Peer-review report of NARIC Ireland

Peer-reviewed by: Nuffic (NARIC The Netherlands)

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1. Executive Summary

23 January 2018 NARIC Ireland was peer reviewed based on their self-evaluation and SWOT analysis. The four priorities identified for the visit by the centre were:

1. Challenges posed to offered services by the new European Union wide General Data Protection Regulation (GDPR);
2. Outreach to stakeholders at higher education institutions and regulatory authorities to increase the visibility of the centre;
3. Level of staff training since in 2015 there was an almost complete staff overturn;
4. How to manage demands of the unit with limited staff.

In addition, the peer review team, on basis of the self-evaluation and SWOT, focussed on:

✓ the work processes in relation to the remit of the centre, in order to be able to make fitting recommendations;
✓ the rationale to shift to issue comparability statements, and the implementation of the LRC principles in the Irish system.

The review team found that NARIC Ireland offers a wide range activities to a varied group of stakeholders. The centre has a quick turnaround time to issue comparability statements which is its core service offered. NARIC Ireland is creative and innovative in developing its operations. It is strong in networking on national level to promote its services and collecting good practice from their international peers.

NARIC Ireland scores substantial compliance on all standards and recommendations are made on how to further strengthen the quality of the centre. These include:

- Write down all procedures (also informal good practice) and review the criteria and procedures of NARIC Ireland on a regular basis;
- GDPR: Develop an online webform that states that permission from the applicant for sharing their data is obtained and undertake awareness raising activities to stakeholders;
- Invest in staff training by letting all participate in the NARIC online course and organize off site days;
- Establish an appeals procedure, in line with the LRC.
- Consider adding the date of accreditation of the programme in the comparability statement database;
- Include the real turnaround time of the issuing of comparability statements on the website (average of 2 - 4 weeks);
- Provide information about the principles of the LRC to stakeholders, to promote smooth and fair recognition in the Irish national context.
- Keep up the good work in networking and reach out to the IUA and THEA (Technological Higher Education Association) to establish a dialogue;
- Track the use of current services in order to adapt outreach activities.

The peer review team acknowledges that implementation of most of the recommendations will depend on the availability of extra human resources.

2. Preparatory phase

2.1 Request ENIC-NARIC

Describe the initial request made by the ENIC-NARIC under review. Why did the centre under review request the site visit? Are there any areas of specific interest to the centre under review?

The Erasmus+ Key Action 3, NARIC call 'IMPACT project' offered NARIC Ireland the opportunity to participate in the peer review.

NARIC Ireland was peer reviewed in 2015. Whilst a peer review is recommended every 5 years, the protocol makes an exception in case of major changes in an office. The latter was the case for NARIC Ireland, which had a make-over in 2015. It moved from the National Qualifications Authority of Ireland (NQAI) to the Quality and Qualifications Ireland (QQI), changed its name to NARIC Ireland and shifted the focus of its to issuing generic comparability statements. In addition, in 2015 three out of the in total four staff members were new.

Being established two years into this new situation, the management of NARIC Ireland valued a self-evaluation and reflections by an external panel of peers on the operations of the centre, with the goal of making improvements where necessary.

2.2 Constitution of the review panel

How was the panel constituted (process)?

After the initial request to Nuffic (ENIC-NARIC The Netherlands), the CV's of two staff members were sent to the centre under review for approval. Upon approval, the centre under review sent a proposal for the national expert, which was accepted. Next, during the Skype preparation meeting, the chair was chosen.

Did the panel meet the criteria of the protocol and how was this checked?

Both the constitution of the panel, as well as the required expertise and subsequently allocated roles, met the criteria of the protocol. This was checked by the panel itself and by the centre under review.

What internal and external expertise was included and why?

Internal:

From the Nuffic office, two experts with different backgrounds took place in the panel. One with focus on policy and Lisbon Recognition Convention (LRC), and another expert with a focus on recognition practice:

- Ms Jenneke Lokhoff (panel chair), Senior Policy Officer at Nuffic. Ms Lokhoff is responsible for European recognition projects in the International Recognition Team and was recently elected for a second term in the NARIC Advisory Board (NAB). She has been coordinator of numerous projects in the ENIC-NARIC networks aiming to streamline recognition practices. As such she brings in knowledge of the LRC, and the Standard & Guidelines and Peer Review process.

- Ms Veerle Laport, Teamleader Team International Recognition at Nuffic, was included bringing in expertise from the credential evaluation practice. Ms Laport is responsible for the coordination of credential evaluators and for managing, developing and innovating the departments' processes for credential evaluation and tools. These include databases, application systems and (online) training. In addition, Ms Laport has been the long-time quality manager of the department and managed various projects. She served as expert in numerous European projects and is account holder for automatic recognition and border mobility with Germany and Belgium.

External

The national expert, Ms Susan Power, provided the external expertise and fulfilled the role of the external expert, providing reflections from the viewpoint of the Irish higher education institutions.

Ms Power joined Trinity College in 1975 and is currently the Admissions Officer, managing the application/admission processes for both EU and non-EU undergraduate and postgraduate students. She has extensive experience of assessing applications from students presenting qualifications from all over the world and is a member of the EU qualifications Group which publishes agreed criteria for students from other EU countries who apply via the Central Applications Office for entry to undergraduate programmes in Irish Universities and Institutes of Technology. She has been a member of various working groups associated with the DARE and HEAR schemes (Access routes to higher education) for many years and is also a member of the Irish Universities Association (IUA) Admissions Officers Group.

2.3 Submitted documents

What documents were submitted in preparation of the site visit?

Prior to the peer review NARIC Ireland indicated the priorities for the centre and submitted the following documents:

- ✓ Self-evaluation and SWOT analysis (sent a month before the review);
- ✓ Agenda;
- ✓ A sample letter to an applicant;
- ✓ Comparability Statement of an Honours Bachelor Degree at NFQ Level 8;
- ✓ Comparability Statement of a Certificate of Completion from a Technical/Professional College including Leaving Certificate;
- ✓ Guide to using the foreign qualifications database;
- ✓ A 'Postcard': an information leaflets that were send out (i.e. through mail shots) to stakeholders.
- ✓ Guidelines on information for learners and referencing to QQI awards under section 67 qualifications act 2012;
- ✓ Qualification Profile;
- ✓ SWOT analysis (and priorities to focus on).

Yes

What additional information was requested by the peer-review team (if any) following the preparatory meeting?

No additional information was requested. However, during the peer review the centre provided upon their own initiative additional information:

- A 'Request for advice on recognition of a foreign qualification' template, used for a comparability statement request that cannot be found in the database;
- Flowchart of the comparability statement process, the 'NARIC Ireland Foreign Qualifications Process';
- A screen shot from the database of the comparability statements;
- Information sheet of QQI, providing information how NARIC Ireland is situated within the organization.

After the peer review the following links were shared:

- 'Podcast for NARIC Ireland (8 mins.)': http://www.podbean.com/media/share/pb-pq5x2-6e018c -
- 'Advice on Foreign Qualifications - Quality and Qualifications Ireland': https://www.youtube.com/watch?v=D3b4bvQGy18

2.4 Objective and focus of the peer-review

What aspects, issues and questions did the peer-review team decide to focus on during the site visit and why? Please explain if this was in line with the request of the ENIC-NARIC under review.

Following the SWOT analysis of the self-evaluation, NARIC Ireland identified four priorities prior to the peer review visit, that were taken on by the peer review team:

1. Bureaucratic challenges posed by the new European Union wide General Data Protection Regulation (GDPR) that will come into effect 25 May 2018. The current comparability statements are based on unanonymised qualifications submitted by third parties, usually employers;
2. Outreach of NARIC Ireland to stakeholders at higher education institutions and regulatory authorities, with the goal to increase the visibility of the centre. The move of NARIC Ireland to QQI and the shift in services in 2015, means that the office needs to do a lot of awareness raising among its stakeholders;
3. Staff training. In 2015 there was an almost complete staff overturn and institutional memory was lost. New staff members, while having no credential evaluation background, learned on the job. Still, staff may benefit from training;
4. NARIC Ireland has a staff of four and has additional tasks beyond its NARIC activities. The question is how to manage the demands of the unit.

In addition, the peer review team, on basis of the self-evaluation and SWOT, aimed to create a better understanding of:

- ✓ the work processes to get a better understanding of the day to day work and the remit of the centre, in order to be able to make fitting recommendations.
- ✓ The shift to issue comparability statements. Although in line with the Lisbon Recognition Convention, there are parts of the convention that are not covered by the comparability service of the centre. The question is how the Lisbon Recognition Convention principles are promoted in the Irish system at large.

2.5 Selection of staff

Which staff was selected to be interviewed and why?

NARIC Ireland is a centre consisting of one Head of Centre and three credential evaluators. The centre is part of QQI and situated in the Qualifications Directorate.

Following the requirements of the protocol, these staff members from QQI were selected to be interviewed:

- ✓ Barbara Kelly, Director Qualifications Directorate
- ✓ Angela Lambkin, head of NARIC Ireland
- ✓ Mark Coney, credential evaluator
- ✓ Yvonne Cullen, credential evaluator
- ✓ Anne Maher, credential evaluator

3. Site visit

3.1 Programme of the site visit

Describe who was interviewed and the topics and issues raised during (each part of) the programme.

Welcome and introductions

Present and interviewed: Ms Barbara Kelly (Director Qualifications Directorate), Ms Angela Lambkin (Head of Centre), Mr Mark Coney, Ms Yvonne Cullen and Ms Anne Maher (credential evaluators).

Topics and questions raised were covered in a general presentation of:

- QQI and the place of the NARIC office;
- Remit of NARIC office and tasks performed;
- Main stakeholders of NARIC office and outreach/promotion;
- Staff size;
- Shift towards comparability statements (and data about its use).

Tour of QQI office by Ms Angela Lambkin.

Visit to the open floor plan of the Qualifications Directorate.

Meeting with management of the office

Interviewed: Ms Angela Lambkin

Topics and questions raised:

- The four priorities raised by NARIC Ireland: 1) GDPR, 2) Outreach to stakeholders, 3) Training of staff, 4) Staff limitations;
- The rationale for shifting to comparability statements;
- The FTE available for NARIC Ireland;
- Probability of involvement recognition of refugees.

Meeting with the members of the staff responsible for the self-evaluation

Interviewed: Ms Angela Lambkin, Mr Mark Coney, Ms Yvonne Cullen and Ms Anne Maher.

Topics and questions raised:

- The process of comparability statements;
- Workflow, and the division of tasks and expertise;
- Turnaround time;
- Inclusion of comparability statements of joint programmes and accreditation.

Final meeting with management & Feedback meeting

Present: Ms Angela Lambkin, Mr Mark Coney, Ms Yvonne Cullen and Ms Anne Maher.

As explained above, these two agenda items were merged due to the team size.

During the session the peer review findings were presented, upon which the manager and staff members gave their feedback.

3.2 Deviations

Were there any deviations from the protocol or were there any deviations from the programme originally agreed upon? If yes, please explain.

Because of the staff size of NARIC Ireland and the fact that the protocol does not allow overlap of questions and information, the following two alterations were made:

- ✓ Item 'Meeting with the members of staff for the self-evaluation' and 'Meeting with other members' were merged on the agenda, because all four staff had been involved in the self-evaluation;
- ✓ Item 'Final Meeting with the Management' and the 'Feedback meeting' were merged on the day of the peer review itself with explicit consent of the head of centre, because the team size and them working very closely together.

Further a short tour in the office was added to the agenda, to get an impression of how the team works on a daily basis. To see the open floorplan helped the peer review in their overall understanding of the operations of NARIC Ireland.

4. Outcomes and action points

4.1 Outcomes

Describe the main outcomes of the site visit.

NARIC Ireland changed its services two years ago, shifting from credential evaluations to issuing comparability statements for competent authorities (employers and higher education institution). Except for one person, the NARIC office was newly staffed.

NARIC Ireland undertakes a wide range of activities for a varied group of stakeholders. This is particularly praiseworthy considering the small staff size off the office. A scarcity of resources leads to creative, innovative and efficient ways to reach NARIC Irelands goals. The Head of Centre fulfils an important role in motivating staff and reaching out to stakeholders for which different communication instruments and channels are used. Moreover the office reaches out to partners within the NARIC networks for innovations and good practice. The credential evaluation staff core activities for NARIC Ireland are the filling and updating the comparability statement database. NARIC Ireland has a satisfying turnaround time of two weeks (often less) of new comparability statements.

NARIC Ireland scores substantial compliance on all standards. However, full compliance with the standards is likely to only be achieved if additional human resources are made available to the centre, given that the limits of the unit's stretch are in sight to take on the tasks needed.

The remit of NARIC Ireland is determined by the issuing of comparability statements, which is a well-organized and transparent service. A point of concern to the review team is who takes on the role of promoting the LRC to ensure smooth and fair recognition in the Irish system? It seems that the focus on comparability statements combined with a shortage of staff training, results in limited expertise on the good practice (LRC), which promotion should naturally be a task performed by a NARIC. It seems that with a little investment, NARIC Ireland could take on this role and improve the national situation.

Recommendations are included below.

Standard 1: Procedures, Criteria and Quality Assurance

Procedures

NARIC Ireland has a description of its work procedures in place that are reviewed as part of QQI's quality cycle. The review team found few examples of good practices that are

standardized practice, but not described as such. Examples are the four eyes principle before uploading the comparability statement and the appeals procedure. Furthermore, the division of work, which seems to work well in practice (all credential evaluators do the same work and divide this on the go by colour coding emails and taking responsibility to follow up), could be described. In addition a feedback loop from experts in the field (for example regarding the validity of statements) can be included.

Recommendations:

- In line with Standard & Guidelines Standard 1, write down all your criteria and procedures, in order to institutionalize all aspects of how your centre operates and ensure the quality of the procedures. This will also allow for (regular) review, for example against new developments;
- Review the criteria and procedures of NARIC Ireland on a regular basis.

GDPR
The upcoming General Data Protection Regulation (GDPR) from the European Union poses a challenge to NARIC Ireland, because the comparability statements are based on information from individuals that are provided by third parties (employers and education institutions) that are not aware of data protection regulation. This practice will be conflicting with the GDPR when it comes into force in May 2018. Moreover there is a bureaucratic risk of having to obtain permission.

QQI has a legal unit with knowledge of the GDPR and all departments are in dialogue on how to meet the requirements of joint data systems used. However, this particular problem is not tackled. Moreover, it remains unclear how the GDPR may affect the work of NARIC Ireland in other ways.

Recommendation:

- Develop an online webform that states that permission from the applicant for sharing their data is obtained. Make this a required field in the form;
- Reach out to employers and institutions to raise awareness about the new regulation, specifying that requests for comparability from May 25 2018 (or earlier) will only be taken into account if explicit consent is given (via the webform);
- Consult with other ENIC-NARICs (with a similar remit) to identify how the GDPR may affect the operations of the NARIC office and to discuss and/or find inspiration for solutions.

Staff workload and training
Staff workload and training is not explicitly mentioned as part of any standard in the S&G, but can be considered part of Standard 1, since it is a precondition for aligning recognition criteria and procedures with established good practice, for the review of procedures on a regular basis and for ensuring that criteria can be consistently applied.

The peer review team was impressed with the variety and amount of tasks performed by NARIC Ireland given its small staff size. All staff dedicated to NARIC Ireland (including

management) also performs a substantial amount of tasks outside of the centre, such as for Europass.

Staff comes from different professional backgrounds, bringing in valuable expertise but (except for one staff member) without experience in recognition. Staff training at NARIC Ireland has been generally on the job learning ("Sit by Nelly") and conference attendance (i.e. UK NARIC meeting). This has been successful to get the current operations working smoothly.

The high workload results in a strong focus on the day to day work processes. Even when considering the specific remit of NARIC Ireland, the peer review considers this focus in combination with the high workload as a risk, because this situation leaves very little room to take on tasks and training that will ensure the quality of operations in the centre in the short and long term.

The peer review team learned that the NARIC staff has only basic knowledge of the Lisbon Recognition Convention. One staff member participated in the NARIC online course. The root cause seems to be the focus on comparability statements which means that there is no daily exposure to the full recognition practice. In addition, there is little time for training and keep up the expertise about the LRC. Despite the different remits of NARICs, this situation is at odds with the function of a NARIC to promote the good practice of the Lisbon Recognition Convention. The limitations of NARIC Ireland to be able to promote the LRC to its stakeholders are considered a weakness by the peer review team for the 'recognition infrastructure' and therefore to the fair and smooth recognition of foreign qualifications in Ireland.

Recommendations:

- ✓ All staff should participate in the NARIC online course which provides an introduction to the Lisbon Recognition Convention and is especially designed for new credential evaluators in the networks;
- ✓ Organize off-site days to reflect, review work processes and do self-organized training. For example, discuss parts of the EAR manual using practical examples (i.e. Substantial Difference). Keep up to date with relevant EU developments and the LRC. If necessary, involve fellow NARIC experts in a Skype call to discuss;
- ✓ An extra staff member who can assist the Head of Centre in her many tasks as well as function as a substitute when she is away. For example, someone who can do regular tasks at a more advanced level and can function as a catalyst between management, policy and operations.

Standard 2: Applicant-centred Recognition

The core of NARIC Ireland tasks is to issue comparability statements, providing an indication of the quality and level of an applicant's education. Providing the level and quality can be considered a form of automatic recognition on system level. The actual evaluation in which the purpose of recognition (and the concept of substantial differences) plays a role, is being done by the employer and/or the higher education institution. Therefore, the extent to

which NARIC Ireland is applicant centred is limited, and covers only part of the recognition process. As indicated under standard 1, the review panel sees role for NARIC Ireland to promote good practice for the 'remainder' of the recognition process that is carried out by employers and admissions officers.

A complaint procedure is in place as part of the QQI operations, but not an appeals procedure for NARIC Ireland as promoted by the LRC.

Ireland is actively exploring compliance with standard 2 and LRC article VII regarding the recognition of refugees' qualifications. NARIC Ireland makes use of peer learning by considering good practice available in the ENIC-NARIC networks and how this can be applied in the Irish situation. The review team sees this effort of international peer learning as one of the good practice examples of how NARIC Ireland uses its limited resources in an efficient and innovative way.

Recommendations:

✓ Awareness raising among higher education institutions (admissions offices) and employers about the principles of good practice of the LRC to ensure an applicant centred recognition approach in the Irish context (see also standard 1). For example through further collaboration with existing networks such as the Irish University Association IUA (see also standard 6) or include information about the LRC principles in the Comparability Statements' User Guide.
✓ Establish an appeals procedure, in line with the LRC.

Standard 3: Quality, Legitimacy and Authenticity

The comparability statements provide an overview of the level and the quality. When accreditation is lost, it is up to the entity that is doing the evaluation to check this. The peer review team considered that the comparability statements would be more powerful, also as a tool for automatic recognition, if the accreditation status would be checked.

Recommendations:

✓ Consider adding the date of accreditation of the programme in the database;
✓ Include a 'reminder' to check the accreditation of the programme when it expires.

Standard 4: Evaluation Tools and Resources

NARIC Ireland uses a wide variety of resources that are applicable to carry out the tasks in its defined remit. The peer review team had a positive impression about how all staff had access to the relevant information needed to make their comparability statements.

Information on education systems is found online through trusted databases or stored on the QQI drive. The office has an account with UK NARIC and uses resources from other organizations such as Nuffic and NAFSA. ENIC-NARIC centres are contacted and the ENIC-NARIC ListServ is used in case of questions.

The national qualification frameworks are used as a key source to establish the level of a qualification.

The review team has no recommendations for this standard.

Standard 5: Transparency and Information Provision

NARIC Ireland has a website that is easily accessible to a wide public and which is very clear about the type of services it offers. In addition, NARIC Ireland has various instruments to target a varied group of stakeholders, such as postcards, information sheets, a YouTube video and a podcast.

In line with what has been previously mentioned, because NARIC Ireland is only responsible for part of the process, it could be more transparent about the 'duties' involved in the part of the recognition process employers and admissions officers are responsible for.

A Customer Relationship Management system is used to track and follow up on inquiries. Emails (with requests) are divided among the team members, which seem to work smoothly due to the professional attitude of the staff members and the managements skills of the HoC.

The peer review team found that the turnaround time to issue new comparability statements in practice is two weeks at most, which is much faster than the twelve weeks mentioned on the website.

Recommendation:

- ✓ Include the real turnaround time of the issuing of comparability statements on the website (average of 2 - 4 weeks);
- ✓ Provide information about the principles of the LRC, to promote smooth and fair recognition in the Irish national context.

Standard 6 - (Inter)national Cooperation and Presentation

NARIC Ireland is pro-active in reaching out to stakeholders to bring attention to the services offered. QQI offers a platform for contact with stakeholders that would otherwise perhaps be more difficult to be reached. NARIC Ireland also reaches out to the ENIC-NARIC networks and it takes on small roles in NARIC Erasmus+ projects, which provide the opportunity to create international peer learning and innovations of services. The manager is an excellent networker in establishing these contacts.

Support and promotion of the activities of the ENIC-NARIC networks and good practice to stakeholders is currently poor, could be further developed through the establishment of contacts with for example admissions officers. The peer review team however takes note of the fact that the office is limited in resources to achieve this goal.

Recommendations:

- Keep up the good work in networking;
- Reach out to the IUA and THEA (Technological Higher Education Association) to establish a dialogue and get a seat at the table. In general, NARIC Ireland could function as

information point informing relevant stakeholders about European good practice into the Irish national recognition context (LRC, new developments in the European Education Area, EAR manuals, etc). This however, will largely depend on the resources available. An extra person in the office (as mentioned above) would provide the opportunity to take on the role as promotor of the LRC, European and perhaps even national good practice, which is expected to be an efficient way to benefit the recognition in Ireland at large and therefore Ireland as a study destination;
- Identify who is using the current services in order to adapt outreach activities.

1. Response of the centre under review

In this section the ENIC-NARIC centre under review has the opportunity to briefly respond to the report findings. Include a description of how you are going to follow up/implement the recommendations (you can publish this description on your website to show a wider audience how you are improving the quality of your centre).

The report is an accurate reflection of the work of NARIC Ireland and we welcome the insights and observations and the fact that we achieved substantial compliance on all standards. Many thanks to the Peer Review group.

With regard to the recommendations we aim to address these over time.

- *Documenting the procedures*
- *Addressing the implications of the GDPR*
- *Facilitating staff training and development*
- *Formalising an appeals procedure*
- *Noting the turnaround time in response time*
- *Engaging with stakeholders in relation to the LRC*

A point of accuracy is that while a make-over (organisation wide QQI re-structuring) was undertaken in 2015, the actual establishment of QQI was in 2012 and this was an amalgamation of a number of agencies the NQAI, FETAC, HETAC and IUQB in line with national legislation/policy. The establishment of NARIC Ireland and its upgraded service and database took place in July 2015 just before the re-structuring.