



ELE Information Briefings

Participant Questions and Answers

Session 1: Dublin, 10 May 2017

1) Will having ACELS recognition automatically transfer over to the International Education Mark (IEM)?

No, all applicants will be treated equally, start at the same point as if they are new to QQI, and undergo the same process as all new applicants. The IEM will be granted to all successful applicants and activated at the same time, after an agreed period of time.

2) We wonder what we can tell agents/ stakeholders- how can we articulate our relationship with ACELS/ QQI? Could we get clarification on this – or maybe a paragraph or legend we can use, please?

If a provider doesn't have ACELS recognition or QQI validated programmes, the provider has no relationship with either ACELS or QQI respectively. Having a relationship with ACELS does not mean the provider is a registered QQI provider.

If a provider has ACELS recognition, it has a connection to QQI insofar as QQI manages the non-statutory ACELS QA scheme, currently on a restricted basis due to the 2015 court case outcome. The logo and legend permitted for provider use are given in the regulations. If a provider has validated programmes leading to QQI awards (or is authorised to hold the IEM once it is introduced), the provider has a relationship with QQI.

3) Has the proposed IEM Bill been stress-tested by an independent legal team?

There isn't an IEM Bill – the IEM is provided for in the Qualifications and Quality Assurance (Education and Training) Act 2012 (2012 Act). Revisions to this have been proposed in the Qualifications and Quality Assurance (Amendment) Bill, which was published on 15th May 2017. The Office of the Parliamentary Counsel to the Government is responsible for drafting the text of the bill that will be presented to the Oireachtas.

The DES Press Release of 150517 clarifies that one of the revisions to the Act regarding the IEM will provide for more than one version of an IEM, therefore, one for ELE, one for HE.

4) Are organisation notified in advance of upcoming inspections?

If this refers to ACELS monitoring inspections currently in operation, the ACELS-recognised provider knows the inspection is upcoming but won't know the exact date(s); therefore although it is expected and it is unannounced in the sense that the precise date(s) is not known to the provider.

5) On what grounds are unannounced inspections made?

The triggers for ACELS monitoring inspections are as stated in the 2017 ACELS Regulations, i.e. changes of ownership, management (general and/ or academic), changes of premises, additional centres, and a complaint process may trigger an inspection. Please refer to the 2017 Regulations for the full information on this.



Session 2: Dublin, 11 May 2017

- 6) Page 5 of the IFY standards states that the language standards for L5 programmes is B2+ and for PG entry programmes is the same, i.e. B2+. Post grad students are *more educated* and more linguistically advanced (because they have more years of language learning under their belts) and older (at least 3-4 years possibly more if they are returning to education after work experience.) Therefore, how can school leavers on UG entry foundation programmes match the same language level as more mature learners? Is this a typo in the standards?

See reply to 7) below.

- 7) Re IFY programmes: school leavers attending a pre-higher education foundation programme for under-graduate (UG) entry are required according Page 5 to reach a minimum competence in English of B2+. This is at odds with entry criteria to many L7 UG programmes many of which require B2 (IELTS 5.5) for entry to 1st year. Entry criteria to UG programmes is dependent on the linguistic demands of the UG programme and vary from course to course. This is not allowed for in our standards which demand that all UG foundation courses bring students to B2+ (IELTS 6.5) which is incidentally the same level required of PG foundation programmes. As this is not logical or implementable, is it an error in the document?

The minimum language requirement for both the UG and PG entry foundation programmes is the same as this is the minimum level of English language competence defined as necessary for a learner entering an HE programme, either UG or PG programmes, in order to be successful.

There is scope within the 58 CEFRL scales to define the EL programme intended learning outcomes in terms of the needs of the programmes / fields of study which the learners are planning to enter. B2+ is the upper half of the broad B2 band on the global CEFRL scale; providers define what this means in terms of the purpose and context for their particular learners.

Please note that the B2+ band is defined by Cambridge Assessment, the IELTS exam provider, as IELTS 6.0, with the cusp of B2 and lower half of the C1 band being IELTS 6.5. An IELTS 5.5 equates to a lower half of the B2 band and is not sufficient to enable learners to be successful in the Freshman year and beyond. This was discussed and agreed by the panel members when designing the standards.

- 8) **Why is ACELS still closed – it is recognised as the national accreditation so this is a disadvantage for schools not in ACELS?**

ACELS was closed to new applications by the judgement given in a high court case taken against the Department of Justice and QQI jointly by two unrecognised schools in January 2015. The judge stated that QQI did not have the powers to operate the ACELS scheme, but it was acknowledged that ACELS is a non-statutory, inherited function, which is voluntary and on an annual private contractual basis. Therefore, in order not to destabilise the current ACELS recognised sector at this time, the ruling stated that ACELS could continue to for the current constituency of recognised ELE providers but that ACELS could not accept new applications. Since that time, ACELS has continued to operate and be managed by QQI on a



restricted basis for the current constituency of ACELS recognised providers (100 providers at the time of the judgement).

It was acknowledged that the ACELS scheme would cease to exist with the introduction of the new statutory International Education Mark (IEM). Revised legislation is awaited from the DES to enable this process to be started as mentioned above. Whilst it is acknowledged that this is not an ideal situation for those providers who since this ruling have been barred from applying for ACELS recognition, this situation is not within the powers of QQI to change.

QQI has devised a new domain of ELE awards and has now two sets of these available to all interested ELE providers. A provider does not need to be ACELS recognised to apply for programme validation for these QQI awards.

9) Suggestions as to steps that can be taken by non-ACELS schools?

QQI cannot answer this as the solution is not in our gift. Contact details of all ELE providers are kept and we ensure that all are invited to any ELE sessions etc run by QQI, and that any news on IEM developments will be shared with all.

10) Several IEMs? How many?

As announced in the Press Release by the DES on 15th May, the revisions to the QQI Act provide for two versions of the IEM – one for ELE, one for HE.

11) PEL only for courses of 3 months or also for shorter courses (now and when IEM is introduced)?

PEL is a requirement for all programmes of 3 months' duration or longer. There is no PEL requirement for students enrolled on shorter English language programmes but best practice would encourage all providers to ensure this is in place.

12) How will fitting ELE programmes on the NFQ work?

There is a current project ongoing in which the relationship if any btw the CEFRL and the NFQ is being explored. As outcomes from this project are ready, we will make the decisions public.

13) Will the IEM be granted to providers or programmes?

The IEM can be at a provider level in circumstances where all of the awards of a provider are included in the NFQ, either directly or through linked provision. A provider may also apply for the IEM in respect of a programme/programmes where the provider has limited engagement with international learners, in other words for any particular programme.

14) When the IEM is introduced will the ILEP cease to exist?

The Department of Justice manages the ILEP in partnership with the Department of Education and Skills, so the question should be addressed to them.

15) Certain school inspected by the ILEP team, some ACELS recognised, some not – if a school has ACELS recognition withdrawn, does it lose ILEP recognition (and vice versa)?

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The ILEP sets out certain immigration requirements for programme listing; it is not a QA system and having a programme on the ILEP is not an indication or guarantee of the provider's quality.

QQI is not involved with the ILEP which is jointly administered by the Department of Justice and Department of Education so questions on the ILEP should be addressed to either of these bodies. From a recent example, it would appear that withdrawal of the ACELS quality mark from a provider, does not mean that a programme offered by the same provider and listed on the ILEP is automatically taken off the list.

It should be noted that providers which are not recognised by ACELS have programmes listed on the ILEP.

16) The ILEP system has only inspected 10 schools? Do the strict criteria trigger inspections?

Please refer to the Department of Justice for a response to this question.

It should be clear that the ILEP listing is not a mark of quality of any provider; it provides some assurance to a learner that the programme offered by the provider is in line with study immigration requirements for access to student visas.

17) NFQ Levels 6-9 HE award non-major. Would current ELE providers need to apply for QA approval under HET?

Please see the interim list of ELE fees – the only current ELE award available to ELE providers is the CELT SP award at Level 7. This uniquely takes the FET fee for QA approval.

18) Checklists for inspections?

If this question is in relation to ACELS inspections, this is available currently.

19) How were ACELS inspectors recruited recently? What is the breakdown of ACELS and non-ACELS?

Inspectors were recruited following a public procurement process on eTenders. Criteria for eligibility to apply were available and there was a two-stage process of recruitment.

There is now a team of 10 inspectors in place who will carry out inspections in pairs for QQI. It was not a criterium for recruitment as to whether the applicant currently worked for an ACELS recognised school or not.

20) Identity of the inspector team?

Induction of the team is to take place – once finished, the list of inspectors will be available.

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Session 3: Cork, 19 May 2017

- 21) Regarding fees for QA and IEM, there must be a separate fee structure for smaller, seasonal and boutique schools so they can survive economically in the future. Fees ought to be staggered over a 5-year period.**

Signed: Clare Language Centre, Waterford English Language Centre, Sunfort Language College, EFL Ireland, Asana School of English, Slaney Language College, Limerick Language Centre

It was highlighted in the session that fees had not risen for 10 years, and that this is a different scheme from ACELS, needs to meet its costs, etc. It should also be emphasised that the current fees schedule for ELE is interim, i.e. not final, and there is therefore space for consideration of the points raised and further based on experience.

- 22) Is a two-tier fee possible for smaller/ seasonal schools?**

See reply above.

- 23) Suggest half of these fees, e.g., QA 2500, Validation of a programme 500, for smaller/ rural/ seasonal schools?**

See reply for 21.

- 24) As the owner of a small EL school, I am surprised to hear that small schools have to pay the same as larger ones. I feel that this will lead to large chains and organisations taking over, small schools having to cease business. Would you consider supporting small schools by reducing fees dependent on either classroom numbers or annual turnover?**

This real concern is noted and we will consider it when proposing the ELE fee schedule. Fees are determined by QQI, but require the consent of Department of Education and Skills and Department of Public Expenditure and Reform.

- 25) Why are the fees so much more for HE establishments? (asked by an NUI HEI)**

This was agreed in line with size and volume and complexity of provision.

- 26) Will the IEM replace the Interim List of Eligible Programmes (ILEP) when the IEM is introduced?**

- 27) Once the IEM is introduced, will the ILEP continue?**

Both 26 and 27 are questions for the administrators of the ILEP, namely the Department of Justice and Department of Education and Skills.

- 28) Will IEM schools have access to international students' visas?**

The ILEP is managed by the Department of Justice with the Department of Education and Skills so this question needs to be addressed to them.

- 29) Will the establishment of a learner protection fund be the only option available to providers? How will student fees be protected by this fund?**

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That is the intention. The proposed Scheme will provide for the learner to complete the programme on which they have enrolled.

30) When can a school attend an Initial Access to Programme Validation Briefing? When can a school start the process of QA approval (Stage 1) – can this be before the IEM ELE CoP is available? (asked by a number of providers)

Please contact Antoinette Beatty (abeatty@qqi.ie) to register for a briefing. You will be informed when the next one is scheduled and you should register for it accordingly. If the school wishes to validate a programme, the school must first attend the mandatory Initial Access to Programme Validation Briefing. After this, the school can start the programme validation process by submitting 1) QA documentation; 2) programme documentation

If the school wishes to gain the IEM, the school needs to wait for the IEM to be available. The school can however prepare the documentation for Stage 1 to be ready to submit this as soon as it is open for submissions.

31) Do all schools/ colleges/ universities delivering English language programmes have to be inspected/ reviewed (especially since we are also being internally inspected)?

If this in relation to ELE provision of a mixed provider, i.e. also reviewed for HE provision, the ELE IEM requirements will be addressed separately where they are not common to both provision. (this was asked by a language centre at an NUI HEI)

32) Who is on the expert ELE panel?

We will be reviewing the register of ELE experts established a couple of years ago. It is a number of national and international experts in the English language education field.

33) Is there a pro-forma for QA approval (sample format)?

Please log onto the QQI website to find all the documentation related to application.

34) What are the implications if courses are not approved?

If this refers to validation of programmes, where a programme is not accepted for validation, the ensuing report sets out the reasons. The provider may re-submit after a period of time.

35) Will providers who have courses on the NFQ through a university be able to retain those qualifications for the IEM?

We were not entirely sure what this refers to – if it refers to linked providers, the intention is they would be eligible. If it refers to foreign universities then this would depend on whether those universities have their qualifications included in the NFQ which would require QQI approval of their QA.

36) When the ILEP is finished, how will schools apply for programme validation? Is it still through the university or will each programme need to be applied for re the IEM?

Programme validation and the IEM are two separate QQI managed processes. Neither are related to the ILEP.

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37) Can QQI please continue to have meetings around the country (such as Limerick as well)?

Thank you for the suggestion – we will certainly endeavour to maintain meetings although this is dependent on resources and location is selected to ensure the best access for the majority of potential participants.

38) How does a provider commence the QA process for QQI?

Please see the following links to the QQI website:

<http://www.qqi.ie/Articles/Pages/Initial-Access-toProgramme%20Validation.aspx> for information on initial access to programme validation,

<http://www.qqi.ie/Articles/Pages/QA-Guidelines.aspx> for information on QA Guidelines.

Gaining approval of QA is the first stage to either validating a programme(s) and/ or gaining authorisation to use the IEM. QA approval is not an end in itself and does not enfranchise the provider to make any claims post successful application of this stage.

39) How soon will fees be due?

Fees are due on application for whatever service is being requested.

40) Can it happen that we will be paying both ACELS and QQI fees?

No, ACELS -recognised providers will not be asked to pay two sets of fees in the same year.

41) Before the implementation of the IEM (end 2018/ early 2019??) should providers follow the QQI QA Guidelines or ACELS Regulations?

See the reply to 38) above re approval of QA as the first stage for access to either programme validation or the IEM.

42) Do seasonal schools have to apply for the IEM and programme validation?

The IEM is voluntary; therefore, there is no obligation on any providers to apply for authorisation to hold it; the same applies re programme validation.

43) Can a provider apply for the IFY programme validation before the IEM?

Yes these programmes are now open for validation. Note that all new providers to QQI are required to firstly attend an Initial Access to Programme Validation Briefing, before moving on to submit a programme(s) for validation.

You can find further information on this on the QQI website www.qqi.ie.