



QQI

Dearbhú Cáilíochta agus Cáilíochtaí Éireann
Quality and Qualifications Ireland

Submission on the PSA Strategy Consultation

January 2014

Introduction

Quality and Qualifications Ireland¹ (QQI) has a broad remit across education and training in Ireland. The agency is responsible for the external quality assurance of further and higher education and training (including English language provision) and validates programmes and makes awards for certain providers in these sectors. QQI is also responsible for the maintenance, development and review of the National Framework of Qualifications (NFQ). Its work concerns learners in diverse settings - schools, adult education, English language schools, vocational training and higher education and training. Other key stakeholders include providers of further and higher education and training; employers; Government departments, State agencies and funding bodies; regulatory bodies; professional bodies; qualifications awarding bodies; sectoral and representative bodies and international bodies responsible for quality assurance and qualifications. QQI aims to bring more coherence between qualifications and quality assurance in further and higher education and training through its work to build on the successes of the antecedent bodies (FETAC, HETAC, NQAI, IUQB) and to help promote public confidence and trust.

QQI has moved from a state of amalgamation to an agency which is structurally very different to its predecessors and which is operating under new policy arrangements (with much additional policy in development). A Comprehensive Policy Development Programme was launched in 2013 and QQI's Strategy Statement covering the period 2014-2016 was published in November 2013. This first Strategy Statement represents an important communication for QQI as it provides direction and guidance for staff and stakeholders on our mission, vision, values and goals and how we intend to achieve them. It will inform the development of annual successive corporate plans.

The context then for this submission is influenced by a number of factors, not only in relation to QQI but also the wider landscape of further education and training. In particular, the establishment of SOLAS, the Further Education and Training authority which has a role

¹ QQI was established in November 2012 under the Qualifications and Quality Assurance (Education and Training) Act 2012 as a new integrated agency under the aegis of the Department of Education and Skills (replacing the Further Education and Training Awards Council, the Higher Education and Training Awards Council and the National Qualifications Authority of Ireland and incorporating the functions of the Irish Universities Quality Board)

in funding activity in the sector. Also relevant is the establishment of the Education and Training Boards (ETBs) and their developing role in providing a range of education and training services nationally.

QQI welcomes this opportunity to provide an input into the PSA's third Strategy Statement. The submission includes a number of comments relating to Question 1 in the consultation paper: *PSA Strategy Consultation* and Questions 2 and 5.

Q1: In light of progress to date, how should the PSA prioritise the regulation of the remaining areas to be licensed especially where there may be significant compliance and enforcement costs in the introductory years of licensing for both the PSA and industry?

One of the (presumably many) factors that must be taken into account in answering this question is the supply of competent practitioners for the new areas. How will they be trained, to what standard and by whom? What suitable qualifications currently exist? How can one ensure that initially trained practitioners keep up-to-date? These questions concern the qualifications system and the education and training system.

As indicated earlier, significant developments have taken place in the qualifications system since the establishment of the PSA. The impact of these warrant careful consideration by the PSA and indeed by the security industry as a whole.

As an amalgamated agency, significant changes to the manner in which the functions of QQI are implemented are both necessary and inevitable when compared to its predecessor bodies. To meet legislative responsibilities and the need for increased efficiency, QQI launched out a Comprehensive Policy Development Programme in early 2013 through a number of large public events and an extensive consultation process.

Policy development activities are informed by a QQI Executive paper providing an overview of QQI's current understanding of the roles of the various agents involved in the qualifications system and subsystems and relationships between them entitled

‘Qualifications systems and related concepts – a QQI background paper’². Outlining the current perspective is considered crucially important for the purpose of helping build coherence in the internal functioning of QQI and with its stakeholders. It is acknowledged that much of QQI’s work *‘will be done by communicating, catalysing, co-ordinating, brokering, reflecting, and helping to identify and engage capacity that is distributed throughout the qualifications system’*.

Detailed issues are addressed in a number of published ‘green papers’ which cover QQI’s functions. A number of green papers have progressed to become policy documents. All papers are published on www.QQI.ie. It is advisable that the PSA consider the impact of the following policies in particular on its own strategy.

New policies adopted to date (January 2014)

- Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards
- Fees for QQI Services (including fees for the submission of quality assurance procedures for approval in respect of new providers, programme validation fees and certification fees)

Policies in development

- Green Paper on Awards and Standards
- Green Paper on Recognition of Qualifications within the National Framework of Qualifications
- Green Paper on the Provision of Information for Learners
- Green Paper on the Recognition of Prior Learning
- Green Paper on Monitoring and Dialogue
- Green Paper on Provider Risk and Proportionality
- Green Paper on Programme Accreditation
- Green Paper on the Re-engagement of Legacy Providers with QQI and Future Access to QQI Awards

² Published in May 2013. Available from <http://www.qqi.ie/Downloads/Consultation/Qualifications%20Systems%20and%20related%20concepts.pdf>

Here, PSA's regulatory impact analysis needs to include education and qualifications dimensions.

Regulation of the private security industry involves education and training provision. In terms of professionalising the private security sector, consideration should be given to balancing the need for *training* leading to licenced activity and *educational* programmes with a broader focus and which include meeting licenced activities/requirements.

Our experience suggests that expectations of what the qualifications system can do for professional regulation may sometimes be mismatched to the reality. Two points in particular:

- Not all training warrants a qualification in the NFQ
- NFQ qualifications can never serve as licences to practise

Experience to date indicates an expectation that licensing of individuals should be linked to national certification by an awarding body. Where training of individuals for a particular role is necessary, it does not always follow that such training must lead to a qualification that is recognised within the NFQ.

The current licensing regime has relied to a significant extent on applicants having a NFQ Level 4 award. The suitability and quality of educational qualifications is critical. A QQI monitoring exercise was conducted in 2013 partly on the basis of a request from the PSA. This exercise identified some matters of concern. These are detailed in the monitoring report: some programmes offered fall short of the actual duration required to meet the credit volume of the awards involved – minor awards at NFQ Level 4 in Door Security Procedures and Guarding Skills.

The qualifications system is much greater than QQI. It is accepted that responsibility for QA in further education needs to be distributed. As agreed previously, the PSA and QQI need to liaise closely to resolve outstanding issues in terms of quality and to explore ways to collaborate to help ensure high quality provision.

Quality expectations are increasing. New providers wishing to access QQI awards already face different criteria as set down by the 'Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards'. Some existing providers will be certainly challenged to meet the emerging new requirements in the policy approach as outlined in the 'Green Paper on the Re-engagement of Legacy Providers with QQI and Future Access to QQI Awards'. It can be anticipated that a number will no longer be able to meet the criteria to offer QQI awards within the next 18 months to 2 years when the policy is finalised and subsequently operational.

The PSA's consultation paper refers to licensing of '*all staff providing Security Guarding and Door Security and cash in transit security services based on mandatory training*'. It is curious that the number of actual licences issued by the PSA to date is substantially less than the number of people who have been awarded the NFQ Level 4 educational qualifications required for the Door Security Procedures and Guarding Skills licences.

The PSA refers to sectors yet to be licensed in the consultation document. Any future licensing activity should be cognisant of the challenges likely to follow a request to develop standards, for example, a similar market drive to deliver training as experienced in the sectors currently licensed. The value of training as a learning experience as opposed to singularly a licensing requirement should be appreciated.

Q2: How can the PSA and industry become more effective in developing standards?

Q5: What should the PSA do now to anticipate future developments of the industry in the short to medium term?

The response to Questions 2 and 5 are combined below.

It is noted that the third key goal of the current strategy concerns '*raising standards within the industry*' and that '*raising standards in existing licensed sectors*' is an issue for the next strategic plan which is the focus of this consultation. A number of questions relating to raising standards are posed in section 4.2 of the PSA consultation paper. It would be helpful to clarify the type of standards being referred to in Question 2 for example industry

standards, operational, occupational standards as opposed to education and training standards.

A number of useful meetings between the PSA and QQI took place in 2013 and have served to aid understanding of the roles and responsibilities of the respective bodies in addition to helping explore future opportunities for cooperation. In particular, the following possible means of collaboration were discussed:

- As stated in the Green Paper on Awards and Standards mentioned above ‘ideally, in defined or regulated occupations, occupational standards should be maintained by the occupational regulator or professional recognition body (PRB) or professional/occupational associations’. The QQI Executive has explored the possibility of PSA maintaining such occupational standards that could be referenced by designers of programmes whose purpose is to enable a person to seek entry to a regulated occupation. In this scenario, the educational standards set by QQI could be much more general than the current QQI Common Awards System (CAS) award specifications (in which PSA was involved). This way, occupational standards would remain current and any change would trigger a change in the co-existing educational standards. Support is available from QQI to link occupational standards to Learning Outcomes.
- QQI has indicated to the PSA its open mindedness about the possibility of recognising within the framework, the qualifications of external awarding bodies where this serves a useful purpose. From previous contact, the PSA may be interested in accrediting programmes for the purpose of recognising that their graduates are assured to have met educational outcomes included in the occupational standards. There is a possibility of coordinating this kind of accreditation with programme validation. QQI have indicated that its validation policy needs to be updated in this regard.

In September 2013, QQI attended a meeting of the PSA’s Training Consultation Group which is in place to agree the standards required of a competent practitioner in the relevant areas. The PSA have confirmed that they will be seeking to have relevant programmes re-validated based on new standards when agreed. The Training Consultation Group issued a

consultation request in August 2013 and points made by QQI at that time are also relevant in terms of this current consultation.

Concluding Comments

The QQI Executive again welcomes this opportunity to provide an input into the PSA's third Strategy Statement. Progress made by the PSA's Training Consultation Group in particular is acknowledged by QQI in terms of connections and relevance to the latter's functions and responsibilities. The QQI Executive looks forward to liaising further with the PSA in the coming period with the expectation that the PSA examine carefully the impact for the private security industry of the changing landscape for education and training provision. Of particular significance are QQI's policy development programme and stated overall strategic direction in addition to the establishment of SOLAS and the ETBs.

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