WHITE PAPER

Policy on Monitoring

FOR CONSULTATION

This White Paper contains proposed policy for QQI monitoring the qualifications and quality assurance landscape.

Following publication and consideration of the outcomes of consultation, this paper will lead to Draft Policy which is proposed for adoption by the Board of QQI. Once adopted, QQI policy and procedures are developed and implemented accordingly.

QQI is seeking feedback from stakeholders on the proposed policy contained in this White Paper.

Submissions may be emailed to

consultation@QQI.ie

The closing date for submissions is **Friday 14 November 2014.**

In your submission please clearly indicate:

1. *Your contact details.*

2. *Whether you are responding as an individual or on behalf of an organisation.*

3. *If you do not wish your submission to be published.*

1 INTRODUCTION AND RATIONALE

This policy outlines the overarching organisational approach that QQI will take to monitoring the qualifications and quality assurance (QA) landscape. It will set parameters for detailed guidelines and procedures for monitoring of education and training providers (ELT, FET and HET). The principles underpinning QQI monitoring activity are both explicitly stated and embedded within this policy.

QQI's approach builds on past experiences of monitoring and the Qualifications and Quality Assurance (Education and Training) Act 2012 (the 2012 Act).

The aim of the policy is to provide the rationale and architecture for the types of monitoring carried out by QQI. It explains:

» What monitoring is and what types of monitoring take place

» The overarching principles which apply to all types of monitoring

② LEGAL AND ORGANISATIONAL CONTEXT

The 2012 Act requires QQI to "*monitor*" a range of provider activities including:

» The effectiveness of providers' QA procedures (Section 9(c))

» Validated programmes including re-validation (Section 9(d))

» Delegated authority (DA) to make awards (Section 9(f))

» Implementation of providers' procedures for access, transfer and progression (Section 9(g))

Providers are also required by the 2012 Act to provide QQI with data, reports and other documentation and information from time to time and on request by QQI.

The act however doesn't define monitoring or set out what monitoring should involve, but there is an implicit obligation to monitor some provider activities that are associated with QQI services and other activities not listed specifically in the 2012 Act, such as the implementation of the National Framework of Qualifications.

QQI is also committed[1] to:

» Being learner centred

» Supporting the enhancement of the quality of education and training

» Providing relevant, timely and comprehensive information to the public about the quality of education and training

QQI monitoring works towards these strategic goals.

The experience of monitoring in the predecessor organisations and the sectors they dealt with was varied. QQI's approach to monitoring will also vary between sectors and types of provision.

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1   QQI Strategy Statement 2014 - 2016

③ POLICY

3.1 MONITORING

Providers are responsible for the quality of their provision; the implementation and evaluation of their own QA procedures; and on-going enhancement.

Monitoring is an external QA process that involves both routine and once-off evaluations, analyses, observations and recording of provider activities.

QQI's approach is underpinned by the principles that monitoring:

a. Assists providers in demonstrating the effective implementation of their QA procedures

b. Supports public confidence in the National Framework of Qualifications, the awards within it and the providers offering programmes leading to these. Monitoring will be mainly focussed on (but not limited to) programmes leading to QQI awards

c. Provides a source of public information through the publication of the conclusions of monitoring engagements

d. May have positive or negative consequences for providers (some of which may be significant)

e. Will involve engagement with other bodies (other agencies and government departments for example) and the sharing of information with these

f. Provides accountability from time to time where there is a cause for concern.

Equally, monitoring is not:

a. The review of the effectiveness of providers' QA procedures

b. A means of implementing providers procedures

c. A means of policing the education and training landscape for corruption, incompetence or poor quality provision.

However, the outcomes of monitoring may contribute to QQI's understanding of the effectiveness of a provider's QA procedures and their implementation as well as the quality of their provision.

QQI will develop procedures and guidelines for monitoring activities for each type of provider and for different provider activities.

3.2   TYPES OF MONITORING

Monitoring will look at different providers in different ways depending on their sector and activity. There are broadly three types of monitoring.

TYPE 1 PROVIDER SELF-MONITORING

Provider Internal Review and Follow-up Activities
Relating to Statutory Engagements

This type of monitoring is a shared responsibility between providers and QQI. Self-evaluation , reporting and publication on QA by providers (as per their agreed/notified procedures) is key to QQI monitoring.

Engagements between a provider and QQI; as set out in the provider's lifecycle of engagements; may generate conditions, recommendations and other actions for follow-up. Providers must internally review and follow-up on these (self-monitor) and then report on them to QQI.

In this way self-monitoring guides providers in demonstrating the effective implementation and enhancement of their QA procedures. It also helps QQI to provide public information on the quality of programmes and the awards they lead to.

Failure on the part of a provider to internally monitor and report accordingly may lead to intervention by QQI, as a result of a cause for concern[2].

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2   See Section 3.2 - Type 3 Monitoring Causes for Concern

Designated Awarding Bodies (DABs) and Institutions with Delegated Authority to Make Awards (DA) – Dialogue and Engagement

Self-monitoring and reporting is also a responsibility of the institutions that can make their own awards (either under DA or as DABs). These institutions identify priorities for their QA activities and undergo review of effectiveness of their QA procedures by QQI. These priorities and review also generate actions for follow-up.

Annual Institutional Quality Reports and Annual Dialogue Meetings provide information and engagement on institutional activities to do with quality assurance, including follow-up.

TYPE 2 ROUTINE INFORMATION PROVISION

Providers are obliged (in different ways depending on their sector and activity) to routinely provide information to QQI, including:

a) Self-monitoring and follow-up reports (as outlined above)

b) Information on system or sectoral QA instruments (external examiner and authenticator feedback for example)

c) Information and statistical data relevant to the education and training system and for QQI's programmes and awards directory, such as:

   ~ Details of changes affecting programmes leading to QQI awards

   ~ Details of changes in the scope of provision of the provider[3]

   ~ Details of arrangements for the Protection of Enrolled Learners[4] and Access, Transfer and Progression.

d) Incidents or risk factors which may affect learners (for example: financial Issues, capacity issues impending media disclosures etc. that may relate to academic quality) and constitute a cause for concern and which may trigger direct intervention by QQI.

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3   See Policy on Initial Validation

4   See Protection of Enrolled Learners: Protocols for the Implementation of Part 6 of the 2012 Act

Providers' specific information provision requirements will be explained in the provider's lifecycle of engagements. If a provider fails to provide routine information to QQI (or information that may be considered a cause for concern), this may trigger an intervention by QQI.

Provision of Public Information

Providers are obliged to provide certain public information as well. The outcomes of QQI monitoring will also be made public. This information may be used by QQI (and possibly in collaboration with other bodies) to create system level reports and analyses which will lead to enhancements for the education and training system.

Monitoring of this nature helps to track policy implementation and identify any difficulties being encountered by learners, providers or other stakeholders. It may also highlight potential problems before they become serious national issues.

The availability of good quality data from providers is essential to enable QQI to carry out its monitoring functions effectively[5].

Sharing and Using Available Information – QQI, Providers and Third Parties

Monitoring will share and make use of publicly available information coming from engagements (statutory and non-statutory) that providers have with other bodies (agencies, funders, government departments etc.) as well as with QQI.

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5   A QQI Data Strategy is scheduled for development

TYPE 3 MONITORING CAUSES FOR CONCERN

QQI may (through Type 2 monitoring outlined above or otherwise) become aware of causes for concern about a provider. Causes for concern may include (but are not limited to):

» Failure by a provider to effectively implement QA procedures as agreed/notified with QQI

» Failure by a provider to meet the expectations set out in their provider lifecycle of engagements

» Concerns regarding the quality of education provision and standards attained by learners

» Complaints made by third parties or information received in other ways (the media, or through whistleblowers for example)

» Failure by a provider to follow-up on conditions and recommendations arising from statutory engagements.

Where QQI becomes aware of a cause for concern it will be investigated. If a cause for concern is a legitimate one, QQI will begin a series of engagements with the provider to address the issue.

QQI monitoring is adaptable, facilitating both proactive and responsive engagements between QQI and the provider.

3.3   CONSEQUENCES OF MONITORING

The outcomes of all QQI monitoring activities will be published.

It is expected that monitoring will, in general, result in positive and enhancement oriented actions by providers and QQI, arising from provider self-monitoring.

Follow-up actions and outcomes arising from monitoring will depend on the circumstances and the relationship between QQI and the provider and their activity.

Possible consequences include (but are not limited to):

a) The provider undertaking a self-evaluation using independent peer review

b) The imposition of additional conditions on a provider

c) Re-validation of a programme

d) A requirement to provide additional information to QQI

e) Revision of the provider's lifecycle of engagements

f) Withdrawal of programme validation

g) Withholding of learner certification

h) Initiation of a statutory review under the 2012 Act (Section 36(b))

i) Withdrawal of authorisation to use the IEM

j) Withdrawal of DA

k) Withdrawal of recognition of awards within the National Framework of Qualifications

l) A moratorium on further access to QQI services (for example, validation of new programmes).

3.4   GUIDELINES

QQI will develop detailed procedures and guidelines to guide QQI and providers in their obligations under this monitoring policy.

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