



QQI

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

## SECTION 4.3

# Green Paper on Recognition of Qualifications within the National Framework of Qualifications

## FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the content of this proposed Policy Document please use the *Questions and Comments* area which appears immediately after it.

PLEASE NOTE:

**13 SEPTEMBER 2013**

CLOSING DATE FOR SUBMISSIONS

## **SECTION 4.3**

# **Green Paper on Recognition of Qualifications within the National Framework of Qualifications**

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### **4.3.1 Introduction**

The 2012 Act defines educational and training awards. An award is conferred by an awarding body, on a person to record or certify that the person has acquired a particular standard of knowledge, skill or competence.

The following bodies make awards that are included within the National Framework of Qualifications (NFQ) and automatically recognised within it:

- QQI.
- Designated awarding bodies (DABs) (Universities, Dublin Institute of Technology and the Royal College of Surgeons in Ireland).
- Providers with delegated authority (DA) to make awards.

The current awards of the State Examinations Commission are also recognised within the NFQ.

The 2012 Act does not offer a definition or classification of 'awards recognised within the Framework'. This was intended not to constrain QQI in developing policies that are capable of adapting to developments within the qualifications system. It was considered important that the NFQ would remain an inclusive and comprehensive framework.

Recognition within the NFQ is not limited to the awards of the aforementioned bodies and this paper is concerned with recognition of awards of other awarding bodies. The following groups of bodies (not mutually exclusive) may be identified:

- Bodies authorised by law to make awards in the State.
- Professional recognition bodies.
- Foreign/international awarding bodies.
- Vendor awarding bodies.

The Green Paper aims to:

- Establish the scope of awards to which policy will have an effect.
- Identify the rationale for policy development.
- Identify issues based on national and international experience relevant to policy development.
- Stimulate engagement with interested stakeholders.
- Seek feedback to inform the development of policy options.

### **4.3.2 Public Policy Context**

The concept of using the NFQ to recognise educational and training awards has been a central feature of NFQ development and implementation.

There are multiple national recognition schemes. Different schemes vary in the QQI-applicant Quality Assurance (QA) responsibility boundary and in how the NFQ is used. It is assumed that there is demand from awarding bodies to have their awards recognised within the NFQ. It is assumed that QQI continues to position the NFQ as an instrument for the recognition of awards in the state.

For the purpose of the credibility and trust in the NFQ it will be important that policy and criteria for the 'recognition of awards within the Framework' are valid and reliable.

### **4.3.3 Legislative and Organisational Context**

The term recognition has multiple meanings and uses within the qualifications system and within the various policies that QQI has inherited. The term is commonly used by providers of education and training programmes; funding bodies; regulators; professional recognition bodies; and employers when specifying acceptable awards for a diversity of purposes including access to education and training programmes, employment opportunities and access to professional registration or licence to practise.

The 2012 Act applies the term 'recognition within the framework' to awards and it is this usage that concerns this paper. In the past the terms 'inclusion of awards in the framework' and 'alignment of awards with the framework' were used to express kinds of recognition

within the NFQ. Fees were charged for the alignment of awards with the NFQ by the NQAI and the HET Awards Council. The 2012 Act makes no provision for such fees (see Green Paper 3.2 Fees).

The concept of 'awards recognised within the Framework' is used in the 2012 Act as a requirement in relation to certain functions of QQI such as the International Education Mark (Section 61) or the Database of Programmes and Awards (Section 79). The 2012 Act also reinforces the absolute requirement for appropriate QA arrangements on the part of awarding bodies and providers in relation to awards recognised within the Framework.

The 2012 Act establishes connections between the recognition of awards within the Framework and a number of statutory provisions.

*Database of Programmes and Awards (Section 79)*

QQI is required to establish, maintain and develop a database providing information on awards recognised within the NFQ, programmes of education and training which lead to awards recognised within the NFQ and any other programmes QQI thinks appropriate.

*Standards and Awards (Section 43)*

Each body authorised by law to make awards in the State shall ensure, in so far as is reasonably practicable, that each award that it makes is recognised within the NFQ.

Each awarding body in the State shall, in respect of each award the body makes that is recognised within the NFQ, ensure that a learner acquires the standard of knowledge, skill or competence associated with the level of that award within the NFQ before an award is made.

Each provider of a programme of education and training leading to an award that is recognised within the NFQ shall, in respect of each such programme, ensure that an enrolled learner acquires the standard of knowledge, skill or competence associated with the level of that award within the NFQ before an award is made.

*Arrangements between providers and awarding bodies other than QQI (Section 48)*

Where an Institute of Technology with DA or other public institutions providing further education and training enter into an arrangement with an awarding body, other than

QQI, to provide, organise or procure a programme of education and training leading to an award, the award of the body is recognised within the NFQ.

*International Education Mark (Section 61)*

Providers seeking authorisation to use the International Education Mark (IEM) must ensure that where a programme of education and training leads to an award, that award is recognised within the NFQ by QQI where it is capable of being so recognised.

*Obligation on providers to furnish information to enrolled learners (Section 67)*

Providers have obligations in relation to provision of information to learners. Such information includes whether the award is recognised within the NFQ, and if so the level of that recognition within the NFQ and whether the award is a Major, Minor, Special Purpose or Supplemental award as identified within the NFQ.

Section 13 of the 2012 Act requires a professional recognition body to co-operate with QQI in the performance of its functions in so far as those functions relate to the functions of the body, and to consult with QQI, as appropriate, in regard to the performance of the functions of QQI in so far as those functions relate to the functions of the body.

The 2012 Act does not provide explicitly for QQI to charge a fee for recognition within the NFQ. The evaluations required for the purposes of a recognition service are costly. Whether or not a fee can be charged, QQI can only recognise awards on the basis of valid and reliable evaluation processes.

#### **4.3.4 Transitional Arrangements**

A large number of awards have been aligned within the NFQ. The majority are awards of UK Awarding Bodies aligned by the NQAI. The list of awards recognised under this arrangement is subject to periodic updating and liaison with the awarding bodies and their regulators / quality assurance agencies.

The HET Awards Council and the NQAI had policies for inclusion and alignment of awards. The HET Awards Council's policy was revised in 2011 and this was linked with a new set of professional award-type descriptors that are now part of the NFQ. Until QQI establishes

policy for recognition of awards within the NFQ no additional awarding bodies will have awards recognised.

#### **4.3.5 Anticipated Stakeholder Expectations**

Alignment is a form of recognition. The alignment process used by the NQAI for UK awards was based on the comparability of the UK and Irish frameworks and an agreement with the UK regulator regarding the QA of these awards. NQAI did not directly quality-assure these awards. They also did not quality-assure programmes leading to these awards, given that the definition of recognition in the 2012 Act is expanded, these arrangements will need to be revisited. These bodies might anticipate that current arrangements will continue.

There is interest among professional recognition bodies in having their awards recognised within the framework. The professional award-type descriptors introduced in 2011 (following the review by the HET Awards Council) have yet to be used in any recognition process. The possibility is being explored that some preliminary work might be done during this year with one group of professional bodies on translating these descriptors into their discipline-area.

Providers of QQI validated programmes, DABs and providers with DA to make awards may wish to ensure that awards that have recognition within the NFQ and the programmes of education and training associated with them are comparable in standards and quality.

#### **4.3.6 Rationale**

This Green Paper, as outlined above, is concerned with recognition within the NFQ of awards that are not automatically recognised by virtue of other arrangements. The 2012 Act, particularly Section 43(4) implies the need for such a policy.

There are many examples where the public policy warrants an inclusive widely embracing approach to recognition within the NFQ. Public funding for education and training, particularly in further education and training, national immigration policy and labour market activation initiatives, signal a wider public acceptance and support for the concept of awards recognised within the framework.

Regulatory bodies for some regulated professions specify framework level and award type when prescribing qualifications for registration. Regulation in sectors such as the early childhood care and education<sup>1</sup> have largely relied on the framework to specify the level and volume of learning associated with national, international, professional and sectoral qualifications in order to meet eligibility criteria for subvention grants for childcare services.

There is evidence of strong labour market demand for industry recognised certification that may be provided by foreign awarding bodies. The Service Plan for FÁS Training Provision 2013<sup>2</sup> indicates a reliance on FET certification that is not linked to the Common Awards System (CAS) developed by the FET Awards Council.

The investment by awarding bodies in standards development and promotion is significant. When well recognised standards are already available, QQI has an interest in working with the owners of these standards to achieve mutual benefits. QQI will also need to consider how it should best work with regulatory bodies (including professional recognition bodies) that have an interest in, and impact on, qualifications so that the demand for recognition of awards within the NFQ can be responded to in ways that are in the best interest of the qualifications system and in the best interest of individual learners.

At European level there is interest in national approaches to recognising awards from outside of the formal education and training systems within qualifications frameworks<sup>3</sup>. The implementation of the European Qualifications Framework (EQF) has raised the question of what types of awards can and should be recognised within national qualifications frameworks. There is a growing consensus that national qualifications frameworks should support lifelong learning and therefore it is crucial that they are open to what have been termed as 'non-formal' qualifications. At this early stage of implementation of qualifications frameworks in many countries, there is some anxiety that opening up of qualifications frameworks to awards that are not part of a country's own formal education and training system, may present a reputational risk and technical challenges to overall standards associated with frameworks.

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<sup>1</sup> Department of Children and Youth Affairs, Free pre-school year in Early Childhood Care and Education Programme <http://www.dcy.gov.ie/viewdoc.asp?fn=%2Fdocuments%2FECCE-Scheme%2Fintro.htm&mn=chig&nID=2>

<sup>2</sup> FAS Service Plan for Training Provision 2013 <http://www.fas.ie/NR/rdoonlyres/2431A911-8EAD-4D7B-BD6E-39CC641526D7/2942/ServicePlanforF%C3%81S2013.pdf>

<sup>3</sup> CEDEFOP International Qualifications (2012) [http://www.cedefop.europa.eu/EN/Files/4116\\_en.pdf](http://www.cedefop.europa.eu/EN/Files/4116_en.pdf)

These examples illustrate a demand within the qualifications system for the framework to recognise a wide range of awards made in the State.

#### **4.3.7 Implications of Framework-to-framework Alignments for Recognition**

National frameworks are referenced to the Framework of Qualifications for the European Higher Education Area and EQF meta-frameworks. There are some bilateral alignments between national frameworks (e.g. between the frameworks of Ireland and the UK). The interplay between these relationships may lead to a chain of inferred equivalency relationships. For instance, if award 'a' is aligned with award 'b' and award 'b' is aligned with award 'c' then an assumption might be made that award 'a' is aligned with award 'c' even though no formal comparison has been made between 'a' and 'c'. Given that all frameworks use best-fit processes and that different frameworks have different numbers of levels it is possible that different paths of equivalency relations may produce different equivalency estimations.

This situation needs to be clarified in the development of QQI policy on recognition within the NFQ. To avoid contradictions, two principles are proposed for the development of policy for recognition within the framework:

- Consult widely including internationally especially when international awards are involved.
- Avoid decisions based on single chains of framework-to-framework equivalencies.

#### **4.3.8 Recognition within the NFQ – Issues For Consideration**

It is premature to present a definitive set of considered options here. Rather, the following sections indicate the areas that appear to require development—some options are suggested for consideration and others will, no doubt, emerge when this paper is discussed with stakeholders and as events unfold.

##### **Issue 1      Should QQI establish new policies and criteria for recognition of each of Groups A, B, C and D (as defined by the NQAI)?**

The NQAI, FET and HET Awards Councils had previously operated award recognition policies that provided for the recognition of:

- The awards of bodies authorised to make awards in Irish law (**Group A**).
- The awards of professional recognition bodies (**Group B**).
- The awards of education and training awarding bodies based in other jurisdictions, but where provision and related qualifications are available in Ireland (**Group C**).
- The awards of international sectorial awarding bodies (**Group D**).

The legacy policies and criteria are set out on the NQAI website:

<http://www.nqai.ie/AlignmentApplications.html>

**Issue 2      Should there be ‘degrees of recognition’ within the NFQ?**

Different degrees of recognition might, for example, be associated with different degrees of certainty in the recognition afforded. A high degree of recognition would require information about the award, its associated programme and awarding body that is comparable to that available to QQI in respect of awards made by DABs, awarding bodies with DA or by itself. A lower degree of recognition could be offered where less information is available and therefore there is greater uncertainty. For example, the Group C (foreign awards) alignment as operated by the NQAI was based on equivalency relations between the UK and Irish frameworks and presupposes confidence and mutual trust in the underpinning quality assurance arrangements. Were this approach to continue, it might be necessary for Group C alignment to be separated from the other alignment categories and afforded a different degree of recognition.

**Issue 3      How can the integrity of the NFQ be maintained where different routes to the NFQ are subject to radically different quality assurance arrangements?**

Awarding bodies seeking recognition in the NFQ are subject to various national or international external quality assurance regimes. While there is an expectation that these are consistent with relevant European guidelines, the detailed implementations are not necessarily comparable with those that apply to Irish national awarding bodies.

**Issue 4      In order for awards to be aligned with the Irish NFQ, how should programmes leading to these awards in Ireland be quality assured?**

QA of awards is not the same as QA of programmes leading to awards. The NQAI policy for Group C was concerned with awards and learning outcomes only. The way in which recognition within the NFQ is referred to in the 2012 Act implies a concern with QA of programmes as well as awards.

**Issue 5      Should the recognition of awards within the NFQ be processed under QQI policy and procedures for programme validation?**

This would require QQI to scrutinise the award standard, the associated awards and programmes of eligible bodies. The outcome of a successful validation process would be the recognition of an award within the framework. QQI would not have any proprietary rights in relation to the recognised award and would not necessarily make the award. Provision related to awards recognised within the framework would be subject to relevant QQI quality assurance guidelines and procedures.

**Issue 6      Do the following principles indicate some of the issues that need to be considered before an award is recognised?**

- The awarding body itself is recognised and quality assured by QQI or by a body recognised by QQI for this purpose.
- The agreement with the awarding body and the recognition of its awards should be subject to periodic review e.g. every five years.
- The awarding body operates a fit for purpose programme validation and provider accreditation process where relevant.
- The award for which alignment is sought certifies a minimum specified volume of learning, or credit, comparable to other awards included in the NFQ.
- The award for which alignment is sought has a defined standard of knowledge, skill or competence.
- Candidates for the award are reliably and validly assessed against the prescribed standard before an award is made.
- Awarding bodies can reliably report on the performance of candidates in Ireland seeking their awards e.g., completion rates.

# Questions and Comments

## GENERAL CONSULTATION QUESTIONS

**Q4.3.A** Do you have any comments on the issues raised in this Green Paper?

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**Q4.3.B** Do you agree with the principles set out in Issue 6?

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- » You can choose to save this document and return to add further comments.
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Thank you for your time!