QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Comprehensive Policy Development Programme

Consultation Events Feedback Report
for consultation events held in:
Dublin (Croke Park) 20th May
and in Cork (Rochestown Park Hotel) 28th May

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Executive Summary

This document describes the feedback and comments received from discussion groups at two open stakeholder consultation events conducted by QQI in May 2013 as part of its comprehensive policy development programme.

The purpose of the consultation events was to enable stakeholders to formulate informed submissions to the published Green Papers.

This document sets out the stakeholder views and opinions expressed through the discussion groups on a range of proposed topics and questions. Commonly expressed opinions include the following;

- the need for more information on QQI

- the need for more information, training, templates and guidelines across all policy areas.

- the need to facilitate provider groups, mentoring and networks.

- the short timeframe to respond to some Green Papers.

- the welcome for consultation events and the wish for further consultation meetings/group events.

- a range of specific provider sector issues.

- concerns about costs of meeting new requirements and fees.

These findings and the submissions received through the online consultative process will be used to inform the development of White Papers in the phase II of the comprehensive policy development programme.

Introduction

The Green Papers on QQI's comprehensive policy development programme were made available for public consultation in the week beginning 13 May 2013. The main avenues for formal public consultation are through an online submission process for each of the individual Green Papers and by written submission sent directly to QQI through consultation@qqi.ie

Two consultation events were held in Dublin on 20 May and in Cork on 28 May. The purpose of these events was to facilitate stakeholder engagement with the consultation process.

Both consultation events commenced with presentations; from Dr Padraig Walsh, CEO, and from the heads of the three business sections in QQI; qualifications, quality assurance services and provider relations. The presentations are available on the consultation page of the QQI website. These were followed by a number of discussion group sessions throughout the day.

Concepts arising from the presentations and from the following Green Papers formed the basis for the first discussion group session;

- Comprehensive Implementation of the functions of QQI.

- Risk and Proportionality.

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

A second set of discussion groups were held on specific Green Papers and policy topics.

This report summarises the comments and feedback arising from the discussion groups for both consultation events. As many similar themes emerged comments and feedback are summarised for both events. All Green Papers can be downloaded at www.qqi.ie/Consultation/Pages/default.aspx

A summary of the feedback from the first set of discussion group sessions is provided under the five topics which delegates were asked to address;

(i) Relationship and Expectations of QQI, (ii) Approach to Consultation (iii) National Framework of Qualifications, (iv) Lifecycle of Providers, (v) Risk and Proportionality

A summary of the feedback on specific Green Paper discussions is provided under each policy topic.

The feedback from both discussion group sessions is summarised in the form of *comments, questions and suggestions* expressed by delegates and reflects the diverse range of stakeholders and views.

A separate report has been compiled on the evaluation of the arrangements and effectiveness of the events; this can be downloaded at www.qqi.ie

Discussion Groups I

Topic 1: Relationships and Expectations of QQI

- Expectation that good communication and meetings such as these events be continued.

- QQI awards will provide recognition both nationally and internationally and should be a qualification of value.

- QQI as an organisation will be effective, inclusive and open.

- QQI will manage the reputation of education in Ireland, representing national standards, enforcing national standards.

- Support needs to be provided on 'the ground'. If QQI expects providers to support their learners, equally QQI should support their providers. A balance needs to be struck between support provided and compliance on requirements.

- Lines of communication should be strengthened making it easier to link up with a support person in a specific area and a help desk would be one suggestion.

- Transition to QQI has been seamless to date which is good, it is hoped it would continue in that way and that there would be a similar relationship with QQI as there was with the FET Awards Council, similar support in place.

- Will there be a continuation of existing services; with improvements

- There needs to be more clarity on where the different provider types will fit in e.g. linked providers.

- There was a lack of training on the legacy HET QA procedures, there should be more support for HE provision e.g. provide templates.

- The relationship with the legacy Awards Councils was very different, it is hoped that there would be a streamlining of relationships with clear and consistent guidelines e.g. validation process for FET and ACELS was currently very different. Systems need to be accessible and consistent across providers.

- In regard to smaller, community based providers there should be a more coherent approach taken in order for their input/voice to be heard.

- Is it a given that providers have a system of academia in place? Voluntary/ community sector do not necessarily have this in place. These types of providers want recognition and proper support.

- Equal priority should be given to all sectors with particular concern for community education and English Language Training (ELT).

- There is concern there is an inner circle of providers and it is hard to break in.

- There needs to be more clarity on where the different provider types will fit in e.g. linked providers and an equal playing field for all.

- FETAC name well known and will QQI be the same? What will happen to FETAC and HETAC names?

- Future committees within QQI should represent industries appropriately.

- The provider QA relationship with QQI is integral to students and QQI needs to assist student representative bodies in relation to QA training. There should be more student participation in policy and partnering with QQI so that the learner's voice will be heard – this could be achieved through the existing Student Representative structures within HE institutes.

- It is expected that QQI will develop policies with regard to the existing legacy systems and not reinvent the wheel.

- QQI should be learner centred; look at each individual learner as being different.

- Will providers have a similar relationship with QQI as with the legacy bodies?

- QQI must consider the social agenda that is missing from the Green Papers. QQI should take a lead on social agenda in the context of lifelong learning.

- More explicit branding of QQI is required.

Topic 2: Approach to Consultation

- So far so good! Very positive and welcomed process.

- It is very important that QQI maintains an openness to consultation, in former FET systems, it is felt centres were outside of this.

- The approach to consultation should be continued, not just about completing QQI's legislative requirement of consulting with stakeholders; it should be more than 'lip-service'.

- The consultation is a big improvement on what was there before, welcome the inclusive and open process.

- Consultation must be authentic, it should be focussed and lead to a process.

- The regional consultation meeting in Cork is good. Consultation groups are appreciated, could they be more local?

- In communicating and consulting with stakeholders QQI should refrain from using too much jargon.

- Events like this are very powerful, with all stakeholders together in one place.

- Why are the timelines so short for consultation? Summertime is not great for some providers.

- Timeframe is too short to consider all policies. Need time for internal deliberations cross organisations. Summer closure, assessments/examinations impacts on the time available to respond, additional two weeks would make a difference to responses.

- 7th June is an unrealistic deadline, this will affect the quality of responses. There should be a two week extension to the consultation process.

- Emphasis should be on challenge to include all stakeholders rather than on the deadline.

- It was commented that the consultation event/meeting is a more useful process than written submissions, as the consultation is happening during exam boards, there is uncertainty as to the extent to which this will be engaged with.

- Will consultation process and feedback be published?

- Learners should be embraced into the consultation process, online as well as face to face.

- Provider Relations as a new section to interact is very welcomed.

- Concern expressed over the amount of material being consulted on, quite a lot to take in, absorb and provide feedback on and revert in such a short time.

- Will consultations continue once white papers are issued, how?

- QQI should consider putting information on the website for providers relating to what is to be gained for providers in having a relationship with QQI and what are the alternatives.

- Could an online discussion forum be created? *"Could we post questions online where others could read what we're asking and also read the responses?"*

- QQI should build networks, include sectoral engagement.

- It is suggested QQI develop a Customer Charter with commitment to more timely provision of service, specifically for potential new applicant providers.

- QQI could develop an interactive system on the website; QQI interactive – different sectors, different learners, different needs/requirements, through a phone call/email ticket system. Communication with QQI requires a call centre type approach.

- Looking for more information from QQI, more FAQs would be useful.

- The feedback mechanism for the consultation on the website is excellent.

- How will feedback from the consultation events be made available?

- There is a need for further group meetings to have further discussions and dialogue after the consultation process. The devil is in the detail and sectors want to know what this means for me.

- QQI should hold events held throughout the country while others questioned the practicalities of this.

- Suggestion that an advert in newspapers is needed on consultation process.

Topic 3: National Framework of Qualifications

- A lot of work has been done to get the NFQ to this point, it is well regarded. It is a clear, transparent structure, which is user friendly.

- *'If it's not broken, don't need to fix it';* already rolling out QQI, don't need more changes.

- QQI should address NFQ Branding, there needs to be more understanding for learners and employers and a clearer link to the EQF, opportunity to re-launch the Framework.

- There should be more consistency in award alignment. Two awards are at the same level in UK/NI framework but at different levels here. Hoping for a more flexible system under QQI.

- There needs to be ease of access and consistency of approach in the NFQ. There is confusion as to who is the regulator – Irish or UK awarding bodies.

- Professional awarding bodies which are not included, problematic, becoming restrictive for funding.

- Framework should not be used for something it is not designed e.g. funding was not anticipated in its design.

- Funding mechanism is different for those aligned rather than placed.

- It can be easier for UK awarding bodies to get on the framework than bodies in this country.

- Passed OFQUAL system in UK and met large number of requirements and then had to through second process here.

- There should be a level playing field on the Framework.

- Awards and Qualifications framework or a credit framework system – we need a credit system.

- Clear mapping of NFQ to European framework and UK frameworks needed.

- NFQ L6 awards are not equal across providers; this causes problems nationally and internationally. Urgent need for this to be sorted.

- NFQ L6, what will happen to HET and FET awards at this level? Will this be streamlined?

- Minor Awards.,There is a need for standalone awards as for some people these are the only certificates they have ever received in their lives, circumstances may not allow them to commit to a full award and for some who are starting from scratch the idea of a full award seems daunting.

- Will framework fan now be levels 1-10 with a clear link e.g. Can an FE provider now offer a level 10 if they have the capacity?

- Continuity for learners, the Irish system was compared to the UK system which caters far better for progression for its learners than the Irish framework. The stigma between FET and HET must go.

- How will professional and occupational qualifications fit into the framework?

- Progression of learner, pathway of learner, paths made easier for learner.

- Why is funding only offered if a person is moving up the Framework? Some people have to move down and retrain in order to gain employment.

- Framework can be a barrier instead of an enabler (restrictive process).

- ISO recognition? Not currently recognised through the framework.

- Some delegates expressed concern about occupational training (30,000 affected).

- QQI should make sure the Framework is fit for purpose , it should be reviewed.

- QQI could get more involved with the Universities and have a steering role.

- A delegate suggested QQI should extend delegation of authority for post graduate / research awards.

- Need to monitor quality of international awarding bodies.

- ESL not on the framework, where does it sit?

Topic 4: Lifecycle of Provider Engagement

- What is capacity? What is the boundary or legal basis?

- Some providers might struggle to meet all requirements.

- Will QQI recognise difference between providers and universities?

- Will allowances be made for community providers – already stretched to the limit?

- Will all legacy providers have to demonstrate capacity to continue to access QQI awards?

- Capital is an issue, all providers are not operating on a level playing field e.g. private versus public – private can't compete with public providers.

- Expectations and demands may be higher for some categories of providers.

- Will smaller providers incur the same costs as large providers?

- There needs to be clarity on how the system will be enforced.

- Private sector can really deliver quality if it can operate on a level playing field.

- Public sector providers do not necessarily determine good practice.

- When finalised, guidelines should be more explicit on what 'capacity' will be.

- Could lead to potential elitism due to cost implications.

- One delegate referred to the panic for smaller providers e.g. smaller provider pushed into corner. Is it too rigid for smaller providers? Is the investment that has already been made by smaller providers now no good?

- Provider capacity requirements will make demands on provider resources, there needs to be a mechanism to ensure demands are fit for purpose.

- Will this force some smaller providers to close?

- Training processes are needed for providers once new policies are published.

- QQI should roll out information sessions for providers.

- Is there still a place for community education?

- Some delegates expressed a fear that engagements will be 'HET' driven'

- There is a need for great rigour on standards in Assessment.

- QQI will need to be provider centred in order to facilitate the diversity of education and training provided.

- Provider capacity is important, each sector needs to be treated differently in terms of how they operate.

- How will QQI engage with providers? It might be advisable to divide organisations into three categories, organisations can decide which group they want to be in.

- Current self-assessment QA systems are very time consuming and are diverting attention away from teaching and learners.

- Expectations that quality needs to be equal.

- Minimum standards must be met but prescriptive requirements won't work in HE.

- ISO standards are an example/model that could be used.

- Could have different standards/ requirements for different categories of providers, might be problematic and difficult to manage.

- Is QQI an advisory service as well as auditing?

- QQI needs to be aware that they are not the *'only show in town',* there are many layers and demands on providers, now throwing QQI into the mix too.

- QQI needs to be mindful of the size of provider organisations, some are big, some very small and won't be able to engage with a bureaucratic process. One size does not fit all.

- Perhaps the 'Life-Cycle' could be a shorter cycle in the first instance as an introduction to doing business with QQI.

- Assessment of capacity must be transparent.

- Provider access to accreditation includes the element of capacity, not just capacity to engage with QQI but capacity to delivery to learners.

- The idea of capacity should be reflected in all the Green Papers, not just section 2.

Topic 5 Risk and Proportionality

- QQI should build on processes that exist and don't reinvent the wheel.

- Track record of provider is important and useful.

- Every provider is different, 5 leaners vs 500 learners; processes need to reflect this.

- Currently not enough information being provided.

- Concern was raised about QQI being a quality body and also an awarding body.

- Proper quality audit systems is needed; current monitoring systems is too loose.

- More rigorous monitoring system needed.

- There is a perceived lack of fairness in treatment amongst providers and QQI could address this. Equity should be treating providers appropriately (not necessarily equally) i.e. parity of esteem.

- Concern expressed on administration capacity and expectations on small providers, creating additional burden on small organisations.

- What will happen independently managed networks of providers? What will changes mean for existing and new providers?

- Authenticators should have more power over all aspects of the courses (protecting the brand for everyone). They need to check QA in general more than just signing off on portfolios. It is on the form but overlooked.

- Qualifications and experience of Authenticators should be clear.

- The role of the internal verifier needs to be strengthened.

- QA belongs to the provider, QQI should take a harder line. Risk is a way to find providers who lack capability.

- Disreputable providers can bring down the reputation of all providers.

- People need to be clear about what they are signing into when becoming a provider.

Discussion Groups II - Green Papers

Green Paper on Provider Access to Programme Accreditation (Cork Event only)

Assessing Provider Capacity

- Who decides which type/mechanism of Evaluation is used to assess provider capacity?

- Do not exclude anything from the list of mechanisms for evaluation- fairly standard and could vary depending on applicant.

- Site Visit – is it an inspection if you need facilities but may or may not be critical.

- View expressed that the site visit is essential to see programme in operation – might be at stage 2.

- Track Record- applicant to be in existence for a while – if starting off may not have that track record. Although acknowledged that some of those involved should have development and delivery experience.

- Sustainability should be part of assessment of provider capacity.

- Need for Communication re: pre-eligibility.

- Clarity re stages in the process and access to validation / accreditation not quite understood.

- Is it possible for sole traders to apply?

- Question of effort on part of provider- seems to be considerable.

- Bond – PFL Challenge (Bond difficult to achieve in current climate).

- Public tender processes which specify turnover can be a barrier – need to watch this in QQI determination.

- There is provider demand to access accreditation for Levels 3 – 6.

- One delegate of the group strongly disagreed with option 2 'Applications restricted to providers of programmes of Major awards only.'

- It was felt that the following needed to be included 'on the job training, apprenticeships, vernacular training'.

- Stage 1 of process.

- The fact that no public status given for completion of Stage 1 was considered a problem. Successful completion of that stage could be become a currency and bartering tool for applicant.

Implementation of process

Option 1 'Assessment of capacity and approval of QA procedures against QQI criteria based on modified legacy FET and HET Awards Council guidelines' was favoured with additional criteria. This was considered fair, open for all, no restrictions.

Option 2 'Assessment of capacity and approval of QA procedures with additional conditions/ criteria for (a) the applicant provider and/ or (b) the programme.' This was considered impossible to defend, could lead to legal challenge

- It was suggested that Stage 2 first could be an option then QA procedures.

- Both stages are closely interlinked. The timing of the process will be important.

- Fees will be a concern

- The proposal to restrict from applying for a period of time if Pre- Engagement is unsuccessful is considered rather draconian. The barrier should not be insurmountable.

- Pre-application phase – suggest group networks working together, suggest further briefings

Green Paper on Protection for Enrolled Learners (PFEL)

- Acknowledged there is legislation in place which requires PFEL for QQI providers

- Protection for Learners to be more feasible. Very difficult for small providers in niche areas.

- It was stated that PFEL can be very expensive and that the purpose of having it doesn't actually occur that often for providers. Also, having money in a bond is not possible for some providers as it ties up their cash flow.

- Providers are being asked to put arrangements in place but required arrangements are not clear.

- Bonds are not currently available.

- Some arrangements with backing of several financial institutions.

- How to define monies most recently paid.

- The approach needs to address the diversity of providers.

- Quality control must be sound, QQI PFEL policy is required for new providers.

- A consortia approach might be viable option for some providers.

- Some providers within the group felt *"PFEL is an intolerable burden".*

Green Paper on Fees for QQI Services

- Smaller centres that cater for level 1 to 4 (and provide a starting point for people to get back to education) who don't have the resources will fall by the wayside if fees for QA are too expensive. One delegate suggested *'thousands of learners will be lost'.*

- Funding in relation to the different types of providers will be an issue e.g. publicly funded bodies. *Will publicly funded bodies benefit more?*

- Clarity of Fees, this is essential for budgeting. How can it be done for September?

- Some delegates were concerned about impact of cost on learners, as providers would pass on cost to learners.

- Will FE providers now have to charge students too much now for courses? Anti – competitive e.g. serious threat to people at bottom – will be a big impact on learner as well.

- One delegate asked whether QQI needs to become another *Cash Cow?*

- Registration Fee – How can it be approached in recognition of reasonableness?

- General agreement among delegates in the discussion that there is a need for different level of fees for different provider groups i.e. small versus large private providers, community and voluntary sector providers etc.

- Is there a relationship between QQI costs/fees?

- Incentive or dis-incentivise? If applications come in perfect – return fee – more engagement – higher fees.

- It was suggested that only registration fees should be paid by the provider, the learner should pay rather than the provider.

- One delegate suggested the Provider fees should be based on the number of students?

- Are fees to put off providers putting in a "junk" application?

- The current fees should be available and transparent on the QQI website for all to see.

- Suggestion of annual fee per provider i.e. continuous registration fee. Could lead to less cost for validation (expectation). Agreement that impact of fee will impact providers in terms of volume of activity and their ability to provide a service. Introducing a fee seen as a stick to improve practice.

- Fees should not be the same for private and public providers as community based providers; community providers do not have the same funding available.

- There is no income for levels 3 and 4 programmes at community based centres and no income for some level 5 awards. It was felt that some exemptions should be considered.

- For the community and voluntary sector it is complex and no clear boundaries exist in regard to fees.

- The question of fees in relation to private versus a VEC/ETB was stated and the impact it will have on the learner in terms of cost/fees.

- Will fees be charged for programmes that already, have been validated, what happens now in relation to fees?

- Should there be flat fees for each service? Also, discussed were initiatives to incentive and dis-incentive providers such as: no fee on first application sent in to QQI but fees would be applied for subsequent checking of applications? This was viewed as a good concept by participants.

- The concept of fees charged on cost recovery was discussed as well as the concept of relationship fees/subscription fees and composite fees and what exemptions should apply?

- The notion of an annual fee which would be properly, scaled for the size/type of provider was seen as a good option.

- It was suggested that if there are costs/fees involved in the process of recognition of awards through the NFQ, these will be will be passed on to the learner.

- Could you have different versions of the IEM, if so, how would QQI charge for multiple versions for the IEM?

Green Papers on Awards and Standards

- What will QQI awards and standards policy look like?

- Short term policies are needed in the interim for standards determination and making awards.

- Concern was expressed around part-time learners' access to minor awards.

- Concerns was expressed over the type of standards, what will they look like?

- Higher education has a better *'ease of passage'*, colleges can make changes easier and quicker. FET is more complex and may be disadvantaged.

- Training-specific awards may take time to develop if major awards are pushed over minor awards.

- Will QQI have the same role in standards determination as the former bodies?

- Who are the people who will develop standards? Role of industry? Legislation?

- Sectors view standards (the development process) as being too complicated

- Is there capacity for providers and QQI to develop?

- Standards may be adopted; multiple routes to the framework.

- Need more special purpose awards, more focussed learning and training.

- Standards at lower levels of the NFQ should be pitched at very broad range of foundation skills. Learner outcome at these levels is very important.

- Continuity is needed, there are massive changes, causing *'despair'*!

- CAS – too many changes. System hardly implemented and it's being reviewed / changed! CAS may not as yet be fully embraced, concern now that it's changing. Maybe it needs tweaking, but stability is important.

- It was accepted that in the main public providers provide major awards. Community education is a stepping stone and minor awards are needed in this sector.

- Will there be opportunities for delegated authority within FET sector? Possibly joint awards with ETB

- How will legacy awards be recognised in the future?

Green Paper on Certification

- Is there an option to keep Certification as it is? It was suggested the less changed the better – keep it as stable as possible.

- It was accepted that FETAC is a well-known brand. QQI must be careful about making any changes. If you have a brand referring to the new agency QQI, you must reassure the public about the changeover and that their certificates are not invalid.

- Some participants suggested FETAC and HETAC award brands should continue; others that there is a lot of good will towards QQI and it is logical to set up a new brand.

- It was suggested that a learner should be able to access their learner records online so they can see in black and white what credits they have built up. Could the current FBS system be used – PPS numbers could be used by the learner to access their learner records.

- What about developing a web based/ electronic certificate?

Green Paper on Recognition of Qualifications within the NFQ

- Recognition of international awards on the NFQ is an issue for UK awarding body awards, in particular for CAO courses. Colleges don't accept these awards as fitting the CAO criteria. Some of these awards are aligned but not all. There is a big issue around non-recognised awards for learners.

- There is a vacuum since NQAI was dissolved - some of the awarding bodies expressed concern that there has been little engagement since.

- There is significant interest in alignment, it is imperative for learners, for further employment it is necessary or in some instances a requirement that the qualification is recognised in the NFQ, for European roles, recognised qualifications are required.

- Some professional bodies are included in the Framework via alignment so there is an expectation that the rest should follow suit, there is also pressure because for those not on the Framework learners don't qualify for tax relief on fees.

- There is also an issue stemming from social welfare, learners unable to get funding for internationally desirable certificates such as the STW 95 (Maritime Training) as these are not on the NFQ.

- Higher Education Institution delegates stated that they are already recognising International awards (such as Comptia/CISCO) through their RPL procedures. These awards are seen as the international and industry standard. It was suggested that a recognition policy would increase the transparency of such awards and establish more formal recognition for these awards.

- Aligned awards provide choice to providers. There was a suggestion that in some sectors existing FET awards at NFQ level 5 or 6 do not stand up to UK awards, for example a private provider suggested that a NIBOSH award in the area of health and safety is considered more desirable than the existing FETAC award.

- Interest was expressed in having access to information on the recognition of awards (similar to qualifications recognition database –NARIC).

- An awarding body delegate commented that providers want to see their awards formally recognised on the NFQ, alignment is not sufficient.

- It was suggested that the OFQUAL QA process is rigorous, having gone through this, professional awarding bodies should be allowed the same access to the NFQ as institutions with delegated authority to make awards. Ownership of the award is an important issue for these professional awarding bodies.

- FETAC, HETAC and QQI are not well known brands. There is an opportunity for QQI to use aligned awards to promote the QQI brand.

- Can QQI profile be raised through alignment policy? Can QQI logo be included on recognition award certificates?

- A PLC provider suggested that international awarding body awards such as CIDESCO, City & Guilds and CIBTEC awards are all internationally recognised and could potentially provide a 'flag of international convenience' for QQI.

- A PLC provider suggested that the Quality Assurance process for foreign awards or international awards is superior to the existing national quality assurance for FET. For example, teacher training requirements for CIDESCO and the fact that all assessment is centrally administered.

- FET Providers are currently trying to integrate CIDESCO into FETAC level 5 standard and operate both awards in parallel in the interests of learners, effectively this is an informal arrangement leading to a dual award.

- One stakeholder commented that the specific needs of Irish learners didn't allow learners to progress in employment. Learners need to be the focus; how through a quality assurance process do we enable this?

- A VEC delegate commented that learners who do not qualify as mature students (i.e. under 23) are in limbo as the CAO doesn't acknowledge their further education learning unless they are mature students. The also commented that Public VET providers are unaware of alignment process and the availability of NFQ recognised awards available to them.

- There is a risk of misunderstanding among employers of qualifications and the NFQ.

- There is an issue regarding the provision of information and guidelines are required.

- Has public funding been too blunt? Everything connected to the NFQ will be funded and has to be seen as progressing vertically through the NFQ. This approach is inconsistent with the re-skilling needs of many employees and those seeking work.

- Progression also an issue, getting into HE using FE awards. It is necessary to implement mechanisms to promote them, creating programmes that will lead to progression.

- Other awarding bodies already have quality assurance systems, will QQI recognise those? How do we do that, do we audit them? Some awarding bodies stated that they have already done QA work for the alignment process.

- Suggestion that in publishing guidelines a prescriptive approach should be adopted for some issues. Guidelines should be simple and easy to follow.

- QQI needs to define a credit policy for Ireland.

- It was suggested that if there are costs involved in recognition, these will be placed on the learner.

- A VEC delegated suggested that Department of Education sees QQI as a monopoly awarding body in VET even if QQI does not share this view.

- Level 6 co-habitation of FET/HET is problematic for operation of EU lifelong learning programme (i.e. Grundtvig/Erasmus programmes differentiate between VET and Higher Education).

- SOLAS representatives stated that there will be targets for progression and the NFQ will need to provide appropriate pathways and guidance to learners. NFQ will need to 'broaden out to avoid a log-jam of demand without appropriate recognition options'.

- There was consensus in the discussion group that it is the job of QQI to quality assure all awards recognised within the NFQ. It is important that there is public confidence in the way in which this is done. Quality assurance must involve an external dimension (review) but should be uncomplicated.

Green Paper on the International Education Mark

- There appears to be a particular concern around the IEM and how it will be 'rolled out' or made available to all providers as there will be much competition. The IEM should be available to all provider types at the same time. There is a potential to disenfranchise some providers if some are given preference. The practicality of this was also questioned.

- Will providers need to engage with QQI to access the IEM?

- Concern was expressed that if the IEM manifests itself in the form of a list when it becomes available, this may introduce a new dynamic where there may be more of a danger to *not* being on the list than potential benefits arising from being on the list.

- Delegates queried the investment/ budget/resources that may be required for the smaller providers for access to the IEM, (such as PLC colleges, who provide learning only to a small number of non-national learners). Will the criteria be as stringent for them as the larger entities, will different pathways be made available?

- A delegate referred to the HTS (Highly Trusted Status) System in the UK, and queried if this was the basis for the IEM. The delegate was worried about the rather "black and white" nature of being on the list or not on the list, and the notion of a minimal difference in provision and quality between centres/ providers deemed eligible to meet the requirements of the HTS system – and the potential impacts seemingly arbitrary difference have on a provider's success if they are not on the list – therefore it is important to learn from the UK system if we are using this as a basis. It was argued that we shouldn't be as stringent in terms of compliance as the UK.

- Should there be single or multiple versions of the IEM? Universities and the IOTs may want separate versions. Some providers will have more funding and resources than others.

- Other delegates favoured a single Mark, where a provider agrees to certain standards. If there is more than one version this would dilute it.

- It was suggested there could be detailed criteria below the IEM to distinguish sectors. There could be common criteria with a brand for each sector.

- How would QQI charge for multiple versions for the IEM?

- There are pros and cons of having a one size fits all approach, one mark with varying criteria, or a range of possible marks. Some delegates said that it would be confusing to have different marks available. Others said that the logo should be the same but that the categories should be different. Not all delegates agreed on whether there should be one or more versions of the IEM.

- In the UK, smaller organisations can still gain access to the trusted mark as there are different requirements in terms of facilities and resources. This has led to multiple versions of the mark being available, where for instance a provider's ranking can determine whether or not learners on their programmes can work for 20 hours or not.

- A delegate queried the notion of having two sets of QA criteria to be met, one for institutional approval and a whole new subset for the IEM, particularly when the FE & EL criteria are currently deemed as being so similar.

- If we pursue the self-certification (against 10 criteria) option, it may lose its element of exclusivity, and therefore may be of lesser value as a marketing tool. The general view was that the value of having the Mark would not be enhanced if everyone had access to it automatically (as a right).

- The option on QQI doing the assessing (even with its limited resources), was not viewed as favourably as if there was an external element involved, which would make it quicker, more efficient and unbiased.

- It was felt by the discussion group that option C could delay the IEM too much; but there could be detailed criteria for this option with one IEM. This would need to be developed promptly.

- Option A was viewed favourably; option B was viewed as unfair as you are categorised, others felt this option would establish a very high standard.

- The discussion group in the main were not keen on option D, assessing one subgroup first, followed by others in order of priority, this would dilute IEM.

- It is important for "brand Ireland" to build something that has currency.

- The market needs the IEM, the sooner the better.

Green Papers on Access, Transfer and Progression, Provision of Information for Learners, and, The Recognition of Prior Learning.

Access, Transfer and Progression (ATP)

- The guidelines in place currently are those published by the NQAI in 2003. However, changes/developments have occurred, e.g. the Higher Education Links Scheme, existing guidelines are out of date.

- ATP should include access to employment. In the future, funding will depend on how many get employed as a result of education and training.

- English language school delegates are interested in ATP and how to implement this in their area, emphasis on it being learner centred. This group felt that many of their students are highly qualified professionals but language skills not developed.

- Progression – more places should be available for PLC/FETAC award applicants.

- From a national perspective, there is a need to address the situation of people with uneven skills, e.g. good practical skills but poor literacy.

- There is a demand in industry for access flexibility, e.g. workplace and experiential learning.

- NFQ Level 6 presents particular concerns/problems. Clarification on progression opportunities needed.

- It was noted that SOLAS is to develop a strategy for FET but this will take about 2 years.

- Some delegate providers offering awards at NFQ levels 1, 2 and 3, stated that they did not want any change in the validation process. A Change of programmes caused problems at this level, especially numeracy.

- ATP must form part of the Quality Assurance; there is a need to consolidate quality assurance.

- There is a need for recognition of professional bodies and access to framework.

- There should be a requirement for statements of knowledge, skill and competence per programme, better articulation of learning outcomes is needed to serve learners.

- The definition of progression needs to be expanded to include employment. It was felt that there is not enough thought on the occupational area that a particular qualification leads to. We don't have sector skills councils like the UK. The ESCO initiative is looking at this. The ECCE scheme was mentioned as an example of where specific programmes are linked to employment.

- QQI should develop policy incrementally; it should ensure; Plain English, that Enhancement is affordable, there is Information and Guidance, it is Flexible and Non-Prescriptive and Research Based.

- QQI should lead on developing a common language and ensuring good quality data, including on learner retention.

Provision of Information for Learners

- Information to Learners – specific information is needed on awards and levels; there is a need to ensure that user friendly documents are produced, very problematic for those with literacy difficulties.

- Access Officers present were particularly concerned that there is sufficient information and guidance around ATP and information for learners.

- Guidance to access – There should be consistency in procedures and approaches.

Recognition of Prior Learning

- How will RPL be driven forward? Can QQI show leadership and provide national.

- coherence?

- There are funding issues for both ATP and RPL.

- RPL must indicate best practice.

- It was commented that QQI is a relatively small organisation – how are they physically going to achieve all this?

- One delegate commented that there was very little attendance at the consultation event from Universities and feels that there is a disconnect from the universities.

- What does a 'national approach' to RPL mean? There needs to be a clear language and a common approach.

- Reference was made to the Dutch centralised RPL model. It was felt that this is not a good approach as there is a lack of flexibility. There are significant subsequent recognition issues in the Netherlands.

- There was a feeling amongst some delegates that perhaps support is needed rather than policy as RPL is carried out to resolve particular problems.

- The planned joint paper with NCGE was mentioned in terms of the extent of QQI's remit and the role of guidance.

- As custodian of the NFQ, QQI must join-up QA and RPL.

Green Paper on Monitoring and Dialogue

- QQI accreditation will lose value if monitoring is not robust.

- Current FET monitoring is too light at present, more robust review needed, but not too much as small providers might not have the resources to carry it out without stopping delivery of programmes.

- Will the Act references to monitoring of QA, ATP apply to *all* providers? – clarity will be needed in this.

- Mix of monitoring methods likely.

- Generally involvement of monitor is viewed positively.

- Guidelines needed for providers to ensure consistency.

- Fear around monitoring – staff dedicated and 'sick' of being monitored used in an inappropriate context by provider leading to negativity around process.

- Audit approach – what are we to be monitored on/about.

- Whistle blowers approach – where do you go in this instance?

- How do we ensure we own our QA.

- Don't like term provider.

- Review experience is exhausting takes 1 year of focussed attention, everyone is involved, you have control over it, need guidance.

- AIR reports useful – could be further enhanced, need to analyse and discuss content.

- Monitoring should not be extra burden / body of work – should integrate with QA activities.

- Perspective of extern – useful to visit centres who are taking more responsibility.

- Public accountability aspect is important – need to publish reports, findings.

- Training required for monitors/ authenticators.

- What is the provider capacity to engage in 'monitoring' – should be proportional to the numbers of learners.

- Providers need to be informed of their obligations and responsibilities.

- Is monitoring top down/bottom up.

- Is QQI the watchdog?

- Note the situational leadership model – how to use this to modify behaviours and evolve.

- Reference to publication by Flood and O'Connor – styles of leadership/ transformation of organisations.

- Payments – who pays for monitoring, factor in the payment aspect after the event will not work.

Green Paper on Reviews

- Audit versus Enhancement Process; Not auditing – enhancement, enhancement makes assumption QA systems is already in place.

- Is it one size fits all? Wide variety of providers, one size will not fit all, different review models or scales.

- How will it affect ACELS inspectorate?

- How will it affect FETAC providers?

- Will reviews be across institutes or sectors (i.e. review on research?)

- Providers already carry out reviews, extra ones may not be of value – Review fatigue.

- What do we use reviews for? Regulatory purpose? Where does the Review sit from the institute's perspective?

- Internal audit reviews may work better for some providers. Panels can give different outcomes (no consistency). It's important to give clear guidelines (definitions) to panel members.

- A lot depends on the scale of the organisation. Maybe align the review to a range of topics.

- Work should be done well in advance of the review. It should be clear to the Panel what the end product of the review is. A lot of time is wasted. The review should be more focused, direct and to the point. Reviews can throw up things that are not relevant.

- There can be a heavier review on larger organisations.

- The more independent the organisation the less communication with QQI, therefore the more important the review is.

- It's important to measure engagement and avoid duplication.

- Relationship between funding and review – need to consider this more – funded elements could become part of a review checklist alongside an enhancement agenda.

- It possible to do ATP, IEM and DA all together. Maybe 1 package a year across the sector (thematic).

- QA should be on-going (rolling review process). There could be a template that is live and updated constantly. When the review happens everything would be to hand.

- Each college should have an annual update.

- 7 years more effective than 5.

- Streamline them maybe 10 questions for reviewers.

- How will we review clusters?

- Funding percentage for clustering (top slicing) – so could review clustered entities at the same time.

- Are QQI going to be reviewed? Will this be an independent review?

- Need to be more cognisant of funding aspect.

- Professional bodies open to Review process – seen as positive.

- There is a need to develop guidelines for review.

- The purpose/outcome of review may be different for different sectors (i.e. public funding – value for money aspect).

- QQI Review should take into consideration other external reviews of the institutes.

- Review process should be used as a means of improvement.

Green Paper on Quality Assurance Guidelines

- QQI needs to ensure QA guidelines are accessible and understandable, and to vary the approach depending on the provider i.e. new provider vs. existing provider.

- There is a risk of 'prescribing' in the guidelines.

- The underpinning QA principle should be uniform.

- It is important that QA doesn't suffocate smaller providers.

- QA should be seen as an active process in the institution.

- Efficiencies of scale, to *facilitate* instead of *bring about*, to *provide* instead of *prescribe*.

- The focus needs to be on enhancement, QA guidelines are a development tool instead of a compliance model. The QA document should set out how the provider meets requirements.

- There should be more time perhaps on a panel visit as opposed to documentation, a move from procedural to engaging with the whole provider as an organisation.

- QA should deliver transparency, equal standards, standardisation.

- QQI should write guidelines in terms of outcomes.

- QA Guidelines could be unitary at a very high level and then left to providers to develop their own systems.

- There are different expectations for different parts of the system, should offer choice. Some providers will take minimal guidelines, others will go for prescription.

- Clear Guidelines and Templates will be needed so that there is a consistent approach. QQI will need to produce multiple sets of guidelines to cater for the different sectors. Providers need direction as to what is expected of them.

- QQI should start with the minimal guidelines and expand as appropriate.

- The old Guidelines form a good basis for development of new guidelines and templates. These could be enhanced to reflect increased experience and capacity of providers specifically in FET sector.

- It was commented by a delegate that the VECs need to own and implement QA systems – should not be optional for staff any more.

- Informal networks should form to facilitate development and then benchmarking.

- ENQA Guidelines are very suitable for HE providers who want to have flexibility to develop context specific QA systems. It was noted that these are very high level guidelines i.e. principles of QA + legislative and European requirements, this would work for many providers but others would need more detailed guidelines.

- QA should deliver quality experience for learners. Regular evaluation and feedback mechanisms from learners and independent experts are the core mechanism for enhancing quality of provision.

- QA needs to impact on teaching and learning and not just be a paper exercise.

- It was suggested that self-evaluation and programme improvement are not currently sufficiently implemented in FET.

- Review of effectiveness of QA can be painful but is very good learning – essential for enhancement, but the role of evaluation and review is not sufficiently embedded particularly in FET.

- QQI should facilitate knowledge exchange across providers; create a monitoring and mentoring role for providers. There is a confidence of providers in other providers.

- QQI is best placed to write QA guidelines, given extensive experience of reviews.

- One delegate stated that it is an evolving quality framework for providers.

Green Paper on Data

- There is a need for connected data, and one-collection point.

- Data must have a use/ideally multiple uses and be of value for the provider (i.e. serve a local need) as well as for QQI.

- There is a need for common national definitions. Who and how could these be developed? This should be explicitly referenced in the Green Paper.

- There is a danger that data can be mis-used and mis-interpreted.

- Data needs to be of a high quality, accurate and timely.

- If the data is of value to the provider, there is automatic buy-in.

- It was suggested that QQI start small scale, pilot and test.

- Data is needed on student mobility.

- The need for integrated national data was discussed within the group.

- Reliable data should fuel quality.

- QQI should explore the international angle and data.

- What is the value of existing datasets, such as Qualifax.

Green Paper on Programme Accreditation

- QQI needs consistency of approach to programme accreditation.

- Delegates from smaller providers suggested templates should be developed to help. Small providers often don't have resources to run and submit programmes which might not be validated. Would QQI run workshops which would help with the process?

- QQI should encourage 'grouping' of providers and provide a roadmap for small providers to come together.

- Validation is perceived as mark of quality and added value.

- Training is needed for small providers in QA issues - opportunity for HET providers to facilitate this either as business opportunity or could be a QQI initiative to link providers of different types/sectors/levels.

- Providers need an outlet for sharing information and getting support on the process.

- A delegate HE provider suggested more clarity is needed in relation to access requirements to level 9 Masters. Use of 'equivalent work life experience' seen as backdoor for access by providers who don't hold to access via level 8 in cognate area i.e. wants to see consistency of practice across HE including universities.

- If HE providers merge under HEA landscape initiative what will be the effect on validation? i.e. Do they retain delegated authority?

- Validation should recognise different type /modes of learning. Can't assume it is all classroom based. In HET there's tension between 3 year (180 ECTS) degrees and 4 year (240 ECTS). In FET some views were expressed that QQI is making duration longer with no basis.

- There is too much emphasis currently on learning hours and duration; programme requirements don't meet the needs of leaners.

- There needs to be consistency in validation timelines. Programmes must respond to changing needs and be flexible; a long validation process is not feasible.

- There are currently delays in validation; this is causing problems for providers.

- Regarding validating components – providers want to retain flexibility; not validating programmes leading to minor awards would have impact on small providers.

- Levels 1 – 3 components are needed; programmes leading to minor awards are needed at these levels.

- The cost and time of developing large programmes is prohibitive and also raises PFL requirements.

- If QQI increases volume of programme to be validated, this puts pressure on private providers and contradicts view that all learning should be accredited.

Next Steps

These consultation events were part of the consultation on Phase I of QQI 's comprehensive policy development programme. Having concluded this phase of development some of the policy areas will continue to stage II – the production of draft policy papers (White Papers). These White Papers will be subject to a further consultation phase.

To enable the introduction of the relevant policies in September, that enable providers who do not currently have a relationship with QQI to have access to external quality assurance Phase I of the consultation for some Green Papers closes on the 7th June. The policies are:

- Provider Access to Programme Accreditation
- Protection for Enrolled Learners
- Fees for QQI Services

Further consultation will be undertaken for Phase II of the development and will result in the introduction of these policies in September 2013.

Phase I of the consultation on the rest of the policy development programme closes on 13th September. The timetable for Phase II of the development for these policy areas will be confirmed subsequent to the outcomes of the consultation conducted on the Green Papers.

Appendix A

Stakeholder Category Analysis

Prospective attendees to both the Dublin and Cork events were asked to select sector specific categories when booking for the consultation event. These categories enabled QQI to gain an overview of the stakeholders interested in attending the consultative events. The figures below represent the delegates who registered online for the event and may vary from specific delegate attendance on the day. It is however an accurate reflection and indication of the diversity of stakeholder attendance. In Dublin the attendance was marginally higher than the number registered and in Cork the final attendance lower.

Category	Dublin	%	Cork	%
Community and Voluntary Sector	24	10.00	29	15.6
English Language Provider	8	3.33	11	5.94
FET External Authenticator Panel	8	3.33	4	2.16
FET Monitors	1	0.42	0	0
FET Programme Evaluators	2	0.83	0	0
FET QA Evaluators	1	0.42	0	0
FÁS	3	1.25	2	1.08
Institutes of Technology	10	4.17	21	11.35
International Awarding Bodies	4	1.67	7	3.78
Linked Providers	1	0.42	2	1.08
Other	15	6.25	6	3.24
Private Provider 1-6	46	19.17	28	15.13
Private Provider 6 – 10	30	12.50	8	4.32
Professional Bodies	11	4.58	8	4.32
Provider/Centre Directors and Managers	4	1.67	4	2.16
Providers not currently registered	7	2.92	5	2.70
Representative Organisation	17	7.08	3	1.62
Universities and Designated awarding bodies	23	9.58	7	3.78
Vocational Education Committees	25	10.42	40	21.6
Universities and Designated awarding bodies	23	9.58	7	3.78
Vocational Education Committees	25	10.42	40	21.6
Total	240		185	

QQI, an integrated agency for quality and qualifications in Ireland.

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