



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

SECTION 4.5

Green Paper on Access, Transfer and Progression

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 4.5

Green Paper on Access, Transfer and Progression

4.5.1 Introduction

This Green Paper is intended to explore QQI roles, responsibilities and intentions with respect to access, transfer and progression (ATP).

It identifies, for consideration, some draft policy positions and actions to facilitate engagement and maintain momentum, while preparing for new policy development, along with some issues and options that arise.

4.5.2 Context

4.5.2.1 Legislative Context

The 2012 Act defines ATP for movement into and between programmes of education and training with recognition for knowledge, skill and competence previously acquired. A general function of QQI in the opening to the legislation (Part 2 Section 9 (g)) is to *determine policies and criteria for access, transfer and progression in relation to learners and monitor the implementation of procedures for access, transfer and progression in relation to learners by providers*. In general, throughout the legislation, QQI has responsibility for learners, while providers are responsible for enrolled learners. QQI sets the basis for ATP, approves / facilitates and advises (depending on the type of provider) the provider's ATP procedures, and monitors and reviews effectiveness of implementation of those procedures. The provider pays for approval and review of procedures, implements those that are approved across the spectrum of related policy areas, and provides QQI with relevant information as required. The 2012 Act gives a statutory base to many of the NFQ ATP determinations and strengthens the consequences to providers of non-compliance.

The Act defines ATP for movement into and between programmes of education and training 2(5) and sets out obligations regarding ATP and information for learners as follows:

Sections 56, 57, 58 and 59 set out specific obligations regarding ATP as follows:

- QQI shall establish and publish policies and criteria for access, transfer and progression 56(1)
- These shall include policies on credit and recognition of prior learning 56(3), credit referring to completion of a programme or part of a programme (13)
- As soon as QQI has published its policies and criteria each relevant and linked provider shall establish its own procedures for access, transfer and progression 56(2) and publish them 56(6), *prior to making an application for validation 44 (7)(b), including any other provider i.e., neither relevant or linked*
- Except for previously established universities, prior to establishing them, relevant providers shall submit a draft of its procedures to QQI, accompanied by such fee as QQI determines 56(4), which may approve them or refuse them, with recommendations 56(5) which the provider must take into account prior to resubmission 56(7)
- These providers shall then implement the procedures they have established and that QQI has approved 56(9)
- Previously established universities shall consult with QQI prior to establishing their procedures 56(10), which they are to publish 56(11)
- QQI shall facilitate and advise universities on the implementation of their procedures for ATP 56(12)
- QQI shall review implementation of ATP procedures by relevant/linked providers, accompanied by a fee as determined by QQI, 57 and may issue directions to providers on foot of such reviews 58
- QQI may, after prescribed due process, withdraw agreement of ATP procedures from providers, other than universities, which fail to implement its directions, with consequent loss of validation of all programmes and simultaneous withdrawal of any delegated authority to make awards and authorisation of authority to use the international education mark 59
- Under the savings provisions, procedures to be implemented by providers, as determined by NQAI under the Act of 1999, continue to apply to relevant and linked providers until new policies and criteria are established 84(15).

With regard to information for learners:

- QQI shall promote and facilitate the use by providers and awarding bodies of statements of what an enrolled learner is expected to know, understand and where appropriate demonstrate, on completion of a programme of education and training 43 (2) (d)

- All providers, not just those that already have a relationship with QQI, are obliged to furnish specified information to learners prior to commencing a programme or accepting any payment from learners 67(1) and notify learners when that information changes 67(2)
- A provider who fails to supply such information commits an offence 67(3) which may be prosecuted by QQI 5(5).

4.5.2.2 National public policy context

The overhaul of the public FET system with the establishment of SOLAS and the Education and Training Boards currently being enacted is responding to the need for a more coherent approach to the provision of opportunities for life-long learning. The National Strategy for Higher Education (2011) emphasised the importance of opening up the HET system to more diverse groups of learners, along with predicating new configurations of provision, including regional clustering, national and international collaborative provision, and technological universities. The achievement of access, transfer and progression is the result of the activities of various players. It is, of course, very dependent on providers, but unlike other provider functions such as quality assurance, it is to some extent a property of the interaction between providers or emergent properties of the system. Other players too, particularly the Department of Education and Skills and its funding bodies, also have key roles. This systemic character may be why QQI, like the NQAI before it, has been tasked with promoting access, transfer and progression. The NQAI policies and criteria for access, transfer and progression which accompanied the launch of the National Framework of Qualifications in 2003 are now an accepted part of the policy landscape. The four main planks of the 2003 policy were credit, transfer and progression routes, entry arrangements and information provision. While the NQAI's Framework Implementation and Impact Study in 2009 found that implementation of ATP procedures was uneven, the basic policy approach was not faulted.

4.5.2.3 Anticipated Expectations

All providers are advantaged by having coherent links to other provision in terms of ATP. Consequently it is anticipated that new providers will seek and enjoy the same provisions as others who have agreed quality assurance arrangements. The development of coherent links is particularly important in preparation for change under the 2012 Act. It is currently somewhat impeded by the lack of information, or effectively a framework of provision to

match the NFQ. There may be an expectation in the short to medium term of more transparent and accessible programme data.

Providers and others will expect an integrated service from QQI both across different functions and in terms of accessing as appropriate, levels of the NFQ associated formerly either with further or higher education and training.

Learners have an expectation that the State will act to make the system more coherent and supportive of lifelong learning and protect them from providers that make false claims about the recognition of their programmes.

Funding and strategic agencies such as the Department of Education and Skills, the Higher Education Authority and the National Access Office it contains, FAS/SOLAS, Aontas, the National Adult Literacy Agency (NALA), the Expert Group on Future Skills Needs (EGFSN), Leargas (the EU Lifelong Learning Programme funding agent in Ireland), and other awarding bodies, may have specific assumptions and expectations of QQI regarding access for learners to programmes leading to awards recognised in the NFQ. These need to be explored and analysed for impact in detail. This includes a focus from the perspective of leading patterns of provision in order to anticipate and contribute to shaping and facilitating innovation, opportunity and improvement across the sector.

In addition there is an expectation generally that QQI will be both a source of reliable statistical and qualitative data and a strong contributing voice with regard to access, transfer and progression both nationally and internationally. ATP is frequently associated with targeted initiatives to increase participation within the lifelong learning context for socio-economically disadvantaged and marginalised groups within the population. In addition there are EU wide initiatives such as the recent recommendation on the validation of non-formal and informal learning that QQI may contribute to in the context of ATP policy (see Green Paper 4.7 on Recognition of Prior Learning). This infers a strong data and research base with implicit implications for providers providing such data consistently, and for consideration particularly in programme validation, information provision for learners, participation in monitoring and review e.g., completion rates, and both progress and progression outcomes.

4.5.3 Transitional arrangements

The 2012 Act (Section 84(15)) states that the policies and criteria for ATP established by NQAI in 2003 shall continue in effect until QQI establishes new policies and criteria. This

applies both to providers that already had such obligations prior to the establishment of QQI (see Green Paper 4.14 on re-engagement of legacy providers) and to those seeking to enter into a relationship with QQI for the first time (see Green Paper 2 Provider Access to Programme Accreditation).

4.5.4 Rationale for Policy Development

QQI is required to establish statutory policy and criteria for access, transfer and progression as soon as possible after establishment. Given the savings provisions, it is possible to retain the 2003 policy determinations pending consideration of QQI's ultimate policy direction. As legacy award arrangements may, under the same provisions, continue to be recognised, the additional supplementary guidelines and policies of the former awarding bodies in relation to access transfer and progression may also apply until such time as QQI determines.

The statutory policies and criteria on access, transfer and progression include guidance on the information to be communicated to learners by providers whose qualifications are recognised in the NFQ. Any provider that is not subject to QQI's policies and criteria on ATP is subject to statutory obligations to provide information to learners of this fact (see Green Paper 4.6).

Policy for the agreement and withdrawal of agreement of providers' procedures for ATP will be addressed in the policy for accreditation of providers (Green Paper 2).

Recognition of prior learning (RPL) is discussed in Green paper 4.7.

4.5.5 Issues

Issue 1 Currency of the 2003 Policy and Criteria issued by NQAI

NQAI's 2003 policy ascribes distinct roles to itself and to the FET and HET Awards Councils which are now absorbed into QQI. The 2003 requirements were predicated on structures that no longer exist. Moreover the two Awards Councils implemented their functions in different ways which may impose overlapping, even conflicting obligations on providers.

4.5.a How do the 2003 policies and criteria need to be modified, if at all, for use in an interim period?

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Issue 2 The shifting landscape of publicly funded FET and HET

With the most significant overhaul in the public provision of FET since 1932 underway and major steps in the implementation of the national strategy for higher education imminent, the question arises as to the timeliness of issuing formal policy and criteria. On the one hand QQI could use its legal authority in this area to influence the direction of implementation of these changes in the landscape. On the other hand, the core providers and their representative organisations are undergoing fundamental change and may not be able to engage fully the development of comprehensive new policies and criteria. It might be more productive to conduct extended consultation on ATP issues prior to issuing new statutory policies and criteria. QQI could also prepare for new policies and criteria by conducting further research activity in the area.

4.5.b What timeline and approaches should QQI adopt for the development of new statutory policies and criteria for ATP?

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Issue 3 ATP and employment

Progression is defined in the 2012 Act, as it was in the 1999 Act, in terms of progression to further programmes of education and training at a higher level. An issue that is increasingly highlighted in the scientific and public policy literature is the challenge of progression into employment from formal education and training. This includes progression into new non-formal and informal work-based learning opportunities, which may be at higher or lower levels. These include internships and other forms of structured work-based experience. This topic was not addressed in the 2003 policies and criteria. This might be addressed by supplementary statutory policies and criteria (if the legal definition of ATP can be interpreted in a manner that would permit this) or by way of guidance and information.

4.5.c In light of the current national employment problems should QQI develop new policies or guidance in relation to employability even in advance of a comprehensive review of the 2003 policies and criteria or are there other priority areas not addressed by the 2003 policies and criteria that merit such consideration?

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Questions and Comments

SPECIFIC CONSULTATION QUESTIONS

Q4.5.A How do the 2003 policies and criteria need to be modified, if at all, for use in an interim period?

Q4.5.B What timelines and approaches should QQI adopt for the development of comprehensive new statutory policies and criteria for ATP?

Q4.5.c Should QQI develop new policies on progression from formal education and training into employment even in advance of a comprehensive review of the 2003 policies and criteria? Are there other areas not addressed by the 2003 policies and criteria that merit such priority consideration?

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