Relations, LWL provides much needed access to third level education in Longford.

LWL is a member of AONTAS, the National Adult Learning Organisation, and is represented on the AONTAS Executive Committee as well as being an active member of the Community Education Network (CEN). To date, LWL has fed into the AONTAS response to the changes in Further Education and Training and the establishment of SOLAS and the Education and Training Boards and we welcome the opportunity to make this submission to QQI.

Longford Profile

The majority of our adult learners are from Longford Town and County. The Trutz Haase Profile Report (2013) shows that The Midlands Region is the third most deprived region of Ireland and County Longford is the most deprived local authority area within this region. Like any other part of the country, Longford has been severely affected by the economic downturn after 2007, reflected in the drop in the absolute deprivation score from -4.9 in 2006 to -12.1 in 2011. This represents a drop of 7.2, compared to a nationwide drop of 6.5. Longford is the fourth most disadvantaged local authority area in Ireland.

In terms of education, the proportion of adults with third-level education in County Longford is more than eight percentage points below the national average, and remains to be the second lowest proportion pertaining to any county.

While many of our adult learners accessing education opportunities at LWL are early school leavers or women wishing to undergo a positive learning experience, some of our adult learners are seeking to upskill or to retrain following redundancy/periods of unemployment. In this regard, unemployment rates for County Longford have fallen significantly less than the nationally prevailing ones between 1991 and 2006. Male unemployment fell from 16.1% in 1991 to 10.2% in 2006, a drop of 5.9 percentage points (compared to 9.6 percentage points nationally). In contrast, female unemployment increased by 1.3 percentage points, from 11.9% to 13.2% (compared to a drop of 6.0 percentage points nationally). Critically, Longford is the only county in Ireland where the female unemployment rate actually rose during the Celtic Tiger Years. Given the lack of employment opportunities in the area, appropriate education and training opportunities are vital.

Longford also has a high proportion of female-headed lone parent households. Female ,one parents who wish to avail of education and training opportunities at LWL face the added barriers of childcare and transport facilities as well as rural isolation for those living outside urban centres. In terms of the proportion of lone parents (as a proportion of all households with dependent children) County Longford had a rate of 22.3% in 2011; i.e. marginally higher than the national average of 21.6%. However, reflecting the urban-rural differences within the county, areas such as Longford No. 1 Urban (44.8%), Killashee (43.6%) and Ballinalee (35.8%) all have rates which are extremely high by national comparison.

Women's Community Education

As a Women's Community Education centre, LWL is committed to adult education and community development based on the recognition that women have unequal access to resources and to influence, and challenge these inequalities. We are committed to providing the very highest standards in Women's Community Education – education, a unique and distinctive approach that enables and empowers women to make choices about their lives by being:

- Based on on-going social analysis of gender equality and social inclusion issues
- Based on commitment to women's safety, growth, and well-being
- The creation of space for feelings as well as dialogue
- Based on peer support as well as staff support
- Informed by participative evaluation and self-evaluation

Comments on Individual Green Papers

While LWL welcomes the opportunity to make submission on all papers, in the interest of avoiding potential duplication with other providers, we have decided to focus on areas specific to our area of WCE delivery.

4.1 Awards and Standards

In relation to **sections 4.1.4 and 4.1.8.15**, LWL suggests that clarification is required on what constitutes a 'small provider'. Providers delivering WCE to specific groups play a key role in the delivery of education and training to learners experiencing disadvantage and any potential policy reforms (FET awards or CAS) should not impact on the opportunity for learners to access and engage with education and training supports. In addition, resources continue to impact not-for-profit providers in the delivery of WCE, in particular those who are dependent on specific funding streams such as BTEI and who are based in disadvantaged areas. Providers in this sector have a wealth of experience in identifying the needs of learners in their communities as well as the best methodologies for WCE delivery. While LWL recognises that QQI wishes to ensure absolute credibility of qualifications (and supports this), it must be noted that any additional financial or administrative demands on community providers will place these centres under extreme pressure and may result in service reductions which naturally will impact on the very communities we aim to support.

4.1.8.1 – Determination of Standards

LWL recognises the coordinating role to be played by QQI in determining framework standards – organisations within the community and voluntary sector may also be a useful ally in relation to standards development and ensuring that the 'lifelong learning' element of adult and community education is retained while also fulfilling labour market objectives.

4.1.8.21 – Award-types and Credit

LWL believes that minor awards have a critical role to play in the delivery of WCE. The very essence of WCE is its ability to deliver flexible learning. Many adult learners require this flexibility due to personal circumstances (e.g. lone mothers with childcare and transport

issues, previous negative experiences with mainstream education, family and caring demands etc.). In addition, many of our learners require part-time options or may simply require a specific award to address a skills need e.g. IT/First Aid for childcare. It is essential that learners are given credit for each step of their learning journey in order to ensure that they develop the confidence to progress and are supported to do so.

It may be that minor awards need to be rebranded as component or module awards as the term itself is not reflective of the fact that these are not 'minor' achievements for our learners.

4.2 Certification

4.2.4.1 – Award Branding

LWL feels that it is essential that the FETAC/HETAC branding is retained at present until such time as the QQI brand becomes more widely recognised (which should be a gradual process). Learners require that their certificates are recognisable by both potential employers and the public in general. Therefore LWL would be in favour of **Option 1**.

4.2.4.4 – Format and Authentication of Certification

LWL is very much in favour of **Option 1**, given the importance that is attached both to graduation ceremonies and retention of a physical certificate. Achievement of awards and presentation of actual certificates enable learners to celebrate their achievements and in a sense, publicise these achievements within their communities e.g. photographs in the local papers of graduation ceremonies or the use of social media.

4.8 Monitoring and Dialogue

While LWL recognises the need for adequate monitoring and dialogue, we would ask for further clarity on the functions of QQI in this regard. It is unclear whether they are a monitoring agency in terms of QA reviews or whether they also have a support function.

4.8.5: Options for Monitoring and Dialogue

There are concerns in relation to a number of the options proposed – any attempt to 'profile' providers (Options 2 & 5) risks penalising smaller community providers, simply because they are being measured against University providers. It may give the impression that for whatever reason standards are lower in the C/V sector, however there is absolutely no basis for this.

Devolving audits to providers (Option 3) appears to be the best option however engaging external experts can often be a costly process and a method of ensuring that providers are not unduly financially burdened must be devised. We believe that any external auditors must be approved by QQI and should be aware of the complexities of the sectors (and in some cases organisations) within which they are auditing. For example, WCE delivery is just one element of LWL's integrated model of service delivery.

4.10 Quality Assurance

4.10.4 QA Guidelines

In terms of the purpose of QA guidelines, LWL welcomes the idea that coherence in systems be promoted however, as with **section 4.8** we would seek clarification as to the exact role of QQI. The provision of 'guidance and support to providers in the development of their programmes' concerns us as we believe that programme development must originate within the sector and not through policy makers/monitoring bodies.

With regard to the scope of QA guidelines, we would not support the notion that QA guidelines would vary according to category of provider. QA standards need to be universal however it is possible to vary the means of meeting these standards depending on the

provider. Therefore we believe that one single high-level set of guidelines is the preferred route.

LWL agrees that QA responsibility belongs with the provider.

4.12 Data

LWL recognises the importance of accurate and timely data collection from the perspectives of learners and providers. The current FETAC database is somewhat cumbersome and it is difficult to track learners, given that often they move between different providers e.g. ETBs and private providers.

Therefore LWL believes that data provision should be a component of the provider/QQI QA relationship and that tracking learner progression is crucial in order to enable the development of a multifunctional system which can provide meaningful outcomes for providers. LWL welcomes the commitment to minimise burden of responses for providers – this is particularly welcome given that there is significant duplication of data at present which places additional administrative demands on providers who do not have the human resources to meet these demands.

4.13 Programme Accreditation

LWL agrees in principle that a new overarching approach to programme accreditation is welcome however the validation process needs to be tailored according to the level and length of an award.

Issue 3: Programme Duration

LWL agrees that a single approach to validation is not feasible. When considering programme duration it is imperative that specific consideration is given to Community Education/WCE providers who are often dealing with learners from disadvantaged backgrounds who require specific tailored supports and who may be dealing with negative past experiences associated with mainstream education. Therefore defined timeframes will put additional pressure on both the learner and provider and will distract from the learning experience. In addition, it is also unrealistic to set specific defined timeframes for programmes from Levels 1 to 6. The very essence of WCE delivery is its flexible approach and its ability to work at the pace of the class. At LWL we have often found that learners within the WCE environment may progress at a much faster pace than the defined timeframe allows. This has numerous implications – learner motivation is reduced, learners express dissatisfaction with the process as they are no longer enjoying the experience and providers are obliged to expend resources for tutors for hours which are unnecessary. The latter point is particularly difficult for providers who are already dealing with financial pressures and funding cuts as this is effectively a waste of resources. There must be an element of incorporating the wealth of experience of providers who are best placed to judge the potential and abilities of their learners.

Issue 4: Validation of Programmes

LWL agrees that in theory, all programmes should have the capacity to lead to a major award however, in reality many WCE learners are not in a position to complete a major award. As outlined in previous sections, issues of child and family care, part-time employment and transport/resource issues as well as other impacts of disadvantage and social exclusion have very real impacts on a learners ability to commit (timewise) to education and training. Enabling the completion of component awards is often a huge step for learners who are able to progress through the various levels at their own pace. Stating at the outset of the learning experience that a major award is the desired outcome may be off-putting and prohibitive for many learners.

Given the successful sharing of programmes at Level 3 (through FESS), LWL would also welcome the opportunity to avail of shared programmes at Levels 4-6. This would also

minimise use of resources involved in several providers seeking validation for the same components through QQI.

Issue 6: Validation Fees

While LWL understands that fees are charged at present for HETAC awards, we wish to state that WCE providers such as ourselves do not have the capacity to absorb validation fees and therefore if fees are to be charged, this needs to be taken into account in terms of relevant funding programmes such as BTEI.

4.14 Re-engagement with legacy providers

LWL believes that consistent and relevant communication flows are the key strategy in terms of engaging with legacy providers. To date, guidelines, particularly in relation to programme validation have not been clear, resulting in delays and waste of resources. Also, the turnaround time for queries has been very slow and the FETAC website was not particularly user friendly. It is simply not feasible to have to read through large documents online to try and locate relevant updated information. Any major updates need to be summarised and sent by email.

4.14.6: Options for Re-engagement

In order to minimise disruption to providers and learners as well as minimising use of resources, LWL believes **Option 1** is the most suitable.

Finally, in relation to tutors engaged in the delivery of WCE and other community education courses, it is imperative that they are not required to register with the Teaching Council as Further Education Teachers. It is essential that there is sufficient confidence in Community Education providers who can ensure that tutors have the relevant skills in order to deliver education and training content at the appropriate level and within the required frameworks and standards. In essence, providers should have autonomy in terms of tutor qualifications and experience as they are best placed to deliver the required standards of learning within their own communities.

Conclusion

LWL would urge QQI to ensure that the expertise of community education providers is not discounted, particularly in terms of QA and programme development. The recognition of different needs according to levels of disadvantage and/or geographic location is also required e.g. a rural woman experiencing economic disadvantage and social isolation may have very different learning needs to an urban man/woman who may have better access to learning centres/transport or who may have a different set of barriers to overcome.

SUBMISSION BY:

Maurice Fitzgerald

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and has not been proofed/edited by QQI.*

GREEN PAPER ON CERTIFICATION (Section 4.2)

I Maurice Fitzgerald, Shanbally, Ringaskiddy, County Cork make the following submission which are my views and comments on **Certification (Section 4.2)** regarding the Quality and Qualification authority Ireland public consultation on various Green papers:

- 1) I say that: the current scheme of Certification in this country is seriously fragmented and that there are major problems with recognition and uniformness. The QQI should have full executive authority over the certification process without exception on all courses. All private operators offering their own certification should be also be covered, and where not, be legally obliged to tell learners that it is not a QQI award by law. And that is not state-recognised and is a private certificate.
- 2) The QQI should have full retrospective and future remit on all state certificates and state awards, including group certificates, inter certificates, leaving certificates, City and Guilds, NCVA, NFQ, NCEF, FÁS, VEC certificates and all and every parchment given to a learner.
- 3) It should have the power of review, regardless of the passage of time. It should have the right to revoke, amend, or award or re-award a certificate or other award where issues have arisen, or injustice done.
- 4) All state certificates should be headed QQI with the name of the award body on it, until and such time as there is one standardised qualification system and level system in this country, which does not exist at the moment.
- 5) The QQI should have vicarious supervisory remit over the "Level" of award given. Currently, there is much debate over levels and reclassifications. The system is a mess.
- 6) The QQI should not let any school sign any certificate under its own hand or allow VEC committees to issue any certificates. These are not award bodies and have no proper recognition or no recognition.
- 7) The QQI should demand that no school change the subjects or amount of subjects done in an exam, without the strict permission of the QQI. All and any such changes must be notified to students or learners not later than one month after the course has started and any changes disallowed after that time. Students should be given the right of complete withdrawal and to choose any subject where changes have been made against their will, irrespective of the school's wishes. No student should be forced to do any exam or subject that he/she was not aware of the exact nature of the exam and certification to be awarded, at the very start of the course or subjects to be examined. This must be made known at the interview or the first day on the course at the latest. Major changes in curricula must also be approved by the QQI for any exam. The QQI should take a very dim view of mid-course changes or any changes.
- 8) The QQI should not allow any school or college to issue supplementary certificates in addition to a main award certificate. All examination papers must state: "QQI Approved National Awards" or similar, without any exception. No other exam papers should be allowed in a QQI examination under any circumstances. Or taken alongside without prior approval and with the approval of the learner.
- 9) Schools, colleges, or providers should not be allowed to issue any prospectus or advertise any course without the QQI mark, which should be under specific licence, and be a serious offence to label any course with the mark unless specifically authorised to do so.
- 10) The QQI should be informed of all problem issues to do with any exam the moment they arise and have the power to suspend any exam where procedures have not been followed.
- 11) All parchments should also state the exact percentage the learner got, irrespective of merits, passes, or distinctions. These percentages should appear on the back of the certificate.

12) The QQI should mandate that all schools explain in detail to learners at the start of the course what subjects will be examined and that all subjects are QQI approved. Each student should receive a permanent QQI number for all exams and be placed on certificate when awarded.

13) All Certificates should state the name of the institution where the exam was sat and that it is QQI approved. All certificates should be signed by a QQI Chief supervisor and Minister for education.

14) The QQI should have the absolute power to annul any award where it is found that requirements were not met and demand that certificates be returned. It should also have the power to issue certificates to people who should have been awarded and were not. E.G. FÁS courses in the 1980's had almost no certification, except for statutory apprentices. Thousands of students have done FÁS courses without any certification and deserve to be awarded, irrespective of the passage of time.

15) All certificates should have international marks and emblems and Ireland as a country or origin, in addition to the national and EU flag.

16) All person's awarded certificates bearing the QQI mark or any other mark that is awarded in the state, should be allowed to question it, and any issues arising from it without cost.

Maurice Fitzgerald,
Shanbally,
County Cork.

SUBMISSION BY:

National Association of Principals and Deputy Principals (NAPD)

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and has not been proofed/edited by QQI.*



National Association of Principals and Deputy Principals
Cumann Náisiúnta Príomhoidí agus Príomhoidí Tánaisteacha

Feedback on
QQI Comprehensive Policy Development Programme
Section 4 Green Papers
September 2013

Submitted by: NAPD Further Education Subcommittee

Director: Clive Byrne

NAPD FE subcommittee formed a review group in August 2013 to examine the Green Paper Documents set out by QQI as part of a comprehensive policy development programme. A link to the Green Papers on the QQI website was emailed to all members of the subcommittee representing xxxx FE providers nationally.

Comments were invited and provided to the review group. The group has liaised to review the Green Papers this submission provides a summary of that feedback, divided into the relevant policy areas as set out in Section 4 Green Papers.

4.1 Green Paper on Awards and Standards (4.1)

General Comment

This Green Paper outlines an *'agenda for a comprehensive policy development process that will involve consultation with a range of stakeholders over an extended period'* (4.1.1)

The paper in turn sets out a logical sequence of topics in a manner that is conducive to inviting consultation and opinion, which is to be welcomed.

QQI furthermore acknowledges in the paper, the amount of reform currently taking place as well as the fact that it's *'awards policy and the associated standards determination policy will help support the broader reform of FET in Ireland'* (4.1.2)

Consultation with stakeholders is once again emphasised, while maintaining the CAS and *'planning its (probably gradual) evolution in consultation with stakeholders and their evolving needs'*

NAPD welcomes the maintenance of the CAS together with the parallel process of **consultation and evolution**. In representing principals and deputies who work with teachers and learners across all school sectors the association is committed to leading this wide membership in the work that lies ahead.

Much of the work will undoubtedly be done through the medium of Steering and Work Groups, where issues can be teased out and ultimately foundations put in place to support new structures. In mainstream 2nd level there is much meaningful interaction between NAPD and NCCA in particular at Steering and Work Groups. **QQI will assume a role in FET, very similar to that of the NCCA at 2nd level** and NAPD therefore regards it as vital that it is also afforded the opportunity here to serve as a partner on Steering and Work Groups.

4.1.2 Public Policy Context

Maintenance of the CAS during the process of evolution is already noted above. We agree that the CAS also needs to be *'more open to integrating other awarding bodies qualifications where they are recognised within the framework'*.

4.1.4 Anticipated Stakeholder Expectations

There will be significant policy reform and we agree that one result should be *'more emphasis on major awards and a greater distinction being made between major and minor awards.'* NAPD would also welcome *'an evolution of CAS that would render it more open to awards of other awarding bodies.'*

4.1.5 Continuity Arrangements

Continuity arrangements should maintain certainty in the system. The formula of words in use currently on certificates is an aid to that certainty.

NAPD would welcome the resumption of standards development activity, particularly where major awards are concerned, but rather than it being purely on an 'ad hoc' basis and agreed by QQI, a transparent system must be put in place which would allow providers apply and make their particular case.

4.1.6 Rationale

The policies of FET and HET Awards Councils do need to be more consistent with each other. This will be imperative if the system is to be fully streamlined, facilitates access transfer and progression and is understood by all stakeholders.

4.1.7 Options and Preferences

Policies, procedures and criteria concerning awards do need to be reformed. QQI does need to work closely with SOLAS in discussing the optimisation of resources for the development and maintenance of standards in FET, but these discussions should also include consultation with the management bodies as well as with practitioners on the ground and across all sectors in 'mainstream' education. In this regard, NAPD (as already emphasised) is committed to full involvement.

4.1.8.1 Determination of Standards: development vs. adoption

There are 'multiple perspectives' here in the determination of framework standards. NAPD agrees that QQI can

a) Coordinate the development of framework standards (working with communities of practice).

b) Adopt (or recognise) standards as framework standards (that might be available to all).

c) Recognise (within the Irish framework) awards (and thereby their underpinning standards)

We also agree that '*a diverse range of approaches will be required*'.

Furthermore, it is imperative that QQI resists '*any pressure to over-standardise*'.

4.1.8.2/3/4 Resourcing Standards Development/Support for Standards/Capacity Distribution within the Qualifications System

It is legitimate to raise issues of finance, particularly in the current economic climate.

In developing and maintaining standards, NAPD believes it essential to involve the '*community of practice as well as the programme providers and potential employers*'

The association also believes that those in the '*FET sub system*' should continue to assume formal roles in standards development and NAPD is fully committed to assisting QQI in this regard.

In terms of devolution of responsibilities, due regard must be paid to the question of capacity and resources. Now is an appropriate time to examine the re-alignment of resources as part of the amalgamation under the ETBs of Further Education with Training.

4.1.8.5 Forms of Standards

We agree that in terms of awards, '*a wide variety of forms is likely to be necessary*'.

4.1.8.6 Sectoral Frameworks

NAPD has consistently pointed out that there has never been recognition in this country of a clearly defined and separate FE / FET sector. A sectoral framework would certainly assist here in underlining the '*distinction between initial general education and further education and training (FET) within the CAS*'

4.1.8.8 The Common Awards System and Standards

It is necessary to review the criteria and methodology for developing new awards. In this context, NAPD would favour a move towards broader standards and placing most of the emphasis on major awards.

4.1.8.9 Credit Accumulation and Standards

We agree that *'Credit is a convenient accounting device for expressing expected learner effort but has no direct connection with learning outcomes'* and that clearer guidance is needed *'on the conceptualisation of credit and its applications and limitations in the qualifications system'*

4.1.8.10 Validation and Standards

The importance of the validation process cannot be over stated. *'The existence of a standard, however detailed, can never completely replace the need for scrutiny of the intended programme learning outcomes at validation.'*

4.1.8.11 Engaging Employers on skills Needs

QQI will have to have a variety of ways of engaging with employers. A formal system needs to be put in place to facilitate this. Providers also need to be afforded the opportunity to inter-act and engage with whatever system is in place. The more opportunities there are to have different groups engage with each other the more integrated the system becomes.

4.1.8.12 Educational and Training Standards vs. Occupational Standards and the Roles of Regulators

There is a difference between occupational standards and educational standards. Occupational standards are more specific and have a distinct purpose. They are the concern of employers. They are related however as educational standards may refer to occupational standards.

We agree therefore that QQI does have a role here, but it is an area that requires further scrutiny and discussion, as professional bodies have particular obligations in regard to occupational standards.

4.1.8.13 Qualifications and Licencing to Practice

We are in agreement with this.

4.1.8.14 Learning to Learn and Standards

We agree the views expressed in this section, as well as the statement that *'The workplace is the 'laboratory' for many vocational disciplines and cannot be easily replicated (if at all) in an educational institution.* The importance of ongoing workplace learning should also be highlighted however, as should the undoubted and already proven ability of FET providers to **deliver in the workplace.**

4.1.8.15/16 Awards Policy/QQI as Awarding Body

We are in full agreement with the views expressed in these sections. In context of the establishment of the new ETBs, NAPD believes that it is an opportune time to encourage the networking of providers, to facilitate a sharing of resources, providing smaller centres with the opportunity to access support provided by the larger FE colleges.

4.1.8.17/18/19/20 Awards Branding/The Common Awards System/ Delegating Authority/Joint Awards

We are in agreement with the views expressed in these sections

4.1.8.21 Award-types and credit

NAPD agrees that the role of minor awards and the approach to credit will need to be considered as part of the policy development process.

The questions raised in this section are valid and further consultation is needed.

The association would emphasise once again that it is entirely committed to contributing to any discussions initiated by QQI as part of that consultation process.

4.2 Green Paper on Certification

Award Branding 4.2.4.1

Select **Option 1**

It allows for current interim arrangement for branding parchments, pending a full re-design after finalisation of QQI policy on awards.

Authorisation of Parchments 4.2.4.2

Select **Option 3**

This standardises the arrangements in HET and FET and could work if the authorisation was done at ETB level?

Ownership of Parchments after Issue 4.2.4.3

Select **Option 2**

The learner is informed that the authenticity of the parchment has been withdrawn and is withdrawn from QQI records

Format and Authentication of Certification 4.2.4.4

Select **Option 3**

Combination including Parchment issued as well as a secure electronic system accessible to employers and others to check registration

4.3 Green Paper on Recognition of Qualifications within the National Framework of Qualifications

Q4.3a

A comprehensive and wide ranging set of issues has been raised in this paper. NAPD agrees that these are issues that need further analysis, discussion and consultation. The association is committed to full engagement with any exercise which sets out to do this.

The association is uniquely placed in representing principals and deputy principals across all sectors in the education system and working at the level of provider / deliverer.

Q4.3b

The association is in agreement with the principles as set out in Issue 6

4.4 Green Paper on the International Education Mark

Has consideration been given to providing the IEM mark to FET providers? If so, the costs associated with this should not be prohibitive. Perhaps a different pathway could be offered to such providers.

Issue 1 – Should there be a single or multiple versions of the IEM?

From a practical standpoint and for ease of access by potential providers and learners, **‘one version’** would be the more focused approach. A fragmented and disparate approach here is not in the interest of all concerned and indeed a single entry procedure would reverse the trend in recent times where the inflow of international students has been on the decline.

Issue 2 – When should the IEM be available?

In order to avoid gaps in terms of an international provision **all relevant QQI providers compliant with the Code of Practice should be authorised to use the IEM immediately.** To fragment this provision with regards to QQI providers would raise issues in relation to accredited QQI providers. A ‘hurdle approach’ would be cumbersome, not user friendly, create gaps etc. Compliance standards set should be high and lack of compliance should warrant immediate action.

Issue 3 - Should all providers, including public providers, authorised to use the IEM be required to establish arrangements for the protection of enrolled learners under section 65 of the 2012 Act?

Yes all providers whether private or public must establish arrangements for the protection of learners there should be no distinction in the requirement upon providers. What is essential is that standards are set and remain high

All suggested areas for inclusion within the code as listed should be included based in international best practice.

Other areas might include:

Arising issues with individual countries and providers.

- Database to record such incidents, issues...

This is broader than 'handling of student complaints' but rather to provide the means to regulate compliance with the Code of Practise.

Issue 4 - What level of prescription and detail should be included in the Code of Practice?

The Code should be based on a combination of high level principles and detailed criteria

The Code of Practice should be embedded in the highest principles reinforced with detailed criteria. The Code should aim to provide learners with detailed information on provision of the Code of Practice

Issue 5 - How should QQI carry out a review of compliance with the Code?

A review of compliance with the code should be integrated with other statutory reviews provided by QQI e.g. review of effectiveness of provider's quality assurance procedures
The review should be integrated with other statutory reviews provided by QQI which would maintain a streamlined QA approach and adherence to the Code of Practice.

Issue 6 - In which countries should the Code be applicable?

Off shore provision is currently within the realm of Higher Education institutions but from the perspective of a uniform practice of the IEM geographic situation should not preclude conformance to this international Code of practice.

4.5 Green Paper on Access, Transfer and Progression

In 1998, the OECD published *Pathways and Participation in Vocational and Technical Education and Training*. This report on a cross-country study involved ten countries and some of its key observations could, in many cases, be regarded as stating what many would regard as common sense:

“Policy makers can influence the attractiveness of educational programmes, and consequently the level and pattern of participation in them, by changing the structure of the pathways which connect them” (p.377).

It went on to say that:

“Participation in a programme is influenced by the labour-market value of the qualifications to which the programme, and the pathways to which it gives access, may lead” (p.379).

In Ireland the development of such pathways has been developing within the context of the National Framework of Qualifications (NFQ), since its launch in 2003. In outlining the national public policy context the Green Paper stated:

“The NQAI policies and criteria for access, transfer and progression which accompanied the launch of the National Framework of Qualifications in 2003 are now an accepted part of the policy landscape” (p.3)

The NQAI’s policies and criteria in relation to access stated:

“It is more productive for all learners to focus the access concept on completion (the achievement of the award) rather than on entry”
(Policies, actions and procedures for access, transfer and progression for learners, NQAI, p.6)

In other word, the criteria for access should be whether the applicant has demonstrated the capacity to successfully participate and succeed on the programme for which he/she has applied.

Following the formal agreement of regional clusters of Higher Education Institutions by the Minister for Education and Skills, one of the two initial priorities identified by the Minister as needing to be addressed was a regionally coordinated approach to the development of pathways into and within Higher Education from second-level and Further Education institutions (Letter from Minister to the HEA dated 30th May 2013).

Progression from Further Education to Higher Education

Access into any post-secondary educational programme involves an application passing through 3 stages:

1. Did the applicant meet the subject requirement stipulated in the entry requirements? Yes or No? If yes, proceed to stage 2.
2. Did the applicant achieve the necessary grades as stipulated in the entry requirements? Yes or No? If yes, the applicant has now met the entry requirements and is eligible to receive an offer of a place on this course. In other words, the applicant has, in accordance with the entry requirements, demonstrated the capacity to successfully participate and succeed on this programme.
3. In the event that there are more applicants than places, apply the stated procedure for such a situation, e.g. CAO points.

Entry to first year in Higher Education is primarily through the CAO system. **NAPD is of the view that, to date this pathway has been unnecessarily complicated for FETAC students from an administrative point of view and questionable from an educational point of view.** This is particularly the case when comparing the Leaving Certificate and FETAC routes.

Within the NFQ both the Leaving Cert Established (LCE) and the Leaving Certificate Vocational (LCV) and placed on the same level as FETAC Level 5 major award. Matriculation requirements for third level have remained largely unchanged for some period of time – six specific subjects (Stage 1 above), two of which are to be honours on higher papers (stage 2 above). In the FETAC system, the subjects are as per the certification requirement for the FETAC award (stage 1) and in many cases “at least five distinctions” is the stated grade requirement (stage 2) above.

But how does stage 3 apply to the two routes? In terms of CAO points, excluding the bonus points for higher level mathematics, the LCE and the LCV can generate a maximum of 600 CAO points for applications to any programme in any HEI in the CAO system.

On the other hand, for FETAC applicants there are two systems in operations (even though this is not clear from the CAO website nor the FETAC website which seems to indicate that there is only one!). If applying to any of the HETAC colleges the FETAC results are converted to CAO points and the application is included with all LC applicants. In this system a FETAC level 5 major award can generate a maximum of 400 CAO points despite being at the same NFQ level as the LCE and LCV. **NAPD is of the view that this is not in keeping with the principles of equity and parity of esteem.**

If a FETAC applicant is applying to one of the Universities or DIT then a quota system applies. Why the two systems for FETAC applicants? **NAPD is of the view that having multiple systems has resulted in unnecessary confusion and lack of clarity regarding the progression pathways. These present barriers to progression for FETAC applicants that do not exist for LC applicants.**

The LCE/LCV results are accepted for entry for all programmes within the CAO system. FETAC results are not. If all of the programmes within a Higher Education Institution (HEI) are available to all suitable qualified LCE/LCV applicant but not to FETAC applicants then the HEI in question is

engaging in recruitment and not providing access. **NAPD is of the view that this is contrary to established NFQ/NQAI Access policy.**

The LCE and LCV are education awards of general academic education consisting of a diverse range of subjects assessed on the basis of a widely criticised examination system which places great emphasis on rote learning. Alternatively, FETAC applicants have studies for a major award consisting of at least 8 modules within a specific field of learning. The methods of assessment are wide ranging and include assignments and projects as well as practicals and examinations. Students who have achieved a full FETAC major award at level 5 have developed skills in independent learning, research and the self-discipline of submitting assignments by stated deadlines. Such “soft skills” acquired in addition to the programme specific learning can only add to the student’s capacity to study at third level. Indeed, having completed a one year courses of study in a particular field of learning, the FETAC applicant is making an informed decision in applying for a programme in third level – and is like to have a higher probability of retention. Anecdotally, this has been the experience of many colleagues in third level.

It is also worth noting that while the HEAR and DARE schemes are available to LC applicants, FETAC applicants, who would be eligible if they were LC students, are not eligible to apply for them because they are applying through the FETAC route.

NAPD is of the view that the current system is unnecessarily confusing and lacks transparency, and has resulted in an inequitable system which is contrary to the national policies on access, transfer and progression and, indeed, equality in education.

4.6 Green Paper on the Provision of Information to Learners

The purpose of this section is simply for learners to make informed choices. A recent case in Athlone IT highlights this issue where an award for a course advertised and even commenced, was not recognised within the Framework.

Given the current state of the nation’s finances, a very practical approach is advisable to the use of resources, both in human and financial terms.

The focus should be emphasising a developmental approach to providing accurate information for learners rather than a negative monitoring approach.

Sample templates of the layout for the required information under Section 67 of the 2012 Act may assist in providing a coherent format on the key points of information for the benefit of the learner.

While one objective is to promote and facilitate Access, Transfer and Progression, and informed choice, the robustness of data sources and how one disseminates it to different audiences requires a very specific plan. The degree to which data information is public is also to be questioned.

The whole issue of completion rates must be contextualised and not hijacked by 'league tables', etc.

On the issue of policing, existing providers should be relied upon to assist policing. The concentration should be on the register and database as a means of communicating reliable information. The database and register should be extended to any provider fulfilling its now legislative requirement for information provision. Develop a protocol for dealing with errant providers.

4.7 Green Paper on Recognition of Prior Learning

This Green Paper is intended to clarify QQI roles, responsibilities and intentions with respect to the recognition of prior learning (RPL)

A worry would be where learners may apply to QQI for awards where they meet QQI standards. While the HE sector went with this, FE referred them to the Awarding body. This needs careful consideration for the FE sector.

The cultural context of the FE sector is very much 'open arms'. The HE sector is quite different. The FE sector is more worked based, e.g. manual handling courses recognised, but there is no provision for direct application. RPL covered access, exemption and full awards. Maybe QQI should re-open the process of agreeing RPL procedures with providers of FETAC awards.

There doesn't seem to be a national strategy for RPL. The recommendation of the European Council of December 2012 states that by 2015, citizens will be able to have skills acquired outside formal education / training system validated and to use that validation across an EU framework. Without a national strategy, sourcing resources is a problem.

It is our experience that RPL is very expensive and time consuming. While we recognise that acknowledgement of achievement is vital, RPL should have other potential purposes rather than just for access, transfer and progression purposes. It is not just a tool for ATP. The integration of RPL into a whole dialogue of ATP is important.

Again, a very pragmatic approach is needed in dealing with RPL issues. Resources need to be provided if it is to be seriously dealt with. FE colleges have not anything near the required resources to deal with RPL in a realistic way.

NAPD believes that as custodian of the NFQ, QQI must join up QA and RPL. Consideration needs to be given to what will constitute evidence for the purposes of RPL, for example, how could life experience be presented and evaluated as evidence; could learners avail of partial exemptions based on the achievement of particular learning outcomes; how will RPL be graded – i.e., pass, merit or distinction – and will credits be allocated to RPL which may be used by learners when applying to the CAO on the basis of FETAC certification.

4.8 Green Paper on Monitoring and Dialogue

4.8.5. a Are there other options that have not been considered in this Green Paper?

No. The options here are quite comprehensive and reflect the range of options open for monitoring and dialogue. However the option to be selected will have huge ramifications both in implementation and financially for NAPD FE centres and colleges. This Green Paper as it asserts on page 3 'can provide an important link between all QQI policies' is within this context that this Green Paper is hugely important. NAPD would urge QQI to tread wearily in the approach here.

Q4.8.5.b Are there advantages and disadvantages that have not been identified for the options described?

No. Generally the pros and cons, advantages and disadvantages of each option are well flagged.

Q4.8.5.c Do you have any preferences among the options?

Yes. Because of budgetary and internal constraints within NAPD FE centres and colleges the preferred option would be Option 2, that is audits undertaken systematically and periodically by a site visit of auditor(s) and expert(s) employed by QQI. External objectivity would be welcomed.

Notwithstanding the above, the quality reviews in Option 6 as part of a monitoring and dialogue function have merits and perhaps could be incorporated in Option 2.

Q4.8.5.d Do you have any comments on the issues raised in the Green Paper?

As stated above this evaluative and monitoring function cannot be understated and the stance to be taken by QQI will have far reaching implications for NAPD FE centres and colleges. We would welcome further discussion on this prior to the eventual finalisation of a White Paper.

4.9 Green Paper on Reviews

4.9.a Are there other approaches to institutional review that have not been considered in this Green Paper?

There are others but they do not fully address the requirement of the legislation to 'review'. Prior to amalgamation, institutional review practice across the former bodies was varied and to get one that suits all operators will be difficult.

There are bespoke models where specific terms of reference are devised and negotiated for every review, or it may use resources in more generic ways, building experience into policy and front loading workload to the policy development phase (for instance devising an approach that allows

for standardisation and the use of templates). This would be a good method and would form an even standard among all providers, would be clear and easy to implement. Expense, resource and manpower are the main obstacles in deciding on a review process. The potential for QQI to support a review regime of this nature, given current resources and other engagements will be difficult.

4.9.b Does the institutional review approach as discussed in this paper meet the needs of sectors outside of higher education and training, or should further consideration be given to developing significantly different approaches to reviews outside of higher education and training?

Institutional review has at its core an external evaluation of the effectiveness of the quality assurance procedures of providers considered at the level of the institution as a whole. The 2012 Act provides for a number of different kinds of QQI review: review of the effectiveness of provider QA procedures and their implementation (Section 34); quality reviews (Section 42); withdrawal of quality assurance (Section 36); review of the NUI's linked provider procedures (Section 40); review of validation (Section 46); review of delegated.

4.9.c Should QQI encourage, where possible, the practice of incorporating other reviews provided for in legislation (IEM; DA; ATP)into institutional review?

The institutional review approach is simple, clear and easy to communicate policy and would mean that a new cycle of reviews could commence soon. This is a low-resource option, allowing for focus at development instead of implementation phase and restricting expensive review processes to autonomous providers only and reduces the potential workload for providers who have a range of QQI engagements.

4.9.d Do you have any preferences among the options set out?

OPTION 2: A Single Broad Generic Review Model not aligned to any particular current approach This is a very broad based approach with equality of treatment for all providers and allows for a significant negotiation with sectors on the design of review. It also allows for bespoke options that may cater for unanticipated events.

4.10 Green Paper on Quality Assurance

NAPD worked closely with FETAC on the development of its Quality Assurance (QA) guidelines prior to their publication in 2005. Indeed, members of the Adult and Further Education committee played an active role in both the Consultative Forum and the Technical Working Group at the time. A key issue at the time was to develop a framework that could be used by all FETAC registered providers-from the largest to the smallest.

NAPD remains committed to working with QQI in the evolution and development of QA.

The Green Paper outlines the legacy arrangements QQI has inherited following its establishment from its previous bodies. It also outlines the legislative and European contexts in relation to quality assurance.

NAPD acknowledges and accepts that there is both an imperative and an opportunity to rationalise and perhaps, where appropriate, streamline the QA framework. However, given the embedded nature of existing QA systems, any change should be introduced in as collaborative as manner as possible.

The implementation of the current QA framework within Further Education, developed under FETAC, within the post-primary sector, has only recently been completed, following the resolution of an industrial dispute. However, even at this early stage of its full implementation, some issues have arisen that could be resolved within this consideration.

In particular, the administrative overhead associated with the operation of the QA system within current post-primary structures is onerous. Indeed, it is the view of NAPD that, this overhead has begun to take time away from the quality of teaching and learning and more towards the administration of the QA system.

NAPD recommends that the next evolution of the QA system should ensure as much as possible that the administrative burden is minimised to the most appropriate extent. In particular, any such new evolution should be usable by providers of all sizes, from the largest to the smallest.

4.11 Green Paper on Provider Risk Proportionality

QQI is not interpreting risk as a necessarily negative concept and understands that risks can be coupled with opportunities. This paper introduces the possibility, and associated advantages and disadvantages of establishing a transparent, comprehensive and principles- based structure for assessing, managing and communicating the various categories of risk associated with providers

Risk management (if adopted as an approach) will be aligned with the mission, vision, strategic objectives and priorities of QQI and will be embedded as part of the planning and management systems.

The OECD suggests that the use of deliberate risk- based approaches to regulation can result in more efficient government services and better protection for citizens from hazards.

Other benefits arising for governments and their agencies being able to correctly identify and respond to risks include more targeted use of public resources; reduced cost of delivering a wider range of services and higher rates of regulatory compliance. Internationally, risk-based models of regulation are becoming more commonplace.

4.11.c Do you have any preferences among the approaches? option 1 option 2 option 3

Available options sit on a spectrum ranging from entirely risk-based and therefore “bespoke” interaction with providers to a one-size-fits-all approach whereby providers are not risk assessed in any way and one model for QA and related policies and procedures is applied to all providers, regardless of their individual circumstances.

The preference is option 1, Formal Risk (evidence-based) Approach to Regulation for the following reasons, a risk-based approach could lead to proportionate intervention on the part of QQI rather than treating all providers in the same way. In this way, sufficient resources can be allocated to address known risks, while over-regulation or disproportionate intervention is prevented in low-risk situations, thus minimising the impact on both QQI and provider resources. This in turn should reduce the compliance burden on providers with a demonstrated low risk profile.

This approach recognises that providers are in the best position to recognise their own business needs and the risks inherent to same, and therefore to develop systems and procedures that are fit-for-purpose to identify and address those risks. Provider self-assessment and evaluation of their own risk is a means to supporting continuous improvement of provider operations. Benefits and incentives to providers may result in terms of improving internal governance in order to reduce risks. This approach contributes to the Provider Engagements Lifecycle.

4.12 Green Paper on Data

NAPD agrees that the development of a central database is a necessary part of the QA relationship between QQI and providers and would consider that this needs to be pursued with urgency. QQI should seek to influence the national co-ordination of certain data and any register established should be an integrated one on a national basis, from initial set-up.

4.13 Green Paper on Programme Accreditation

NAPD believes that the development of national programmes in the FET sector was a good short-term measure. However, in the medium term, it is considered important that providers at level 5 and 6 be able to put forward their own programmes for validation based on local and national industry needs and demands. This would ensure consistency in programme accreditation from levels 5 to 10.

QQI fees for programme accreditation and validation should be appropriate to the level of the programme and validation timelines should be kept to a minimum to allow providers to respond in a timely fashion to industry needs.

4.14 Green Paper on the re-engagement of Legacy Providers with QQI and Future Access to QQI Awards

NAPD FE providers believe that awards standards and QA provision are sufficient at this time and that no additional arrangements are required during the restructuring of the sector. However, it is our view that all voluntary Legacy Providers should be required to undergo a full accreditation process as if they were New Applicant Providers in order to ensure QA standards across all sectors are consistent, into the future.

SUBMISSION BY:

National Council for the Blind of Ireland (NCBI)

*Please note this response appears as received
and has not been proofed/edited by QQI.*

National Council for the Blind of Ireland (NCBI)

To Whom it may Concern:

I write the below comments on behalf of the National Council for the Blind of Ireland (NCBI), a not for profit organisation providing services to over 16,000 people in the republic of Ireland who have varying degrees of sight loss.

The comments requested in the Green Papers are significantly late in their submission, for which I apologise, but the format in which submissions were requested was largely inaccessible to those of us with sight loss and some basic accessibility checks had not been carried out to make the in-document forms usable with Assistive Technology.

We are happy to assist in the future to make such documentation from QQI more accessible if requested to do so.

I include by copy Martin Quilty, Coordinator of Rehabilitation Training and Guidance Service at the HSE, Swords, Co. Dublin, who provides a significant stream of funding to allow the Rehabilitative Training Programme, run by NCBI, to take place.

It is the Rehabilitative Training Programme that engages, on behalf of NCBI, with QQI and as such the comments below relate specifically to that programme, the impact on NCBI service users and our concerns around some of the proposed policy changes outlined in the Green Papers.

We very much look forward to on-going positive engagement with QQI, and welcome the opportunity to give constructive feedback on changes and developments.

I hope the brief comments below will be useful in outlining some of NCBI's concerns and will serve to assist in outlining the context in which we exist, and the importance of certification to our learners.

Yours sincerely,
Stuart Lawler
Rehabilitation Centre Manager
NCBI

Section 4.14: Green Paper on Re-engagement of Legacy Providers

NCBI recognises the considerable work involved in any of the re-engagement options outlined in this green paper, to liaise with existing legacy providers.

We are anxious however, that any re-engagement process would not be excessive in terms of time and resource consumption for NCBI as a relatively small provider at present.

We do however, value and understand the need for consistency as outlined in this document but hope that QQI can at the same time incorporate a level of flexibility to recognise the different contexts and structures of providers.

We are concerned around proposed changes to the PFEL policy and procedures, and would welcome clarification from QQI as to our standing in this regard.

Whilst NCBI does not charge fees to service users who avail of our programme, we are funded by the HSE for the delivery of the programme. Whether this means we need to adapt a PFEL policy and procedure is still not clear to us.

Identifying three academic partners, given the specialist nature of the training we provide, would be next to impossible for us.

The above are some of our initial observations on the proposed changes that have been communicated thus far, and our concerns around the effect of these changes to NCBI and those who use our services.

Once again we welcome the opportunity to contribute to this consultative process, and look forward to the continued engagement.

Stuart Lawler
Rehabilitation Centre Manager
NCBI: Working For People With Sight Loss
Whitworth Road, Drumcondra, Dublin 9

SUBMISSION BY:

National Learning Network

*Please note this response appears as received
and has not been proofed/edited by QQI.*

National Learning Network

Here is some feedback with regard to Green Paper on Certification.

4.2.2.1 Award Branding

FETAC/HETAC

QQI are the awarding body therefore QQI Logos should be prominent on the award parchments and QQI should be exposed to providers, learners and employers to raise public awareness.

FETAC/HETAC no longer exist as award councils therefore they should be referred to with regard to either further education or higher education to show the distinction between levels.

Would suggest that the QQI Logo is the only logo that should appear on the parchments.

FET should only be referred to as part of the NFQ i.e. This award is a Level 4 FET certificate on the National Framework of Qualifications.

HET should also be referred to as part of the NFQ i.e. This award is a Level 7 HET certificate on the National Framework of Qualifications.

4.2.4.2 Authorisation of Parchments

Only have QQI authorisation on parchments – need to be consistent in promoting QQI as an awarding body

QQI needs to be promoted as the awarding body for FET and HET so that the public don't see QQI as a set of letters on the parchment and continue to see FETAC and HETAC as the awarding bodies. Also need to put more emphasis on the NFQ and the levels FET and HET sit at.

4.2.4.3 Ownership of Parchments after issue

The provider should make an attempt to recover the parchment from the learner i.e. letter to learner requesting they return the parchment. Where no contact is made by the learner the provider should notify QQI. QQI can then flag on the certification system that the parchment has been withdrawn (similar to invalid entries) and notify the provider who is entering current awards that the parchment has been withdrawn and ask the current provider to send in the old parchment to QQI. Providers need to see a copy of the parchment in order to allow credit therefore the parchment can be recovered in this way.

4.2.4.4 Format and Authentication of Certification

Virtual certification

This would be a major break with tradition that may not be popular with learners in particular learners who have struggled through the current education system..virtual certification on its own may not be a useful tool to promote QQI. Physical parchments can be shown to others easily and displayed in the work place which would further promote QQI. Virtual parchments may become redundant as soon as they are issued.

Warm Regards,

Linda Coone

Certification Officer

National Learning Network

SUBMISSION BY:

National University of Ireland

*Please note this response appears as received
and has not been proofed/edited by QQI.*

National University of Ireland

Dear Sir/Madam,

The National University of Ireland values the opportunity to comment on QQI's suite of Green Papers and offers the following observations:

Green Paper 4.1: Awards and Standards:

In relation to the issue of double-certification highlighted in section 4.1.8.21, experience gained in the past in situations of complexity relating to the making of awards (e.g. a second award with the same title) would suggest that double certification may be the least problematic approach and that among employers and other stakeholders, the highest level award will be preeminent.

Green Paper 4.3: Recognition of Qualifications within the National Framework of Qualifications

In many cases it would be beneficial for QQI to seek to recognise awards from the groups highlighted. Given the increased mobility of learners, a reliable system of recognition could be of benefit to institutions for the purposes of access, transfer and progression and in supporting lifelong learning.

In order to ensure coherence, it is considered that to overcome differences in definition and interpretation alignment should be based on a defined standard and description of learning or credit.

Given the resource implications of quality assuring recognition of such awards, it is also suggested that QQI remains open to the possibility of different degrees of recognition for awards that are not automatically recognised. This could involve a spectrum of recognition that would reflect differing levels of QQI quality assurance (or QQI confidence in the quality assurance mechanisms of other bodies). For international awards, QQI could determine the degree of recognition on the basis of bilateral discussions with its international counterparts to establish the equivalency of awards and the reliability of quality assurance mechanisms. It is imperative, however, that any system that has different degrees of recognition clearly communicates those differences to relevant stakeholders (learners, employers, Irish institutions etc.) so as to ensure confidence and clarity in the recognition of awards.

Green Paper 4.4: International Education Mark

Issue 1: It is considered that one version of the IEM would be preferable to ensure consistency of standards and clarity in international perceptions.

Issue 5: Integrating the IEM Review into an Institutional Review would seem to be the most efficient approach. It may be beneficial to underpin this approach with an annual or biennial self-certification from the institution.

Issue 6: The University is of the view that for a provider to be compliant with the Code of Practice, it should be compliant in all of its settings, including 'off-shore' provision. QQI should ensure that the wording of any self-certification and review reflects this. There would therefore be no need to restrict providers' use of the IEM for promotional purposes.

Green Paper 4.5: Access, Transfer & Progression

Q4.5.a: QQI should seek to rationalise the 2003 policies so as to eliminate any overlapping or conflicting obligations on providers in the interim period.

Green Paper 4.6: Provision of Information for Learners

It is suggested that QQI incorporates review of information provision within its general quality assurance/review processes for providers with which it has a relationship.

Green Paper 4.7: Recognition of Prior Learning (RPL)

4.7.5.a: It would be preferable to include RPL as part of a broader ATP policy development process.

4.7.5.b: Yes, defer until a national strategy is in place.

4.7.5.c: Given the responsibility imposed on QQI by the 2012 Act, for each award that QQI makes, it could identify, and enter into an agreement with, a suitable provider with RPL experience to undertake an assessment and advise the Authority on applications submitted to QQI for RPL. Applications would still be made to QQI and QQI would still make the decision (based on informed advice), thus fulfilling its statutory obligations. Providers might expect the cost of providing such advice to be offset against any fees to QQI.

4.7.5.e: RPL could be included as part of both overall provider review processes and annual dialogue discussions.

Green Paper 4.8: Monitoring and Dialogue

The University considers that the nature of QQI's monitoring and dialogue activities should be proportionate to the size of the organisation and the level of risk associated with it. Different combinations of the approaches described in the Paper are therefore likely to be appropriate for different providers.

Green Paper 4.10: Quality Assurance Guidelines

4.10.a: The University considers that a fundamental purpose of quality assurance is to work towards continuous quality enhancement. The list would therefore benefit from a focus on quality enhancement.

4.10.c: QQI should remain involved in, and abreast of, ongoing developments and establish mechanisms through which all stakeholders can feed into, and be kept informed of, proposed changes to QA guidelines.

4.10.d: As the purpose of QQI's guidelines is to support institutions in the development of their own procedures, it would be preferable for the guidelines to be set at a high level, providing scope for institutions to develop more detailed procedures reflecting their own circumstances.

4.10.f: Existing QA guidelines should remain in place until updates are deemed necessary.

4.10.g: The statutory responsibility is ultimately QQI's. However, the requirement to consult with relevant parties before issuing guidelines indicates an expectation that QQI will give due consideration to the views of affected institutions, and existing QA arrangements in place within those bodies, in developing their content.

4.10.i: Yes. It is important that institutions impacted by changes to guidelines are involved in and aware of decision-making in this regard in advance of changes being implemented.

Green Paper 4.11: Provider Risk and Proportionality

4.11.b: A disadvantage of Option 1 is that QQI's risk assessment of providers is potentially disclosable under FOI and could result in reputational damage for individual institutions.

4.11.c: Option 1

4.11.d: QQI should establish protocols to advise relevant stakeholders of significant risk issues, e.g. where issues have been identified about a provider, any relevant awarding body is notified.

Yours sincerely,

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and has not been proofed/edited by QQI.*

National University of Ireland Maynooth

From: Professor Jim Walsh, Vice President Strategy and Quality, NUI Maynooth

To: QQI

Date: 12/09/13

The following document summarises the feedback from NUI Maynooth on Green Papers 4. 1- 4.14

Paper 4.1 GP on Awards and Standards

4.1.4 We note and agree with the suggestion that there might be more emphasis on major awards and a greater distinction between major and minor awards.

We agree that autonomus awarding bodies should consult with relevant professional organisations and employers on matters relating to awards and standards. However the content and standards of awards are the responsibility of the awarding body. We recommend that the first line of final para in 4.1.4 should be amended with ‘approval’ replaced by ‘accreditation’ . Professional recognition bodies do not ‘approve’ our programmes – that particular governance responsibility rests with our Academic Council.

4.1.8.7 The possibility of introducing Subject Guidelines is a matter of great concern for us . An initiative such as that will require a well developed rationale, extensive consultation, and respect for the principles of institutional autonomy and academic freedom.

4.1.4.14 We welcome the formative focus of this section and especially developing the learning to learn competence and the role that work experience can play.

4.1.4.15 first line of this section should be amended to extend focus beyond simply ‘volumes of knowledge’ and give due recognition to the appropriate standards, depth and quality of knowledge required for qualifications / awards. The emphasis on formative assessment is a welcome development that can be linked to the transition to a greater focus on learning outcomes. However, one must be careful that a particular suite of tools does not end up as a constraining straight jacket for the design, delivery and assessment of programmes.

Paper 4.2 GP on Certification

This is relevant for joint awards made by the University and also by QQI or a body to which QQI has delegated authority. As a general principle the joint awards should continue to make full reference in both text and supporting visual material to all of the awarding bodies involved in the awarding process.

Paper 4.3 GP on Recognition of Qualifications within the NFQ

4.2.3 The Act places considerable emphasis on the requirement that QQI establish, maintain and develop a database..... It is of the utmost importance that the database will be comprehensive, reliable and up to date. Consideration needs to be given and assurances provided on how this will be achieved. In relation to Issue 6 p. 9, 4th bullet point we recommend that ‘volume’ of learning be replaced with ‘depth and standard’ of learning. We also propose that bullet point 3 read as ‘The awarding body operates a fit for purpose programme validation, provider accreditation process where relevant and professional endorsement process where appropriate’

Paper 4.4 GP on International Education Mark

1. It is extremely important that the IEM will provide an authoritative, evidence informed confirmation of the high standards of provision and service by all relevant education and training awards. Our preference is for one version of the IEM. Multiple versions based on different codes of practice will lead to confusion and defeat the overall objective. All aspects of the code should apply to all providers, both public and private.

The strongest confirmation of whether an institution merits the IEM should follow a thorough institutional review. Self certification of compliance with the Code of Practice is not a sufficiently robust or reliable process. Where a successful outcome has been achieved from an institutional review the IEM should be granted without payment of any additional fee.

2. We recommend that the IEM should be made available sooner rather than later, while ensuring that the mark is only available to *bona fide* providers which already have in place suitable procedures and processes for working with international students. This means that options b) and/or c) are preferable. Existing established linked providers (ie linked to those providers who meet the criteria under b) or c)) need to be accommodated as part of this, pending their own QQI review process.

3. We recommend that in the first instance the code requirements should be restricted to the three areas mentioned in the 2012 Act.
4. The Code needs to be based on broad high level principles, not a detailed checklist, ensuring the same range and quality of services for international students as for domestic students.
5. The IEM review process should be linked to the institutional review process and not require a new process. Relevant external agencies and international students can thus also be included among the groups consulted as part of the quality review. By integrating these review processes, the implementation cost of the IEM – to both the provider and to QQI - can also be reduced significantly.
6. The Code of Conduct should also apply to off-shore students, thus ensuring that the provider is doing its job for all students. This aspect of the Code will however require further elaboration.

Paper 4.5 GP on Access, Transfer and Progression

NUI Maynooth welcomes the proposed reform and development of ATP by the QQI. The university Access Office and other departments, especially Adult and Community Education and Applied Social Studies, work with underrepresented and often marginalised groups who need to be encouraged and supported through the various education sectors. The proposals to have a nationally coordinated coherent strategy that would support these learners is welcomed. Learners from disadvantaged socio economic backgrounds, learners with disabilities and mature learners are often the least able to navigate complex and often confusing sectors and need much support in the context of information around what these qualifications mean, how transferable they are, and the opportunities to seamlessly progress either to further education or to employment. These groups in many cases have the most to lose from a system that is not coordinated with clear rungs of progression and are often risk averse. The objective that students from targeted equity groups are to be encouraged and supported to achieve further educational qualifications and skills can only be achieved in the context of the structures proposed, including a coherent and well articulated national strategy to support access, transfer and progression.

It is essential that the new structures address the barriers experienced by learners, support collaboration across all sectors including industry and employers, and ensure both the quality of courses offered and the opportunities to progress. Putting the awarding function under one roof is a definite step forward in terms of guaranteeing consistency across FE courses. It would be an important step forward from a learner's perspective that all course work could put them on the path to employment or higher education if that is their goal. The important element is to ensure that all further education courses have high standards of delivery and students who complete them are ready to progress or transfer to the next rung of the framework.

We also recommend that consideration be given to the possibility of providing exit awards for students who partially complete a degree programme or do not meet the required professional standard of practice but do meet the academic standards.

4.5. a *How do the 2003 policies and criteria need to be modified, if at all, for use in an interim period?*

The 2003 policies and criteria need an urgent review in the context of new structures and responsibilities. The review is an opportunity, in the context of new educational landscapes, and the changing needs of learners, education providers and employers, to maximise the opportunities offered to have a more coherent and transparent system that will benefit learners and providers. The challenging economic climate makes such a review an economic imperative.

4.5.b *What timeline and approaches should QQI adopt for the development of new statutory policies and criteria for ATP?*

The current structures are changing significantly. The establishment, role and strategy of Solas and the establishment of Education and Training Boards need to be considered by the QQI. Prolonged delays in the development of statutory policies and criteria could result in the QQI having to adapt to the changing landscape rather than participate in the fundamental changes that are necessary. Clear

policies and directives backed up by legislation outlined during the early stages of change may have more of a chance of successful implementation than policies and directives that come on foot of a major overhaul.

ATP is a major issue for equity target groups and the problems encountered by learners are many (courses that just end with no transfer possibilities, progression to higher education only offered to students who achieve the highest grades, students unable to study at the pace that suits them, students forced to withdraw before receiving an award and no credentials accrued for the work done up to withdrawal, etc...).

4.5.c In light of the current national employment problems should QQI develop new policies or guidance in relation to employability even in advance of a comprehensive review of the 2003 policies and criteria, or are there other priority areas not addressed by the 2003 policies and criteria that merit such consideration?

The NFQ is widely represented as a ladder of qualifications rather than a framework of learning. Movement across the levels is becoming more common as learners seek new learning for professional and personal development purposes. The concept of 'one step up' has greatly influenced thinking about how the framework operates. Policy of this nature undermines the flexibility inherent in the framework because it promotes a linear path that advances vertically upwards rather than one that offers a multiplicity of avenues to learning across the entire NFQ.

Certification continues to be popular and awards are valued by learners as currency in the jobs market and as signifiers of status. Credit and credit accumulation is not well understood in the public domain and should be explained and promoted.

A new policy may be required to address these issues. In some institutions RPL policies do not allow 'double credit'. This practice disables learners from bringing credit from prior awards into future programmes. This technicality needs to be addressed and policy developed to tackle it.

The last decade has seen a substantial increase in the numbers of students from identified equity groups accessing higher education. There is some evidence however that such students are not accessing employment opportunities equally and that some of the barriers that prevented students from accessing further or higher education are also impacting negatively on their progression from college to career. For non-traditional students, access to career is being directly impacted with many of these students having a fragmented career path, lacking relevant work experience and/or supportive role models or having issues with self esteem and the confidence to navigate the labour market effectively. We propose that the issue of employability should be prioritised for these students in particular with a coherent national strategy to address the issue. The proposal that QQI might provide guidance to providers on how graduates can be enabled to progress to employment particularly graduates from equity groups merits further consideration.

QQI needs to liaise with HEA regarding data on ATP as the HEA already collects this data (regarding students on all courses) for various purposes and is the accepted repository for a wide range of data, including First Destinations Report (currently under improvement). QQI may wish to use this for review / QA purposes. We do not favour any possibility that QQI collect such data in addition to the HEA. The universities recommend that QQI and HEA clarify their respective roles in this area, and that QQI avoid diverting its resources unnecessarily. It would be productive for QQI to conduct more extensive consultation on ATP issues (given the changing educational landscape) prior to issuing statutory policies and criteria in this area.

The review of ATP policies and practice should also be integrated into an overall institutional review process, as with the IEM.

Paper 4.6: GP on Provision of Information to Learners

NUI Maynooth already provides a considerable amount of information to learners before they apply to enrol in the University and subsequent to their enrolment. It is important that due cognisance is taken of the information resources that are currently available and of might be contained in the proposed QQI database. We are not in favour of creating any further databases and recommend that the resource implication of any initiatives in this area be considered very carefully, including full consultation with the different categories of providers.

Paper 4.7: Green paper on the Recognition of Prior Learning

RPL is particularly important for mature students with substantial life and work experience coupled with limited formally recognised educational achievement. Our experience since 2011 is that a rigorous and workable approach to RPL is an essential feature of recruitment and selection processes. We favour an approach that enables RPL decisions to be made at a 'local' level that balances the best interests of the applicant with the need to safeguard the award standard.

Q4.7.5.a Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative?

It would be preferable to include RPL as part of a broader ATP policy development process. A thorough analysis of the educational outcomes attained by learners where RPL has been awarded to date would be helpful.

Q4.7.5.b Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated?

We strongly recommend YES to this query.

Q4.7.5.c Should QQI develop a procedure of direct application for awards? How else might it fulfil its obligations under 2012 Act?

No. QQI should not facilitate direct applications for awards through RPL. Any correspondence should be only between the applicants the provider.

Q4.7.5.d Should QQI reopen the process of agreeing RPL procedures with providers of FET Awards Council awards?

Yes, but a national strategy for RPL should be developed first.

Q4.7.5.e What measures can or should be taken to improve the collection of information on RPL activities by Irish providers and awarding bodies?

Whatever data collection system is put in place it must be both efficient and effective and avoid any duplication of processes already established. Thus data on RPL could be taken for Student Record Systems and transferred with the annual data returned to the HEA and forwarded to QQI at an aggregate level.

Q4.7.5.f How urgent is the reconciliation of national approaches to credit in FET and HET to the realisation of objectives for RPL?

It should be addressed within a national strategy for RPL

Paper 4.8: GP on Monitoring and Dialogue

We favour option 7: there as a need to provide for various approaches. We would welcome an opportunity to engage with QQI on this matter. The proposal re a risk-based approach to monitoring and dialogue merits further consideration.

We consider the regular Departmental Peer Quality Review processes an appropriate mechanism for both dialogue and monitoring QA internally.

Paper 4.9: GP on Reviews

We understand that the focus in this paper on external QA reviews of institutions has been addressed separately in the "review of reviews" consultation by QQI to which we already provided feedback. We reiterate our view that QQI should review other approaches in addition to the legacy models and avoid a one-size-fits-all for all providers. There is scope to build on the experience we have already gained from previous reviews.

Paper 4.10: GP on Quality Assurance Guidelines

We understand that the scope of this paper is confined to internal QA guidelines. As a general comment our view is that QA Guidelines should reflect overarching principles while accommodating diverse contexts. We note the reference in section 4.10.3 to the variety of approaches currently in use by different providers. We strongly recommend that the potential of QA as a development tool, in the manner it has developed in the universities, should be retained for the universities. A transition to a more compliance driven model would be a regressive step that we could not support.

Paper 4.11: GP on Provider Risk and Proportionality

The potential for including a risk management policy as an analytical tool in QA is an innovative and therefore challenging proposal. However, it may be viewed as evidence of a maturing of the approaches already applied to QA and of the relationship between the provider and QQI. The estimation of risk is crucially dependent on the quality of the evidence informing the assessment. A move to publish a provider's risk profile would need to be supported by a very robust verification and prior consultation process. If these challenges can be overcome there may be merit in testing a provider risk and proportionality model as set out in option 1 on a pilot basis among a sample of providers with long established and verified track records of proven commitment to QA.

Paper 4.12: GP on Data

- a. Principles – we agree subject to caveat that sharing, linking, publishing of data must only be at a level, following aggregation, that will safeguard integrity and confidentiality. Another principle should be added – the ownership of the data resides with the provider. The purposes for which the data will be used must be agreed in advance with provider. Any sharing or linking of data from one institution with data from other sources must be agreed in advance with the providers. A further principle to consider is that QQI will only collect from providers data which cannot be obtained from any source to which the provider has already supplied data.
- b. We agree
- c. Yes
- d. Option 2 is preferred - programmes and awards need to be clearly and unambiguously linked to their relevant provider.

Paper 4.13: GP on Programme Accreditation

As a general comment we recommend that the matters raised in this paper should be considered in conjunction in Paper 4.1 on awards and Standards.

- a. The current programme approval model involving internal and external assessment and periodic review of programmes works well for us. While there may be merit in moving to a new unified approach to programme approval and, where appropriate, accreditation this does not seem to be a sufficiently pressing matter that would merit further resources for QQI. Any new model should retain the core features of the approaches that are already working well for us in the university.
- b. There is clearly a considerable amount of preparatory work including changes in work culture and practices to be undertaken before any new proposals in this area are developed and opened up for discussion as part of a more focused consultation. The duration of programmes must also take account of any fluctuations in demand and also of the ability of the provider to retain capacity to deliver a programme. The resource implications mentioned in Issue 3 are potentially considerable. One must set against the cost some estimate of the potential added value. If there is little likelihood of significant added value the process needs to be reconsidered. The possibility of using the Provider Risk and Proportionality approach needs to be examined very carefully – it should only be used, following

pilot testing, with providers that already have externally validated track records re QA; otherwise there is the possibility of a spill-over risk that could affect all providers. The piecemeal approach mentioned in Issue 4 is unsatisfactory and should not be tolerated in the future. Maintenance of quality should always be the top priority – the risks associated with pressure for short expediency measures should be avoided.

- c. Accreditation arrangements should be sufficiently flexible to provide opportunities for programme amendment and development within the accreditation period to comply with endorsement requirements and sectoral priorities that may arise..

Paper .14: GP on Re-engagement of Legacy Providers with QQI AND Future Access to QQI Awards

The matters raised in this Paper are for the most part beyond our remit. However, in the area of youth work and community related work programmes there are some voluntary groups previously registered as providers with FETAC. There is a value to quality accredited learning provided by these organisations that directly relates to issues of ATP as well as the broader issues of capacity building at the local level. We recommend that opportunities will be available for these providers to engage with QQI and wider sectoral bodies responsible for occupational standards in order to ensure the relevance of the programmes to practice, and to maximise opportunities for progression to professional qualifications and employment for learners.

SUBMISSION BY:

One Family

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One Family

One Family, Ireland's leading organisation for one-parent families, stresses the need for the National Reform programme to deliver economic, environmental and social measures designed to develop and build cohesion in Ireland particularly for those parenting alone or going through a family transition. One Family offers support, information and services to all members of all one-parent families, to those experiencing an unplanned pregnancy and to those working with one-parent families.

Children are at the centre of our work and we help all the adults in their lives including mums, dads, grandparents, step-parents, new partners and other siblings. One Family's holistic model of specialist family support services works in two ways – firstly, to progress parents on social welfare to take the next step to education, training or employment; and secondly, to provide expert parenting and family supports to people parenting alone or sharing parenting and to those working with one-parent families.

Our Vision

One Family believes in an Ireland where every family is cherished equally, and enjoys the social, financial and legal equality to create their own positive future.

Our Mission

One Family is working to ensure a positive and equal future for all members of all one-parent families in Ireland – changing attitudes, services, policies and lives. Together with one-parent families and those working with them, we are committed to achieving equality and respect for all families. In addition to striving for fundamental structural change, we support individual one-parent families as they parent through times of family, work and life change, and those experiencing a crisis pregnancy. We know that every family is unique, and so we work in a family centred way to bring about better lives for parents and children.

Social and economic prosperity

More people have achieved individual success, more employers have improved the skills and productivity of their workforce, and more colleges and providers have demonstrated the way in which a responsive further education system is central to delivering greater social and economic success. At the same time, we know that there is more to do if we are to sustain and build our economic strength in the face of increasing challenges, and if we are to ensure that more people reap the benefits of this.

There is a great opportunity to assert our strategy and focus investment in a creative workforce and social development service as we have the opportunity to get more people qualified to Levels 4, 5 and 6 (and increasingly Level 6), so that they can access greater opportunities.

We know that we must engage more people in quality learning (including learning below Level 5) to support their progression into further study and/or employment, and to enable them to realise the wider benefits that learning brings. We need to ensure that investment is available each year for more adults to enjoy a broad range of learning opportunities, including foundation learning skills for life, and personal and community development learning (PCDL).

Creating a culture of demand for skills

Collectively, we have to create a culture where adults and employers demand skills and qualifications because they recognise the social and economic benefits that they bring. As well as being more innovative about the incentives that we use to increase participation and deliver greater achievements, we need to work across the system to stimulate demand from potential learners and employers. We will do this by making sure that they have access to diverse and high-quality learning and training opportunities that will meet their needs.

Skill Accounts

Effective marketing and communications needs to be designed to change attitudes positively towards learning and skills. We must step up a gear for adults and employers, and put increased investment in guidance and Skill Accounts. Where people can afford to contribute towards the cost of their learning, they should be expected to do so, and incentivised through the tax system.. This will enable to focus government resources on engaging and supporting those who are most excluded from the labour market, enabling them to develop the skills and qualifications that will improve their ability to succeed in work and in life. The added value is that it will put greater ownership and purchasing power in the hands of individuals.

We want to ensure that everyone entering the workforce is equipped with the skills they need to fulfil their potential in work and life. All our activation programmes must ensure that education and training will prepare everyone to make a success of their life. The critical aims therefore are:

1. to raise attainment and participation now, while narrowing achievement gaps;
2. to ensure that routes are created for all, providing them with valuable and recognised qualifications; and
3. to deliver an entitlement that will provide all with access to the routes that are most likely to lead to their success.

We have a central leadership role in delivering all of these reforms, with key responsibilities for the first and third aspects and a strong interest in the second. We must broker partners to make sure that there are learning opportunities in place for all people.

Increased social inclusion: the role for skills

We must work hard with colleges and other providers to deliver strong performance against targets. This will need to collectively deliver on the social and economic prosperity that the Government aspires to. This means that we must do more to engage people with low or no skills – those who are more likely to be socially and economically disadvantaged. We must be more innovative in the way in which we excite and connect with those who are least likely to participate in learning and development.

Raising skills levels and gaining new skills and qualifications are essential not only if we are to help more people to come off benefits and to enter and progress in work, but also if we are to reduce social and economic disadvantage and support greater social mobility. Only then will we truly raise demand to the levels that we need.

For people, there needs to be a continued and relentless effort on reducing the number of those not in education, employment or training, so that they do not get left behind by their peers. This means being more flexible in the way in which we deploy public funding and funding available.

It means working with the full range of colleges and providers to ensure that they are engaging with all sections of the community. It also means aligning our work with that of our partners, to integrate skills with better employment opportunities at all levels.

Focusing on priority groups

More people will study for qualifications if they are accessible, affordable and have currency. We want more people on these courses to come from our priority groups – for example, people who are not in education, employment or training (NEET); those with low or no skills; lone parents; those who are on benefits; those who live in deprived neighbourhoods; and those who face issues of social exclusion. We realize that these are often the people who need the most support and encouragement both to engage with, and remain in, learning. We will use the opportunities created by the ETBs to engage wider sections of the community and to support their progression into further learning and employment. We need more second-chance learners to progress to higher levels of learning and to higher education. Partnerships will be critical to making this happen for people.

Gaining new skills is essential if we are to help more people to come off benefits and to enter and progress in work targets provision for those groups of learners that are most vulnerable. Working closely with colleges and providers to honour our commitment to continued investment in this provision will reap benefits. But if the system is to deliver the most from this funding, we must attract greater contributions from employers and the people who benefit from learning, stepping up our efforts to increase overall investment in skills. Where they are able to, we should expect more people to contribute to the cost of their learning, with more colleges and providers generating income from their ability to meet existing and growing demand. We want adult learning to thrive, but only in a context in which it is sustained by a combination of business, individual and government investment.

Similarly, we must be clear that we expect more employers to contribute towards the cost of upskilling and reskilling their workforce through say, 'Skill Accounts'. Although, we have to do more to make the service as streamlined and as effective as it is possibly, we must set out how we will do this, while also significantly improving overall performance. As we move towards a system in which learners and businesses hold increasing purchasing power, we need more colleges and providers to develop their commercial expertise and acumen. We need them to be able to deliver more to businesses and individuals and, through wider investment, to increase the income that they are able to generate and the learning that they can sustain.

All of this presents a significant challenge to the way in which the sector operates. Is the goal a self-governing sector operating in a simplified system – a system that clearly responds to the needs of businesses and communities, while continuing to deliver against government priorities and targets?

Realising skills for social and economic prosperity: the role of QQI

Functions, vision and values

QQI's functions should include:

- registering training providers as 'registered training & skill development organisations';
- registering organisations as centres of Training & Skill Development providers—and providers that can enrol international students
- accrediting vocational education and training and skill development courses
- ensuring that organisations comply with the conditions and standards for registration, including by carrying out compliance audits.
- QQI should also collect, analyse and publish information on the sector and providers.

Vision

QQI's vision should be that students, employers and governments and its agents have full confidence in the quality of vocational education training and skill development outcomes delivered by registered organisations.

Values

QQI must be committed to:

- **independence** in their regulatory role and in providing advice
- **transparency** in their regulatory decisions and activities

- **collaboration** with industry bodies, employers, government and its agents; the independent sector and registered organisation

QQI needs to be a national system, based on a partnership between government; industry and providers. Governments provide funding, develop policies and contribute to regulation and quality assurance of the sector. Industry and employer groups contribute to skill development policies and priorities, and in developing qualifications that can deliver skills to the workforce for economic and social development. Therefore a national quality in qualifications system provides high quality and nationally recognised training.

QQI must give learners the opportunity to:

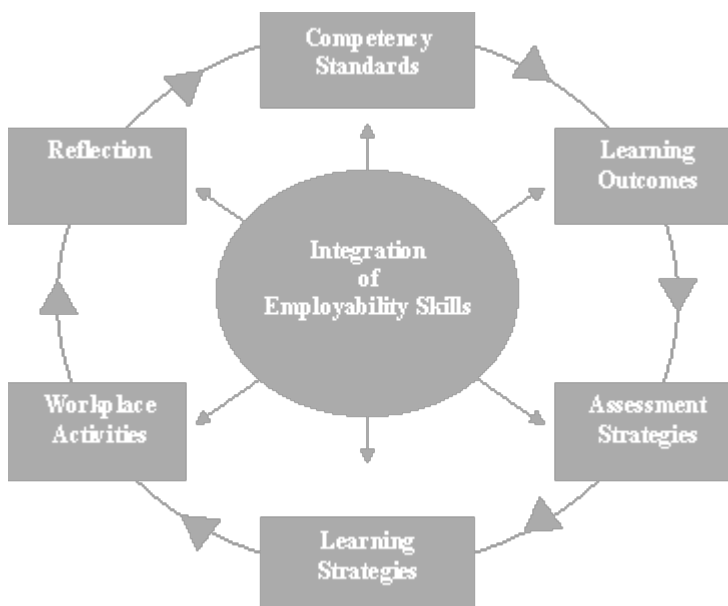
- Gain the skills they need to enter the workforce for the first time
- Live fulfilling lives
- Contribute to social development
- Re-enter the workforce
- Retrain for a new job
- Upgrade their skills for an existing job, or
- Gain additional qualifications

In this national approach to quality systems must be :

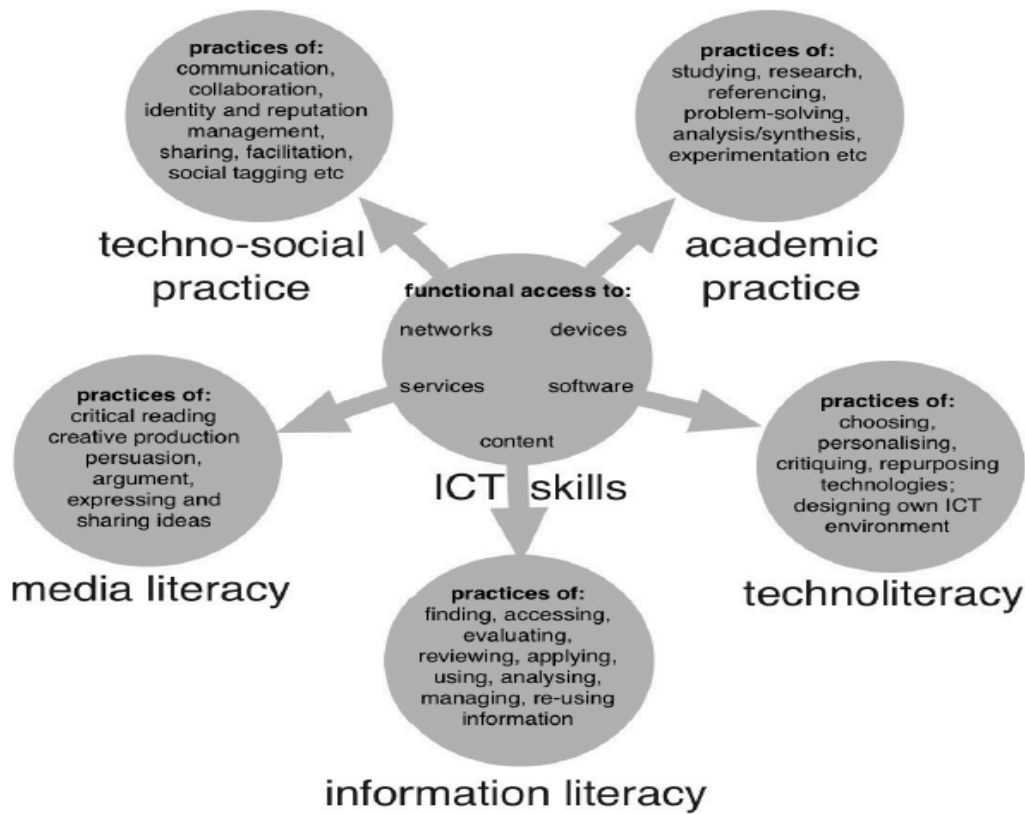
- Industry-led- employers, unions and professional associations of an industry define the outcomes that are required from the skill development programme; and
- Be jointly managed by state in partnership with industry and providers.
- Client focused- Clients of the system are employers and individuals who use it or intend to use it.

A simple, flexible and relevant system must respond to client needs. Below are a set of diagrams which assert a methodology and framework for building our national systems.

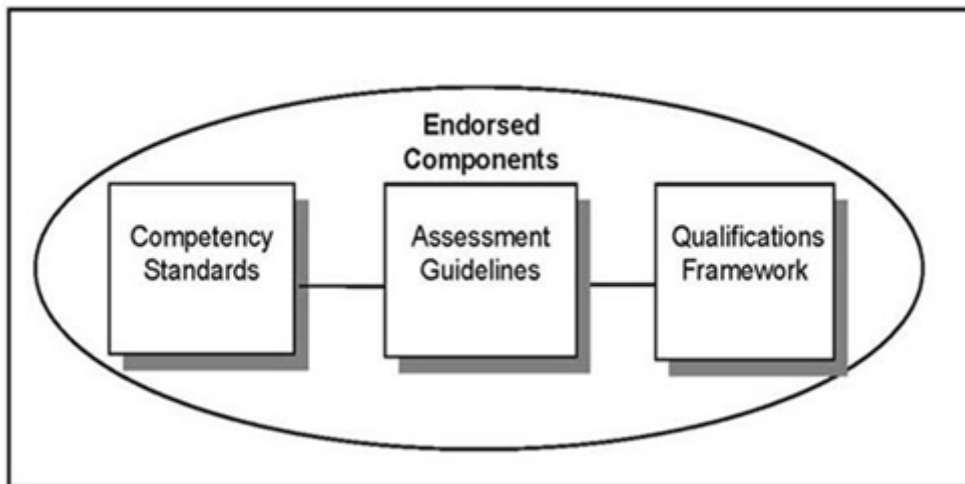
1. The Integration of Employability Skills



2. The Integration of ICT Skills



3. The Framework and Process



QQI has a key economic and social function in up-skilling, integrating and strengthening people into the labour market; in providing high quality technical skills and ensuring cohesive social development. But in recent decades, employability and vocational skills have been a neglected part of initial education: education policy research and reforms have tended to focus primarily on school and tertiary education. Therefore the following must be recognised, endorsed and enabled by QQI

A Quality Framework

The QQI framework must be aimed at achieving greater national consistency in the way providers are registered and monitored and in how standards in the vocational education, training and skill development sector are enforced. The QQI Quality Framework must comprise of [Standards for a National Regulator for Registered Organisations](#)

Standards for Registered Organisations

An essential mechanism for the regulation of vocational education, training and skill development is the national standards against by which applicants are assessed.

Standards

The standards must be used by QQI as an instrument in protecting the interests of all students undertaking vocational education, training and skill development in Ireland.

The standards must guide nationally consistent, high-quality training and assessment services in the vocational education, training and skill development system. This will rely on the development and delivery of a [National Skills Standards Council](#) which is responsible for providing advice for tertiary education, skills and employment. The National Skills Council would in turn have a pivotal role in providing advice on national standards for quality assurance, performance monitoring, reporting, risk, audit, review and renewal of providers' accreditation status, and accreditation of qualifications. The standards put forward by the National Skills Council would be implemented by QQI.

The Standards for Registered Training and Skill Development

Organisations must include both initial and continuing registration requirements.

The **standards need to** express all requirements as standards, ie there is no differentiation between 'conditions' and 'standards'. In addition to a QQI quality Framework, there must be [standards set for all accredited courses](#). The standards for accredited courses must apply to all courses regulated by QQI, without exception.

QQI must be seen as a new national regulator for Ireland's vocational education, training and skill development sector. QQI must enable learners to gain qualifications for all types of employment and social development and specific skills to help them in the workplace and in life.

QQI must recognise that the providers include technical and further education institutes and colleges, adult and community education providers, as well as private providers, community organisations, industry skill centres, and commercial and enterprise training providers. In addition, QQI must recognise and promote that some universities and schools may (wish to) provide these qualifications too.

Vocational education, training and skill development must be channelled through a network of social and economic development agencies, along with industry, public, private and community providers that work together to provide nationally consistent training and skill development across Ireland. QQI and its inter-agency working is crucial to the Irish economy; for the development of the national workforce; for Irish social development; and as a potential major export industry.

Registered Organisations

Registered organisations must be viewed as those providers registered by QQI to deliver training and skill development services. They are recognised as providers of quality-assured and nationally recognised training, skill development qualifications.

It is vital for consistency, quality en-surance and reputation that only registered providers can:

- deliver nationally recognised courses and accredited
- the Irish qualifications framework of training and skill development

- apply for Irish state funding to deliver vocational education, training and skill development.

In addition QQI must look at developing, delivering and promoting

- Vocational Graduate Certificate; and a
- Vocational Graduate Diploma.

Being registered by QQI means a provider must act in the learners' best interests and meet the [standards for registered organisations](#).

Course accreditation

QQI accredited courses must address industry, enterprise, educational, legislative or community needs. Accredited courses must respond to changing skill requirements, including changes to the needs of emerging and converging industries and sectors. In this way QQI course accreditation will be seen as formal confirmation that the course:

- is nationally recognised;
- meets an established industry, enterprise, educational, legislative or community need and standard;
- provides appropriate competency outcomes and a satisfactory basis for assessment;
- meets national quality assurance requirements; and
- where it leads to a qualification, is aligned appropriately to the **Irish qualifications framework**.

The added value of this approach is that accreditation could mean a course would be eligible for:

- national and international promotion enabling marketing and delivery to international students;
- participant/employer financial assistance through government agencies and priorities;
- to access an occupational licensing or regulatory outcome.

QQI's approach to course accreditation

QQI's role as the national regulator is to accredit courses that may be offered and/or delivered by registered organisations. This relies on a responsive and thorough assessment framework. QQI must be committed to providing timely and responsive services to sector stakeholders and keeping them actively informed and engaged about accreditation processes, requirements and decisions. Evidence put forward by course owners that there is a need for their course must be thoroughly evidence-informed. QQI must be satisfied that the need exists and that course outcomes are not duplicated. As the national regulator, QQI must engage with course owners, providers and developers during the assessment and accreditation process.

It must be the course owner's responsibility to demonstrate that the courses they put forward for accreditation has been designed, developed and documented in compliance with the requirements of the relevant standards for accreditation. Course owners must be expected to have a thorough understanding of standards (QQI, industry and community) and must provide assurance, evidence and endorsement that the course complies with these standards.

QQI course accreditation processes must be clearly documented and all accreditation activities must be conducted in a transparent manner. In seeking continuous improvement, QQI must monitor its own course accreditation processes and outcomes to assess their effectiveness, efficiency and consistency, identifying opportunities for improvement, and implementing strategies to realise those improvements. In this way QQI as the national

regulator QQI must aim to ensure learners, employers and government have full confidence in the quality of Ireland's qualifications.

As part of the QQI framework, providers must comply with the [National Qualifications Framework](#). QQI will provide the standards for Irish qualifications and includes the requirements for issuing qualifications and statements of attainment. QQI going forward must continue to issue Testamurs: 'an official certification document that confirms that a qualification has been awarded to an individual'. That is a learner who has successfully completed all of the required units of competency or modules (as specified in the qualification or accredited course) is entitled to receive the following certification documentation on award of the qualification:

- a testamur,
- a record of results;
- a statement of competences and skills.

This additional information is vital in the delivery of essential skills; transferable skill and enables understanding to potential employers of learners' abilities. A statement of attainment should only be issued if a learner successfully completes one or more units of competency or modules or an accredited short course, but does not meet the requirements for a qualification. The statement of attainment must list all of the units of competency or modules achieved.

Responding to a changing landscape

These changes represent a significant opportunity to put skills at the top of the political agenda and to demonstrate how they contribute to wider government goals to reduce child poverty, promote social mobility, improve innovation and business productivity, and support higher levels of sustainable employment.

These are challenging times for the sector as together we deliver a programme of significant transformation against a backdrop of further structural change. It is also a time of huge opportunity, offering a unique chance for us all to enhance the way in which learning and skills are delivered. We must be committed to working closely with partners nationally, regionally and locally to ensure that learning and skills are positioned at the heart of local and regional economic development and community regeneration. In this way we can set out how we intend to focus our efforts and resources to deliver better skills, better jobs and better lives.

SUBMISSION BY:

Pearson

*Please note this response appears as received
and has not been proofed/edited by QQI.*

QQI Green Paper 4.3 on the Recognition of Qualifications within the National Framework for Qualifications

13th September 2013

Pearson is the world's leading learning company and has been the parent company of the awarding organisation Edexcel since 2003. In 2010 the legal name of the Edexcel awarding organisation became Pearson Education Limited - although, with the agreement of Ofqual, the regulator for England, we continued to use the name Edexcel for our awarding activities on the understanding that we would move to Pearson in the near future. In May 2011, EDI plc also became part of Pearson. Since April 2013, our listing on Ofqual's Register for Regulated Qualifications has been 'Pearson Education Limited', and all Pearson qualifications are now identified as 'Pearson', followed by our existing brands like BTEC, Edexcel, EDI and LCCI.

We are recognised as an awarding organisation by the regulatory authorities in England (Ofqual), Northern Ireland (CCEA), Scotland (SQA) and Wales (Welsh Government).

Pearson offers academic and vocational qualifications and testing to schools, colleges, employers and other places of learning in the UK and internationally. Our academic qualifications include GCSE and GCE A level. Our vocational qualifications include NVQ and BTEC from entry level to Higher National Diplomas. BTECs are recognised in more than 80 countries, and taken by over 1 million learners worldwide.

In March 2011 Ofqual and the NQAI confirmed an agreement to align awards of Ofqual recognised awarding organisations with the Irish NQF. Edexcel subsequently had 250 Ofqual-regulated BTECs (levels 1 - 5) aligned with levels 1 - 6 of Ireland's NFQ and made available to centres and students in Ireland. Of these, 40 qualifications had 1,253 Irish learners registered in 2012.

The alignment agreement between NQAI and Ofqual stated that qualifications not on any UK framework and therefore not aligned with the NFQ (i.e. Pearson self-regulated) must make no reference to any NFQ level and clearly state they have not been aligned with the NFQ. Therefore Pearson awards designed for customers in Ireland using our Customised Qualifications Service are not aligned with the NFQ and there is no route currently by which we can seek for these to be evaluated in terms of their comparability with awards made on the NFQ.

Executive summary of response

Pearson wishes to make its qualifications available to centres and learners in the Republic of Ireland as it does in many other countries around the world. Currently the only way to operate with QQI recognition is via the 2011 alignment agreement between the NQAI and Ofqual. Making our qualifications available in this way has allowed a significant number of Irish centres and learners to take up our BTEC qualifications but our awards are not currently fully recognised within the Irish NFQ with the same status as organisations based in the Republic of Ireland who make awards. The current alignment of Ofqual regulated qualifications does not involve direct QQI scrutiny of our processes and qualifications, and therefore, we recognise, does not give all stakeholders in Ireland confidence in the quality and comparability of these awards as compared to local awards.

Pearson believes that the current arrangements prevent us meeting the needs of all providers and learners who may wish to take advantage of our qualification portfolio. We would therefore welcome the opportunity to apply for recognition directly from QQI and be subject to greater periodic scrutiny in our delivery if this will result in full recognition within the Irish NFQ. This would be consistent with our separate recognition as an awarding organisation by the regulatory authorities in England (Ofqual), Northern Ireland (CCEA), Scotland (SQA) and Wales (Welsh Government). Whilst this is necessary to provide assurance to all relevant stakeholders in the Republic of Ireland, we would expect that QQI processes can be proportionate and that some duplication can be avoided by QQI accepting the findings of Ofqual's quality assurance checks where QQI deems it appropriate.

If direct recognition from QQI was available and foreign awarding bodies chose not to pursue it, it would seem reasonable for awards based purely on framework equivalencies, and trust in the quality assurance of a third-party regulator, to be assigned a different degree of recognition in Ireland.

Pearson also provides a Customised Qualifications Service where qualifications can be adapted or created to meet local needs but still developed and delivered to the same standards as our wider portfolio of qualifications. Due to their use by specific providers, these qualifications do not appear on Ofqual's Register of Qualifications. Some centres in Ireland are taking advantage of this service to meet their learners needs and we would be keen to explore with QQI a process whereby we can submit these qualifications to QQI for recognition within the NFQ.

Issue 1 - Should QQI establish new policies and criteria for recognition of each of Groups A, B, C and D (as defined by the NQAI)?

Pearson is currently recognised within Ireland as a Group C organisation – an education and training awarding body based in other jurisdictions, but where provision and related qualifications are available in Ireland. This was facilitated by an agreement between the English qualifications regulator – Ofqual – and the NQAI in 2011, which enabled Ofqual-recognised awarding organisations to apply for their qualifications to be aligned to the NFQ for Ireland. There is a demand amongst centres and students in Ireland for access to our work-related BTEC qualifications which have been designed to provide a practical, real-world approach to learning in a wide range of industry sectors and built to accommodate the needs of employers and allow progression to university in the UK and internationally. In 2012, 40 qualifications had 1,253 Irish learners registered.

However, the current alignment of awards arrangements means that our BTEC qualifications are not currently allowed the same status as other comparable local awards on the NFQ. For example, the current alignment agreement states that awarding organisations that have aligned their awards with the NFQ are not entitled to use the logo of NQAI, or that of any future amalgamated body on their certification. Also, foreign awarding bodies and their recognised centres are not permitted to use this logo in any marketing materials associated with the award. Although awards aligned to the NFQ can make use of a 'framework diagram' to illustrate the alignment, we would welcome the scope for our awards to be fully recognised within the Irish NFQ with the same status as organisations based in the Republic of Ireland.

In addition to our standard qualification suites, Pearson provides a Customised Qualifications Service (CQS) on Pearson's Self-Regulated Framework (SRF) <http://www.edexcel.com/quals/cust/Pages/default.aspx>. This service allows for qualifications to be specifically adapted or created to meet the needs of particular learners and stakeholders where their needs cannot be fully met from our standard qualifications suites. The CQS is regulated against Pearson's SRF Policy and therefore the qualifications created via this service generally do not sit on the UK national framework. They are not be accredited or regulated by Ofqual, the qualifications regulator in England, as they are produced to meet the needs of specific providers rather than a national market.

Although these qualifications are not usually subject to third-party scrutiny, Pearson always applies the same standards in its self-regulation of these qualifications as it does for its regulated qualifications. In each case, Pearson qualifications:

are fit for purpose and designed so they can be effectively quality assured by Pearson

- have a specification document which sets out the key aspects of the qualification.
- have been designed with diversity, equality and inclusion in mind to ensure there are no artificial barriers for students
- apply standards that are benchmarked to a recognised qualification framework(s)
- can only be delivered by centres that have met Pearson's centre approval quality requirements
- will have a network of experts in the UK and internationally who support centres in the design and delivery of the qualifications
- have the standards being applied checked by Standards Verifiers (SVs) who visit all centres each year
- will issue certificates to students only if the appropriate quality assurance and standards have been met.

The 2011 alignment agreement between NQAI and Ofqual stated that qualifications not on any UK framework and therefore not aligned with the NFQ (i.e. Pearson self-regulated) must make no reference to any NFQ level and clearly state they have not been aligned with the NFQ. Despite this there is strong interest from Irish centres and learners in qualifications that are designed to meet their specific needs and requirements, with 8 centres in Ireland currently offering qualifications from Pearson's CQS. Our understanding is that our Customised Qualifications Service and subsequent quality monitoring is very similar to the approach of HETAC and FETAC programmes offered in Ireland and recognised within the NFQ, in that they are individually centre-devised rather than being part of a qualifications suite. As there is clearly a demand in Ireland for this kind of service, and it mirrors the service provided by local awarding bodies in many ways, we would welcome the opportunity for Pearson's customised qualifications to gain recognition within the Irish NQF.

Pearson's ability to meet the needs of all potential providers and learners in Ireland who may benefit from our products and services is currently restricted by the definitions of Groups A, B, C and D bodies for recognition. We would support the establishment of new policies and criteria that will enable us to make our full qualification provisions available to learners in Ireland.

Issue 2 - Should there be 'degrees of recognition' within the NFQ?

Issue 3 - How can the integrity of the NFQ be maintained where different routes to the NFQ are subject to radically different quality assurance arrangements?

Issue 4 - In order for awards to be aligned with the Irish NFQ, how should programmes leading to these awards in Ireland be quality assured?

Issue 5 - Should the recognition of awards within the NFQ be processed under QQI policy and procedures for programme validation?

Degrees of recognition -The Green paper asks for views on a number of areas around 'degrees of recognition' and how this could be linked to quality assurance and validation processes. We acknowledge that as Group C (foreign awards) alignment was based on equivalency relations between the UK and Irish frameworks, and presupposes confidence and mutual trust in the underpinning quality assurance arrangements, there are valid questions about whether Group C alignment should be afforded a different degree of recognition from other categories.

It is suggested that a lower degree of recognition could be offered for aligned awards where less information is available to QQI and therefore there is greater uncertainty. A high degree of recognition would require information about the award, its associated programme and awarding body that is comparable to that available to QQI in respect of local awards made by DABs, awarding bodies with DA or by itself.

At present, the arrangements for Group C (foreign awards) do not provide Pearson with a route to provide QQI with full information about its awards, the associated programmes and its institutional approach to quality assurance of the design and delivery of qualifications and awards. We think it appropriate that a route for full recognition within the NFQ is available to all awarding organisations able to prove that they meet QQI's criteria and expectations. If this route was available and foreign awarding bodies chose not to pursue it, it would seem reasonable for awards based purely on framework equivalency assessments and trust in the quality assurance of a third-party regulator to be assigned a different degree of recognition in Ireland.

Quality assurance arrangements - At present the QQI do not make an assessment of Pearson and other foreign awarding organisations quality assurance processes, and therefore is unable to confirm whether they are comparable with those that apply to Irish national awarding bodies. As noted in the Green paper, this poses a potential threat to the integrity of the NFQ. As stated above, Pearson would support moves for QQI to have a process whereby foreign awarding bodies' quality assurance processes are reviewed by QQI to ensure they meet their expectations for awards made in Ireland, as long as these arrangements were proportionate and led to full recognition within the NFQ. As an organisation that has been refining our quality assurance processes over many years and subject to the scrutiny of Ofqual and other national regulators, we would welcome the opportunity to gain similar recognition from the QQI to ensure all stakeholders can have confidence in the quality of our awards in Ireland.

Quality assurance of programmes - Issue 4 of the Green Paper notes that the NQAI policy for Group C was concerned with the alignment of awards and learning outcomes only, and the quality assurance of awards is not the same as the quality assurance of programmes leading to awards. Pearson spends a great deal of effort in ensuring that the programmes delivered by centres preparing students for Pearson awards meets our requirements. All centres throughout the world wishing to deliver Pearson qualifications to students must first go through a centre and qualification approval process which includes a visit from one of our Centre Approval and Implementation Training Officers. Once a centre is approved and delivering a programme of study and assessment to students it will receive two visits per year from one of our standards verifiers to allow all units and assessors to be sampled before certification is allowed. These visits are per programme offered, rather than per centre, so many centres will receive several visits per year across the range of subject areas they offer.

Each visit will normally involve: a review of assessment materials; programme documentation; the operation of a centre's internal verification process; meeting learners; and checking the arrangements for management of the programme and the adequacy of resources. Only when Pearson requirements have been satisfied will certificates be released to students who have completed. We are therefore confident that programmes delivered in Ireland for both our standard and customised qualifications are subject to appropriate quality assurance checks, but we would be happy to submit these processes to QQI scrutiny to give the transparency that will allow all stakeholders to have confidence in the quality of our awards in Ireland. Information we gather about providers delivery of our qualifications can be provided to QQI as required.

QQI policy and procedures for programme validation - As already stated, Pearson would welcome the introduction of QQI scrutiny of our award standard, the associated awards and programmes if the outcome of a successful validation process would be the full recognition of an award within the Irish framework.

We would hope that both our standard Ofqual-regulated and customised qualifications could be recognised within the Irish framework. To limit duplication in the checks undertaken by national regulators QQI may wish to renew its understanding with Ofqual regarding the validation checks that qualifications on Ofqual's Register of regulated qualifications have already undergone. Pearson would hope that this will provide QQI with necessary assurances regarding most if not all aspects of these qualifications, and limit the need for duplication. As already discussed, it would seem entirely appropriate that QQI would still wish to subject foreign awarding organisations' institutional internal and external quality assurance processes to its own scrutiny to provide necessary assurance about these processes for awards in the NFQ.

Where Pearson and other foreign awarding bodies wish to offer qualifications which have been designed for specific centres and learners in Ireland, and which are not subject to Ofqual checks, it would appear essential that these qualifications are subject to the QQI programme validation process before they can be included in the Irish NFQ.

Issue 6 - Do the following principles indicate some of the issues that need to be considered before an award is recognised?

The awarding body itself is recognised and quality assured by QQI or by a body recognised by QQI for this purpose.

The agreement with the awarding body and the recognition of its awards should be subject to periodic review e.g. every five years.

The awarding body operates a fit for purpose programme validation and provider accreditation process where relevant.

The award for which alignment is sought certifies a minimum specified volume of learning, or credit, comparable to other awards included in the NFQ.

The award for which alignment is sought has a defined standard of knowledge, skill or competence.

Candidates for the award are reliably and validly assessed against the prescribed standard before an award is made.

Awarding bodies can reliably report on the performance of candidates in Ireland seeking their awards e.g., completion rates.

Pearson would support the listed principles being applied for any award to be recognised within the NQF, and that a process to prove compliance with these principles is available to local and non-local organisations wishing to award qualifications within the Republic of Ireland. As stated, Pearson would welcome the opportunity to apply for direct recognition from QQI and to be subject to the associated quality assurance checks. However, we would hope that duplication and administrative burden can be kept to a minimum by QQI recognising the findings of regulators in England, Northern Ireland, Scotland and Wales who have already applied a recognition process and quality assurance checks to awarding bodies. We would hope that additional QQI checks on an awarding body could be limited to only those areas where QQI judged it necessary to conduct its own review as necessary to be able to assure itself and stakeholders.

We would not object to the principle that recognition would be subject to periodic review, as long as this process would be conducted in a way that ensured awarding bodies could have confidence that long-term investment was justified and likewise that Irish centres and students could have confidence in the longer-term currency of the awards delivered. As outlined above, Pearson operates a provider accreditation and programme validation process to help ensure candidates for the award are reliably and validly assessed against the prescribed standard before an award is made. In addition, both our Ofqual-regulated and customised qualification provision

state the volume of learning and credit applicable, and define the standard of knowledge, skill or competence required, as proposed in these principles. Awarding bodies should also be able to reliably report on activity in the specific regions in which it operates, and Pearson would support the principle of candidate level data being collected and provided to QQI.

SUBMISSION BY:

Scottish Qualifications Authority

*Please note this response appears as received
and has not been proofed/edited by QQI.*

SCOTTISH QUALIFICATIONS AUTHORITY



16 September 2013

Quality and Qualifications Ireland
26/27 Denzille Lane
Dublin 2
Ireland

QQI Consultation

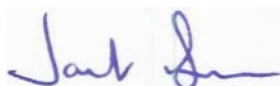
SQA is the national accreditation and awarding body in Scotland and in our role as Awarding Body, SQA has aligned a number of qualifications with the National Framework of Qualifications (NFQ) in the Republic of Ireland. These include different types of qualifications developed for different purposes. Alignments were approved on application to the National Qualifications Authority in Ireland (NQAI) from 2008 and the latest approved by QQI in June 2013.

SQA Awarding has provided a limited contribution to QQI's consultation on the policy options detailed in the Green papers with many of the comments around clarification of the role of international bodies (as SQA is considered in the current system) operating in the new system.

QQI have developed a very detailed and evidence-based approach to the proposed reform in Ireland and we have answered relevant questions as detailed as possible. However, there are many questions where we were unable to provide an answer from the perspective of SQA as a provider of qualifications aligned to the National Qualifications Framework (NFQ Ireland) in this market. Additionally, at times we frame our answers from the perspective of SQA as the national body in Scotland and based on our extensive experience, and it is in this role that we may be able to offer a greater contribution to your policy developments.

We hope that our contribution to the consultation is useful to QQI, but please do not hesitate to contact us should you need additional information or further explanation.

Yours Sincerely



Dr Janet Brown
Chief Executive

SUBMISSION BY:

Society of Chartered Surveyors Ireland

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and has not been proofed/edited by QQI.*

SOCIETY OF CHARTERED SURVEYORS IRELAND

4.1 – Green Paper on Awards & Standards

4.1.8.6 - Sectoral Frameworks

- *“In the future it may be useful to expand the framework by adding generic sub-frameworks or sectoral frameworks.”*

The Society would support the development of sub-frameworks/sectoral frameworks that would take account of professional qualifications and the ways in which these are delivered/assessed in a non-academic environment.

- Evaluation of applications in respect of sub-framework/sectoral framework should include industry practitioners from within the community of practice.

4.1.8.9 - Credit Accumulation and Standards

- The Society does not assign ECTS to the learning outcomes of our training and assessment programme. How will ECTS be applied or calibrated in respect of professional body awards?

- *“Related to the concept of credit, there may be a potential role for non-framework certification offered by quality assured providers that would be recognised (within zones of mutual trust) for the purpose of access to specified programmes possibly with exemptions.”*

Could this apply to professional body awards?

4.1.8.11 - Engaging Employers on Skills Needs

- The Society would welcome and support the principle of QQI engaging closely with professional bodies and employers to ensure their needs and views are expressed in awards standards – in respect of both academic and professional body awards.

4.1.8.14 - Learning to Learn and Standards

- The Society welcomes the acknowledgment of the importance of work placements in vocational education programmes. It is suggested that this be recognised as central to the learning outcomes in respect of the assessment and training provided by professional bodies

4.3 – Green Paper on Recognition of Qualifications within the National Framework of Qualifications

4.3.5 – Anticipated Stakeholder Expectations

- The Society welcomes the proposal of working with a group of professional bodies on translating professional award-type descriptors into a set discipline area.

4.3.8 - Issue 1

- The Society would support the proposal to establish a policy and criteria for recognition of each of the Groups (the Society falls into category Group B)

4.8 – Green Paper on Monitoring and Dialogue

4.8.5 – Options for Monitoring and Dialogue

- As professional body awards are not necessarily delivered according to formal academic processes, the Society would encourage flexibility with regard to key indicators and metrics.
- Any audit should be tailored to the individual provider – whether this is evaluated externally (QQI) or devolved to the provider.

4.10 – Green Paper on Quality Assurance Guidelines

- 4.10.3 Anticipated External Expectations

- The Society welcome guidelines for Quality Assurance as a developmental tool in respect of pedagogy, teaching, learning opportunities and assessment. However, as a professional body, we would encourage flexibility in respect of Quality Assurance guidelines which should take account of the non-academic nature of many professional body awards. To this end, we would support the proposal of QQI issuing a variety of QA guidelines for distinct categories of provider, sectors of provision or groups within.
- In respect of the development of QA guidelines, the Society recommends that industry/non-academic representatives be involved in their drafting.

4.11 – Green Paper on Risk and Proportionality

- Professional body qualifications carry a greater risk profile, and would not confirm to a one-size-fits-all model of regulation.

SUBMISSION BY:

St Patrick's College, Drumcondra

*Please note this response appears as received
and has not been proofed/edited by QQI.*



St. Patrick's College, Drumcondra

Dublin 9, Ireland

A College of Dublin City University

**Submission: Quality and Qualifications Ireland QQI Consultation Process: Phase Two
Response to Green Papers, Sections 4.1-4.14, September, 2013**

I make this submission on behalf of St. Patrick's College, Drumcondra, and the College Quality Promotion Committee. Once again, we welcome the opportunity to participate in the public consultation process underpinning Quality and Qualifications Ireland (QQI) policy development programme. The attached document reflects our feedback on the second phase of consultation on the Green Papers Sections 4.1- Section 4.14 specifically in respect of;

- 4.1 Green Paper on Awards and Standards
- 4.2 Green Paper on Certification
- 4.3 Green Paper on Recognition of Qualifications within the NFQ
- 4.4 Green Paper on 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

As iterated in our other recent submissions to QQI, as amalgamation with Dublin City University progresses, we will work towards alignment with the University's position across the diverse policy areas under development in this consultation process. And again, as the College moves, into the future, towards amalgamation with Dublin City University, we anticipate continuing and deepening our engagement with QQI.

Dr. Catherine Maunsell
Director of Quality Promotion and Assurance
September, 2013

SECTION 4.1 Green Paper on Awards and Standards

Q4.1a: Do you have any thoughts, comments or concerns raised by the issues in this paper? Response: Comprehensive overview exploring the range of policy approaches to determining Awards and Standards which as stated will require further and ongoing consultation.

OPTIONAL: Additional comments on specific sections of the Green Paper on Awards & Standards:

Response: 4.1.8.11 Helpful if the claim in the first sentence was referenced.

SECTION 4.2 Green Paper on Certification

Q4.2c: Do you have any comments on the issues raised in the Green Paper on Certification?

Response: Further feedback is envisaged on these issues in the next phase of the consultation process, as particular positions become defined and approaches as to how they will be addressed are identified.

SECTION 4.3 Green Paper on Recognition of Qualifications within the National Framework of Qualifications

Q4.3b: Do you agree with the principles set out in Issue 6?

Response: The principles set out in Issue 6 seem both comprehensive and appropriate

SECTION 4.4 Green Paper on International Education Mark

Q4.4a Should there be a single or multiple versions of the IEM?

Response 1.a. Single version

Comments To avoid multiple versions, confusion and duplications

Q4.4b When should the IEM be made available?

Response: 2b. Relevant providers that have completed an institutional review process and that self-certify their compliance with the Code of Practice would be authorised to use the IEM immediately.

Comments: This would be similar to the process used for HEIs getting their Erasmus University Charter.

Q4.4c Should all providers, including public providers, authorised to use the IEM be required to establish arrangements for the protection of enrolled learners under section 65 of the 2012 Act?

Response: Yes

Q4.4d: Are the suggested areas set out for inclusion in the Code appropriate?

Response: Yes

Q4.4f What level of prescription and detail should be included in the Code of Practice?

Response 4c. The Code should be based on a combination of high level principles and detailed criteria.

Comments: In order to make the code workable and doable, it should be based on a combination.

Q4.4g How should QQI carry out a review of compliance with the Code?

Response: 5b. A review of compliance with the code should be integrated with other statutory reviews provided by QQI e.g. review of effectiveness of provider's quality assurance procedures. **Comments:** This would make it workable, and avoid duplications, expanding remits etc.

Q4.4h In which countries should the Code be applicable?

6a. Given the restricted interpretation of an international student in the 2012 Act, should providers be restricted from using the code and the IEM in promoting their off-shore provision? Response: Yes

6b. Should review of compliance with the code extend to the off-shore provision of relevant providers?

Response: Yes

SECTION 4.5 Green Paper on Access, Transfer and Progression

Q4.5b: What timelines and approaches should QQI adopt for the development of comprehensive new statutory policies and criteria for ATP?

Response: While the opportunity to take the lead in shaping ATP policy into the future is clearly open to QQI, nonetheless, given the pace and degree of change in the field, the approach suggested of engaging in extended consultation on ATP policies with relevant stakeholders, while also allowing QQI further time to undertake additional evidence base investigations to underpin ATP policy recommendations seems the more productive approach.

Q4.5c: Should QQI develop new policies on progression from formal education and training into employment even in advance of a comprehensive review of the 2003 policies and criteria? Are there other areas not addressed by the 2003 policies and criteria that merit such priority consideration?

Response: Given the economic changes in the decade 2003-2013 then it is evident that new policies need to be developed.

A related area for consideration in relation to progression is that of more diverse/flexible employment/unemployment experiences e.g. periodic transitions into and out of employment/unemployment.

SECTION 4.6 Green Paper on The Provision of Information for Learners

Q4.6c: Do you have any preferences among the options proposed?

Response: This is undoubtedly a challenging issue – given the range of options and the advantages/disadvantages cited for each – however, pragmatically and most compliant with QQI's duties under the 2012 Act would appear to be the option set out in 4.6.5.4 whereby QQI concentrates on meeting its legislative responsibility to develop a register of programmes and awards and a database of providers as a means of communicating reliable information.

SECTION 4.7 Green Paper on The Recognition of Prior Learning

Q4.7.5a: Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative?

Response: Yes

Q4.7.5b: Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated?

Response: That would appear to be the most pragmatic and expedient approach to take.

SECTION 4.8 Green Paper on Monitoring and Dialogue

Q4.8.5c: Do you have any preferences among the options? (In your response, please refer to the option numbers listed in the paper).

Response: Once again a challenging issue, however, given that a purpose of such engagement is to support and promote self-reflection on the part of providers and institutions then as the options which prioritise this response as set out in this Green Paper would appear to be one or both:

Option 1 Using key indicators and metrics to underpin monitoring and dialogue activities.

Option 6 Using QQI's legislative capacity to conduct quality reviews (Section 42) as a monitoring and dialogue tool.

SECTION 4.9 Green Paper on Reviews

Q4.9a: Are there other approaches to institutional review that have not been considered in this Green Paper?

Response: One potential approach that has not been mentioned in the green paper is an 'outcomes based' review, where the potential benefits and outcomes that are hoped to be achieved are set out as much as possible in advance of the review. This would encourage both the institution and the review team to have a very focused approach in writing, reviewing, and providing feedback on the Self-Assessment Report, Review Report and resulting Action Plan.

Q4.9b: Does the institutional review approach as discussed in this paper meet the needs of sectors outside of higher education and training, or should further consideration be given to developing significantly different approaches to reviews outside of higher education and training?

Response: Strong consideration should be given to undertaking different approaches with sectors outside of education and training. The wide range of training courses and the different methods of delivery merit a lot further consideration to address the needs of both learners and providers.

Q4.9c: Should QQI encourage, where possible, the practice of incorporating other reviews provided for in the legislation (IEM; DA; ATP) into institutional review?

Response: Encouraging the Incorporation of other reviews into institutional review would be helpful in order to co-ordinate overall review activities. It would also result in 'joined-up' thinking in regard to quality assurance throughout an organisation.

Q4.9d: Do you have any preferences among the options set out?

Response: Option 3 allows for more flexibility in approach in regard to undertaking reviews, and also allows more opportunity for thematic reviews. This is to be welcomed. Option 3 also allows for the individual contexts of the wide range of QQI providers to be taken into account, and avoids a 'one-size-fits-all' scenario.

Q4.9e: Are there advantages and disadvantages that have not been identified for each option identified in this Green Paper?

Response: These appear to be comprehensive.

Q4.9f: Do you have any other comments on the issues raised in the Green Paper?

Response: There is no mention of review panels or committees in the Green Paper and these individuals and their overall remit and terms of reference are key to a successful outcome for a review process.

SECTION 4.10 Green Paper on Quality Assurance Guidelines

Q4.10a: Is anything missing from this list?

Response: Early in the list there may be consideration given to reiterating 'principles' (referred to on page 1 of this Green paper) as underpinning the purpose of the guidelines. Include reference to diversity of providers.

In the final bullet- consideration to be given to also listing templates for learner feedback/evaluation.

Q4.10c: How can QA Guidelines remain a stable and effective basis for providers' QA procedures while reflecting the evolution of the education and training landscape and QA practices?

Response: Through systematic referencing of the principles which underpin the Guidelines and engagement of ongoing review as is envisaged of the currency of these principles.

Q4.10d: Do you have any comments on the nature and scope of QA guidelines to be issued by QQI?

Response: There is undoubtedly a complex process involved in the decision around the nature and scope of QA guidelines - While a single high-level set of guidelines is appealing in terms of supporting coherence in the system – the diversity and range of educational providers which QQI engages with would suggest that Option 5 – Modular suite of QA Guidelines might prove most effective in the long-term.

Q4.10f: What should be the status of the quality assurance guidelines and criteria issued by HETAC, FETAC and IUQB/IUA currently in use in the various sectors? Could they be used as the basis for establishing new QQI QA guidelines?

Response: The primary underpinning for establishing the new QQI QA Guidelines needs to be the Principles –as set out in other documentation - however, as a secondary source/basis – the former guidelines could prove useful – given that such guidelines were given due consideration for relevance when they were developed for their sector.

Q4.10g: Where is the balance of responsibility between QQI and providers for the development of QA guidelines?

Response: The balance of responsibility lies with QQI – though the comprehensive programme for policy development maintains opportunities for provider input.

Q4.10i: Does QQI require a mechanism for continuous or periodic updating of QA guidelines

Response: YES –Suggest 2-3 year review period.

Q4.10j: For each of these functions, can QA guidelines serve as relevant criteria?

Response: Yes

SECTION 4.11 Green Paper on Provider Risk and Proportionality

Q4.11d: Do you have any comments on the issues raised in the Green Paper on Provider Risk and Proportionality?

Response: Further feedback is envisaged on these issues in the next phase of the consultation process , as particular positions become defined and approaches as to how they will be addressed are identified. Balance clearly needed between supporting development and diversity amongst providers while ensuring legislative compliance re: QA etc.

SECTION 4.12 Green Paper on Data

Q4.12a: Do you agree with the principles proposed to underpin QQI’s relationship with data? Response: Yes

Q4.12b: Do you agree that the provision of data should be considered part of the quality assurance relationship between QQI and the providers with which it engages?

Response: Yes

Q4.12c: Is it your view that QQI should seek to influence the national coordination of certain data sets?

Response: Yes

OPTIONAL: Additional comments on specific sections of the Green Paper on Data:

Response: As the more collaborative approach, acknowledging the diversity of data sources, Position 3 where QQI could seek to actively promote a coordinated and whole of system approach to data collection and data analysis seems most pragmatic.

SECTION 4.13 Green Paper on Programme Accreditation

Q4.13a: Do you agree that a new overarching approach to programme accreditation is preferable to continuing sectoral approaches?

Response: Yes – preferable on grounds of enhanced coherence.

SECTION 4.14 Green Paper on the re-Engagement of Legacy Providers with QQI and Future Access to QQI Awards

Q4.14i: Do you have any comments on the issues raised in this Green Paper?

Response: Here again, further feedback is envisaged on these issues in the next phase of the consultation process , as particular positions become defined and approaches as to how they will be addressed are identified.

SUBMISSION BY:

**South Westmeath Employment, Education
and Training Services Limited (S.W.E.E.T.S)**

*Please note this response appears as received
and has not been proofed/edited by QQI.*

**South Westmeath Employment, Education and Training Services Limited
(S.W.E.E.T.S)**

Dear all,

Please find below some comments on Green Paper 4.1- I was unable to submit our comments via 'submit' page.

Section 4.1.4

Longer term changes in policy on standards and awards might make it harder for small education and training providers to operate as independently as they do now-we have concern as to viability of small providers in local communities going forward.

Policy makers should not forget the purpose of such community based service groups throughout the country - amalgamation is not suited to their cause!

Section 4.1.8.2

QQI will need to estimate the cost establishing an award standard including initial set-up and continual maintenance - will this additional cost be passed on to the providers who in turn may be forced to pass on to participants?

Section 4.1.8.4

The possible move towards devolving more responsibilities raised question about the capacities in the qualifications system - what will this mean for course providers - they will need to understand what they require as individuals- upskilling?

Regards,

Liam Daly

SUBMISSION BY:

Trinity College Dublin (TCD)

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and has not been proofed/edited by QQI.*

Trinity College Dublin (TCD)

In addition to the Irish Universities Association (IUA) response on behalf of the universities, Trinity College Dublin (TCD) would also like to draw attention to a number of specific points, outlined below.

QQI Green Paper 4.1 on Awards & Standards

In relation to credit accumulation and standards, (section 4.1.8.9) Trinity College Dublin (TCD) welcomes the development of a common framework for Recognition of Prior Learning (RPL) and Access, Transfer and Progression (ATP), with articulation for the various levels of educational provision, such that it is enabling for non-traditional learners while at the same time allowing institutions to manage their admissions policies in a way that is appropriate to their particular range and level of provision.

With regard to engaging employers on skills needs (section 4.1.8.11) while we recognise the need to ensure that standards for educational and training awards are consistent with workforce development needs, and are happy to consult with employers in this regard, ultimate responsibility for the content and standards of these awards remains with the Universities, as the designated awarding bodies.

The paper states that ‘*Qualifications may be awarded to certify non-trivial volumes of knowledge...*’ (section 4.1.8.15). We would suggest that “volumes of knowledge” be qualified by explicit reference to credit, e.g. “non-trivial volumes of knowledge, expressed in terms of a recognised credit system,”

Award-types and credit (section 4.1.8.21) - TCD welcomes the development of policy that addresses the issue of double certification in relation to minor awards. We would also expect that the Bologna process is considered in the development of new policy on award types and credits.

QQI Green Paper 4.2 on Certification

TCD concurs with the sectoral response on Certification.

QQI Green Paper 4.3 on Recognition of Qualifications within the National Framework of Qualifications

In relation to the development of a ‘database of programmes and awards’ and the proposed links with other initiatives such as the International Education Mark (IEM) (section 4.3.3), TCD acknowledges the importance of maintaining reliable and up-to-date information on programmes and awards. We support the development by QQI of a database that interfaces easily with existing university systems to facilitate straightforward uploading of the most current information on programmes and awards. In developing such a system we would encourage close consultation with the relevant university personnel (e.g. the records manager).

While TCD supports the recognition of non-formal and experiential learning in relation to lifelong learning (section 4.3.6), it would caution against the inclusion of ‘non-formal’ qualifications on the NFQ when there are still many on-going challenges to including existing ‘formal’ qualifications.

In response to Issue 2 - Should there be ‘degrees of recognition’ within the NFQ – we feel that the value of the NFQ is clarity and consistency in relation to award types and levels, underpinned by recognised quality assurance processes. We do not see that awards made by

awarding bodies in other jurisdictions need to be recognised in the Irish NFQ. Programme quality is the responsibility of the provider and the validating institution, although quality assurance in relation to the Irish provider is a matter for the relevant State or professional accrediting body, or equivalent.

QQI Green Paper 4.4 on the International Education Mark

TCD concurs with the sectoral response on the International Education Mark (IEM):

Issue 1 – Should there be a single or multiple versions of the IEM?

TCD concurs with the sectoral response in relation to Issue 1 but suggests that the complexity of the international education sector and the necessity to ensure quality at all levels points towards the need for at least three versions of the IEM.

Issue 2 – When should the IEM be made available?

TCD concurs with the sectoral response in relation to Issue 2.

Issue 3 – What areas should be included in the Code of Practice?

Some of the areas listed are areas over which providers would in many cases have little control, e.g. private accommodation, post-study supports, etc. The Code needs to take due cognisance of this reality.

Issue 4 – What level of prescription and detail should be included in the Code of Practice?

TCD concurs with the sectoral response in relation to Issue 4.

Issue 5 – How should QQI carry out a review of compliance with the Code?

TCD concurs with the sectoral response in relation to Issue 5.

Issue 6 – In which countries should the Code be applicable?

TCD concurs with the sectoral response in relation to Issue 6.

TCD would like to add the following comments:

All seven Irish universities and some private institutions work with Study Abroad Providers (SAPs) in recruiting US students. The Paper does not outline how the IEM will impact on students entering the university system via this pathway. Will these providers also be required to have the IEM? And will this mean that universities will only be able to work with SAPs holding the IEM? If yes, we are concerned about how providers will be included under the terms of the IEM criteria as they are quite a distinct group and currently not included on the Internationalisation Register. It is important that the criteria for awarding the IEM and Code of Practice capture the nature of the various student pathways to studying in Ireland.

How will the IEM apply to International collaborative providers who are working in partnerships with Irish providers?

QQI Green Paper 4.5 on Access, Transfer & Progression

TCD welcomes the proposal to develop national policies and criteria for access, transfer and progression. We hope that these will be high-level and overarching without infringing on institutional autonomy to determine admission policies.

We concur with the sectoral response, in particular in relation to ATP policies for international collaborative providers. We support the development of clear and transparent admissions policies which are critical for successful recruitment of both national and international students.

Q4.5a – How do the 2003 policies and criteria need to be modified, if at all, for use in an interim period?

TCD concurs with the sectoral response in relation to Q4.5a.

Q4.5b – What timeline and approaches should QQI adopt for the development of new statutory policies and criteria for ATP?

TCD concurs with the sectoral response in relation to Q4.5b.

Q4.5c – in the light of the current national employment problems should QQI develop new policies or guidance in relation to employability even in advance of a comprehensive review of the 2003 policies and criteria or are there other priority areas not addressed by the 2003 policies and criteria that merit such consideration?

TCD concurs with the sectoral response in relation to Q4.5c.

QQI Green Paper 4.6 on Provision of Information for Learners

TCD concurs with the sectoral response on Provision of Information for Learners.

QQI Green Paper 4.7 on the Recognition of Prior Learning

In addition to concurring with the sectoral response on the Recognition of Prior Learning, TCD queries how advanced entry by International students will be impacted by the proposed changes.

Q 4.7.5a – Is it preferable to develop policy in the area of RPL rather than including it as a component of a comprehensive ATP policy development initiative?

TCD concurs with the sectoral response in relation to Q4.7.5a.

Q 4.7.5b – Should further development of qualifications and quality assurance policy to promote RPL be deferred until a national strategy on RPL is articulated?

TCD concurs with the sectoral response in relation to Q4.7.5b.

Q 4.7.5c – Should QQI develop a procedure of direct application for awards? How else might it fulfil its obligations under the 2012 Act?

TCD concurs with the sectoral response in relation to Q4.7.5c.

Q 4.7.5d – Should QQI reopen the process of agreeing RPL procedures with providers of FETAC awards?

TCD concurs with the sectoral response in relation to Q4.7.5d.

Q 4.7.5e – What measures can or should be taken to improve the collection of information on RPL activities by Irish providers and awarding bodies?

TCD concurs with the sectoral response in relation to Q4.7.5d.

Q 4.7.5f – How urgent is the reconciliation of national approaches to credit in FET and HET to the realisation of objectives for RPL?

TCD concurs with the sectoral response in relation to Q4.7.5f.

What other issues in relation to RPL should be addressed at this stage?

TCD concurs with the sectoral response.

QQI Green Paper 4.8 on Monitoring and Dialogue

TCD concurs with the sectoral response on Monitoring and Dialogue and feels that existing good practice in relation to established processes should be built on.

QQI Green Paper 4.9 on Reviews

We feel that it is too early to comment on this and await the outcome of the ‘Review of Reviews’ which will inform sectoral discussions with QQI.

QQI Green Paper 4.10 on QA guidelines

TCD concurs with the sectoral response on QA guidelines.

Q4.10c – How can QA guidelines remain a stable and effective basis for providers’ QA procedures while reflecting the evolution of the education and training landscape and QA practices?

TCD concurs with the sectoral response in relation to Q4.10c

Q4.10d – Do you have any comments on the nature and scope of QA guidelines to be issued by QQI?

TCD would not be in favour of developing guidelines which take the form of detailed prescribed templates.

Q4.10e – What are the implications for a change in the scope of QA guidelines?

TCD concurs with the sectoral response in relation to Q4.10e

Q4.10f – What should the status of the quality assurance guidelines and criteria issued by HETAC, FETAC and IUQB/IUA currently in use in various sectors? Could they be used as the basis for establishing new QQI QA guidelines?

TCD concurs with the sectoral response in relation to Q4.10f

QQI Green Paper 4.11 on Provider risk and Proportionality

Q4.11b – Do you have any preferences among the approaches (outlined in the Green Paper) to provider risk?

TCD concurs with the sectoral response in relation to Q4.11b

Q4.11d – Do you have any comments on the issues raised in the Green Paper?

TCD concurs with the sectoral response in relation to Q4.11d

QQI Green Paper 4.12 on Data

We concur with the sectoral response on Data and re-iterate the importance of QQI ensuring in its co-ordinating role, that duplication of effort by all bodies involved is avoided. We would urge close consultation with the relevant institutional records managers on the design of any new database.

Q4.12a - Do you agree with the principles proposed to underpin QQIs relationship with data?

TCD concurs with the sectoral response in relation to Q4.12a

Q4.12b - Do you agree that the provision of data should be considered part of the quality assurance relationship between QQI and the providers with which it engages?

TCD concurs with the sectoral response in relation to Q4.12b

Q4.12c - Is it your view that QQI should seek to influence the national coordination of certain data sets?

TCD concurs with the sectoral response in relation to Q4.12c

Q4.12d – Which of the short-term proposals (below) for the realisation of a provider register and database of programmes and awards do you prefer and why?

TCD concurs with the sectoral response in relation to Q4.12d

Q4.12e – Have you any observations in relation to the long-term approach?

TCD concurs with the sectoral response in relation to Q4.12e

QQI Green Paper 4.13 on Programme Accreditation

TCD concurs with the sectoral response on Programme Accreditation

QQI Green Paper 4.14 on Re-engagement of legacy providers with QQI

TCD concurs with the sectoral response on Re-engagement of legacy providers with QQI

Q4.14a - Is any further differentiation required between the different Designated Awarding Bodies to clarify the effects of this transition (i.e. that from legacy bodies to QQI)?

TCD concurs with the sectoral response in relation to Q4.14a



Patricia Callaghan

Academic Secretary

SUBMISSION BY:

University College Dublin

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UCD Response to Section 4.5 Green Paper on Access, Transfer and Progression

This submission to Section 4.5 Green Paper on Access and Transfer and Progression is being made by University College Dublin

Having examined the 2003 policies, UCD recommends that few, if any, modifications be made in an interim period. UCD agreed that the policies are very wide-ranging, progressive and comprehensive with respect to Access, Transfer and Progression, and in particular with regard to the major issues on the access and lifelong learning agenda. Indeed it is suggested that no changes at all should be made in the interim, as the introduction of temporary policies pending the launch of a revised document would cause confusion and uncertainty for both learners and providers.

This submission summarises UCD feedback on the main areas as outlined in the report: Vision and Principles; Objectives and Meeting Objectives; and Policies, Actions and Procedures. Concluding remarks and recommendations are summarised in the final section. **UCD makes this response with the caveat that the July/August consultation time frame did not facilitate an effective internal institutional consultation process.**

Vision and Principles

The National Qualifications Authority of Ireland (NQAI) states in the opening section that the 2003 policies were designed and structured around a ‘learner-centred vision’ (NQAI, 2003: ii). This emphasis on equality of opportunity for the learner in accessing and participating in Higher Education is evident throughout the document. The 2003 policies commit to creating an integrated and clear approach to access, transfer and progression to “ensure that learners can avail of entry arrangements to all programmes leading to awards in the National Framework of Qualifications that are fair, transparent and compliant with equality legislation [and] to ensure that accurate and reliable information is available to all learners, through a range of approaches and formats that is accessible to a diversity of learners” (ibid: ii). Of note is the NQAI policy view that an ‘anticipated outcome’ of the work in general is “a more diverse learner community with diverse needs, throughout further and higher education and training” and that the NQAI policy has accommodated in policy that “changes should be brought about to meet these learners’ needs” (ibid: iii). UCD strongly supports this vision and objective and hopes that it is maintained and strengthened in the next iteration of this document.

UCD endorses the concept of access as developed in the policy, that it should apply to all learners but “particularly to the participation of under-represented learner cohorts such as those with special education needs, learners from disadvantaged communities, learners in the workplace and adult learners generally” (ibid: 6). This is also articulated in respect of the operational principles influencing the development of ATP policy that state that programme adaptation and support provision is inherent in this definition of access. The policies recommend that issues of ATP should be addressed for all learners but particularly “learners who have in the past had limited access to education and training awards – those with limited levels of basic education, mature learners, older learners, learners who are unemployed or not in the labour force, workers in unskilled or low-skilled occupations, people with disabilities, those living in remote or isolated locations, members of the Traveller community or minority ethnic groups, and refugees” (ibid: 7).

Objectives and Meeting Objectives

Objective 4 addresses the provision of information to learners and emphasises the importance of accessibility of the information provided for enabling learners to chart their education. In meeting these objectives, the NQAI policy states that it will “proactively” seek to facilitate the cultural changes that it sees as necessary to realise its vision (ibid: 11)

Framework Development

UCD acknowledges that the framework developed has provided clarity to stakeholders, students and potential students in Higher Education. As the framework is modified and developed in line with the emerging QQI structures, there is perhaps scope to consider how to integrate the growing body of research on the wider and social benefits of learning. Adult learners enter, and re-enter, the education system with multiple and diverse motivations, and not solely for economic benefit or career progression. UCD Adult Education’s recent research on “Learning Matters”, drew 720 responses by questionnaire, and it corroborates many of the research findings which emerged from the Centre for Research on the Wider Benefits of Learning. Students report that they attend Open Learning courses for social reasons, to meet like-minded individuals, and to participate in a learning community. They comment on improved cognitive function, enhanced sense of well-being and greater levels of self-confidence. The outcome of such experiences may be progression to accredited learning, but non-formal and open learning also serves a purpose in contributing to a learning culture, enhancing intergenerational learning and in contributing to personal and community well-being. Finding a way to capture such outcomes, and not exclusively think of progression as a linear accredited process, should form part of any future policy development

Policies, Actions and Procedures

Credit

UCD recognises that developments with respect to credit have been crucial in supporting ongoing efforts with regard to lifelong learning and support for underrepresented students.

Entry arrangements

With respect to entry arrangements it is particularly important to highlight that inherent in the concept of access is the “achievement of an award” rather than solely entry to a programme (ibid: iv). The focus on fair and transparent entry arrangements to programmes is also fully supported by UCD, as they are grounded in the notion of ‘equal opportunity’ for the learner. Of particular note is the view of the NQAI policy that the changes envisaged will result in a modification of systems to facilitate wider participation by diverse learner groups (ibid: 31) to support the “significant diversification of the learner cohort in further and higher education and training” resulting from these Access, Transfer and Progression policies (ibid: 32).

UCD also wishes to highlight the particular reference to the need for “appropriate arrangements for entry by adult learners to higher education” (ibid: 32) with “special significance” to be given to entry arrangements in this context, given the importance of the transition to higher education and training for progression for this cohort of learners (ibid: 32). It is the NQAI policy’s view that the existing arrangements are unsatisfactory (ibid: 33) and that new procedures are required. This view is strongly endorsed by UCD. There is a deficit of collaboration between HEIs in respect of recognition of access foundation courses in different institutions. This has frustrated learners ability to transfer and progress beyond host institutions to other universities, it devalues these courses and inhibits learners seeking accreditation for their learning (Fleming, 2010). It is also worthwhile to note that the NQAI

policy highlights the benefits to the entire HE community of expanding entry options for adult learners with regard to the rationalisation of procedures and administration and for the development of processes to accommodate the evolving higher education system (NQAI, 2003: 33). The NQAI policy recognises that the implementation of policies pertaining to entry arrangements will necessitate action to remove barriers, and UCD supports the NQAI policy's suggestion to work with the HEA to ensure the development and implementation of appropriate entry arrangements for adult learners.

Information provision

This is an important aspect of the access agenda and the NQAI policy has a solid objective in seeking that “all learners should have accurate and reliable information available to enable them to plan their learning on the basis of a clear understanding of the awards available and the associated entry arrangements and transfer and progression routes” (ibid: 35). The Qualifications Act also provides a legal basis for this objective. The NQAI policy also supports the concept that information should be available to learners in a “nationally co-ordinated manner” (ibid: 35). In recommendations to programme providers, the NQAI policy includes the protocol that all information must be published in an accessible format with details on the learning supports available of specific groups (ibid: 35 – 36).

Concluding Points and Recommendations, University College Dublin:

- UCD suggests that the 2003 policies be adhered to in the interim, pending the introduction of a revised and final policy. A temporary iteration of these policies before the final policy is decided on would cause considerable confusion for stakeholders
- UCD finds the 2003 NQAI policies to be comprehensive, still pertinent and fit-for-purpose and would recommend few, if any changes, to them. UCD does recognise however, that the difficulty lies in the coherent implementation of these policies at sectoral and institutional levels
- UCD recommends incorporating policy direction addressing “exit points” to enable learners to exit programmes early with a qualification
- A national system of recognition of Access and Foundation courses needs to be considered in the review of these policies
- Institutions face serious funding implications in increasing flexibility with regard to their offerings. This needs to be addressed, as the current funding model doesn't reward or incentivise institutions and provide the associated resources to administer to accommodate ATP and flexible learning
- The needs of people with disabilities must be clearly incorporated in the provision of information. All material should be accessible to those with learning difficulties and/or sensory disabilities. The framework used to provide this information should be rigorously tested to ensure accessibility for all learners
- It may be useful to summarise the policy document to make it more “user-friendly”
- The 2003 policies advocate the development of processes of transfer routes between HETAC and university. UCD suggests that consideration might be given to using the framework levels to develop a mapping process to link HETAC to university

programmes. It also might be useful to pilot such a process, with a view to its implementation throughout the sector.

- It is recommended that QQI liaise with the Task Group on Reform of University Selection and Entry (TGRUSE) chaired by Professor Philip Nolan to standardize policy on entry arrangements

4.5.b What timelines and approaches should QQI adopt for the development of comprehensive new statutory policies and criteria for ATP?

Irish Universities have a legal obligation to address access under the Universities Act 1997, therefore it is essential that any new policies are developed and their implementation planned and supported without delay. The HEA *National Plan for Equity of Access to Higher Education* (with a scheduled launch date of 2014) is also currently under development and may provide momentum for redevelopment of the QQI policies.

4.5.c Should QQI develop new policies on progression from formal education and training into employment even in advance of a comprehensive review of the 2003 policies and criteria? Are there any other areas not addressed by the 2003 policies and criteria that merit such priority consideration?

See conclusion of section 4.5.a

References

Fleming, Bairbre (2010) *Mature Student Access to Higher Education in Ireland*. Unpublished PhD Thesis. University College Dublin

National Qualifications Authority of Ireland (2003) *Policies, Actions and Procedures for Access, Transfer and Progression for Learners*. Dublin: National Qualifications Authority of Ireland

Quality and Qualifications Ireland (2013) *Green Paper on Access Transfer and Progression*. Dublin: Quality and Qualifications Ireland

SUBMISSION BY:

**University College Dublin,
Supplemental Response**

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Supplemental UCD Response

The following points are supplemental to the brief feedback provided by UCD on these papers already, and broadly apply to all three.

1. Potential alternate Review model/approach to dialogue and monitoring:

Capacity to prepare for and undertake quality reviews is a major constraint for both individual institutions and QQI. Processes and systems need to accommodate a wide range of institutions and provision. Consequently, it may be necessary to apply a proportionate risk type model, for example:

Sampling - QQI/review panels talk to a sample of staff and students, inspect sample papers/documents covering a range of processes and activities etc. To guide these deliberations QQI might identify key factors that may trigger a more detailed on site visit eg

Governance/management of QA - are the structures clear? are they effective?

Risk management - the likelihood and consequences of things going wrong; the integrity of the institution's QA framework;

Evidence - is there sufficient evidence that supports a view that the institution's QA framework is robust eg minutes of quality committees; programme monitoring reports and follow -up action; Quality Review reports and Quality Improvement Plans; student feedback; professional accreditation reports etc

On the merits of this scrutiny, a decision is made about the focus, level of intensity and frequency of monitoring and/or review.

2. A framework for internal institutional quality assurance

An argument might be made that the current process of 'unit' review - particularly for an academic school is too wide (eg reviews attempt to cover all the key school activities from T&L, Research to HR and facilities under the current framework) in the limited time available to Review Groups. While all the areas currently covered by review are legitimate - it is possible that they cannot be adequately covered given the limitations mentioned above. A possible future model might focus on a more limited range of school activity eg how is QA managed within the school/institution - how effective are the governance structures? how effective are the mechanisms to maintain standards and enhance provision eg module/programme approval and monitoring; how effective is student feedback mechanisms - is there evidence that student feedback has been responded too; what are the relevant programme statistics telling us? etc. What changes have been made to programmes that provide evidence of ongoing review and enhancement. This type of approach would also tie more directly into institutional review which, at the moment, seeks to assess a similar range of activity but aggregated across the institution.

Roy Ferguson
Dr Roy Ferguson
UCD Director of Quality
University College Dublin

SUBMISSION BY:

US Study Abroad Community Joint Response

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US Study Abroad Community Joint Response to QQI Request for Consultation on the Proposed International Education Mark 13 September 2013

1

The United States Study Abroad Sector in Ireland

Over 273,000 American students studied abroad for academic credit in the 2010/11 academic year, including 7,007 who studied in Ireland¹. Ireland is the 9th most popular destination for US study abroad students. Some US students come to Ireland for short summer courses, while others stay for one or more semesters. It is estimated that international higher education students in Ireland generate revenues of approximately €700 million² in tuition income, student spending, and additional overseas visitors to students. US students appear to generate about 15% of this tuition income², and likely a large proportion of the other in-country spending. These figures do not include the significant spending by students or employment created on programmes not associated with Irish universities, or short-term faculty-led programmes operated by US universities.

Most study abroad providers follow Codes or Standards of Good Practice that would be rigorous, detailed, and formulated in the interest of health, safety, and financial protection for students. The Standards of Good Practice from the Forum on Education Abroad is an example of a code followed by many providers³.

Programme Models

There are several different models for study abroad operating in Ireland as noted below. Note that these are general groupings, and some providers may operate across these categories. There are perhaps 20-30 study abroad providers working in Ireland (a complete count does not yet exist), most of whom would be Third Party Providers, but some of whom are fully accredited US universities. Many of the providers operate in dozens of countries around the world.

Within any one of the below models, students may be placed in an unpaid internship/experiential learning environment undertaken for academic credit. Small stipends for bus fare or lunch are sometimes given to the students by the internship host.

1. **Stand Alone Programmes** (also called Island Programmes)– these Programmes offer a US-accredited academic experience to visiting students for generally one semester (4 months). The students are not attending Irish universities, pay tuition to a US based university or study abroad provider, and receive immigration letters from the stand alone program itself. These programmes are completely responsible for pastoral care, housing, and the academic and cultural experience. These programmes would generally have a physical base in the country and in-country staff and locally-hired faculty. The programmes are accredited by the home US university, or in cases where the programme is not operated by a university, accreditation is through a US-based university of record⁴.

¹ *Institute for International Education, Open Doors Report 2012* <http://www.iie.org/Research->

² *International Students in Irish Higher Education, 2011-2012, Education in Ireland*

<http://www.educationinireland.com/en/publications/international-students-in-highereducation-in-ireland-2011-to-2012.pdf>

³ *Standards of Good Practice, Forum on Education Abroad*

<http://www.forumea.org/standards-index.cfm>

⁴ *A university of record is one who provides academic accreditation for courses offered by non-degree granting institutions, such as third party providers.*

US Study Abroad Community Joint Response to

QQI Request for Consultation on the Proposed International Education Mark

13 September 2013 2

2. **Hybrid Programmes** – these study abroad programmes would have a link to one or more Irish universities where students take courses and are part of the international student intake for that host university. Hybrid programmes also teach one or more of their own courses to complement the Irish university academic experience. These programmes often have a physical base in Ireland and local staff and faculty. Tuition

payment is made by the student in the USA, and the programme passes tuition to the Irish provider. These programmes typically offer pastoral care over and above that provided by the host Irish institution, and often provide housing. The programmes are accredited by the home US university, or in cases where the programme is not operated by a university, accreditation is through a US based university of records³.

3. **Third-Party Providers** – these organizations recruit students in the USA for placement at Irish universities, taking into account the Irish university’s requirements and standards. The Irish university provides the complete academic experience, and often the housing and a significant amount of pastoral care. Tuition payment is made to the third party provider in the USA who pass the funds on to the Irish university. Third party providers often have a staff member in country to organize additional activities and provide some emergency response and pastoral care. Many Irish universities rely on these Third Party Providers for recruiting US students.

4. **Faculty-Led Programmes** – these academic programmes are often developed and led by a member of faculty from an American university, and involves travel to Ireland for a period of time (usually several weeks). Logistics are either done by the faculty member or are contracted out to Ireland or US based organizations. These programmes do not assume any physical base or staff in Ireland. Academic credit is granted by an American institution.

Who Needs the IEM?

The members of the US study abroad community in Ireland support the recognition of quality provision of programmes to international students and adherence to recognized Codes of Practice to protect students.

Most members of the US study abroad community in Ireland are bound to similar Codes of Practice through organizations such as the Forum on Education Abroad³, the UK Quality Assurance Agency for Higher Education⁴, and accrediting bodies within United States⁵, among other quality assurance bodies either in the United States or in other countries in which the provider may operate.

The US study abroad community in Ireland has a long-standing commitment to quality and dedication to our students, as well as international learners from other countries. In symbolic as well as practical terms, *it is students who need and most benefit from quality assurance*. In practical terms, according to the Green Paper – Section 4.4., they will need it – via the ³*The Forum on Education Abroad is a 501(c)(3) non-profit association recognized by the US Department of Justice and the Federal Trade Commission as the Standards Development Organization (SDO) for the field of education abroad.*

⁴*<http://www.qaa.ac.uk/InstitutionReports/types-of-review/tier-4/Pages/default.aspx>*

⁵*E.g. Middle State Association of Colleges and Schools; New England Association of Schools and Colleges; North Central Association of Colleges and Schools; Northwest Association of Schools and Colleges; Southern Association of Colleges and Schools; Western Association of Schools and Colleges.*

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institution or provider with which they study – in order to gain a visa or leave to remain for more than 90 days.

The IEM, in itself, is understood to be a mark of quality and compliance with the Code of Practice for the provision of programmes of education and training to international learners. Within these terms, seeking access to the IEM is voluntary for providers.

According to the Green Paper – Section 4.4.7.1

The national strategy states that the statutory Code of Practice and the IEM will not be mandatory for education and training providers, however: *“Visas will not be issued for study in institutions that do not have the IEM, nor will students attending such institutions from non-visa required countries outside the EEA be allowed permission to remain to study for courses of longer than three months’ duration.”*

Thus while seeking the IEM is voluntary for the provider, **attendance at institutions/**

programmes with the IEM will be a prerequisite for students seeking visas or leave to remain for longer than 90 days. **If study abroad providers need students in order to be viable, seeking access to the IEM is not, in practical terms, truly voluntary.**

How Far Does the Umbrella of the IEM Extend?

1. Providers Working with Institutions Expected to Achieve the IEM

Many study abroad providers work in close partnership with Irish institutions whose quality monitoring and practices will certainly give them access to the IEM.

A typical model would see Irish universities working in partnership with linked study abroad providers. Students typically are undergraduate, degree-seeking students at a US university who must obtain official, written permission from their degree university in order to attend the programme at an Irish university. The permission includes an agreement to accept successful coursework toward the degree programme in the US. US students typically study abroad after successfully completing two years of university coursework in the US. They come from the top-ranked universities in the United States. The US based provider provides students with application support to the Irish university, predeparture information and orientation, housing, pastoral care, and social and cultural activities.

Students pay tuition and accommodation and other fees in US dollars directly to the study abroad provider. The study abroad provider is billed by the Irish university for tuition and if they provide accommodation, for that as well. The study abroad provider pays those bills on behalf of students. The provider assumes all financial responsibility and risk of non-payment by individual students. There is no risk to the university and no burden of pursuing nonpayment of fees. The provider often assumes the responsibility of guaranteeing and paying for housing regardless of whether the university offers accommodation or not.

In some cases, the Third-Party/Hybrid provider would also deliver some additional academic content to complement the course of study in the Irish institution – this may be in addition to a full time course of study at the institution or it may replace a small proportion of academic participation in the Irish institution.

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In such cases, **the IEM of the institution providing a significant proportion of the instruction or training should cover the Third-Party provider and Hybrid provider where the bulk of instruction is provided by the institution with the IEM. A Hybrid provider would not need to have the IEM to ensure access to visas or leave to remain for their students if those students are receiving a significant amount of instruction from an institution that has the IEM. The institution with the IEM would be responsible for ensuring that any providers with which it works adhere to quality assurance standards.**

2. Providers Who Will De Facto Need the IEM for Students to Be Granted Leave to Remain

For those Stand Alone and Hybrid providers who are not covered under the umbrella of another institution's IEM, it is the position of the US study abroad community that there should be multiple versions of the IEM and/or the IEM should be based on high level principles in order to ensure access to the IEM to the broad and diverse range of study abroad models, many of which have been delivering quality educational provision to students for decades.

The Green Paper section 4.4.9. acknowledges that current legal interpretation does not adequately cover the scope of already extant quality provision in the sector. Once the Code of Practice is available, it is likely - due to the diversity of study abroad programme models and the sheer size of the sector in Ireland - that some programmes and providers will fall into a "grey area" (e.g. providers and universities based in the US or another country but who employ staff and run programmes in Ireland). **QQI should have the discretion to determine if these providers can seek access to the IEM.** Six months at a minimum (running concurrently with the six month advising/training period as indicated in our timeline) should be allowed for this process ahead of application/self-certification deadlines.

QQI Codes of Practice

Establishing the QQI Codes of Practice for study abroad providers, programmes, and institutions in Ireland.

What is "...the balance of responsibility between QQI and the providers responsible for establishing, re-establishing and continuously improving their own QA and the teaching and learning environment."?

QQI Green Paper 4.10.1 Introduction

Option 1 – QQI Green Paper 4.8.5

"Using key indicators and metrics to underpin monitoring and dialogue activities. This would entail benchmarking of providers using high-level indicators and metrics agreed with the provider, based on QQI's Quality Assurance Guidelines (see Green paper 4.10). The provider would periodically report to QQI against these indicators and metrics. Quality indicators could be based upon the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the European Quality Assurance Framework for Vocational Education and Training Quality (EQAVET)"

Code of Practice standards will be met by utilising quality indicators used by ESG, EQAVET and - most importantly - the overseas qualifications made in the context of the study abroad providers/institutions own native education systems.⁶

⁶For comparable Codes of practice evaluation bodies see

USA www.ed.gov, <http://www.forumea.org/>

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Understanding that the various programmes and institutions functioning in Ireland (as outlined in the overview) historically and in practice meet and surpass their native Codes of Practice will streamline and support the QQI Code of Practice evaluation.

The Codes of practice these differing national/EU-wide bodies evaluate

--- an examination of the status of the awarding institution, i.e. whether it is accredited/recognised in the country of origin

--- an examination of the standing of the qualification within the country's education system, i.e. whether it constitutes a national standard and/or forms part of the national qualifications framework / national education system

--- an evaluation of the level to which the qualification has been benchmarked in the country of origin

--- an evaluation of entrance requirements in the country of origin and in the "host" country

--- an examination of the duration of a course of study

--- a review of the course structure

--- an analysis of course content

--- an analysis of method of study

--- an analysis of the method of examination.

N.B. this list is not exhaustive, but consists of commonly shared points of review among international bodies.

Additionally, when a study abroad provider (known also by QQI as a foreign/international awarding body) proves it meets the native and EU benchmarks of high-level indicators and metrics accepted by QQI, it demonstrates also it that meets Irish equivalents within the National Framework of Qualifications in its individual accreditation in the US.

Requirements in Relation to the Tax Compliance of a Provider.

The provider should be in a position to demonstrate that it is appropriately registered with the Irish Revenue and has obtained the relevant Tax Identification Reference number. It should also be able to self certify that it is up to date with all tax filings and payments.

Timeline of Implementation

If, as anticipated, the IEM will be a de facto requirement for US study abroad programmes should they want their students to be granted leave to remain, it is essential that the implementation of the IEM be gradual and carefully planned.

The financial cost of the IEM will also have a major impact on all providers in the US study

abroad community: many, if not most, providers are not-for-profit, and need time to adequately prepare for the financial and labour costs of obtaining the IEM.

Canada <http://www.cicic.ca/>

UK <http://ecctis.co.uk/naric/default.asp>

EU <http://www.enqa.eu/>

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Students and Universities Need Time to Plan and Prepare, Too

As with virtually any quality educational provision, the planning and delivery cycle of study abroad programmes is long-term process. A *minimum* cycle of 12 months is typical for academic planning; student advising, application, and selection; provision of housing; ensuring adequate staff resources in Ireland; predeparture advising; and collection of relevant fees and deposits.

US students are accustomed to a “high touch” and highly planned educational experience. The study abroad experience is most often (though not always) incorporated into the degree they ultimately receive from their college or university in the United States. This requires collaborative planning with and approval of their academic advisors, and can require institutional approval by their university of particular study abroad providers.

Due to the different levels of government support for third level education in the US (which is often administered via individual grants and loans rather than at institutional level), students also require significant lead-time to apply for relevant federal grants and loans.

As we write this submission in September 2013, students and universities in the US are beginning the advising process for Summer 2014 programmes. Members of our community are gravely concerned for the viability of these programmes. There is uncertainty surrounding the need for the IEM, who will have access to the IEM, on what basis the IEM will be awarded, and how long the application and review process will take.

If the US study abroad community does not have sufficient time to ensure compliance with the standards/Code of Practice of the IEM (which are as yet not published), it will not only affect our intake of students, but the uncertainty of programme viability will result in providers withdrawing from Ireland, or even going out of business before doing something as unethical as encouraging students to apply for and plan their education around programmes that are not viable.

Over 7,000 US students already come to Ireland through the US study abroad community.

Even short term suspension, cancellation, or closure of programmes and providers would have a significant and long lasting negative impact on third level institutions, jobs in the study abroad sector, government targets for international students, the economy in general, and Ireland’s reputation as a welcoming and trustworthy destination for US students.

In seeking to assure and encourage more international students to study in Ireland, the IEM must be very careful to build on, not jeopardize, Ireland’s success and reputation as a study abroad destination.

Suggested Timeline

The IEM must be introduced alongside clear guidance on what providers must demonstrate in order to comply with the Code of Practice.

The US study abroad community in Ireland is confident that it can meet any of the required quality standards of the IEM. The vast majority of our community already abide by quality and standards programmes which exceed most European requirements, but we still must know what the criteria for the IEM will be as well as the cost, particularly as most members of this community are not-for-profit.

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Once the Code of Practice is public, **QQI should allow at least six months** to advise and train affected providers and institutions before providers complete an institutional review

process and self-certify their compliance with the Code of Practice.

If no further external review is required, then providers should have access to the IEM as soon as they have self-certified their compliance.

If further review beyond self-certification is required, QQI should create and allow access to a provisional category for providers in the review/application process (or reapplication process if the provider does not obtain the IEM after the first review) for not less than 12 months.

Without such a category, no ethical provider will allow students to apply for a programme that is not virtually guaranteed to meet the requirements for students being granted leave to remain in Ireland – this could mean suspending programmes and possibly shutting down organizations which have providing quality educational programmes in Ireland for, in some cases, decades.

QQI should establish clear timelines for their own reviews, decisions, and communication with providers in the process of seeking the IEM. Where there is any delay in review or decision as a result of QQI, providers should be given an extension to access to the provisional category for an equivalent amount of time.

Submitted on behalf of

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