



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

SUBMISSIONS

GREEN PAPER

Facilitating the Recognition
of Qualifications

SUBMISSIONS

QQI received submissions from the stakeholders listed below.*

- » Acupuncture Foundation Ireland (AFI)
- » Bachelor, Jeremy (Individual Response)
- » Chartered Accountants Ireland
- » Department of Health
- » Higher Education Colleges Association (HECA)
- » ICS Skills
- » Institutes of Technology Ireland
- » Irish Small and Medium Enterprises Association
- » Irish Universities Association
- » Local Government Management Agency
- » National Disability Authority
- » National University of Ireland
- » The Open University

**Please note the responses on the following pages appear as received and have not been proofed/edited in any way.*

SUBMISSION BY:

Acupuncture Foundation Ireland (AFI)

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and has not been proofed/edited by QQI.*

Questions to be considered for Option A are:

Option A - Question 1.

With assurances of the quality of research and the development of a useable online tool, would award-holders and those being presented with such information (education institutions, employers etc.) agree with online availability only?

Online availability useful but not sufficient. Online statements are open to misinterpretation. There should be a facility for individual comparability statements.

Option A - Question 2.

What type of information and resources should be available online to support this approach?

A clear detailed comparability framework, with each countries qualification levels, compared to the NFQ. This should not be a static document and should take account of all new recognition of award queries.

Option A - Question 3.

Should an online database concerning international recognition advice be maintained by QQI separately to the planned programmes and awards database, as required under the 2012 Act, or be developed as part of this?

Yes it should, so that learners and other stakeholders can consult and compare.

(See [Green Paper 4.12 on Data](#) for more detail.)

Option A - Question 4.

Should a fee be applied for access to such a database?

☐ Yes ☒ No

OPTION 5.2.b

Continue processing individual award-holders' applications

Questions to be considered for Option B are:

Option B - Question 1.

Is there a value in individual comparability statements relating to international awards where documents are not authenticated and the outcome of the statement is not legally binding?

Yes there is always a value in an individual comparability statement, Learners just want to see where their award fits on the Irish NFQ, as do employers and other stakeholders. There is no expectation that a statement of comparability would be a legally binding document.

Option B - Question 2.

Should the service act as a full authentication service for stakeholders where required?

Yes, this is very important, however it should be an accessible process, not one of delays and poor information and engagement. It should be fit for purpose.

Option B - Question 3.

Should a fee be applied for the processing of an application?

☐ Yes ☒ No

Option B - Question 4.

Should online applications be facilitated?

☒ Yes ☐ No

5.3

Consultation Questions

Question 1.

Which of the options above, (a) or (b), is more favourable in terms of making best use of resources?

☐ A ☐ B

Question 2.

Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

A clear framework of comparability of the UK, European, US, Australian, Chinese, Malaysian, Korean, Japanese awards to the national qualification framework.

Question 3.

Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?

Yes there should be a process of communication and engagement with all stakeholders, without exception or denial of any sector. All learning should have a route to recognition by the national authority with the responsibility for the NFQ on behalf of its citizens,. It is undemocratic to deny this to any sector and against all international recommendations including those of the OECD on member country acknowledgement and recognition of all learning, formal, informal or non formal. Currently the Complementary Therapy sector is being denied a route to acknowledgement and or recognition of learning without any consideration as to how this impacts on the sector or the public who choose to seek services from the sector. QQI are not fulfilling their role under the act by continuing to deny this sector a route to recognition of learning in this sector.

Question 4.

As discussed, QQI has a role in promoting understanding of the Irish education and qualifications systems abroad. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?

A comparable framework showing where the Irish awards fit into the main international qualification frameworks.

Are you finished commenting?

Please provide the following details.

Name

Bernadette Ward

Name of Organisation - *If you are making a submission on behalf of an organisation?*

Acupuncture Foundation Ireland (AFI)

Contact Email Address

QQI intends to publish the responses to this form.

Please indicate your consent below

- ☒ I give my consent to have my feedback published
- ☐ I do NOT give my consent to have my feedback published

If you are satisfied with your comments please send them to us now by clicking the Submit button below.

SUBMISSION BY:

Bachelor, Jeremy (Individual Response)

*Please note this response appears as received
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Individual Response

Jeremy Bachelor

April 16, 2014

This letter is in reference to your "Green Paper" proposal. I am writing in strong opposition to your proposed elimination of individual evaluations. The basis for Quality & Qualifications Ireland's evaluations is to ensure that employers within the country understand the foreign qualifications of candidates. In this very competitive field, a database providing general degree equivalencies does not meet this mission, as employers will quickly point out that not all degrees, even within a given country, are identical. The equivalency letter that QQI provides demonstrates to the employer that the degree was analyzed and determined to meet basic Irish standards at a specific level.

Furthermore, it has been my personal experience that employers in Ireland are unfamiliar with official accreditation in other countries. The individual evaluation clears up doubts employers may have concerning program accreditation. As is the case in the United States, there are many universities that offer unaccredited Bachelor's degrees that are not meeting the standards that officially recognized universities are. How is an employer to know whether or not the university is accredited? If the burden lies on the employer, it is unlikely that they will invest in researching individual accreditation circumstances and will discard potential candidates. The QQI individual letter makes specific mention of the university where the degree was obtained and speaks to its accreditation status.

Finally, candidates who seek the QQI individual letter may use that letter throughout the European Union, which was the purpose of NARIC, so that one country's degrees or official recognition letters could provide evidence of degree equivalency. With the current economy, candidates would have to seek recognition in every single country where s/he were to apply. I have found that a letter from QQI is generally accepted across Europe, and the country-specific recognition process is only required if the candidate is offered the position. The general database would not suffice in this instance.

Given my personal experiences and the benefits that I have received thanks to my individual evaluation by QQI, I implore you to reconsider moving towards a general database. While useful as a reference tool, it does not speak to specific program accreditation or status, and leaves employers confused and more likely to discard potential candidates.

I thank you for your time.

SUBMISSION BY:

Chartered Accountants Ireland

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Chartered Accountants Ireland

Anticipated Stakeholders Expectations :

QQI view is that stakeholders expect a very responsive service providing authoritative advice. For example employers in non-regulated areas often interpret international recognition advice as de facto recognition within the NFQ as opposed to advice regarding the academic comparability of the particular qualification with awards placed in the NFQ. Email queries responded within 2 working days while formal applications from awards holder are processed as quickly as possible, within 3 weeks of receipt of application. Where advice is published online, it appears that many stakeholders, particularly individual award holders prefer alternative written confirmation XXXXX Not reasonable – a fee should be charged

ENIC-NARIC expect a responsive service in terms of questions posed on the Irish E&T systems. The Secretariat network expects a relatively high level of engagement with recognition issues and contribution to the development of the network - ? is that a two way expectation – how often does QQI make enquiries and is there a monetary cost to participation of the network ? Is there a standard template across all the network? (see below)

Options 5.2 A - Cease processing individual award holders' applications

Response :

1. It will depend on how the information is presented on line – clear concise
2. Country, Sector, have template map under each sector – General Information, specific qualification – (individual must show equivalent of NQF and drill down). Database will need to be kept updated – could be resource intensive, keeping database updated of both national and international movement.
3. Yes but separate National database from International database
4. Nominal fee /Difficult one - expectation, if paying a fee, will want a definitive response?
No fee for access might be the way to go

Option 5.2.B Continue processing individual award holders' applications

Response :

1. No
2. Yes
3. Yes
4. Possibly not, as you will need to view original documentation

Consultation Questions

1. Difficult, would say A probably more favourable in terms of making best use of resources.
2. See 5/2A2. Above
3. Engage with recognition authorities and professional bodies – have standard template across the sectors and ask bodies to complete for information /guidance /links etc..
4. Work with Naric Partners – review each sector and level and how it is recognised across all 55 centres for consistency.

Kind regards

Maria

Maria A Murphy

Manager, Regulations & Accreditation (Undergraduate)

Chartered Accountants Ireland

SUBMISSION BY:

Department of Health

*Please note this response appears as received
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QQI Consultation: Facilitating the recognition of qualifications: **Department of Health observations**

Context

The consultation relates to whether the QQI Qualifications Recognition service should continue processing applications from individuals to facilitate recognition of their achieved awards, or if this function could be satisfied with the provision of general information and advice by the service. The consultation notes that available resources are concentrated in the main on administering formal applications from individual holders of international awards.

Role of the Department of Health in professional qualification recognition

The Department of Health has policy responsibility for the regulation of health and social care professions. Professional qualification recognition is an aspect of statutory regulation and a role of the Department is to ensure the implementation in Ireland of Directive 2005/36/EC on the recognition of professional qualifications, as well as providing a legal base for the assessment of health professional qualifications outside the scope of the Directive. Where statutory registration bodies exist for a profession, they provide the qualification recognition function; for other health professional qualifications, the Department performs the role for qualification recognition, but for public sector recruitment only (see http://www.dohc.ie/public/foreignqualification/foreign_validation.html) and this function has/will transfer to the Health and Social Care Professionals Council (CORU) for most of the professions concerned.

A criterion for eligibility under the Directive is the number of years of professional training - rather than the actual educational level; the substance of the applicant's professional training and/or post-qualification professional experience is then compared with the Irish entry level qualification.

The consultation notes that a number of professional recognition bodies and higher education institutions require that individual award-holders receive advice on academic recognition of their international qualifications from QQI as a first step in their respective recognition processes.

While a competent authority may seek the level of a qualification from an applicant, this would not be a usual circumstance, as it would be more concerned with the content of the training programme.

CONSULTATION QUESTIONS

- 1. Which of the options (to (a) cease processing individual international award-holders' applications or (b) continue processing individual international award-holders' applications), is more favourable in terms of making best use of resources?*

The Department would have no objection to on-line availability of information on the academic level of incoming awards as it would be happy to rely on the expertise of QQI and could engage bilaterally if required.

The service to Irish awards should be considered separately. From its experience of verifying Irish professional qualifications, many non-EEA countries (e.g. India; Middle East)

seek primary source verification and are not happy to be referred to a website. It would not be fair to disadvantage Irish-trained applicants seeking recognition abroad by not having an information service available. The Department is not aware if this issue exists for academic recognition but if it does, a fee might be charged to maintain a recognition service. As the same issues may arise for other ENIC-NARIC network members, it is suggested that a common approach to solving the issue may help. Alternatively, QQI could engage in bilateral dissemination of information.

2. Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

Improved communication of the qualification recognition role could help. The consultation acknowledges that some expectations are mistaken, for example QQI does not provide an authentication service for international qualifications nor apostillation of Irish qualifications.

Qualification recognition is a complex area of which the general public is largely unaware. For example, it is unclear to most people that QQI assesses the level of an academic award but not its content; likewise the differences between academic and professional recognition are not well known. Yet in the Irish labour environment where many modes of “professional “ pursuit are not regulated, the QQI assessment may be the only “check” that an Irish employer may have on non-Irish training.

Accordingly, clearer information on the QQI website may assist.

3. Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?

It is assumed that the Irish health professional bodies will respond directly to the Consultation but for the reasons identified above, it is considered that they may well be able to rely on web-based information from an Irish state agency. Moreover, statutory registration is in the process of being introduced for 12 health and social care professions so the professional recognition function will largely transfer to CORU.

It is assumed that within the EU, the Diploma Supplement should indicate the EQF level of an award, if it applies. Our experience is that non-Irish higher education institutions, engaged in professional training, do not advise applicants of the requirements of Directive 2005/36/EC. To reduce the workload of QQI (and the Directive competent authorities), these foreign institutions must market themselves better with regard to both the EQF and Directive 2005/36/EC but an EU/EA level initiative would probably be required.

4. As discussed, QQI has a role in promoting understanding of the Irish education and qualifications systems abroad. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?

See response to question 1.

Ends

May 2014

SUBMISSION BY:

Higher Education Colleges Association (HECA)

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HIGHER EDUCATION COLLEGES ASSOCIATION (HECA)

RESPONSE TO QQI GREEN PAPER on FACILITATING the RECOGNITION of QUALIFICATIONS (April 2014)

Options for consideration:

5.2.a: Cease processing individual award-holders' applications

Response: The Green Paper states that “For international awards previously presented to QQI, applicants would be required to access the general academic recognition advice published online. HECA’s question is how would students know if an international award had been previously presented to QQI.

Questions to be considered for this Option are:

- Q. Would award-holders and those being presented with such information agree with online availability only?
- A. We believe that they definitely would not agree. Students have a right to receive written confirmation from awarding bodies as to the equivalence of their award. Denying them that right could impact adversely on their employment prospects or on their future academic progression.

- Q. What type of information and resources should be available online to support an online approach?
- A. We assume that online information and resources would have to reflect what is currently provided through the present personalised service. At the very least, a print out would be essential which would confirm the award, its title and level, where it sits on the Irish Framework of Qualifications and its equivalence on the European Framework.

- Q. Should an online database concerning international recognition advice be maintained by QQI separately to the planned programmes and awards database?
- A. We assume that both systems should be offered but should be linked to be cost effective.

- Q. Should a fee be applied for access to such a database?
- A. One suggestion could be to use the model applied by the Companies Registration Office whereby one can view material etc. but, if one wishes to obtain printed documents, then payment is required.

5.2.b Continue processing individual award-holders' applications

- Q. Is there a value in individual comparability statements relating to international awards where documents are not authenticated and the outcome of the statement is not legally binding?
- A. Definitely No.

- Q. Should the service act as a full authentication service for stakeholders where required?

A. Yes, because if QQI won't offer this service, who will?

Q. Should a fee be applied for the processing of an application?

A. Yes

Q. Should online applications be facilitated?

A. Yes, if the authenticity of the application can be guaranteed.

Consultation Questions:

Q. Which of the Options above, (a) or (b), is more favourable in terms of making the best use of resources?

A. We believe that a combination of Options (a) and (b) would be most favourable. Obligations to students must take priority over resource issues.

However, in the case of a student resident in Ireland with an overseas qualification seeking recognition confirmation, then it would be more appropriate for that student to approach the relevant authority in the awarding country.

Q. Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

A. It could prove beneficial if QQI were to review other countries' practice which could inform it as to the implementation of an appropriate approach.

B. Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies?

A. Yes, in particular there should be greater guidance for employers enabling them to make a judgement particularly in relation to legacy qualifications which are hard to place on the present Framework. Likewise, this need also applies to Higher Education Institutions who can also experience difficulties of interpretation particularly in respect of pre-framework awards from Ireland or internationally.

Q. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences?

A. HETAC awards have always been well recognised and valued internationally. Work will need to be carried out to establish the QQI brand so whatever measures and strategy were effective in the promotion of the HETAC brand should now be employed to promote the QQI brand.

Further comments:

Reading through this Green Paper there was a definite sense that the commercial imperative was paramount at the expense of delivering a much needed student service and this was a cause of concern among members.

Surprise was expressed at the use of the term "alignment" on Page 13 given QQI's stated approach to abandon the concept of alignment and it was decided that clarification will be required on the terminology used.

SUBMISSION BY:

ICS Skills

*Please note this response appears as received
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Name:	Linda Keane, Business Development and Quality Manager
Responding on behalf of:	ICS Skills, 87-89 Pembroke Road, Ballsbridge, Dublin 4.

ICS Skills, the training and certification division of the Irish Computer Society, welcomes the development of this green paper and its inclusion in QQI's consultative process.

1. Which of the options, (a) or (b) is more favourable in terms of making the best use of resources?

In terms of maximising the use of QQI resources option a is a more suitable option. Publishing recognition advice online will only work however if the site is easy to access, easy to navigate and the information is clear and unambiguous. One simple address www.qqi.ie should be the landing page for any and all qualifications related queries whether you are a provider, learner, employer, institution or awarding body. In relation to qualifications recognition there are at least three separate websites that need to be interrogated to access information: nqai.ie, nfq.ie, qualrec.ie and enic-naric.net. Functionality that could be built into an online recognition advice portal accessed through the QQI website might include:

- High level overview of the NFQ vs. EQF
- International Qualifications Database than can be easily interrogated by learners, employers and institutions.
- Charge a fee to generate a branded, printable copy of search results.
- Details and links to relevant international, sectoral and professional recognition bodies for further information.

This portal should be maintained by QQI separately to the planned programmes and awards database in the short to medium term. This is to enable QQI gain the resource savings associated with moving the recognition advice service online as soon as possible.

2. Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

QQI should seriously consider engaging with recognition authorities such as higher education institutions, professional recognition bodies and other awarding bodies in this regard. These bodies could provide the individual service to learners and stakeholders that QQI will cease to provide and over and above what's made

available through a QQI online recognition advice portal. Key to this arrangement would be QQI's recognition of other awarding bodies (Groups A, B, C and D as defined by NQAI – Green Paper 4.3 refers) and the alignment of their awards to the NFQ.

3. Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?

ICS Skills strongly believes that a more active programme of engagement with recognition authorities and international sectoral awarding bodies. We are also aware of the importance of maintaining the integrity of the NFQ. In that regard, QQI should engage with recognition authorities and awarding bodies who are subject to their own or international quality assurance procedures, some of which may mirror QQI's own QA policies. (QQI Green Paper 4.3 refers)

A small group within QQI could have overall responsibility for these arrangements. Initially, awarding bodies would be selected based on their proven track record, established reputation, national reach and whose awards are considered the de facto standard in a particular field.

Other criteria that might be considered include:

- History and record of the awarding body
- How long the certifying body has been issuing qualifications in Ireland
- The volume of certification issued by the certifying body in Ireland over the past three years
- The countries in which the certifying body operates and certifies qualifications
- Penetration or reach of the awarding body within the State, particularly in relation to 'non formal' awards i.e. is the awarding body concerned with one narrow profile of the population or does its reach cover the broader population?

3. Contd.

The onus could be put on the awarding bodies in question to evaluate their awards against the NFQ and submit the evidence of such evaluations to QQI for recognition. The responsibility for the currency of their award information on QQI's website and the provision of individual recognition advice could also fall to the awarding body as part of this arrangement.

- 4. As discussed, QQI has a role in promoting understanding of the Irish education and qualifications systems abroad. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?*

As in question 1, amalgamation of the relevant websites into a one-stop-shop for information regarding qualification recognition is an essential part of this service. Formalised and transparent arrangements with international sectoral awarding bodies will also simplify the process and ease the burden on QQI resources.

SUBMISSION BY:

Institutes of Technology Ireland

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and has not been proofed/edited by QQI.*

QQI Comprehensive Policy Development Consultation – Submission of IOTI re May 2014 documents

1. Green Paper on Facilitating the Recognition of Qualifications

Consultation Questions 1, 2, 3

- *Which of the options, (a) or (b), is more favourable in terms of making best use of resources?*
- *Are there alternative means of delivering academic recognition advice on international qualifications to both individual-award holders and other stakeholders that should be considered?*
- *Should there be a more proactive programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?*

IOTI is not entirely convinced that the two options (a) and (b) should be presented as alternatives, as there is a need for QQI to undertake both activities – i.e. the processing of individual award-holders' applications, and the provision of high quality information on international qualifications – if it is to perform its statutory role as qualifications authority, and not simply function as a quality assurance agency. The recognition service probably suffers from the fact that it was developed as an afterthought – following the NQAI's assumption of the ENIC-NARIC and NRP roles – and was not fully integrated into the qualifications policy space, which NQAI had originally staked out for itself on the basis of the 1999 Qualifications Act. The question that QQI now needs to consider is whether resources on the qualifications side should continue to be concentrated on the policy development side e.g., in European frameworks and related engagements, where the returns for learners and other stakeholders are less and less tangible, or whether qualifications activity should be concentrated on delivering services needed directly by learners, or in support of the providers/awarding bodies that award qualifications to learners. IOTI believes that serious consideration needs to be given to this question – in essence, there is a need to do a rigorous cost-benefit analysis of qualifications related activity in QQI – and would favour the emphasis being placed on the needs of the individual learner, and the needs of providers that are paying substantial professional fees to QQI.

IOTI would value the expansion of the qualifications recognition service to encompass activities that support the internationalisation of Irish education, specifically in relation to improving the recognition of qualifications (general and VET) that are used for the purpose of admitting students into higher education, or in developing a national approach to the recognition of English language qualifications for the purposes of study at third level. While it would be unreasonable to expect QQI to undertake analyses of such qualifications alone, it would be a very helpful – and would boost QQI's credibility and standing as the Irish NARIC – if it coordinated inter-institutional research/activity aimed at comparing the learning achievements of international students with the Leaving Certificate and other Irish qualifications that are used for the purposes of admitting students. A similar approach would also be valuable in the area of ELT recognition.

Consultation Question 4

- *What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?*

There are no easy answers to the above question. IOTI believes that there is a need to undertake some research to identify what issues, if any, are arising in relation to the recognition of Irish awards abroad. No doubt QQI has information available to it based on cases that it has dealt with in relation to individual learners who have experienced recognition difficulties abroad. Providers and other stakeholders would also have similar anecdotal information to hand. The question is whether this information is accurate and significant, and whether it should be used to shape policy. Without proper research, it is impossible to frame the key policy issues that pertain to the recognition of Irish awards abroad. The delineation of these issues, both in terms of what they are, and their prevalence, should be a prerequisite to determining the nature of the service that QQI will provide in this area in the future. One area of concern to the IoTs is the issue of communicating information on awards made under delegated authority to prospective international students or the bodies that coordinate and fund international study abroad programmes. DA is not an easy concept to communicate to international audiences and unfavourable perceptions of the concept can sometimes raise questions about the status and, by implication, the quality of IoT awards, on the grounds that their awarding authority does not operate on the same basis as the Designated Awarding Bodies. In terms of the recognition of Irish awards abroad, it is arguable – particularly in the context of the implementation of the National Strategy for Higher Education to 2030, which advocates the establishment of a coherent Irish HE system – that QQI and the State should be attempting to bring about more coherence to the awarding authority of public providers. Granting self-awarding authority to the IoTs on the same basis as the DABs would, arguably, simplify the promotion of the Irish awards abroad, and facilitate and enhance their recognition.

SUBMISSION BY:

Irish Small and Medium Enterprises Association

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Irish Small and Medium Enterprises Association

CONSULTATION QUESTIONS

1. Which of the options above, (a) or (b), is more favourable in terms of making best use of resources?

With some provisos (a) is a more favourable option.

Is it possible that wording on certificates may not be in Latin characters, as they are on the database, but in Cyrillic or Chinese characters, etc.? If so, then there needs to be some means of recognising the characters very specifically.

There are many qualifications not listed. There needs to be the possibility to request a comparison for non listed qualifications.

A brief user's manual should be produced.

An overview of the Irish qualifications system needs to be provided.

It would need to be possible to download some sort of authentication/formal recognition so that job seekers could print it out and include it in their job application.

The area of apprenticeship qualifications needs to be covered.

It would seem logical to have an online database concerning international recognition advice in the same location.

2. Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

If there was an international body that would host all qualifications and provide recognition on an international basis with QQI providing oversight on this with respect to Irish qualifications then this would work.

3. Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?

If they believe there is a need, then there is a need.

4. As discussed, QQI has a role in promoting understanding of the Irish education and qualifications systems abroad. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?

As the system works in both directions and there are many qualifications not listed, there needs to be the possibility to request a comparison for non listed qualifications so that Irish awards can be recognised abroad.

Liz Carroll
Training and Development Manager
ISME
17 Kildare Street, Dublin 2

SUBMISSION BY:

Irish Universities Association

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and has not been proofed/edited by QQI.*

Questions to be considered for Option A are:

Option A - Question 1.

With assurances of the quality of research and the development of a useable online tool, would award-holders and those being presented with such information (education institutions, employers etc.) agree with online availability only?

It is difficult to choose Option a) or b) as it is unclear as to what exactly the workload and information required entail for the HE sector or individual Universities from the information contained within the Green Paper (1900 applications, 2000 email and 1500 telephone calls). It would be useful get a breakdown for these figures as representative of the Third level sector in Ireland or the University sector or by individual HEI. This would the Universities to assess any impact of Option a) if QQI were to cease processing individual applications. The universities anticipate there will still be requests to individual HEIs for official documents to be issued for individual purposes. In terms of QQI resources, they would seek that QQI continue to accept individual applications until such time that an online database be that i) separate to or ii) the planned programme and awards database required under the 2-012 Act, is launched. This needs to be supported by an appropriate communications strategy directed at Irish and International audiences. The universities reiterate that no fee should be applied for access to such a database.

Option A - Question 2.

What type of information and resources should be available online to support this approach?

Option A - Question 3.

Should an online database concerning international recognition advice be maintained by QQI separately to the planned programmes and awards database, as required under the 2012 Act, or be developed as part of this?

(See [Green Paper 4.12 on Data](#) for more detail.)

Option A - Question 4.

Should a fee be applied for access to such a database?

☐ Yes ☒ No

OPTION 5.2.b

Continue processing individual award-holders' applications

Questions to be considered for Option B are:

Option B - Question 1.

Is there a value in individual comparability statements relating to international awards where documents are not authenticated and the outcome of the statement is not legally binding?

No

Option B - Question 2.

Should the service act as a full authentication service for stakeholders where required?

Option B - Question 3.

Should a fee be applied for the processing of an application?

☒ Yes ☐ No

Option B - Question 4.

Should online applications be facilitated?

☒ Yes ☐ No

5.3

Consultation Questions

Question 1.

Which of the options above, (a) or (b), is more favourable in terms of making best use of resources?

☒ A ☐ B

Question 2.

Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

The universities' views are that it is preferable for a national body to provide academic recognition advice on international qualifications and to engage with third parties that are seeking information from graduates to establish standards and pro forma for documentation. In consultation for the response to this document, the universities found a lack of awareness of the service provided by the QQI Qualifications Recognition Service.

Each university provides graduating students with transcripts, translations of parchments and certifications of graduation and the NFQ level on request. It would be useful to see the documentation provided by QQI to assess the level of duplication or where a step-change in the information already provided would serve the needs of individual award holders and other stakeholders. It is planned that when our new systems are implemented and fully operational and students' academic records are complete, we will be in a position to provide via a Portal access to individual transcripts and information on qualifications and awards.

Question 3.

Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?

Engagement with QQI on this issue would be welcomed by the universities. It would address the current lack of awareness on the services provided by the Qualifications Recognition Service. It could explore potential enhancement activities between QQI and higher education institutions and professional recognition bodies to meet students and other stakeholders needs e.g. linkages across databases and websites. The management and resourcing of this engagement is an internal matter for QQI: it should not be an extra charge to HEIs.

Question 4.

As discussed, QQI has a role in promoting understanding of the Irish education and qualifications systems abroad. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?

The universities feel it is important that a national body that oversees standards and quality should continue to have a key role in promoting understanding of the Irish education and qualifications system abroad. This is particularly important in view of the International Education Mark to be introduced under the QQI Act 2012 and the universities' interest in globalisation and increasing international student numbers.

The universities are also interested in promoting any service to their students which would assist them to have their Irish awards recognised overseas. They are currently unaware of their students' usage of or satisfaction with the QQI Qualification Recognition Service or alternates e.g. UK ENIC-NARIC that do charge fees.

Are you finished commenting?

Please provide the following details.

Name

Lewis Purser

Name of Organisation - *If you are making a submission on behalf of an organisation?*

Irish Universities Association

Contact Email Address

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SUBMISSION BY:

Local Government Management Agency

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Questions to be considered for Option A are:

Option A - Question 1.

With assurances of the quality of research and the development of a useable online tool, would award-holders and those being presented with such information (education institutions, employers etc.) agree with online availability only?

From an employers perspective job applicants may be required to submit proof at the initial application that their qualifications meet the minimum qualifications criteria. As long as the award holder can print off (or download/save) the determination/academic recognition advice and supply it to the employer they are making the job application to then this approach should work. The onus must be on the job applicant to supply proof to support their application not on the employer going to the recognition service website.

Option A - Question 2.

What type of information and resources should be available online to support this approach?

There should be clear and logically sequenced instructions for applicants on how to submit qualifications for recognition. Instructions should be in multiple languages or the most common languages from the countries where the most award recognition requests relate to. Using key word in the award title should direct applicants via a link to the relevant body that is tasked with making a determination on course content.

Option A - Question 3.

Should an online database concerning international recognition advice be maintained by QQI separately to the planned programmes and awards database, as required under the 2012 Act, or be developed as part of this?

Yes.

(See [Green Paper 4.12 on Data](#) for more detail.)

Option A - Question 4.

Should a fee be applied for access to such a database?

☐ Yes ☒ No

OPTION 5.2.b

Continue processing individual award-holders' applications

Questions to be considered for Option B are:

Option B - Question 1.

Is there a value in individual comparability statements relating to international awards where documents are not authenticated and the outcome of the statement is not legally binding?

Yes. The qualifications recognition service is just that. From an employer's perspective it is a service to job applicants so that they can determine whether they meet the minimum eligibility criteria. The onus on verifying whether the actual award presented by the job applicant is authentic is between the prospective employer and the applicant when a job offer is being made. Similar to determining whether the references supplied by the applicant are authentic.

Option B - Question 2.

Should the service act as a full authentication service for stakeholders where required?

See answer above. From an employers perspective having a determination of what level on the NFQ the foreign award compares to is really only for the shortlisting stage of the job application process.

Option B - Question 3.

Should a fee be applied for the processing of an application?

☐ Yes ☒ No

Option B - Question 4.

Should online applications be facilitated?

☒ Yes ☐ No

5.3

Consultation Questions

Question 1.

Which of the options above, (a) or (b), is more favourable in terms of making best use of resources?

☒ A ☐ B

Question 2.

Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

Not aware of any other approach.

Question 3.

Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?

Yes if that engagement allowed for professional recognition bodies to make a determination of the award content parallel to the award comparability advice and that the one website could contain the historical determinations of both award and the award content. This would be useful for employers when they are presented with similar award by a new applicant. This engagement by both the qualifications recognition service and the professional recognition bodies should be an online

process. The benefit to employers would be that whilst they still have to make their own determination (based on transcripts supplied by individual applicants) they will have some historical precedents to refer to when making their decision.

Question 4.

As discussed, QQI has a role in promoting understanding of the Irish education and qualifications systems abroad. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?

Would it be possible for QQI to link formally with the other qualifications recognition services around the world?

Are you finished commenting?

Please provide the following details.

Name

John Conway

Name of Organisation - *If you are making a submission on behalf of an organisation?*

Local Government Management Agency

Contact Email Address

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SUBMISSION BY:

National Disability Authority

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and has not been proofed/edited by QQI.*

The National Disability Authority

Consultation on the Quality and Qualifications Ireland's policy papers May 2014

The National Disability Authority is the independent statutory advisory body on disability policy and practice, and on universal design.

The National Disability Authority welcomes the opportunity to provide feedback on the Green Paper and three White Papers published for consultation by Quality and Qualifications Ireland (QQI):

- Green Paper on "Facilitating the Recognition of Qualifications"
- White paper on "Policy and criteria for Higher Education and Training Legacy Voluntary Providers"
- White paper on "Policy and criteria for Further Education and Training Legacy Voluntary Providers"
- White paper on "Re-engagement with legacy providers"

The National Disability Authority advises that the QQI, as with all public bodies, has a remit to ensure that its policies and procedures take into account the requirements to accommodate people with disabilities in line with the provisions of s 26 of the Disability Act 2005. Under these provisions, where practicable and appropriate, education and training for people with disabilities and others should be integrated. It is important therefore that QQI ensure that the framework in Ireland for the recognition of qualifications, and all policies and criteria for both Further Education and Training (FET) providers and Higher Education and Training (HET) providers wishing to validate their programs leading to QQI awards are disability proofed.

The National Disability Authority recognises that the Green Paper and three White Papers available for consultation are primarily concerned with the establishing the framework and policies related to the recognition of qualifications and the validation of programmes leading to QQI awards. Specifically we note that two of the White Papers deal with moving educational providers in Ireland out of the current transition arrangements and into a position of formal engagement with QQI, on the basis of the functions are set out in the 2012 Act. It is the National Disability Authority's view that a key aspect of this process in relation to the education and training of persons with disabilities are the Quality Assurance procedures that will be established by the HET and FET providers, as referenced in the White Papers. It is the National Disability Authority's understanding, based on a conversation with the QQI, that the content of these QA criteria will be published and available for consultation later this year or in early 2014.

The National Disability Authority advises that the content of the QA criteria and procedures are critical to how FET and HET providers engage with learners with disabilities. For example the previous FETAC QA guidelines cover policies and procedures on key topics such as;

- Communications,
- Equality,
- Access, Transfer and Progression;
- Programme Development, Delivery and Review, and

- Fair and Consistent Assessment of Learners)¹.

The National Disability Authority is eager to consult on any new or updated Quality Assurance guidelines that form the basis of engagement between QQI and HET and FET providers in Ireland. We therefore expect to have more detailed and substantive comments to make on the content of these QA criteria related to learners with disabilities and their needs and accommodations that work. In this present round of consultation we therefore limit our comments to general observations and advice based on the National Disability Authority's role on disability policy and practice, and on universal design.

Importance of education and training to inclusion of persons with disabilities in society.

NDA research shows that people with disabilities are more poorly educated than the population at large. In particular, young people with disabilities are more likely to have underachieved relative to their peers on leaving education. Further education and training is essential to develop their talents and capacities in the future. People who acquire a disability in adult life are disproportionately drawn from people with lower levels of education. Manual workers, who are more vulnerable to disability, may lack the skills to transfer to other occupations without further training.

In counterpoint to this, the World Report on Disability has noted that there are few jobs which someone with a disability cannot do, and few people with disabilities cannot work. A further education and training system that is focused on maximising people's capacity, their self-belief, identifying what they can do and building on that, can play a part in breaking this cycle of low expectations and low educational and training attainment.

Further education and training play a key role in providing a pathway for people with disabilities into employment. This includes providing effective bridges for young people with disabilities from school into education or training, and providing opportunities to the many people with disabilities who have left the workforce, so they can re-engage and acquire skills that can lead to work.

Person centred-learning

The Disability Act 2005 established the Centre for Excellence in Universal Design within the National Disability Authority to promote Universal Design in education and standards. The Act defines Universal Design to mean the design and composition of environments so that can be accessed understood and used to the greatest extent for possible by all people regardless of their age size ability or disability.²

For learners with disabilities, it is important that training and education are designed around the individual and their learning style.

In its 2013 report "What Works in the Provision of Higher, Further and Continuing Education, Training and Rehabilitation for Adults with Disabilities?", the National Council for Special Education noted the emergence of universal design for learning (UDL) in course design, teaching methods and assessment, and its relevance in supporting access.³ The report found that that UDL is an area of development with respect to supporting learners with a diverse range of abilities and that "indications are positive and the research base is developing." It concludes that "UDL is strongly focused on teacher training and the literature

¹Quality Assurance in Further Education and Training: Policy and Guidelines for Providers v1.3, http://www.fetac.ie/fetac/documents/Policy_and_Guidelines_on_Provider_QA_v1.3.pdf

²<http://www.universaldesign.ie/exploreampdiscover/definitionandoverview>

³http://www.ncse.ie/uploads/1/Report_15_Adult_Ed_19_12_13.pdf

shows that even a little training can have a notable impact on the learning experience of students with disabilities”. (page 165)

The National Disability Authority recommends that universal design for learning is considered by QQI as a key theme in the QA policies mentioned above.

Gathering data and measuring outcomes

It is important that all actors involved in the ecosystem of the provision of education and training in Ireland have access to accurate data on the outcomes of persons with disabilities. There is at present a paucity of data on many aspects of the experience and outcomes of persons with disabilities in training and education. The National Disability Authority therefore advises that the QQI, in its engagement with training and education providers, requests that accurate and reliable data is gathered on outcomes achieved and experiences of persons with disabilities. The National Disability Authority is available to advise on gathering such data. Given the range and number of FET and HET providers QQI engages with it is particularly important that data is collected in a way that it is comparable between relevant providers and across sectors.

Universal Design and award standards

Under the Disability Act 2005 the Centre for Excellence in Universal Design is tasked with “assisting and promoting the introduction of the principles of universal design to courses of education and training” and liaising with “vocational and third level educational institutions and with professional bodies to” the development of appropriate curricula for courses of education and training related to architects, engineers, town planners, systems analysis's, software designers, transport providers and designers of passenger transport vehicles and passenger vessels.

The National Disability Authority therefore has a statutory remit to influence curricula and standards in courses related to the aforementioned professions, as well as to ensure that that examinations recognised by professional bodies in such courses include material relating to Universal Design. The Centre for Excellence in University design is currently undertaking a programme to develop, promulgate and promote the use of said curriculum in relevant courses and is currently engaging with universities and Institutes of Technologies as well as relevant professional bodies such as Engineers Ireland and the Royal Institute of Architects of Ireland on an ongoing basis.

The National Disability Authority is aware of QQI's roll in facilitating the development of standards for particular areas of practice and that these standards will become available for consultation from time to time. We are therefore available as part of our statutory remit to contribute to the production on and consultation of award standards in the areas of practice outlined above. We wish to engage with QQI in the development of such award standards and are available to sit on relevant development groups and to consult on draft award standards.

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⁴Quality Assurance in Further Education and Training: Policy and Guidelines for Providers v1.3, http://www.fetac.ie/fetac/documents/Policy_and_Guidelines_on_Provider_QA_v1.3.pdf

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For learners with disabilities, it is important that training and education are designed around the individual and their learning style.

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Gathering data and measuring outcomes

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⁵<http://www.universaldesign.ie/exploreampdiscover/definitionandoverview>

⁶http://www.ncse.ie/uploads/1/Report_15_Adult_Ed_19_12_13.pdf

persons with disabilities. The National Disability Authority is available to advise on gathering such data. Given the range and number of FET and HET providers QQI engages with it is particularly important that data is collected in a way that it is comparable between relevant providers and across sectors.

Universal Design and award standards

Under the Disability Act 2005 the Centre for Excellence in Universal Design is tasked with “assisting and promoting the introduction of the principles of universal design to courses of education and training” and liaising with “vocational and third level educational institutions and with professional bodies to” the development of appropriate curricula for courses of education and training related to architects, engineers, town planners, systems analysis's, software designers, transport providers and designers of passenger transport vehicles and passenger vessels.

The National Disability Authority therefore has a statutory remit to influence curricula and standards in courses related to the aforementioned professions, as well as to ensure that examinations recognised by professional bodies in such courses include material relating to Universal Design. The Centre for Excellence in University design is currently undertaking a programme to develop, promulgate and promote the use of said curriculum in relevant courses and is currently engaging with universities and Institutes of Technologies as well as relevant professional bodies such as Engineers Ireland and the Royal Institute of Architects of Ireland on an ongoing basis.

The National Disability Authority is aware of QQI's roll in facilitating the development of standards for particular areas of practice and that these standards will become available for consultation from time to time. We are therefore available as part of our statutory remit to contribute to the production on and consultation of award standards in the areas of practice outlined above. We wish to engage with QQI in the development of such award standards and are available to sit on relevant development groups and to consult on draft award standards.

SUBMISSION BY:

National University of Ireland

*Please note this response appears as received
and has not been proofed/edited by QQI.*

The National University of Ireland (NUI) offers the following observations on the Green Paper on Facilitating the Recognition of Qualifications.

NUI regularly receives requests from graduates of the University who, largely for the purposes of entry to postgraduate study or employment (whether in Ireland or abroad), require attestation of the level at which their qualification is located on the NFQ. Some employers / HEIs also require information on the ECTS credits associated with a particular award.

Whilst an online resource containing information on the alignment of awards would certainly be beneficial and may be sufficient for some stakeholders, we have found that there are some bodies, particularly overseas institutions, that require certified documentation - in some cases, from a national authority such as QQI or DES. In order to enable Irish graduates to progress in their studies or careers, it is important that they are supported by relevant bodies in obtaining any documentation required in respect of their qualifications. QQI may wish to give consideration to including a facility in its proposed online resource that would allow a user to print a statement with a QQI logo that outlines the alignment information recorded on the system in respect of a particular award. However, some graduates may still require services additional to those provided by their own institutions and QQI should remain open to consideration of these.

In terms of the content of online information, it is suggested that this should include alignment with the Irish NFQ (and possibly the equivalent frameworks of other jurisdictions) and the ECTS credits associated with the award.

It is also considered that access to such information should be free of charge.

Yours faithfully,
Roisín Morris-Drennan
Administrative Officer for Academic Affairs
National University of Ireland

SUBMISSION BY:

The Open University

*Please note this response appears as received
and has not been proofed/edited by QQI.*

Questions to be considered for Option A are:

Option A - Question 1.

With assurances of the quality of research and the development of a useable online tool, would award-holders and those being presented with such information (education institutions, employers etc.) agree with online availability only?

Yes, as long as sufficient and reliable information is provided for award-holders and organisations (see next question).

Option A - Question 2.

What type of information and resources should be available online to support this approach?

Individuals should be able to download a statement to confirm comparability between a particular qualification type and the NFQ equivalent in order to provide suitable evidence to employers and education institutions. The statements should include information on how to confirm that a qualification is from a recognised awarding institution or body.

Option A - Question 3.

Should an online database concerning international recognition advice be maintained by QQI separately to the planned programmes and awards database, as required under the 2012 Act, or be developed as part of this?

It would be useful for this information to be provided through a single QQI portal but clearly visible in its own right and so distinguishable from the programmes and awards database.

(See [Green Paper 4.12 on Data](#) for more detail.)

Option A - Question 4.

Should a fee be applied for access to such a database?

☒ Yes ☐ No

OPTION 5.2.b

Continue processing individual award-holders' applications

Questions to be considered for Option B are:

Option B - Question 1.

Is there a value in individual comparability statements relating to international awards where documents are not authenticated and the outcome of the statement is not legally binding?

In certain circumstances, it can be useful to have such information by individual, especially where comparability information is not more generally available. We would only anticipate this option being offered where a more general, online information resource and provision of generic statements for stakeholders will not suffice. Any statement must clearly set out the status of the information and not mislead the reader into believing a local award has been made.

Option B - Question 2.

Should the service act as a full authentication service for stakeholders where required?

In instances where there is a specific requirement for full authentication, it could be desirable for QQI to be able to provide this in order to offer greater assurance than that possible by any other route. This aspect, however, should not be the priority and, if offered, should attract a fee to at least cover costs.

Option B - Question 3.

Should a fee be applied for the processing of an application?

☒ Yes ☐ No

Option B - Question 4.

Should online applications be facilitated?

☒ Yes ☐ No

5.3

Consultation Questions

Question 1.

Which of the options above, (a) or (b), is more favourable in terms of making best use of resources?

☒ A ☐ B

Question 2.

Are there alternative means of delivering academic recognition advice on international qualifications to both individual award-holders and other stakeholders that should be considered?

We suggest option (a) provides a more sustainable, long-term approach and so would favour this option as long as: (a) the online arrangements also enable individuals to download a statement to confirm comparability between a particular qualification type and the NFQ equivalent in order to provide suitable evidence to employers and education institutions and (b) the site and downloadable statements provide information on how to confirm that a qualification is from a recognised awarding institution or body.

Question 3.

Should there be a more active programme of engagement with recognition authorities such as higher education institutions and professional recognition bodies? How should this be managed and resourced?

The Open University would welcome such engagement by QQI. A move towards general academic recognition advice provided online, and away from consideration individual award holders' applications (except where not previously assessed), would free up resources which could be used for this purpose.

Question 4.

As discussed, QQI has a role in promoting understanding of the Irish education and qualifications systems abroad. What type of service is required to deliver information on the NFQ and awards delivered in Ireland to international audiences, including to individual award-holders that seek to have their Irish awards recognised abroad?

It might be expected that other territories would provide a service such as that offered by QQI regarding accessible information on comparability of qualifications. However, we know this is not universally the case. It would therefore be helpful if the QQI could provide sufficient online information to show how the NFQ maps onto other territories' qualification frameworks. It would only be appropriate to do this in cases where the mapping has been formally agreed with the other territory. Otherwise there is a risk of providing information that would not be accepted by the territories concerned.

Are you finished commenting?

Please provide the following details.

Name

Dr Frances Morton

Name of Organisation - *If you are making a submission on behalf of an organisation?*

The Open University

Contact Email Address

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