



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI DRAFT STRATEGY STATEMENT 2014 - 2016

CONSULTATION WITH EXTERNAL STAKEHOLDERS

SUBMISSIONS

Submissions were received from the following organisations

Aontas	IBEC
Business and Computer Training Institute	Irish Course Providers Association
Carlow International English Language School	Irish Sports Council/Coaching Ireland
Cavanagh, Dermot (Individual)	Irish Universities Association
Certification Group of Skillnet Network Managers	Irish Water Safety
Chartered Accountants Ireland	Local Government Management Agency
Clanwilliam Institute	Medical Council
Crafts Council of Ireland	Moran, Collette (Individual)
Department of Health, Professional Regulation Unit	Morgan, Susanne (Individual)
Devine, Jim (Individual)	National Adult Literacy Agency
Digital Skills Academy	National University of Ireland
Dublin City University	National University of Ireland Galway
Dublin Institute of Technology	National University of Ireland Maynooth
Education Training Boards Ireland	Pobal
Engineers Ireland	Private Security Authority
Enterprise Ireland (Education in Ireland)	Royal College of Surgeons in Ireland
Federation of Irish Complementary Therapy Associations	Road Safety Authority
Forfás	State Examinations Commission
Headway	St Patrick's College, Drumcondra
Higher Education Authority	Teachers Union of Ireland
Higher Education Colleges Association	Tyrrell, Bernie (Individual)
Institute of Technology Sligo	University College Cork
Institute of Technology Tralee	University College Dublin
Institutes of Technology Ireland	

SUBMISSION BY:

Aontas

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

Aontas

Mission, Vision and Values

Overall AONTAS welcomes the publication of the QQI Strategy Statement and looks forward to being part of the consultative process. The QQI change agenda is ambitious and demanding for all concerned. We welcome the open consultative approach and the commitment to a holistic approach to qualifications and quality assurance. We trust that this will meet the needs of a flexible lifelong learning agenda, and especially those of adult learners.

We particularly welcome the Learner Centred approach within the Mission and Values. We recognise the challenges involved in identifying the needs of the great diversity of learners who access QQI awards. Adult Learners have a distinct set of needs as they balance their education with family, jobs and other responsibilities. Issues also differ between adult learners in the dispersed FET sector and those in the more centralised HET sector.

AONTAS has a strong track record in bringing adult learners together and enabling them to articulate their issues. Examples of this approach are two Lobby for Learning Days involving learners and senior policy makers held as part of the Adult Learners Festival in early 2013 and 2012. Reports of these events can be found via the following links Community Education Strategy for Success <http://www.aontas.com/pubsandlinks/publications/community-education-a-strategy-for-success-lobby-for-learning-report-2013/> and SOLAS Serving Adult Learners <http://www.aontas.com/pubsandlinks/publications/solas-serving-adult-learners-2012/>. In addition AONTAS produced a comprehensive consultation paper on how best to incorporate the views of adult learners which can be found here <http://www.aontas.com/pubsandlinks/publications/building-meaningful-representation-for-adult-learners/>

AONTAS would welcome the opportunity to work with QQI on ways to ensure that the views of adult learners are represented at all levels of QQI policy development, implementation, monitoring and evaluation.

We are pleased to note your commitment to the “highest standards of public service” and the reference to “responsiveness” and continuous improvement. As you are aware, providers have experienced some difficulties communicating with FETAC in the past, and we trust that this will change in QQI. It is important for providers that documentation is accessible, easy to understand and tailored to different provider types. The development of collaborative linkages between providers and the sharing of good practice will be important going forward.

Enablers

Given the fast pace of change within the education sector, we suggest that under “developing new ways of working” you should include continuous consultation with all stakeholders. We welcome the development of “committee structures”, and note that AONTAS would be willing to participate in such committees where we have expertise to bring to the table including issues relevant to the voice of Adult Learners and the Community Education Network.

Challenges and Opportunities Facing QQI

It will be essential for close working relationships at all levels to be established between the different organisations involved in the reform of the FET sector, in particular SOLAS, ETBs and INTREO. A clear integrated strategy is vital to ensure continuity of a diversity of programmes to meet the diverse needs of learners. Providers are also faced with significant change as they adapt to the new QQI regime. For independent community education providers, it will be important that funding mechanisms are streamlined with QQI requirements.

AONTAS strongly supports the lifelong learning agenda including the provision of education to people at all life stages and on a broad range of topics. We consider that QQI should name as one of its challenges “Ensuring that current and potential learners have access to a broad diversity of programmes to meet personal, lifeskills, labour market, social and cultural needs”. It should also address the provision of education without accreditation and in non formal and informal settings.

Priorities Associated with Goal 1

Based on the importance of education for civic society as well as labour market demands, we suggest expanding point 3 to “Determine new standards for QQI awards to meet the demands of learners, the labour market and society in general”.

Priorities Associated with Goal 2

As previously stated we welcome the focus on learners and on their engagement. We also note the differences between adult learner needs in different settings. These range from those taking the first steps towards second chance education, those addressing very basic educational needs, those seeking to enhance their skills or to change career, those seeking professional development etc. In particular, but not exclusively at the lower levels of the NFQ, learners require significant supports and encouragement on the learning journey as they seek to combine education with often challenging personal circumstances. It will be essential that QQI develop a system to ensure that the needs of all learners are clearly identified, in particular those furthest from education, who will need specific supports. As previously stated, AONTAS are willing to work with QQI to support this process, and to develop provider guidelines for learner engagement.

Issues of access, transfer and progression are especially crucial for learners who wish to pursue their learning on a part time basis, and to take breaks of a year or more as required. Any new guidelines produced need to offer real flexibility to adults to enable them to engage in lifelong learning, in a way that suits them.

Priorities Associated with Goal 3

The development of QQI policies for Quality Assurance offers a significant challenge to providers at this time of reduced resources and change. It will be important that QQI takes a positive and constructive approach to providers to support them to make required changes to meet new standards. Community Education providers have a long track record in offering flexible, innovative, high quality programmes to some of the most disadvantaged groups in Ireland. However many have expressed confusion and some anxiety about the exact meaning of concepts such as “robust” “minimum threshold”, “autonomy”, “capacity” etc. which are used to describe the new standards through the Green Papers.

Communication of the new standards to providers needs to be clear and appropriate to different sizes and types of provider, and facilitate providers to develop systems which meet their own circumstances as well as QQI requirements. Capacity issues differ between provider types, and this needs to be taken into account. We would welcome the addition of the word “constructively” to the priority to reengage with legacy providers.

It is important that adequate time is given to enable providers to meet the new standards and/or come to alternative arrangements to access accreditation for their learners. AONTAS and its Community Education Network recognise that economies of scale may be required in some cases and thus welcomes the commitment to facilitate collaboration between providers. However there need to be clear guidelines for engagement in such a process.

Priorities Associated with Goal 4

AONTAS welcomes the approach taken in this section, and the recognition of the need for “joined up thinking” between the different organisations and agencies involved.

We are very pleased to see the priority to foster innovation in programmes to meet societal and cultural needs. The AONTAS Community Education Network has expertise in this area and would welcome the opportunity to work with QQI in this regard.

We also welcome the development of a range of communication tools for different stakeholder groups.

We suggest the addition of an extra priority of regular evaluation of progress from the perspective of all stakeholders.

Priorities Associated with Goal 5

AONTAS fully supports the need for comprehensive information about programmes and qualifications in the public domain. AONTAS considers that a specific emphasis needs to be placed on achieving a clear understanding of the NFQ and promoting QQI awards at the lower levels to employers and those within the traditional education system. Thus we suggest adding a priority of “Promote the value of QQI qualifications to employers and the general public”.

AONTAS are currently involved in a project to enable learners to access key FET information via a single web portal, operating on both static and mobile devices. This project is supported by the European Agenda on Lifelong Learning. The Further Education Section within the Department of Education and Skills is the co-ordinating body, and other organisations involved in developing the project include ETBI, NALA and the AEGI. Linking with Qualifax, this project may offer opportunities to communicate effectively with current and prospective learners.

Do have any general or specific feedback?

AONTAS is the National Adult Learning Organisation, a voluntary membership organisation. It exists to promote the development of a learning society through the provision of a quality and comprehensive system of adult learning and education which is accessible to and inclusive to all.

The mission of AONTAS is to advocate for the right of every adult in Ireland to quality learning.

AONTAS provides an information referral service to adult learners and the general public, collects data on developments in the sector and undertakes research. AONTAS endeavours to work in partnership with other relevant organisations and Government Departments, and from time to time engages in specific projects designed to support the work of different sectors of the membership. AONTAS also represents the interests of adult learners at a number of important fora. AONTAS hosts the Community Education Network comprising 140 independently managed community education organisations.

AONTAS as a membership organisation believes in the right of every adult to continue their learning throughout their lives. We believe that adult and community education are equal and key components of the lifelong learning spectrum and are of vital importance to both the individual and to society as a whole. For the individual, adult learning provides a means of achieving ones full potential through developing confidence and skills essential for employability, nurturing creativity and imagination, enhancing family relationships and enabling civic participation. For society at large adult learning is essential to building a sustainable economy, promoting social change, highlighting structural inequalities and building a healthy democracy. QQI is an integral part of this process and in its strategy and operations needs to embrace all these aspects of lifelong learning.

SUBMISSION BY:

Business and Computer Training Institute

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

Business and Computer Training Institute

Mission, Vision and Values

Mission

'Provide and maintain quality and the recognition of education, training and extended training programmes and qualifications for the benefit of learners'

Vision

'Excellence in education and training opportunities with qualifications that are widely valued and respected nationally and internationally'

Our Values

~ Learner Centredness – we promote access, responsiveness, flexibility, trust and quality in education and training programmes and qualifications. Our focus is on meeting learners' needs in relation to quality and qualifications.

~ Independence – we are independent in the performance of our roles and functions.

~ Professionalism and Improvement – we treat all persons with respect, dignity and courtesy. We work to the highest standards of public service with particular regard for accountability, effectiveness, responsiveness and efficiency. We are a learning, developing and evolving organisation, committed to continuously improving the quality of our services.

~ Collaboration and Cooperation – we work with providers, awarding bodies, professional bodies, agencies, government departments and international partners to build confidence and improve quality.

~ Integrity – where we regulate, we do so in an open, fair, balanced and objective manner.

Goals

Establish a comprehensive, coherent set of QQI policies and processes with the National Framework of Qualifications as the central organising body

2. Prioritise the needs of learners in our policies and actions and in our relations with all stakeholders

3. Base our relations with providers on their capacity and ability to meet robust education and training standards and to maintain and improve quality on an ongoing basis

4. Promote coherence of the education and training system in collaboration with stakeholders, based on clearly defined roles and responsibilities for QQI

5. Provide authoritative information on programmes and qualifications to the public

Enablers

Technology and processes

Integrating our business processes

Developing and integrating our ICT systems

Introducing an accounting methodology to underpin the fees structure

Governance

Adhering to best practice in corporate governance

Operating committee structures for QQI which enable effective engagement with all stakeholders

Using appropriate measures, indicators and reporting mechanisms for QQI

Implementing a well-functioning internal quality assurance system

Accessing national and international experts to support our quality assurance work

Benchmarking against relevant European and international standards and guidelines

Challenges and Opportunities Facing QQI

Establishing QQI as a cohesive agency for quality and qualifications in Ireland

Priorities Associated with Goal 1

Priorities in Relation to the Goals

1. Establish a comprehensive, coherent set of QQI policies and processes with the National Framework of Qualifications as the central organising body

Priorities Associated with Goal 2

2. Prioritise the needs of learners in our policies and actions and in our relations with all stakeholders

Priorities Associated with Goal 3

3. Base our relations with providers on their capacity and ability to meet robust education and training standards and to maintain and improve quality on an ongoing basis

Priorities Associated with Goal 4

Promote coherence of the education and training system in collaboration with all stakeholders, based on clearly defined roles and responsibilities for QQI

Do you have any general or specific feedback?

I have some minor suggested changes and these have been inserted within each section in the comment box.

Do you think the key elements are appropriate and clear?

Within this area I have suggested minor changes, which I have put in under the appropriate comment box. I also feel that some additional thought should be given to two additional Values - 'Honesty' and 'Respect' towards the learner.

Are there areas that you think are important?

Overall the draft strategy statement is very comprehensive and captures all of the elements in a very focused and inclusive way.

Are there key areas relating to our impact on stakeholders that should be considered?

Within the strategy statement and the strategic document, I feel it would be more appropriate where reference is made to 'Stakeholders' this should read 'All Stakeholders'

SUBMISSION BY:

Carlow International English Language School

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and has not been proofed/edited by QQI.*

Carlow International English Language School

Goals

Should the Values include reference to supporting bona fide, recognised ESL organisations, thereby advancing them above organisations that do not conform to quality guidelines and standards?

Should we promote our Irish Culture by incorporating it in our recognition standards?

Enablers

Should Self-Evaluation be recognised and referred to in this section?

Challenges and Opportunities Facing QQI

Should third-level ESL teaching qualifications from abroad be referred to also?

Priorities Associated with Goal 1

Should third-level ESL teaching qualifications from abroad be referred to also? Should recognition by the National Teaching Council be sought for appropriate qualifications from abroad?

Priorities Associated with Goal 2

Should third-level ESL teaching qualifications from abroad be referred to also?

Priorities Associated with Goal 3

Should Self-Evaluation be recognised and referred to in this section?

Priorities Associated with Goal 4

Develop a comprehensive Self-Evaluation procedure for QQI recognised agencies.

Priorities Associated with Goal 5

Ensure that duly recognised ESL schools/institutes benefit, to the detriment of non-recognised schools/institutes.

Are there areas that you think are important?

Should individuals, as well as organisations, have QQI recognition, bearing in mind the need for ongoing CPD in one's professional development?

Are there key areas relating to our impact on stakeholders that should be considered?

Should we promote our Irish Culture by incorporating it in our recognition standards?

SUBMISSION BY:

Cavanagh, Dermot (Individual)

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Cavanagh, Dermot (Individual)

Do you think the key elements are appropriate and clear?

The challenge of 'supporting the national recovery programme' is undermined by no reference in the statement to 'ethics'. 'Respect', 'dignity' and 'courtesy' are pale substitutes redolent of a bog standard customer care manual. However it may be that you are merely reflecting where we are.

SUBMISSION BY:

Certification Group of Skillnet Network Managers

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Certification Group of Skillnet Network Managers

Mission, Vision and Values

Whilst primarily for the benefit of learners the mission should also reflect the benefit to all stakeholders.

Goals

We agree with all of the above goals - Goal 5 should be amended to include 'the public and all stakeholders'

Enablers

In relation to

'People and Structures' – responsiveness to all stakeholders e.g. Enterprise;

'Technology and Processes' - Integrating our ICT systems ... to National data groupings i.e. can some databases talk to each other to reduce duplication across public organisations ;

'Governance' – agreed

Challenges and Opportunities Facing QQI

Its important to include responsiveness to all stakeholders e.g. Enterprise & their need for a quick turn around.

Priorities Associated with Goal 1

Priorities should reflect fairness to all providers e.g. niche providers should be given due consideration & also fees should be appropriate to the size of provider. E.g. a small provider cannot afford to pay the same fee for Programme Validation that the larger providers can, even though the volume of work may be the same for QQI. This would effectively stifle the provision by smaller providers going forward and significantly impact on learners and stakeholders.

Priorities Associated with Goal 2

A priority should be to develop & maintain relations with all stakeholders e.g. Enterprise

After point three which begins with 'Develop quality standards.....' a new point below should be included which states:-

'Liaise with relevant government departments and agencies to facilitate efficient and effective processing of visa applications for foreign students from non-EU countries.'

Priorities Associated with Goal 3

A priority should be to preserve fairness & equality of access e.g. for niche providers with lower volumes of learners.

We recommend an addition to point five which begins with ' Manage and evolve comprehensive.....' The following at the end of this paragraph:- 'with the Education and Training Boards, SOLAS and all relevant government departments and agencies

Priorities Associated with Goal 4

We feel 'employers & trade unions' is a dated expression and maybe more appropriate to use 'Work with Enterprise and employer/employee representative bodies to promote the relevance of the education and training systems and its qualifications to the labour market.'

Priorities Associated with Goal 5

Agree with all of the above priorities.

Do have any general or specific feedback?

None, apart from the feedback already included.

Do you think the key elements are appropriate and clear?

Yes

Are there areas that you think are important?

None, apart from the feedback already included.

Are there key areas relating to our impact on stakeholders that should be considered?

Serving Enterprise needs in relation to responsiveness and costs

SUBMISSION BY:

Chartered Accountants Ireland

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Chartered Accountants Ireland

Mission, Vision and Values

Under the Mission: reference could be made to the 'national interest' i.e. importance of education to the overall national development etc.

Under Vision: would suggest consideration be given to adding 'recognised' before 'internationally'.

Under Values in the area of professionalism: reference could be made to transparency.

Goals

These goals seem clear and complete.

Enablers

The identified actions are relatively 'open' and it is not clear what is hoped to be achieved within the planned time-frame. A phrase like 'continuing to adaptation to reduced resources' is not totally clear nor is its impact.

'Develop new ways of working' is not specific enough.

Challenges and Opportunities Facing QQI

This seems reasonable. Not sure what 'new types of providers' means or what is intended here.

Priorities Associated with Goal 1

In relation to standards: No detail is given as to what areas are covered and what is prioritised.

The area of fees is probably operational rather than a key priority.

Some of the priorities might be linked e.g. the link between national and international standards.

Priorities Associated with Goal 2

The list of priorities might better be grouped into ongoing activities and areas receiving particular attention/focus.

Priorities Associated with Goal 3

Rather than just have a list of priorities it may be helpful to identify when these activities will happen (in a specific year or continuous).

Priorities Associated with Goal 4

Again to give focus to this list of priorities it would help if these could be clustered around a number of related headings.

Priorities Associated with Goal 5

No comments.

Are there other areas that you think are important that are not covered by the draft strategy statement?

There is clearly a large task for QQI. The need to more clearly define the outputs to be achieved over a specific time-frame might be more specific and measurable.

Are there key areas relating to our impact on stakeholders that should be considered in our draft strategy statement?

I would believe the international dimension (links to European framework) and the role which the QQI will play in the national recovery might have been given greater prominence.

SUBMISSION BY:

Clanwilliam Institute

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

Clanwilliam Institute

Mission, Vision and Values

In general we consider the statement of Mission, Vision and Values to be useful and informative.

We wonder at the exclusion of the concept of diversity in programmes and institutions, recognised in the Hunt Report as “one of the major factors associated with the positive performance of higher education systems” (p. 98). We would agree with the Hunt report that acknowledging the value of diversity is central to innovation, effectiveness and development in the Higher Education sphere.

Goals

We agree with these goals and their fit with QQI mission, vision and values. Again we wonder why the emphasis is on cohesion alone rather than on the three “Arenas of Policy for higher education” identified in the Hunt Report (p. 97): coherence; complementarity and diversity; and collaboration.

We agree with the Hunt Report that consideration of these arenas of policy needs to occur together. We wonder at the consequence of emphasizing coherence without including diversity as a core goal.

Enablers

We agree with these actions

Challenges and Opportunities Facing QQI

We recognise this as a useful summary of the challenges and opportunities facing QQI.

Priorities Associated with Goal 1

We welcome these priorities. However we would like to see some recognition of the social role played by higher education. In particular while standards for awards need to meet the demands of learners and the labour market they also need to take into account the requirements of Irish society as a whole. We would like to see some recognition in goal 1 of the priority associated with goal 4 below “Encourage and facilitate innovation and responsiveness in qualifications and programmes to meet societal and cultural needs”

Priorities Associated with Goal 2

We agree with these priorities. However we would like to see a recognition of diversity of learners and the place of diversity of institutions and programmes in responding to the needs of learners

Priorities Associated with Goal 3

We agree with these priorities.

Priorities Associated with Goal 4

We agree with these priorities.

Priorities Associated with Goal 5

We agree with these priorities.

Do have any general or specific feedback?

No

Do you think the key elements are appropriate and clear?

Yes subject to our reservations mentioned above

Are there areas that you think are important?

The value of diversity of training programmes and institutions.

Are there key areas relating to our impact on stakeholders that should be considered?

We would see that learners need not be seen as a diverse group with different needs

In professional programmes stakeholders include clients of that profession

SUBMISSION BY:

Crafts Council of Ireland

*Please note this response appears as received
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Crafts Council of Ireland

Mission, Vision and Values

Mission, Vision and Values have been well considered and are most appropriate for the diverse functions of the QQI and for the organisation in all its varying facets.

Goals

It would be appropriate to expand action 2 which focuses upon meeting the changing needs of learners, ensuring that processes developed are mindful of that at all times, subject to ongoing review.

Enablers

The CCol (Crafts Council of Ireland) would not agree with the notion of flagging up “reduced resources” as the first point in “People and Structures” - we would suggest amend this to read “Continuing adaptation to various resource limitations and also resource opportunities as they arise”.

In the section “Technology and Processes” we would suggest include a statement on innovation, such as “Seek to develop innovative solutions related to new technological advances as they are developed”.

Although education will be in the main delivered by providers, it would still be beneficial to indicate that the QQI will ensure some levels of direct learner feedback to the QA process, so a statement in the “People and Structures” section such as “Ensuring some ongoing level of direct learner feedback to assist with QA process development”.

Challenges and Opportunities Facing QQI

The CCol would suggest adding the following opportunity statement “Supporting the development of learners who during the prevailing market times are proving that they are embracing the benefits of formalised learning as a way of playing a full and active part towards finding gainful employment”.

Priorities Associated with Goal 1

Goal 1 priorities comprehensive.

Priorities Associated with Goal 2

Question - is it feasible that you are able to provide qualification recognition advice to learners? Would that not be better delivered by providers we think, unless you are able to have specific dedicated resources allied to that objective, which then of course would be good.

Priorities Associated with Goal 3

Add “Where appropriate, seek to engage with other types of educational provision/providers of training outside of the current provider structure, to explore QA related to alternative ways of meeting learners’ needs”.

Priorities Associated with Goal 4

Goal 4 priorities comprehensive and all very relevant.

Priorities Associated with Goal 5

We believe it would be appropriate in this section to indicate information provided to the public on quality of provision via QQI monitored/inspection services which should be part and parcel of the full range of QQI services provided.

Do have any general or specific feedback?

Draft strategy statement all encompassing, with specific comments included and submitted earlier in the consultation document

Do you think the key elements are appropriate and clear?

Yes, in full, with minor comments provided earlier in document.

Are there areas that you think are important?

No, the draft strategy statement is all encompassing.

Are there key areas relating to our impact on stakeholders that should be considered?

No, the key areas are all included.

SUBMISSION BY:

Department of Health,
Professional Regulation Unit

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

Department of Health, Professional Regulation Unit

Dear Sir/Madam,

Professional Regulation Unit within the Department of Health has examined the QQI's first Strategy Statement. I apologise for the late response but this was due to the short response time provided and our annual leave arrangements.

As the Statement is a high-level document, the Unit has only minor specific observations to offer:

- Professional Regulation Unit of this Department appreciates that liaison with Professional regulatory bodies in relation to the NFQ is listed as a priority in Goal 1. This might perhaps be amended to read "Liaise with professional regulatory bodies - both statutory and voluntary - ..."

- related to this is bullet 6 of Goal 4 "effective relationships with professional recognition bodies and awarding bodies". For consistency, should this read "professional regulatory bodies" or is something else intended? Similarly "both statutory and voluntary" might be inserted.

General:

Professional Regulation Unit greatly appreciates the relationship it has established with HETAC over the last few years and the role HETAC played in the quality assurance of entry level health professional qualifications. We hope that this continues under QQI.

At an operational level, Professional Regulation Unit would like that HETAC-initiated work on the accreditation of counselling and psycho-therapy qualifications would be completed as it is required as a basis for the statutory regulation of these professions, to which the Minister for Health has given a commitment. Subject to resources within the two Bodies, it would also like to see an agreed common position on research commissioned by the two Bodies on the accreditation of complementary therapies.

I trust that this is of assistance

SUBMISSION BY:

Devine, Jim (Individual)

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Devine, Jim (Individual)

Priorities Associated with Goal 1

Should there be a reference to the EQF and to achieving an integrated European FE/HE landscape?

Do have any general or specific feedback?

The word 'opportunity' could perhaps be incorporated in vision/mission? The role of QQI reads a bit too much like 'gatekeeping', at a time when opening up wider and more flexible opportunities for learners is both possible and desirable. Balancing openness with quality assurance and standards is a delicate balance.

Are there areas that you think are important?

While you rightly identify as a challenge: "Addressing the internationalisation of education and training provision, collaborative provision and changing forms of delivery of education and training", corresponding action items would appear to be absent? Rapidly evolving developments in Open Education and questions concerning quality, assessment, accreditation, awards, safeguarding interests of learners, are of huge importance at this time. It is likely that there will be a significant rise in transnational private provision (particularly of HE) with the emergence of transnational providers (internationally distributed staffing and internationally distributed academic and/or business functions). How this kind of provision can be brought within the purview of national agencies needs to be factored in.

SUBMISSION BY:

Digital Skills Academy

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

Digital Skills Academy

Mission, Vision and Values

Accountability and responsiveness are as important as efficiency; Like the idea of an evolving organisation.

Goals

Agree that NFQ should remain at the core of the national education system

Enablers

Benchmarking against relevant European and international standards and guidelines

Clearly the way forward in our shrinking global education sector

Priorities Associated with Goal 4

Encourage and facilitate innovation and responsiveness in qualifications and programmes to meet societal and cultural needs

This point is going to be increasingly significant as online and distance elearning changes all our perceptions in the coming decade.

Priorities Associated with Goal 5

Develop and publish a comprehensive national database of quality assured programmes and qualifications

Having made a good start this needs to be the focus and goal for QQI

Do you think the key elements are appropriate and clear?

I found the document well written and clear with a refreshing use of plain English

SUBMISSION BY:

Dublin City University

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Dublin City University

Overall

DCU recognises and acknowledges that this is to be QQI's own strategy and as such is distinct from the Green Papers, which deal, *inter alia*, with providers' issues and the associated correspondences and communications.

Mission, Vision and Values

One suggestion is that perhaps the Vision should precede the Mission. Also the Mission and Vision are quite similar as stated. It might be appropriate to pitch the Vision in a loftier fashion.

Re the Mission, It is not clear what the term 'safeguard' means in regard to Quality Assurance in a HEI. It also might be helpful if national and international 'recognition' was included here to mirror the statement in the Vision. One suggested rewording might be: "promote and monitor the assurance and enhancement of the quality of Irish education and training programmes, and maintain and develop the NFQ for the benefit of learners."

In the introduction, under the heading 'The purpose of this first strategy....', the first bullet point might be more accurately stated: 'Capture the Mission of QQI and.....'

Re the Values, it would be helpful if some mention was made of effective communication processes with providers and others. This could be perhaps included in the collaboration section. Also it is unclear here what 'meeting learners needs in relation to quality and qualifications' actually entails.

Goals

The adjective 'our' may not be appropriate in this or other sections of the strategy as QQI is a 'body' not bodies and perhaps should not be referred to in the plural.

Re goal three, this currently reads as if QQI will only work with providers if they have the 'capacity to meet robust standards....' It will also be helpful, and necessary, if QQI could work with providers who need help to improve their capacity. Perhaps the term 'work and consult with providers' could be included.

Re goal five, timeliness and clarity will be key to providing accurate information. Authoritative is perhaps not the best word to use.

Enablers

Under 'People and Structures', differentiating between QQI's internal and external focus for each of these would be helpful.

The listings under 'Technology and Processes' and 'Governance' are somewhat interchangeable as currently stated. Also some of them are more operational than governance in focus.

Challenges and Opportunities facing QQI

As this is not a complete SWOC analysis, it is not clear whether it is appropriate to include in a strategy statement; it might sit better in the business plans that are to follow. Also only a limited number of Challenges and Opportunities are identified here when there are clearly many more, including the challenge of the scope of the task to coherently bring the legacy of four agencies together across a wide variety of providers.

The Priorities Associated with Goals 1, 2, 3, 4 and 5

In regard to the 'Priorities' identified, it seems that not all are priorities, some are immediate actions that need to be undertaken and some are long-term projects. There is potentially a significant difference in the work involved in the items listed.

It is suggested that this section be reworked with action items and projects separated out from statements of priority.

Do you have any general or specific feedback on the draft strategy statement? In your response, where applicable, specify the section to which you refer.

As identified previously under Goals, the use of the word 'Our' throughout the strategy statement should perhaps be reconsidered and changed to 'QQI' where appropriate.

Do you think the key elements of the draft strategy statement (Mission, Vision, Values, Goals, Enablers and Priorities) are appropriate and clear?

They are clear to some extent. As stated above, it is suggested that the Priorities section in particular be reviewed and revised.

Are there areas that you think are important that are not covered by the draft strategy statement?

There could perhaps be more emphasis on the development of communication processes and protocols, not just consultation, with providers and other stakeholders.

Are there key areas relating to our impact on stakeholders that should be considered in our draft strategy statement?

For the universities in particular it is not yet clear what impact the QQAI Act will have on its reporting requirements to QQI. It would be helpful if any potential changes to the current procedures, including the headings in the AIR template, were highlighted as soon as possible.

SUBMISSION BY:

Dublin Institute of Technology

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

Dublin Institute of Technology

Mission, Vision and Values

We note that the Mission statement is written from an agency / regulatory point of view and therefore the use of the term 'safeguard' is appropriate as the domain of enhancement falls within the remit of providers.

We welcome the inclusion of the value: Collaboration and suggest that it is expanded to Collaboration and Integration. In this context we would encourage the QQI to develop a national database of external reviewers and the provision of national training of reviewers.

We suggest that the values: Independence and Integrity are merged together as one core value.

Goals

We suggest an additional goal: Support national and international higher education policy agendas. QQI has already contributed considerably in this area and needs to continue to do so on a cross sectoral / cross institutional basis.

Enablers

An additional over arching enabler is the strong collaboration between the agency and the sector that has developed to address cross sectoral and cross institutional issues.

Under technology and processes it is important that ICT is developed in collaboration with providers and that there is more integration with providers ICT.

Challenges and Opportunities Facing QQI

There is a challenge that many providers are faced with maintaining quality with reducing resources

Priorities Associated with Goal 1

Additional priorities are:

1. Promote professional recognition internationally of Irish qualifications.
2. Regularise the recognition of foreign qualifications in Ireland.
3. Provide a quality framework which facilitates autonomous HEIs.

Priorities Associated with Goal 2

We note the use of the term 'learner' throughout this strategy as opposed to student. Is this term being used due to its inclusion in the legislation?

Priorities Associated with Goal 4

We suggest bullet point 5 is reworded to be more encompassing: Work with all relevant stakeholders, including employers, professional bodies and trade unions to promote the relevance and understanding of the education and training system and its qualifications to the labour market.

We suggest bullet point 8 is expanded to include “to facilitate and promote the recognition of Irish HEI qualifications internationally.”

Priorities Associated with Goal 5

It would appear that points 1 and 2 are in conflict with point 4. As some providers are making available relevant, accessible, accurate and timely information, there should therefore be no need for a separate database and that the QQI could develop an integrated site with links to the provider information.

SUBMISSION BY:

Education Training Boards Ireland

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

Education Training Boards Ireland

Mission, Vision and Values

Wonder if there needs to be some reference to the need for coherent qualifications where there is clear alignment from bottom to top of ladder - thus facilitating easy progression.

Goals

See where coherence is mentioned here but could its meaning be more clear.

Enablers

As well as developing and integrating QQI's ICT system might there be some reference to facilitating integration with provider systems - also with SOLAS, DES, QUALIFAX, etc. It would be hugely helpful if there was a single integrated web-accessible ICT system that would allow each actor to manage their piece of the process securely (via Web access) and, in the process, draw on the data that other actors have created in a way that ensures full compliance with Data Protection Act.

Challenges and Opportunities Facing QQI

Should the 'funding agency' reference be to the new Further Education and Training Authority - SOLAS?

Priorities Associated with Goal 2

Currently, it is not possible for a learner to obtain what might be termed a 'mixed-award'. For example, a major award that comprises a mix of City and Guilds and FETAC minor awards. C & G has excellent vocational awards and their awards also have huge international and industry acceptance. On the other hand, FETAC does not have the same level of industry or international acceptance but has some excellent awards in the area of soft skills. Might it be possible to provide for learners obtaining major awards that include some C & G minors and some FETAC minors? In the area of beauty therapy, CIDESCO has the international and industry acceptance.

Priorities Associated with Goal 5

Develop and publish a comprehensive and easily searchable national database of quality assured programmes and qualifications. QUALIFAX is excellent but the search facility is quite inflexible. Also, there is need for a standard course profile. In other words, all providers should be required to provide the same information on all courses. Currently, some do not provide NFQ levels, for example. Ideally, all providers should be required to upload all 'accredited' courses on QUALIFAX using a standard course template/profile.

Do you think the key elements are appropriate and clear?

In some cases, the statements assume a certain level of knowledge on the part of the reader to understand what is meant. It might be worthwhile getting the document proof-read by NALA's plain English expert!!!

Are there areas that you think are important?

I feel there needs to be some emphasis on RPL, on ensuring that providers have access to appropriate teaching/learning resources to deliver programmes effectively, that those who deliver FET programmes have the competence set required to deliver these programmes effectively.

Despite the the imminent implementation of the S. 30 of the Teaching Council Act, those who deliver FET are not required to meet an minimum standard of qualifications or competence.

Also, though many who participate in FET programmes find learning a real challenge and often have had poor experiences of education, there is a paucity of resources to support the delivery of FET programmes - by comparison to the resources that are available at 1st, 2nd and third level. This reality impinges on quality. Quality is not just about policy; it is very much about practice.

SUBMISSION BY:

Engineers Ireland

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Engineers Ireland

Mission, Vision and Values

The mission and vision statements should perhaps include reference to more stakeholders e.g. HEIs, professional organisations and industry are equally impacted by safeguarding quality and will also benefit from the QQI processes. These stakeholders are mentioned elsewhere within this document however a generic reference to stakeholders may be apposite in this section.

The mission states that the work of QQI is for 'the benefit of learners'. This may be perceived as too narrow a focus and may negatively impact other stakeholders.

Goals

Engineers Ireland supports the goals as set out and welcomes the opportunity to work closely with QQI in achieving these goals and inputting the views and experience of the engineering profession.

On a minor point: as many of today's graduates require mobility should the reference to National Framework for Qualifications not also reference the European Qualifications Framework? If the NFQ and EQF levels were aligned (rather than mapped) it may simplify recognition of qualifications for migrants.

Enablers

Engineers Ireland supports the specific reference to the use of national and international experts and benchmarking. We are an accreditation body for engineering programmes using European and global standards and our members are involved in accreditation of programmes internationally. QQI may wish to observe the accreditation of engineering programmes and gain insight into the international dimension of the process.

Challenges and Opportunities Facing QQI

A key challenge in the education sector in the coming years will be the spread of new technology. This will impact in a variety of ways:

- How can QQI assure the quality of education programmes delivered from outside Ireland which are electronically delivered to students in Ireland?
- Will QQI assure equivalence of such programmes against NFQ?
- If large volumes of students choose to read for (specific) programmes using MOOCs or other online delivery mechanisms then this may result in a revenue decrease for Irish based providers and a vicious cycle of dwindling revenue followed by lowering of standards.
- Conversely, if Irish providers can assure that their programmes meet EQF and international criteria there is an opportunity to sell Irish programmes overseas - in particular to the diaspora.

Priorities Associated with Goal 1

Engineers Ireland supports closer liaison with QQI in relation to the NFQ.

Priorities Associated with Goal 2

Supporting the recognition of learners' qualifications which have been delivered by non-traditional means (e.g. online) or from non-Irish providers will be a particular challenge.

Priorities Associated with Goal 3

Engineers Ireland views the raising and maintenance of standards as key to providing confidence to stakeholders regarding their education qualifications. Accreditation of engineering programmes to agreed international standards and the trust based in the process by government agencies is crucial to support graduates' mobility in the global workplace.

Priorities Associated with Goal 4

Engineers Ireland welcomes the opportunity to work more closely with QQI.

Priorities Associated with Goal 5

The provision of independent and impartial information on programmes is to be welcomed.

Do you have any general or specific feedback?

The strategy statement is quite detailed and comprehensive. Some additional references to stakeholders as part of the mission statement may be required. As the strategy statement is a forward looking document cognisance needs to be taken of the changes facing third level education in a global context. Many HEIs are trialling delivery of programmes using MOOCs as a pre-cursor to fee-paying delivery. The development of online delivery tools to provide a third level experience is still nascent and different business models will emerge. The successful models will provide challenges and opportunities for learners, HEI's and academic staff.

Do you think the key elements are appropriate and clear?

The sections of the draft strategy statement are appropriate and clear.

Are there areas that you think are important?

Perhaps add more details on:

1. Focus on impact of new technology to deliver programmes from Ireland to overseas and from overseas to Irish-based learners.
2. Alignment with European standards in the area (EQF, ENQA).
3. In view of the legacy organisations and processes which have been merged to form QQI a greater distinction needs to be made between education and vocational training as they may require different strategic levers.

Are there key areas relating to our impact on stakeholders that should be considered?

Specifically in relation to professional organisations -

It is important to recognise that alignment of professional qualifications or specific awards the NFQ are usually quite general in nature. Each learner brings with them a unique set of learning achievements and aligning the recognition of this learning (classroom or vocational) will be challenging.

SUBMISSION BY:

**Enterprise Ireland
(Education in Ireland)**

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

Enterprise Ireland (Education in Ireland)

Mission, Vision and Values

Under Visions 'high-quality education and training opportunities with qualifications that are widely valued nationally and internationally' - perhaps change to

'high-quality education and training opportunities with qualifications that are widely valued and recognised nationally and internationally'

Goals

Under 5. Consider changing to Provide authoritative information on programmes and qualifications to the public, nationally and internationally.

Enablers

Under Governance, consider changing to

Adhering to best practice in corporate governance internationally.

Under governance, point 2, consider including learners (domestic and international)

Challenges and Opportunities Facing QQI

» Addressing the internationalisation of education and training provision, collaborative provision and changing forms of delivery of education and training

May need to be more specific about how TNE programmes will be addressed - this is a growing and challenging area.

Priorities Associated with Goal 2

[consider adding text in brackets]

Engage learners in QQI's quality assurance processes and encourage others to do likewise (domestic and international)

Promote the international recognition of Irish qualifications (in collaboration with other relevant agencies)

Do have any general or specific feedback?

Other than the comments provided, this seems to be a coherent and well thought out strategy.

Do you think the key elements are appropriate and clear?

Yes

Are there areas that you think are important?

No, but I think the who area of TNE needs to be included more specifically.

Are there key areas relating to our impact on stakeholders that should be considered?

Important to ensure that learners, both domestic and international are included in process

SUBMISSION BY:

Federation of Irish Complementary Therapy Associations

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and has not been proofed/edited by QQI.*

Federation of Irish Complementary Therapy Associations

Mission, Vision and Values

Mission - '... for the benefit of learners' is good, unless the perceived benefits mean employment opportunities only.

Vision - qualifications that are valued nationally and internationally could result in 'education for emigration'.

QQI Values

~ Learner Centredness - flexibility that is inclusive of the passionate interests of learners is essential to generating trust in the Authorities goals

~ Independence - How will the QQI square its own independence with any regulation the Minister for Education may provide for without prejudice to the validity of anything previously done? Will '... without prejudice to the validity of anything previously done ...' extend to awards made (or withdrawn) by F/HETAC?

~ Collaboration - are there any professional bodies that the QQI will not engage with or include in consultation on awards development?

~ Integrity - '... impartial and objective manner.?' Time will tell.

Goals

Comprehensive, coherent policies and processes would be welcome, as would coherent education and training systems. An written explanation of what the QQI means by 'benefits to learners', and what it means by 'stakeholders' is required.

Challenges and Opportunities Facing QQI

'Supporting the national recovery programme' would seem to imply that priority will be given to the education and training qualifications that the labour market requires, and that education and training provision that does not meet that requirement will go to the wall! The end result could be an intellectually impoverished citizenship and a work force with limited opportunities for employment and progression.

Such a scenario could conflict with the QQI priority to encourage responsiveness in qualifications and programmes that meet societal and cultural needs.

Priorities Associated with Goal 1

The goals and priorities described herein, do not appear to give any indication of the fate of legacy awards.

Priorities Associated with Goal 2

The protection of learners was the subject of a previous consultation. To what extent will the issues and concerns raised by providers be accounted for in the proposed statutory provision for the protection of enrolled learners?

Priorities Associated with Goal 3

Collaboration among providers and profession bodies on matters of common interest would be a very welcome development.

Priorities Associated with Goal 4

To what extent will the status of professional recognition bodies be an issue for the QQI in developing and maintaining relations with them?

Priorities Associated with Goal 5

Including information on the providers where learners can access quality assured programmes in the proposed database would be advantages to learners.

Do have any general or specific feedback?

Generally - it seems like an awful lot of work to complete in three years, unless the bulk of it is already done!? Within what timeframe will the QQI's own policies etc. replace the exiting ones?

Are there areas that you think are important?

Yes. The issue of appeals. A clear procedure and mechanism for dealing with appeals should be included in this three year strategic plan.

Are there key areas relating to our impact on stakeholders that should be considered?

Yes. The procedures and means by which the QQI will consult with providers, professional bodies and stakeholders in general does not seem to be covered in this strategy.

SUBMISSION BY:

Forfás

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

Forfás

Mission, Vision and Values

Our Values - within the learners' needs focus in relation to quality and qualifications, Forfás would like a labour market needs relevance reflected.

Equipping learners with the skills and competencies required in the work environment, ensuring that programme content reflects the changing needs of the workplace (brought about by for example, technological and regulatory changes, globalisation and changing consumer demands), is crucial for learners' employability.

Goals

Comprehensiveness and coherence in the framework - In the context of the National Skills Strategy targets, lowering the proportion of those holding lower secondary or below educational attainment from 18% to 7% of the labour force by 2020 remains a challenge. Key to this will be the availability of awards at level 1-3 and progression for these award holders to levels 4 and 5. The dramatic fall in awards from 71,000 to 27,000 at level 3 between 2011 and 2012 is concerning in this regard. Level 3 awards have a role to play in not only progressing job seekers to employment but also in up-skilling those currently in employment in vulnerable elementary occupations.

With the amalgamation of HETAC & FETAC into QQI, the progression issues raised by the continuance of two distinct level 6 awards, a FETAC level 6 and a HETAC level 6, are worthy of consideration.

Authoritative information on programmes and qualifications - Aside from the public provision and the private sector provision which is publicly funded, there are a number of limitations when gathering details on awards granted in Ireland. There is no definitive list of all private education and training provision, not all parties involved are in a position to make such data available publicly and the distinction between public and private education and training provision is becoming increasingly blurred - some is part publicly funded and some private provision is accredited by HEIs. While QQI is the most significant awarding body for FET awards, there are also other awarding bodies operating in the private FET sector. It is important that QQI gather information on these at a comparable level to the public/publicly funded private provision so that the entire span of programme provision is available for policy analysis and development.

Enablers

The committee structures for QQI to facilitate effective engagement with stakeholders should include a strong employer composition. The link to what employers require needs to be comprehensive with engagement with a good breadth of employers on a regular basis to ensure that the programmes leading to qualifications reflect occupational needs, are up-to date and revised where appropriate. Special purpose awards may have an increasing role to play in the context of filling occupational skills gaps for some cohorts on the live register which could assist in progressing them to employment. It would be important to have a suite of such awards available in this context.

Challenges and Opportunities Facing QQI

With large numbers of individuals on the Live Register and the key challenge facing Government being to progress them, particularly the long term unemployed into employment, there will be increasing demand for short duration, sharp/focused training interventions to meet particular skills 'gaps' for the jobseeker. The challenge will be to ensure that in the interests of the learner that these are accredited (e.g. minor awards) and that the existing range of accredited programmes will meet the range of focused interventions required.

Priorities Associated with Goal 1

Forfas welcomes the focus on labour market demands in the above priorities.

Regulation of access by national and international awarding bodies to the framework is important specially where gaps in existing provision have been identified in Ireland.

Increasingly there is a focus on industry awards especially in the area of IT skills and in the context of progression for learners within occupations, and indeed for those on the live register to progress to employment, Consideration might be given to whether they can/are aligned with the NFQ.

Access to programme accreditation for new FE and HE and training providers is especially important in the context of the various LM Activation calls and ensuring a competitive market for new providers.

Priorities Associated with Goal 2

Recognition of Prior Learning is an area that has gathered little traction to date on the ground with course providers, particularly in FE.

Advancing the use of this could be of benefit especially to those jobseekers seeking specific interventions to progress to employment. The benefits of this were addressed in the joint work done by Forfás and NQAI - The Role of RPL in delivering on the National Skills Strategy Upskilling Objectives, April 2011 as follows:

For the individual

- Avoid duplication of learning
- More relevant education and training
- Engage in education and training at the appropriate level
- Reveal hidden competencies and skills

For the enterprise

- Improved documentation of staff skills and competencies
- Better matching of employees to tasks
- Improved identification of training needs and savings on training costs

For government...

- More efficient use of education and training resources
- Increasing participation in lifelong learning

Priorities Associated with Goal 3

Re-engagement with providers should be a key focus for QQI at this stage.

Priorities Associated with Goal 4

Innovation and responsiveness in qualification and programmes should also include a focus on labour market needs as well as societal & cultural needs.

Priorities Associated with Goal 5

National Database of quality assured programmes and qualifications -

Qualifax currently is widely used by learners and guidance counsellors and it is an important resource for disseminating Forfás and the EGFSN's information on enterprise development, sectoral reports and wider labour market information to the learner, parent and career guidance communities to assist in career decisions. In the context of cutbacks to guidance counsellors hours dependence on online resources is growing. There is a growing demand from Guidance Counsellors for labour market information from online resources such as Qualifax to be presented in a format that can be delivered in careers classes - easy for second level students and adult learners to comprehend and engage with.

Do you have any general or specific feedback?

No

Do you think the key elements are appropriate and clear?

Yes

Are there areas that you think are important?

No

Are there key areas relating to our impact on stakeholders that should be considered?

Yes - see comments in relevant sections

SUBMISSION BY:

Headway

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

Headway

Enablers

Resources are already reduced and stretched in the disability sector

People with disabilities do not pay fees so how does this work for u

If an organization already has their QA from FETAC which QA do they now follow

Challenges and Opportunities Facing QQI

Strategies and support are needed for Disability groups in order for clients to achieve certification i.e assistive technology.

Priorities Associated with Goal 1

No priority for disability groups

Priorities Associated with Goal 2

Disability not included in developing standards and guidelines

Priorities Associated with Goal 3

In relation to reengaging and collaboration with providers how do you propose to do this

How do you propose to monitor and review past QA

Priorities Associated with Goal 4

In relation to point 4 does this include people with disabilities

Do have any general or specific feedback?

Disability doesn't seem to be mentioned throughout the document

Are there key areas relating to our impact on stakeholders that should be considered?

The amount of work that organizations have put into their QA and their programme validation

SUBMISSION BY:

Higher Education Authority

*Please note this response appears as received
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Higher Education Authority

Mission, Vision and Values

We suggest that the mission statement might be expanded to

- provide for QQI role to enhance quality as well as safeguarding it
- recognise QQI's role in providing assurances to those other stakeholders than students of the quality of programmes and qualifications in the Irish system. this would include for example taxpayers, and employers.

We take it that the vision as expressed is one of the overall education system, rather than just a vision for the QQI perhaps this might be made more clear in the document.

In respect of values we strongly agree with the role of collaboration as an essential value and would see in particular a very important role for QQI and HEA to collaborate effectively so as to enhance the effectiveness of their respective roles in the higher education system. We would see this as an urgent areas for development in the coming months.

Goals

In relation to the goals set out we would suggest

that goal 3 might be reworded so as to avoid any simplistic appearance that quality standards would be reduced depending on provider capacity.

that QQI should consider a systemic role in reporting on risks to quality within the HE system and should also offer appropriate recommendations to address such change.

We would also recommend that QQI look on the development of its role for systemic reviews as outlined in the QQI act in cooperation with other stakeholders

Enablers

We would suggest that

in respect of people and structures

QQI should aim to agree MoUs/SLAs as appropriate with key stakeholders

in respect of governance provide for periodic external review as required by the European Standards and Guidelines

more generally it would be important to signal cooperation with initiatives for shared services/procurement in line with wider Government strategy

Challenges and Opportunities Facing QQI

In addition to the changes arising from the landscape we would suggest that QQI should also have regard to the impact of the reductions in public funding in higher education while simultaneously providing for large increases in enrolments.

In relation to the internationalization of higher education specific note should be taken of the increasing efforts to compare higher education provision internationally, and the likely impacts that this will have on flows of funding, students and staff internationally. In this context it would be important to continue to develop means to make the performance of Irish higher education more transparent so as to better position the system to strive for high performance and in so doing to position itself internationally.

An ongoing challenge is to improve confidence and trust in quality of education and awards among key stakeholders and the wider public.

Priorities Associated with Goal 1

We agree with these goals and given their over-arching impact and benefit for the system as a whole would also emphasise the importance of working with stakeholders to realise their achievement.

Priorities Associated with Goal 2

We agree with these priorities. We would suggest in priority 2 that QQI would specifically engage with learners in the development of the processes.

Priorities Associated with Goal 3

We agree with these goals and also see an important role for QQI to engage with HEA as well as the HEIs themselves in the implementation of the National Strategy.

We specifically note the commitment to test risk based approaches and consider this essential given the diversity of institutions within the system, and the diversity of their scale and operations both within and outside Ireland.

Priorities Associated with Goal 4

We agree with these priorities.

We would suggest specific amendments to prioritise some further, so that in bullet 1 QQI would work with rather than respond to agencies and Departments, and in bullet 7 QQI would promote sharing of good practice rather than facilitate it.

We also consider that the role of the QQI in carrying out systemic reviews of provision as provided for in the Act offers an important opportunity to enhance coherence within the HE system and that the QQI should consider how this might be implemented. As examples the National Strategy specifically referred to systemic issues in relation to the quality of PhD provision, and more broadly to the development of thematic clusters of provision in higher education as a means to enhance the quality of education and training in both these domains.

Priorities Associated with Goal 5

We agree with these priorities. As mentioned previously we also suggest QQI should have regard to whether it should make a regular report on the HE system as a whole, drawing together existing individual reviews with other work to provide a system overview.

Do have any general or specific feedback?

As a general comment the HEA would regard an effective relationships with QQI, with clear understanding of respective roles and appropriate solutions to develop and exploit synergies between the two entities as an essential building block for the operation of the future HE system. The HEA looks forwards to the development of an agreed memorandum of understanding between the two agencies to contribute to the development of such a relationship.

As a second comment, we have noted in a number of instances opportunities for the QQI to be more dynamic in its role rather than responding to issues. (eg comments on Goal 4). The creation of the QQI is a major development in Irish education, and offers new opportunities to improve our HE system. In that context, and while having regard to the breadth of the tasks facing the QQI we would urge QQI to be ambitious in its approach so as to best realise the potential impact it can make.

SUBMISSION BY:

Higher Education Colleges Association

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

Higher Education Colleges Association

Mission, Vision and Values

HECA is in agreement with the Mission, Vision and Values as stated but would draw attention to comments/observations made on Page 5 - Enablers. HECA also believes that “Transparency” should be listed under “Our Values”.

Goals

HECA is in agreement with the Goals as stated but would add “to establish an effective method of providing information on programmes and qualifications directly to learners”.

Enablers

A significant omission from “People and Structures” would appear to be the employees and officers of the providers who are central to the attainment of QQI’s stated mission, and of the partnership structures whereby the envisaged quality and recognition are to be achieved.

While welcoming the proposal under “Governance” of operating committee structures enabling effective engagement with stakeholders, it is vital that such committee structures are representative of all provider sectors and provider institutions.

Challenges and Opportunities Facing QQI

HECA is in broad agreement with the stated challenges and opportunities facing QQI and would stress the importance of working with providers to ensure effective delivery of quality

Priorities Associated with Goal 1

HECA is in broad agreement with the priorities as stated and would make the following comments/observations:

An additional priority - Delegation of Authority. QQI should actively engage with the Minister for Education & skills in relation to regulations specifying the conditions to be fulfilled by providers of education and training in accordance with Section 52(2)(e) of the Qualifications and Quality Assurance (Education and Training) Act 2012.

Priorities Associated with Goal 2

In agreement

Priorities Associated with Goal 3

HECA is heartened to read on Page 9 that QQI will seek opportunities to facilitate collaboration among providers on matters of common interest

Priorities Associated with Goal 4

HECA feels that QQI should be complimented on its stated priority to encourage and facilitate innovation and responsiveness in qualifications and programmes to meet societal and cultural needs which indicate a forward looking approach in anticipating prospective learners’ needs. However, it believes that economic needs should also be included.

Regarding QQI's priority to develop and maintain effective relationships with professional recognition bodies and awarding bodies, it is important that structures and mechanisms are in place which will allow providers to quickly adjust programmes where changes are driven, (sometimes very quickly), by such bodies.

Priorities Associated with Goal 5

In agreement

Do you have any general or specific feedback?

HECA would like to congratulate QQI on its comprehensive Strategy Statement

Do you think the key elements are appropriate and clear?

Yes, apart from the matters dealt with in our response under the various headings

Are there areas that you think are important?

HECA believes that the issue Delegation of Authority is extremely important

Are there key areas relating to our impact on stakeholders that should be considered?

HECA's concerns have been addressed in our responses under the various headings

SUBMISSION BY:

Institute of Technology Sligo

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

Institute of Technology Sligo

Mission, Vision and Values

Mission should include 'safeguard quality and the national and international recognition of...'

Goals

In (4), the interpretation of 'system' is not obvious

The goals don't need to be mutually supporting, or integrated (i.e. if the meaning of supporting is horizontal), as long as they each support delivery of the mission, so there is no real virtue in them being so. Also, goals do not support values. They may follow from them, but values are inherent and immutable.

As so much of the strategy is predicated (correctly) on meeting Learner's needs, how do you establish those needs, and how do you distinguish between 'needs' and 'wants'?

Enablers

Under Governance, it should be clarified that there will be channels of representation by learners/learner bodies and by providers into QQI and its committees

The term 'Continuing adaptation to reduced resources' assumes an ability to predict that resources will continue to fall, an acceptance that this is OK, and that the work of QQI can continue in such circumstances without a drop in quality or scope of provision. The intent of the phrase is clear and laudable, but would, perhaps, be better expressed in a phrase such as 'Continued focus on resource efficiency and innovation in service provision'.

Challenges and Opportunities Facing QQI

Another Challenge will be to provide an education platform across HE and FE that is transparent and accessible to learners.

What 'national recovery programme' is being referred to?

Priorities Associated with Goal 2

It should also be a priority to effectively communicate policies and actions to learners (this is also identified under Priority 4)

Should there be a separate priority on surveying Learners to establish and maintain focus on needs? This could be seen to be incorporated in 'Engage Learners', but might benefit from a higher profile.

Priorities Associated with Goal 3

The term 'Relate with providers based on autonomy, capacity and respective responsibilities' isn't very clear (should all not be related to in a consistent manner?).

Priorities Associated with Goal 4

The title of this priority should identify 'Irish Education'.

The list of priorities do not describe an 'education and training system' as specified in the overall title. Should 'system' be replaced with 'network'?

An additional priority should be to develop seamless and transparent progression from FE to HE.

The last bullet point refers (correctly) to 'different stakeholder groups'. Would there be a benefit in highlighting Learners as a key group?

Do have any general or specific feedback?

The overall thrust of the strategy is very good, and consistent with the agenda of integration of the various bodies and continuous improvement of the system.

Do you think the key elements are appropriate and clear?

Generally, yes, but it would benefit from being read from the perspective of a non-expert 'learner'.

Are there areas that you think are important?

No. It allows for derivative policies and procedures to deal with the detail in all areas.

Are there key areas relating to our impact on stakeholders that should be considered?

No significant ones, but, again, it would benefit from being read from the Learner's perspective.

SUBMISSION BY:

Institute of Technology Tralee

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

Institute of Technology Tralee

Mission, Vision and Values

Learner Centredness as a value would suggest that purposeful consultation with learners is a very important aspect of this consultative process. Perhaps learners (e.g. HEI SU presidents / education officers or USI) should be specifically pursued for feedback.

Learners should have advocacy in the future developments of QQI policies.

Collaboration: This statement could be stronger. Building confidence and improving quality implies there is a perception of deficit in both. 'Ensuring confidence' and 'enhancing quality' are suggested here. The phrase 'Maintaining confidence and trust in the quality of education' is used on the Challenges and Opportunities facing QQI page, for example.

Goals

Perhaps the scope of QQI is not implicit here. Learners are in primary schools, secondary schools, further education, undergraduate and postgraduate programmes, and include full-time, part-time, flexible, major awards, minor awards, etc. Should there be learner representation on QQI boards, steering groups or other fora?

Where the goals of QQI include development of policies that affect progression from secondary schools, the structure and intention of the Leaving Certificate (and possibly Junior Certificate), clarity of progression routes between levels and consultative processes between providers of each educational level must be provided? Point 4 correctly points out that clearly defined roles and responsibilities are critical for long term integration within Irish Education.

It is unclear what the distinction is between 'authoritative' and other existing sources of information on programmes.

Enablers

Suggest that 'developing new ways of working' should read 'adopting best practice', as 'new ways' should not be the goal in themselves.

Similarly, 'effective communication' should read 'ensuring effective communication'.

Note, under 'people and structures', there is no mention of stakeholders. Where there is reduced resources, stakeholder input may be able to substitute for loss of local expertise, and not just quality assurance.

Challenges and Opportunities Facing QQI

Supporting reform includes providing input and ensuring a coherent quality assurance framework on which reform of higher / further education and training can develop.

Priorities Associated with Goal 1

New standards for QQI awards should also be recognisable by other National and International accreditation bodies, such that the International Education Mark and Awards Standards are inextricably linked.

Priorities Associated with Goal 2

We suggest the first point is phrased more emphatically. The learner centred approach proposed should be supported by the development of a easily accessible mechanism for learner feedback to help inform the evolution of quality assurance processes.

A clearly documented set of guidelines and assurance of transparent, consistent implementation of these should be a priority.

Providing qualification recognition advice applies not only to learners but also to employers, career advisors, further education providers, secondary schools, etc.

Priorities Associated with Goal 3

We agree. Seeking opportunities to facilitate / suggest collaboration among providers on matters of common interest would be a very welcome contribution from QQI.

Priorities Associated with Goal 4

Learners should always be a stakeholder mentioned in QQI goals. There is no explicit mention of learners here. Suggest that QQI work with employers, trades unions and learners / graduates to promote...

Stakeholders should be identified, at least in general terms and should include traditional learner representation as well as from Access representative groups.

Priorities Associated with Goal 5

Query 'continue' to provide information on programmes.... 'directly' to learners in the first bullet point. HEI's provide information to prospective and current learners. QQI should have, as is presented in the fourth bullet point, an auditing role to ensure accuracy / checks for accuracy are undertaken.

Do you think the key elements are appropriate and clear?

Yes, subject to some clarification.

SUBMISSION BY:

Institutes of Technology Ireland

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

Institutes of Technology Ireland

Mission, Vision and Values

Broadly speaking, IOTI considers that the mission, vision and values set out in this statement are reasonable, and accurately reflect QQI's role and functions as set out in the 2012 Act. However, one, arguably crucial, element appears to be missing. What is new and distinct about QQI, as opposed to the antecedent bodies, is that it will be attempting to bring about a more integrated approach to qualifications and quality matters across education and training, particularly in terms of the relationship between FET and HET, but also across higher education. In failing to articulate this, there is a distinct lack of boldness in the vision. As currently formulated, the mission and vision could easily have applied to the NQAI under the 1999 Act - indeed they are reminiscent of previous NQAI statements - and do not announce what is new about QQI. Perhaps, Goal 4 in the next section could be reworked into the vision and mission to get at the ideas of 'coherence', 'whole-system' and 'integration'.

Goals

In broad terms, IOTI is supportive of QQI's goals as set out in this document. They are a reasonable set of high level objectives for the period 2014-16. IOTI would suggest, however, that some of the goals could be expressed in a more nuanced fashion, that would give more prominence to the idea of 'collaboration', which QQI has adopted as a core value. Is it, for example, enough to say that QQI will base its relations with providers solely 'on their capacity to meet robust standards to maintain and improve quality'? Does QQI have a monopoly on the matter of prioritising learner needs, or will it be able to provide authoritative information on programmes and qualifications through its own volition? Surely, all of these areas are matters for collaboration between all relevant stakeholders; and education and training providers will, at the very least, have a front line role to play in all of them. Arguably, this should be acknowledged in some fashion by QQI. In a similar vein, the core values of 'independence' and 'integrity', which QQI has adopted, might be given more tangible expression in some short term goals. If they cannot be given such expression, then it is questionable whether they have any place in this document other than for their rhetorical value.

Enablers

IOTI considers that the 'enablers' set out in this section are well thought out. They acknowledge the reality that QQI will operate under genuine constraints both in terms of human and other resources, given the current Public Service financial difficulties; and, more importantly, indicate a willingness on the part of QQI to exploit technology, use imaginative management processes and engage with its stakeholders to achieve its goals. In terms of governance, IOTI would suggest that QQI should clarify in this strategic statement that learners/learner bodies and providers will be represented on relevant QQI committees.

Challenges and Opportunities Facing QQI

IOTI considers that the list of challenges and opportunities identified by QQI is reasonable and comprehensive. It is good that QQI is fully aware that many of the providers that it will engage with, both in FET and HET, are currently undergoing, or are about to undergo significant reform processes; and that their engagement with QQI will need to be integrated in a realistic and reasonable fashion in to these wider developments. In regard to the point made earlier in the section on vision and mission on QQI's integrative role, it is worth highlighting here that QQI will face a significant challenge to facilitate the development of an education and training platform across HE and FE that is transparent, accessible to learners and consistent in terms of the standards of qualifications and the quality of provision.

On a more pedantic note, and to avoid ambiguity, it would be more appropriate to refer to the HE strategy as the National Strategy for Higher Education to 2030.

Priorities Associated with Goal 1

IOTI considers that the Goal 1 priorities are, in general, reasonable and comprehensive. We particularly welcome the priority ‘to update and implement the National Framework Qualifications’, as there are some anomalies that continue to cause confusion between the FET and HET sector. IOTI also considers that, in the light of the current efforts to improve the transition experience between second and third level, it would be helpful if QQI and the relevant stakeholders could further clarify the placement of the Leaving Certificate award over two NFQ levels; in other words, it would be helpful to know what constitutes a Level 4 or a Level 5 Leaving Certificate award. In terms of standards and award development for the labour market, IOTI would have some concerns about the methodology and structures to be employed here. We believe that there should be no attempt to simply replicate past approaches. It is our view that there are significant policy deficiencies in this area, particularly in terms of addressing the structural imbalances that exist between the demand side (employers) and the supply side (providers, awarding bodies), when it comes to identifying qualifications needs and developing them. QQI, through its antecedent bodies, has significant experience in this area and could contribute significantly to the debate on the same, through processes such as the review of apprenticeships and the reforms currently underway in FET (SOLAS/ETBs) and the National Strategy for Higher Education. All of these processes will need to work in tandem if they are to deliver the programmes and awards needed by the labour market, both at a national and regional level, and QQI - both through its own approaches to awards and its oversight of the NFQ - can play a key role in ensuring that, in the development of awards, proper structures are put in place to ensure that the demand side is established in as systematic a manner as the supply side.

Priorities Associated with Goal 2

The Goal 2 priorities reflect the particular and direct set of functions that QQI has in relation to learners. In reality, they are a quite mundane list of actions, which in a very real sense highlights the danger of overplaying ‘Learner Centredness’ as a core value of a state agency involved in quality assurance and qualifications matters, but which is not directly involved in education provision itself. Arguably, what QQI should be doing is encouraging and directly contributing to a broad learner centred culture, in which a range of allied stakeholders are participants and contributors in different ways. This approach should also be a feature of QQI's new functions, including the implementation of the International Education Mark. In terms of the latter, there is a danger that such a collaborative approach may be lost, given the manner in which the discussion on international education is being framed - regulatory/standards versus enhancement-led quality. Notwithstanding the provisions in the 2012 Act, there will be a need to integrate the IEM requirements into existing quality systems and cultures, and it may be more fitting, and ultimately more fruitful, to articulate these requirements in terms of the quality principles, collaborative approaches and enhancement-led themes that have been a feature of the quality landscape in HE over the past two decades - evident for example in the work of the IHEQN - rather than the compliance and regulatory language generally used in this area.

Priorities Associated with Goal 3

The Goal 3 priorities are reasonable in so far as they go. However, it could be argued that the future relationship of QQI with providers should not be expressed solely in terms of the functional matter of meeting robust ‘quality’ standards, but should also focus on a more positive collaboration, to ensure the delivery of the quality outcomes for learners that all stakeholders desire. In this connection, IOTI would support QQI's aim to seek opportunities for collaboration among providers in pursuit of common goals. However, it would also advocate that QQI should identify, review and implement models of good quality practice. The suggestion that QQI will ‘test’ models does not instill confidence from a provider perspective, and many institutions might feel a justified reluctance to be pilot sites for such tests.

IOTI welcomes QQI's acknowledgment that its engagement with HE providers must necessarily take place in the context of the implementation of the National Strategy For Higher Education.

Priorities Associated with Goal 4

Again, the list of priorities associated with Goal 4 is reasonable in so far as it goes. However, given that the goal is to 'promote coherence' within education and training, some allusion should be made to QQI's plans for integrating the systems presided over by the antecedent bodies, especially FETAC and HETAC. Does QQI intend to promote greater coherence between the FETAC and HETAC awards systems, or between the multiple approaches to quality assurance that it has inherited? Will it address the overlap of qualifications at Level 6? How will QQI engage with the schools system, both in relation to the new Junior Certificate reforms and the further elaboration of the placement of the Leaving Certificate over two levels of the NFQ? All of these are matters pertaining to coherence. While, presumably, most of these issues will feature in the development of QQI's new policy suite, it would be useful for outsiders to get some 'headline' view of where they feature in QQI's priorities over the next few years, especially as the area of 'coherence' is one of the key underpinning rationales for the establishment of QQI. As things stand, and particularly when one considers the list of priorities associated with this goal, there is no great sense that QQI will be involved with, or attempting to galvanise a 'system'; rather, it appears to be taking on the mantle of a facilitator or coordinator of a loose network or networks of educational stakeholders. IOTI would argue that its engagement with stakeholder on qualifications and quality matters should be more broadly based than is articulated here: as well as employers and trade unions, it should also extend to the wider community.

Priorities Associated with Goal 5

IOTI notes the priorities associated with Goal 5 and supports the underpinning objective to provide accurate, accessible and timely information on programmes and qualifications to learners. While accepting that there is a statutory and regulatory dimension to QQI's functions in this regard, IOTI also considers that the provision of such information, including the development and publication of a national database of programmes and qualifications, will necessitate cooperation and collaboration between QQI and awarding bodies and providers. Perhaps the collaborative aspect of this venture might be given more emphasis to ensure that it commences in a positive manner.

Do have any general or specific feedback?

IOTI considers that it would be useful if QQI included some Key Performance Indicators, to give some sense to its stakeholders about how the new organisation will measure success. Something more might also be said about its own quality systems and culture, given that this is now such an established expectation for quality agencies operating in the European Higher Education Area, as set out in Part III of the Standards and Guidelines for Quality Assurance in the EHEA.

Do you think the key elements are appropriate and clear?

Yes, they are appropriate and clear. Suggestions for improvement are specified above under the particular sections

Are there areas that you think are important?

As set out above, the integrative role of QQI is surprisingly underplayed in this draft strategy statement. As a result, it is not clear what distinguishes QQI from its predecessors. The notion of integration seems unduly focussed on the internal organisation of QQI, rather than on the education and training system.

Are there key areas relating to our impact on stakeholders that should be considered?

The document sets out that collaboration will be one of the core s underpinning QQI's activities. However, this is not entirely evident within the detailed goals and priorities, where the tone is more redolent of prescription and regulation. IOTI considers that there is a need to give more consideration to this issue, so that there will be sufficient clarity for stakeholders regarding the nature

of the engagement they will have with QQI. Will it be genuinely collaborative or will it be focussed on compliance? Will QQI work with stakeholders to further develop a learner centred approach to education and training or will QQI itself determine what such an approach will entail? The answers to these questions lie at the heart of how QQI will impact on its stakeholders.

SUBMISSION BY:

IBEC

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

IBEC

Mission, Vision and Values

The Mission and Vision capture the QQI's purpose and some of the core values that will underpin the work that is critical to its success. The emphasis on learner 'centredness', improvement, professionalism/ improvement, collaboration and integrity is also welcome. However, the Mission, Vision and Values (or the draft strategy as a whole) do not refer to the importance of a qualifications system that also responds to employment needs and supports work-based learning.

In making this point, IBEC is not seeking to devalue the intrinsic worth of learning for its own sake, both to the individual and wider society. As we have pointed out in previous education submissions, the goals of satisfying the needs of enterprise and developing well-rounded, culturally literate citizens are not mutually exclusive; they are complementary. The rapidly changing demands of Irish business have increased the premium that employers put on what are variously described as 'generic competences' or 'employability skills' – the most important of which is probably 'learning-to-learn'. The NFQ, with its focus on learning outcomes, has already demonstrated that it has considerable potential in this regard.

We would also suggest that a core value for any regulator should be 'Transparency' - a high-quality human-service regime requires mandatory standards and an independent regulator with strong sanctions and publicity of results

Goals

While all five goals are important, we would draw particular attention to No 1 and No 5. We particularly welcome the acknowledgement of the National Framework of Qualifications as the 'central organising feature'. IBEC's own research suggests that the Framework is well established, with a high degree of awareness in the business sector. When asked whether accreditation was a significant factor in the decision to select a course or training programme, 70% of respondents to a recent IBEC survey indicated that it was either 'important' or 'very important'. However a low level of in-company course accreditation would seem to be a missed opportunity for the businesses that are carrying out high-quality training programmes, but failing to get them accredited.

No 4 is the most challenging objective. The education system is undergoing a period of significant change, particularly in the further education and training sector - a sector where the NFQ and FETAC have, in the past, brought some degree of coherence – and in higher education. It is critical that a vacuum does not emerge at a time when a number of organisations, including QQI, continue to redefine their responsibilities and objectives (see below for a further discussion of this issue).

Enablers

This section mainly deals with internal enablers (we discuss effective stakeholder engagement structures in more detail below). However, we would suggest that under the 'People and structures' section, greater attention is given to the need to develop a unified culture and a new organisation with which staff identify, and for which they are proud to work. All mergers (however smooth and well-managed) are challenging. QQI has been assembled from four different organisations with different cultures, histories and understandings. This should be acknowledged and explicitly addressed.

Challenges and Opportunities Facing QQI

Ireland's education and training systems has developed along parallel, but broadly separate lines. The establishment of National Qualifications Authority of Ireland and the NFQ achieved some progress in providing a single unifying framework. The reconfiguration of the Department of Education and Skills and new Solas/ETB structure provide an opportunity for even deeper reform. However, having established the structures for greater horizontal integration, bringing policy coherence and connectedness between higher and further education presents an even greater challenge. The system operates in deep silos - e.g.

at a time when the Higher Education Authority is developing regional clusters, there isn't a statutory requirement for the higher system to be represented on the new local Education and Training Boards (ETBs). Access, transfer and progression' is at the heart of the policy rhetoric around qualifications systems. Therefore this section should not just address the challenge of supporting reform in higher education and further education and training (FET) but help to create deeper links between the two sectors.

Priorities Associated with Goal 1

The proposed core functions of Qualifications Ireland should explicitly acknowledge the close relations between the NFQ and the workplace across a number of dimensions including (a) the ability to compare, understand and trust qualifications (b) the Framework's potential to support lifelong learning (c) how the framework responds to changing employment needs

Priorities Associated with Goal 2

The amount of technical language used by the qualifications agencies is a significant obstacle to deeper engagement by learners, providers and employers. Qualifications and quality assurance is a highly technical and specialised business with its own conceptual framework. However, at a European level in particular, it is in danger of becoming an industry in itself which is divorced from the realities of the workplace and learner needs. QQI should adopt a Plain Language Charter.

Priorities Associated with Goal 3

This section should contain an explicit priority around minimising bureaucracy and administrative delays. Accreditation is a technical and painstaking process and there is an inevitable tension between the quality assurance requirements of the awarding body and the expectations of the providers. Notwithstanding this, significant numbers of provider have, in the past, expressed concern at administrative delays around developing Framework standards.

This Section also omits to mention the school system as a key provider with which QQI should engage. The positioning of the NFQ at the centre of the junior cycle reform programme was an encouraging initiative which has the potential for further development.

Priorities Associated with Goal 4

This Goal contains the solitary reference to employers (or, indeed, the workplace or business) in the document: 'Work with employers and trade unions to promote the relevance of the education and training system and its qualifications to the labour market'. This appears to assume that the education system and its qualifications are 'relevant' to the labour market.

Apart from certain professions and a small number of apprenticeships, Ireland does not have a structure for employers to engage in the development of national occupation standards or the design and approval of specific sector skills frameworks. Without this structure, it is difficult to envisage how employers can collaborate in a meaningful way with qualifications and quality assurance - apart from championing the NFQ concept and reiterating the need for quality and relevance. The draft strategy is framed in a 'supply-driven' model with an undertaking to prioritise the needs of learners and collaborate with stakeholders.

This assertion should not be interpreted as a criticism of the draft strategy itself. The education and training system is much greater than QQI. However we should also acknowledge there is an inevitable tendency for programmes rooted in education institutions to develop their own dynamic, independent of the world of work and unresponsive to rapid change in the needs of the economy. If qualifications are to remain relevant, the consequences of this lack of structure should be acknowledged by QQI and other agencies.

Priorities Associated with Goal 5

This Goal contains the solitary reference to employers (or, indeed, the workplace or business) in the document: ‘Work with employers and trade unions to promote the relevance of the education and training system and its qualifications to the labour market’. This appears to assume that the education system and its qualifications are ‘relevant’ to the labour market.

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This assertion should not be interpreted as a criticism. The education and training system is much greater than QQI. However we should also acknowledge there is an inevitable tendency for programmes rooted in education institutions to develop their own dynamic, independent of the world of work and unresponsive to rapid change in the needs of the economy. If qualifications are to remain relevant, the consequences of this lack of structure should be acknowledged by QQI and other agencies.

Do have any general or specific feedback?

Generally, the draft strategy is appropriate and clear. This type of document is necessarily high level and aspirational. QQI is also at an early stage in its development. However, the agency was not created in a vacuum. It is part of a continuum in the evolution of qualification accreditation and quality assurance. This context should be highlighted.

Do you think the key elements are appropriate and clear?

In light of the above, it would be helpful to learn more about how QQI's work relates to the functions of its legacy bodies. Does the strategy represent a major change of direction? Will the agency retain all of its current activities? If not, which activities will it drop or reduce? For example, QQI will validate and monitor programmes. If it is no longer planning to ‘support’ providers in this process (whether for capacity reasons or due to a perceived conflict of interest with its role as a regulator), this development should be ‘named’.

The issue of QQI's boundaries (i.e. division of responsibilities for quality between QQI) and others is highlighted in an interesting background paper (Qualifications systems and related concepts – a QQI background paper, May 2013). It suggests that ‘there is a range of quality assurance functions that are the proprium of providers of education and training programmes and that ought not to be attempted by an agency such as QQI. This has implications for the capacities required of an organisation to enable it to function as a provider of education and training programmes. That has implications for size.’ Notwithstanding the ‘complex adaptive system’ described in the background document, greater clarity is required on this issue - which has significant implication both for the diversity of training provision and the promulgation of the Framework.

Are there areas that you think are important?

QQI has placed values at the centre of this strategy statement. This is understandable. However, the National Economic and Social Council has argued (Achieving Quality in Ireland's Human Services, October 2012) that while the right values are a necessary condition for trustworthy public authority and human services, they may not be sufficient—either to generate trust or ensure quality services tailored to the needs of individuals. Experience shows that, in certain contexts, good people can participate in the provision of bad services and regulation.

For a variety of reasons, professional accreditation on its own no longer guarantees trust, quality or accountability. Conversely, where trust does exist, it would seem to be based more in our assurance that appropriate institutions and procedures are in place than in a belief in, or knowledge of, the values of those running these systems. Therefore, NESC argues that it is institutions rather than values that should be the focus of analysis and that are amenable to improvement.

NESC explores the concepts of 'meta' and 'smart' regulation which it terms a 'centre supportive of continuous improvement'. This refers to the idea that a regulator and/or department should be concerned not just with whether individual organisations are abiding by standards but how they can be supported in this endeavour and how the entire sector can be continuously improved. Strategies such as capacity building and diffusing knowledge about successes are important in this regard. E.g.:

- An explicit mandate from the policy centre (in this case the QQI) about the standards/goals to be achieved;
- An injunction for organisations to assess their capacity to observe said standards and set out what changes will be required to do so;
- A readiness on the part of the centre to lend support/guidance in the form of capacity-building and/or technical instruments to assist organisations in self-review;
- A willingness on the part of the regulator/policy centre to assess sectoral areas both individually, in terms of how single organisations are abiding by the standards (for example, through inspection and monitoring), and collectively, by asking are there problems common to many institutions that can be resolved by highlighting the work of the most successful organisations;
- A determination on the part of the regulator/policy centre to publicise and disseminate more effective ways of working, which have been uncovered in its review; and
- A resolve, by both regulators and relevant departments/agencies, to assess how the entire sectoral field is functioning and suggest alternative ways of working if necessary.

As the QQI's strategy evolves, it should be assessed against these benchmarks.

Are there key areas relating to our impact on stakeholders that should be considered?

See above

SUBMISSION BY:

Irish Course Providers Association

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

Irish Course Providers Association

Mission, Vision and Values

Some providers have had their CAS applications rejected at the screening stage because it was perceived that the application did not provide sufficient information for learners about the programme.

This category of rejection is quite difficult to respond to in a professional and effective fashion when identical content in other applications has successfully completed the screening and validation stages without any similar issues arising. Unfortunately, in some circumstances it has been noted that when an appeal has been made against such a rejection and the inconsistencies pointed out, the response has not addressed this issue. Rather it has focused on querying the provider's Q & A policies and procedures and other unrelated matters, with in some situations a copy of that response being forwarded to the head of Q & A in QQI, with the possible implication that the provider should be the subject of a monitoring visit.

A clear policy for CAS applications needs to be established in this area, based on a common approach to this matter, and generally, by those involved in the screening and validation processes. Any appeals in this area should as a matter of policy focus on the direct issues arising and require comparison with any other CAS applications that have had the same wording and were successful. In addition, because of the commercial damage of the current length of time for completion of this screening and validation process of up to 20 weeks a clear policy should be established that the entire process will take no longer than 6 weeks. Finally, the policy should include a speedy independent appeals process as an option available to providers in the required circumstances.

Goals

Item 3. The word 'capacity' should be defined.

Item 5. Currently there is misleading advertising on the websites of a significant number of registered providers. Historically, the websites of registered providers have never been monitored to a standard that would help ensure that basic, accurate information on programmes and qualifications was available to learners. In addition, advertising and false claims made by non-registered providers on their websites is also an area that requires regular monitoring.

Enablers

Under the heading 'People and Structures' perhaps QQI ought to give consideration to cost-effectively outsourcing elements of its workload especially when charges are now to be levied on providers. Some specific areas might be considered here include PFL requirements and registered provider and non- registered provider websites.

Challenges and Opportunities Facing QQI

The roles between FAS and FETAC were very often blurred and unclear resulting, even until recently, in FAS commissioning private providers to deliver FETAC programmes when those providers were not FETAC registered.

This type of anomaly should be addressed. The relationship between QQI and SOLUS - the body replacing FAS - needs to be tightly defined in this regard and generally.

Priorities Associated with Goal 1

The need for closer collaboration between international awarding bodies and the National Framework of Qualifications is surely a priority. The perception and possibly the reality is that it is easier and less onerous to offer a significant number of international awards than offer a comparable set of awards with QQI. This is an important issue for all stakeholders.

Priorities Associated with Goal 2

The current obstacles that prohibit providers from offering FETAC certification to overseas students (because of the requirement that students must have a PPS number) must be removed. UK awarding bodies have no such obstacles, either in Ireland or worldwide. This is a serious competitive disadvantage for Irish providers.

Priorities Associated with Goal 3

The reference above to a provider's 'capacity' requires elaboration and /or definition.

Priorities Associated with Goal 4

Relevant comments covered in comments above.

Priorities Associated with Goal 5

Relevant comments covered in comments above.

Do have any general or specific feedback?

We suggest that the requirements that when a provider is making a CAS application the need to produce two letters of guarantee is unreasonable. At the moment the application process is taking up to 20 weeks and during this period the programme has obviously not been validated so the provider cannot enrol learners. We suggest that it would be more appropriate to require these letters of guarantee when the validation process has been completed because providers would then be in a better position to estimate the likely number of enrolments for a programme. There is also the additional factor to consider of a provider not thereby alerting the competition of their intention to compete and so avoid giving the competition 20 weeks to organise themselves to compete with respect to that programme.

Do you think the key elements are appropriate and clear?

We commend QQI for their approach adopted with respect to the Strategy Statement and the many positive elements contained therein. In a small number of areas we are of the opinion that this draft Strategy Statement requires amplification or clarification and we have detailed these in our individual responses earlier.

Are there areas that you think are important?

Yes. QQI needs to be perceived to be operating in an open, fair, consistent, impartial manner as between providers generally, and especially between private and public funded providers. Finally, to ensure a consistent approach across all CAS applications, QQI should have clear internal guidelines on how all applications are processed, and for the sake of full transparency, the name of the individual or individuals involved in the screening and validation processes together with their qualifications should be made available to each applicant provider if requested.

SUBMISSION BY:

Irish Sports Council/Coaching Ireland

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Irish Sports Council/Coaching Ireland

Mission, Vision and Values

Mission - safeguard is an interesting verb choice.

Vision - there is no verb used here. Is this what is intended?

Values - In relation to Learner Centredness - will QQI process be open to the recognition of learning pathways for all learners in all sectors? - Suggest the separation of Professionalism and Improvement

Goals

Goal 4 refers only to the QQI having 'clearly defined roles and responsibilities'. This should also apply to those with whom QQI collaborates.

Enablers

ISC/Sporting Ireland would like to discuss with QQI the appropriateness of playing a role in delegated authority and/or have a programme approval agreement with QQI in relation to the sports sector.

Challenges and Opportunities Facing QQI

Considering separating the Challenges and Opportunities.

Priorities Associated with Goal 1

ISC/Sporting Ireland would like to discuss with QQI the appropriateness of playing a role in delegated authority and/or have a programme approval agreement with QQI in relation to the sports sector.

Priorities Associated with Goal 3

Coaching Ireland was a recognized provider with FETAC for NFQ Levels 1-6. It was in the process of the application process with HETAC but this was suspended due the imminent enactment of the QQI Act 2012. Now part of the ISC, Coaching Ireland would like to discuss with QQI best approach to aligning its work with NFQ Levels 7-10.

SUBMISSION BY:

Irish Universities Association

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

Irish Universities Association

Mission, Vision and Values

Mission: The draft states that QQI's mission is to 'safeguard quality'. This suggests that quality is definable or can be achieved, and appears to take a somewhat restrictive and minimalist approach to 'quality'. IUA would recommend that an alternative more encompassing wording be considered, for example 'to promote, maintain and enhance quality.' This would allow for 'quality' to be seen as a relative concept that needs to be continuously improved and strived for.

Vision: The draft states that QQI's vision is to achieve 'high quality education and training opportunities'. This does not resonate fully with universities, which also need to enhance the quality of research and the creation of new knowledge. IUA recommends that 'learning' be considered rather than 'education', and that the concepts of knowledge dissemination and knowledge creation be included. We would also recommend that the term "qualifications and awards" be used rather than simply "qualifications".

Values: Under "learner centredness", IUA recommends that the reference to "meetings learners' needs" should be reworded as "enabling learners to reach their potential". The values statement should also include a reference to "communication", as well as to the supportive role which QQI is expected to play in helping providers ensure that QQI's overall mission and vision are achieved. These elements could be added to "collaboration", ie "collaboration, communication and support".

Overall: This section would benefit from a clear statement on QQI purposes and functions. The introduction page states that the one of the purposes of the strategy is to capture QQI's own purpose, but this is not built on further. Is there a formal statement on these in the Act which needs to be referenced? Need to recognise and acknowledge diversity of providers, and the need for flexibility, across the education and training fields. The five items proposed under "purpose of this first strategy statement" in the introduction should be clearly identifiable later in the document.

Likewise, the mission, vision and values statements need to specify QQI's main focus area, ie the range of post-secondary and LLL sectors (ie not the primary and second level school sectors).

The universities have drafted a short separate text (which will be sent separately by email to consultation@qqi.ie) on the principles and expectations which we hope will underpin our working partnership with QQI over the lifetime of this first strategy, and which we hope will result in benefits for all parties involved.

Goals

Goal 2: IUA recommends alternative wording, for example "enable learners to reach their potential through our policies and actions..."

Goal 3: IUA recommends alternative wording for this goal, and would suggest "provide appropriate support to providers in assuring and enhancing quality based on internationally accepted standards"

Goal 4: IUA recommends that this also include reference to collaboration with other relevant state agencies.

Goal 5: IUA recommends using the phrase "publish reliable, timely and relevant information", rather than "provide authoritative information".

New Goal 6: IUA suggests that an additional goal is needed regarding national and international promotion, along the lines of "Promote international awareness on the roles and responsibilities of QQI and disseminate information on the effectiveness of the NFQ and QA processes used in Ireland.

Enablers

A general comment is that many of the actions listed in this section are inward looking and refer mainly to enablers for QQI as an organisation in itself.

People and structures: this column should include “internal and external communication” and “consultation”.

Technology and processes: this title of this column might need to be broadened to that of “operations” generally; there are some aspects from the current “governance” column which should then come under “operations”.

Governance: IUA suggests that this column should include issues such as publishing information and transparency; developing strategy and overseeing implementation; consulting with key stakeholders; mechanisms for audit and review; annual reports; etc. The reference to availing of international expertise in this column should be to enable the governance role of strategy implementation and oversight.

Challenges and Opportunities Facing QQI

If this section is to be included in the QQI strategy statement, then it needs to be more complete and better structured, e.g. the results of a full SWOT exercise. In any case, it would be important to differentiate between internal and external challenges.

Some of the challenges identified in the current statement are purely contextual.

This statement should also include the need to maintain confidence and trust in QQI, not just in education and training institutions.

Priorities Associated with Goal 1

General comment re the entire set of Priorities:

IUA suggests that this entire section needs to be rethought. The current lists add up to a lot of “priorities”: are some of these really priorities? There are some very big issues included, along with lots of smaller procedural issues which need to happen anyway. In terms of priorities within this long list, which of them are for Y1 of the 2014-16 period, and which are for achievement by the end of 2016?

IUA suggests that, if the section is structured around the Goals (as previously identified), then under each goal there should then be “actions” to achieve these goals, rather than priorities. Each action then needs a short description with expected outputs, expected outcomes, with a timeline and possibly how it is going to be done.

Do have any general or specific feedback?

Given the importance of QQI’s first strategy statement, the deadlines associated with this consultation draft are particularly unfortunate. It is not realistic to expect many actors and stakeholders in the education and training sectors to be in a position to respond as comprehensively as they would wish during a three-week window in July.

Are there key areas relating to our impact on stakeholders that should be considered?

1. The draft strategy statements needs to be clearer about how QQI interacts with other State agencies.
2. In order to ensure the effective implementation and monitoring of many of the elements included in this draft strategy statement, QQI should ensure that its reporting year is the academic year, not the calendar year.

SUBMISSION BY:

Irish Water Safety

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

Irish Water Safety

Mission, Vision and Values

innovation in programme development and flexibility to change and update current programmes to ensure ease of access for learners and programme developers

Goals

continue to encourage new, innovative and cutting edge developing education programmes to ensure Ireland is ready to move as new technologies and education programmes become available

Enablers

people and structures

taking our place in Europe driving and promoting Irish awards and ensuring we are up to date across all awards in EQF and NQF

Challenges and Opportunities Facing QQI

supporting the national recovery programme with future proofing the needs of the learners and also the current requirements of industry and services

Priorities Associated with Goal 1

Promote recognition of QQI as national awarding body to establish high value in all awards at all levels

Priorities Associated with Goal 2

agree

Priorities Associated with Goal 3

agree

Priorities Associated with Goal 4

agree

Priorities Associated with Goal 5

agree

Do have any general or specific feedback?

page 3,4,5,6,7,

Do you think the key elements are appropriate and clear?

yes

SUBMISSION BY:

Local Government Management Agency,
on behalf of the local govt sector

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

Local Government Management Agency, *on behalf of the local govt sector*

Mission, Vision and Values

Mission

While accepting the appropriateness of a learner centred strategy is the mission for QQI not also to provide a framework for educational institutions and employers as well so that awards are commonly understood by all?

While the vision statement refers to 'widely valued nationally and internationally' there should be more explicit reference to providing a route through which training programmes relevant to the jobs market can achieve accreditation.

Goals

Goal 4

Detailed comments on what is meant by 'coherence' are included on page 4.

Missing goals

There is no goal here that explicitly confirms a commitment to provide a clear structure for national awards that reflects the needs of employers and the labour market.

Enablers

Effective communication

QQI should consider improving its customer/provider facing methods of communication. Currently no immediate way of contacting individual staff or their office directly by telephone or e-mail until they respond to a general e-mail query assigned from a ticket queue.

Challenges and Opportunities Facing QQI

New Further Education and Training Funding Agency

The new further education and training agency mentioned here is news to me! Will it be similar to the Skills Funding Agency in the UK which provides funding for individual learners and providers. Will this agency work with employers a la Skills Net? If so will this funding facility be open to public sector bodies or just private sector?

Supporting the national recovery programme

As already mentioned is providing skills for work still a priority? If so then the challenge to QQI is how do they ensure that QQI awards continue to meet the needs of a ever changing labour market?

Priorities Associated with Goal 1

Determining new Standards for QQI awards to meet learner and labour market demands

It is unclear to me whether this means determining new standards for how awards are developed or developing new awards themselves?

International Education Mark

It is my understanding from reading the separate IEM green paper that the IEM is not mandatory for all providers only those wishing to attract international learners.

Liaise with professional recognition bodies

The Local Govt and construction sector doesn't have a professional recognition body. Employers views are not always the same as professional body views when it comes to award standards. Engineers Ireland while representing the engineering profession doesn't represent employers. An award developed with professional body input alone will be remarkably different in emphasis compared to one with employer and professional body input.

Priorities Associated with Goal 2

Provide Qualification Recognition advice to learners

Can the advice also be made available to employers. Would be useful when they are recruiting people especially people with qualifications from outside the State. Onus should still be on individual job applicants to supply proof that they meet the minimum educational criteria detailed for the job vacancy but there should be an avenue for employers to be able to check the status of educational awards.

Priorities Associated with Goal 3

Re-engage with providers

What form will this take? General consultation, sector by sector or on an individual basis?

Priorities Associated with Goal 4

QQI's role in setting standards for qualifications

Does this mean that QQI will only be involved in setting the standards for how future awards are developed or will QQI actually be involved in the development of new awards as FETAC were?

Develop relations with Designated Awarding Bodies

Who are these designated awarding bodies? It is unclear what is meant by this?

Work with employers and Trade Unions

It is good to see that links with employers are mentioned explicitly. It mentions the education and training system. What is meant by this? Is it the new ETBs and SOLAS?

It uses the phrase '....relevance of the education and training system and its qualifications to the labour market.' Does this mean QQI's awards or the education and training systems awards? If it is the latter then it seems that QQI are trying to divest themselves of vocational awards.

Priorities Associated with Goal 5

Provision of Authoritative Information to the Public

Does the public here also include 'employers'? The text here seems to imply that it is only possible learners?

Do have any general or specific feedback?

Apart from a explicit reference in Goal 4 (pg. 10) the strategy statement does not map out an active role for QQI in meeting the needs of the labour market and of employers. Strategy statement is very learner centred and aimed at the public in general. While there are some references to the labour market and employers/trade unions as stakeholders it is not immediately apparent.

Are there areas that you think are important?

There is reference to a new further education and training agency (mentioned on page 6). There is no explanation as to what this body is and how it will interact/overlap with QQI.

Are there key areas relating to our impact on stakeholders that should be considered?

See general comment above relating to the absence of a explicit focus on the needs of employers/labour market as well as individual learners.

SUBMISSION BY:

Medical Council

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

Medical Council

Mission, Vision and Values

QQI may wish to reflect on the relevant stakeholders for its vision and mission. As the statutory quality assurance agency for medical education and training in the State, the Medical Council identifies the importance of a learner focus. However, it also identifies that the public are a key stakeholder in quality assurance of professional qualifications in medicine since this activity has impacts for patient safety.

Collaboration is welcome as a value identified by QQI in this draft strategy. There are many bodies and agencies active in the area of education and training. It is the Medical Council's experience that the value which each can add is maximized through effective communication and appropriate collaboration. We would welcome the opportunity to pursue discussion with the QQI on this value.

Goals

Please refer earlier comment. The Medical Council would identify a value in QQI identifying stakeholders relevant to its role and ensuring there is appropriate communication and appropriate collaboration so as to maintain coherence across agencies and bodies active in this area.

Enablers

Identified enablers are apt.

Challenges and Opportunities Facing QQI

The Medical Council would also identify a need for QQI to recognise the range of bodies and agencies already active in the arena and a need to ensure effective communication and appropriate collaboration.

As the statutory quality assurance agency for medical education and training in the State, the Medical Council promotes an outcome-based approach. In the case of healthcare and outcomes in medical education and training, it is a constant challenge in the face of continuing health system reform to ensure that qualifications are measures of outcomes achieved which are relevant to health system needs. QQI may wish to reflect on whether a need to ensure that education's outcomes which it quality assures continually meet societal needs is a relevant challenge and opportunity.

Priorities Associated with Goal 1

The Medical Council would welcome liaison regarding the National Framework of Qualifications and the International Education Mark.

The Medical Council is the competent authority for the award and receipt of evidence of formal qualifications in medicine and specialised medicine under Directive 2005/36/EC. Its quality assurance of programmes of basic medical education in the State is a factor which attracts international students to study medicine in Ireland. Medical Council has been recognized as an accrediting body by the National Committee on Foreign Medical Education by the Department of Education in the USA and its accreditation processes make use of international standards - the World Federation of Medical Education Standards.

Priorities Associated with Goal 2

The Medical Council engages with learners regarding its statutory quality assurance role in medical education and training. Coordination of engagement across bodies is important so that learners are clear on the distinct and complementary roles.

The Medical Council promotes the international recognition of medical qualifications acquired in Ireland through acting as the competent authority under Directive 2005/36/EC and pursuing its accreditation to internationally recognized standards.

Priorities Associated with Goal 4

The Medical Council would welcome QQI's engagement with regulatory bodies to establish QQI's role in setting standards for qualifications and quality and to maintain confidence in education and training qualifications.

Do have any general or specific feedback?

Overall the strategy appears to be soundly developed and the opportunity for feedback is welcome.

QQI may wish to consider whether it should develop specific consultation approaches for different types of stakeholders. As a quality assurance agency with a statutory role to quality assurance medical education and training in the State for public protection, the Medical Council would identify a need for QQI to ensure that there is effective communication and appropriate collaboration with other quality assurance agencies so that individual and collective value is maximised.

Are there key areas relating to our impact on stakeholders that should be considered?

QQI may wish to consider whether it should develop specific consultation approaches for different types of stakeholders. As a quality assurance agency with a statutory role to quality assurance medical education and training in the State for public protection, the Medical Council would identify a need for QQI to ensure that there is effective communication and appropriate collaboration with other quality assurance agencies so that individual and collective value is maximised.

SUBMISSION BY:

Moran, Collette (Individual)

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

Moran, Collette (Individual)

Priorities Associated with Goal 1

»»Determine new standards for QQI awards to meet learner and labour market demands - this is confusing to me what do you mean by new standards aren't they already set by the NFQ?

»» Charge appropriate ministerially-approved fees for QQI services - I hope the exemption for level 3 and below will be safeguarded.

Do have any general or specific feedback?

Not sure if this applies to anything specific but there is no mention of equality or the nine grounds - for example in relation to provisions for special needs requirements like dyslexia or if a learner has a physical impairment. Maybe it is covered or perhaps not relevant but it isn't clear to me

SUBMISSION BY:

Morgan, Susanne (Individual)

*Please note this response appears as received
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Morgan, Susanne (Individual)

Mission, Vision and Values

- * ...promote access, responsiveness,... shouldn't it be access to ...
- * ...qualifications.... I am missing something like 'at all levels' or something else that re-enforces the commitment to levels 3 and 4

Enablers

- * lack of funds should not exclude a person from exams

Challenges and Opportunities Facing QQI

- * compared to what? Reduced from what?

Priorities Associated with Goal 1

- * Regulate access by national and international awarding bodies to the National Framework of Qualifications - access to the Framework or spaces on the scale?
- * Charge appropriate ministerially-approved fees for QQI services - but quality should not be depending on money
- * Establish and operate the International Education Mark - has that not been established yet? By some international body?

Priorities Associated with Goal 2

- * Engage learners in QQI's quality assurance processes and encourage others to do likewise - How? This might not be suitable/ possible for all learner groups of the legacy bodies
- * emergent - emerging?

Priorities Associated with Goal 3

- * risk and proportionality based approaches - please explain
- * Re-engage with providers that had relationships with the legacy bodies (Further Education and Training Awards Council, Higher Education and Training Awards Council, National Qualifications Authority of Ireland and the Irish Universities Quality Board) on the basis of the 2012 Act - yes, brilliant!
- * relevant providers - relevant in which way, shouldn't it be all providers

Priorities Associated with Goal 4

- * Encourage and facilitate innovation and responsiveness in qualifications and programmes to meet societal and cultural needs - yes
 - * Maintain and extend relationships with international peer agencies - yes
- both of these should be higher up on the list in my opinion

* Identify and establish a range of effective communications tools and mechanisms for different stakeholder groups - you ezine has made a good start

Do have any general or specific feedback?

While understanding the current financial constraints, the access to quality and QQI backed training/qualifications should not depend on the size of the wallet; do not leave the type of learner that formerly did the lower FETAC levels behind

Do you think the key elements are appropriate and clear?

appropriate - yes,

clear - at times easier (non-buzz word) language could have been used

Are there areas that you think are important?

While learner-centredness is mentioned, some phrasing leads me to believe, that it is getting lost somewhere

Are there key areas relating to our impact on stakeholders that should be considered?

It might just be me, but where do people like me (FETAC External Authenticator) fit into all this?

SUBMISSION BY:

National Adult Literacy Agency

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

National Adult Literacy Agency

Mission, Vision and Values

NALA welcomes the emphasis on learners within the mission and values.

Learners are a primary stakeholder group for the QQI. However, how learners will be included in QQI strategy is less apparent throughout this document compared with other stakeholders. For example, in this section, the value statement ‘Collaboration’ lists a range of stakeholders, but does not include learners.

Goals

NALA welcomes the approach which places the National Framework of Qualifications as the central organising feature of QQI policies and processes.

NALA welcomes the priority on the needs of learners in QQI policies and actions, as well as in relations with stakeholders. NALA suggests that the QQI should reword the second goal to include learners as follows:

3. Prioritise the needs of learners in our policies and actions and in our relations with stakeholders, including learners.

It is not clear how learners will inform the QQI of their needs and shape QQI priorities. The goal should commit the QQI to develop a process to ensure this happens. The process will need to be developed in a way that is inclusive of all learners, including adults with literacy / numeracy difficulties and low /no qualifications. This cohort has benefitted least from education and training systems in the past, and may not have gained qualifications reflecting their abilities.

There is a goal on the QQI giving authoritative information to the public, but this communications strategy is incomplete. The balancing requirement is to receive authoritative information from the public about the relevance and operation of the NFQ, qualifications and programmes. Valuable lessons can be learnt on how to be more inclusive of disadvantaged groups in the future and how to promote equality of access, participation and outcome with respect to achieving qualifications and awards.

Enablers

NALA recommends that a comprehensive action plan be included as an enabler.

Under governance, NALA recommends that committee structures and quality assurance system should explicitly include learners or representatives of learners.

All communications should be in plain English.

Challenges and Opportunities Facing QQI

Challenges that NALA see as priorities for the QQI include:

Creating systems to inform QQI policies actions and priorities that include the perspective of the citizen and the voice of learners.

Enhancing flexibility in education and training to provide increasingly relevant qualifications and to support high quality programmes. Examples include the integration of new technologies in education and training, blended learning, integration of literacy, numeracy and generic skills, and systems for the Recognition of Prior Learning.

Access to and participation within the NFQ, particularly at levels 1-3.

- Nearly one million Irish citizens aged 15 years and over whose full-time education has ceased have NFQ Level 3 as their highest level of educational attainment. CSO 2011 <http://www.cso.ie/en/statistics/education/principalstatistics/>

- “The most significant challenge for the period to 2020 is upskilling those at Levels 1- 3 to Levels 4 and 5. (Department of Education (2010) National Skills Strategy Implementation Statement. <http://www.education.ie/servlet/blobervlet/PR10-03-20.doc>

The statement continues “ensuring the acquisition of literacy and numeracy skills will be key factors in determining the extent to which this challenge is met”.

- There has been insufficient change since the NQAI Framework Implementation and Impact Study Report of Study Team (P.49, September 2009) identified that “Levels 1 to 3 of the Framework generally remain underutilised”. In 2012, the number of FETAC awards at Levels 1-3 actually declined. Access to certification at levels 1 and 2 remains limited and this could act as a barrier to learners, particularly to adults who were least well served by education and training systems in the past. In 2013, ten years after the NFQ was launched, where a person lives, and which statutory provider a person accesses services from, are still determinant factors in the availability of awards to that person at Levels 1 and 2. This is unacceptable. A proactive response, including leadership from the QQI, is needed to address these inequalities.

In supporting the reform of FET, the QQI should ensure that qualifications and quality assured programmes provide for the wider benefits of learning and are not dominated solely by labour market outcomes. This is particularly important to provide for the access, participation and progression of those who benefitted least from education and training systems in the past.

Priorities Associated with Goal 1

The priority to “Promote, update and implement the NFQ” must take account of the work required to provide equal access to the NFQ for all citizens. This is particularly relevant to those who were least well served in the past, including the 495,000 Irish citizens who have primary level as their highest level of educational attainment, and the 499,489 who have lower secondary as their highest level of educational attainment. (CSO 2011 <http://www.cso.ie/en/statistics/education/principalstatistics/>)

NALA advocates that any new QQI fee structure would have free fees for qualifications at levels 1-3.

Priorities Associated with Goal 2

NALA welcomes the QQI priority to provide new statutory guidelines for access, transfer and progression for learners to facilitate providers in meeting their statutory responsibilities. This is much needed. The NQAI Framework Implementation and Impact Study (P.49, September 2009) reported that “Levels 1 to 3 of the Framework generally remain underutilised.” This situation still persists today. Levels 1 and 2 continue to be underutilised and there was a significant and worrying decline in the number of FETAC Level 3 awards in 2012.

NALA also welcomes the commitment to develop quality standards and guidelines to address collaborative provision and changing forms of programme delivery. This should compliment reforms in the FET sector and link to the FET strategy to be developed by SOLAS, including the adult literacy and numeracy strategy, as required by the FET SOLAS Bill 2013. Furthermore, the QQI commitment will encourage flexibility in provision, much needed in FET to address the needs of learners.

NALA believe the priority statement “Engage learners in QQI’s quality assurance processes and encourage others to do likewise” is relatively weak and should be strengthened to require others in so far as possible to engage learners in their quality systems and processes.

The QQI should ensure that a national system for the recognition of prior learning (RPL) is available to Irish citizens, particularly at NFQ levels 1-4 and that provider accreditation processes take account of RPL. The Expert Group on Future Skills Needs report Developing Recognition of Prior Learning (RPL), (April 2011) examined how RPL can be further developed in Ireland, with input from the NQAI. The report addressed the potential role of RPL across a range of issues and policies, including in upskilling, meeting the National Skill Strategy objectives and engaging people in education and training. The report recommended the development of an integrated national RPL service covering Levels 1-4.

Integrating an RPL system covering Levels 1-4 into national further education and training provision has several potentially significant benefits, and could:

- Enhance access, participation, and achievement of adult learners, including adults with literacy, numeracy and ICT needs, and the long term unemployed.
- improve literacy, numeracy and ICT practices of participants and impact on national literacy levels,
- foster the culture of learning and achievement in adult and lifelong learning and positively impact on progression in adult education and training provision, as well as in activation policies, and
- Contribute to meeting national policy targets as well as QQI goals.

An integrated national system of RPL can be a catalyst in the ongoing transformation of the Irish further education and training system of provision. On the demand side, it would facilitate a more direct focus on learner needs, interests, and progression; while on the supply side, it can lead to streamlined and more efficient responses from providers. Ultimately, it can contribute to significantly enhancing flexibility of provision and impact on access, transfer and progression, particularly for those who were not well served by education and training systems in the past.

Priorities Associated with Goal 3

NALA believes the priority statement “Seek opportunities to facilitate collaboration among providers on matters of common interest” could be phrased more directly by deleting ‘seek opportunities to’.

Communications on quality issues among stakeholders - including learners staff and the public - should be in plain English. NALA believes that this is essential to meeting robust standards and maintaining quality in education and training.

Priorities Associated with Goal 4

This section considers a range of stakeholders and prioritises various processes with them. Learners are not explicitly included.

NALA welcomes the focus on enhancing learning and qualifications to meet societal and cultural needs. This reinforces the need for the QQI to have robust and comprehensive systems in place so that it can inform itself of such needs. This will necessarily involve developing processes to ensure learners needs inform the QQI policies and actions, including disadvantaged communities and citizens with low or no qualifications.

All communications, starting with communications to the public / learners, should be in plain English.

Priorities Associated with Goal 5

NALA supports all the priorities listed here. However, we would like to see other priorities included. There appears to be a focus on communications from the QQI to the public on provision - the supply side. It should also be a priority to balance this on the demand side by securing authoritative information on the needs of the public and learners. It would be useful to add a priority addressing how learners inform QQI policies and actions.

All communications should be provided in plain English (see www.simplyput.ie)

Do have any general or specific feedback?

The Mission, Vision and Values are welcome and appropriate.

The goal to prioritise the needs of learners is most valuable. It is less clear how that will be achieved. This is perceived as a significant weakness in the document, and merits a priority action under goal 2.

The draft statement could refer to Irish citizens, and not just learners, to ensure that the QQI responds to the strategic needs of Irish society, and not the more limited cohort of those already in education and training.

Do you think the key elements are appropriate and clear?

Yes the elements are clear.

The elements could be more appropriate to the learning and qualification needs of all citizens, especially to those with low or no qualifications.

Are there areas that you think are important?

A specific priority should be included on the development of a process to ensure Goal 2 is achieved - the needs of learners shape QQI policies and actions. This should be developed in a way that is inclusive of all learners, including adults with literacy / numeracy difficulties and low / no qualifications.

A proactive response, including leadership from the QQI, in relation to access, participation and progression on the National Framework of Qualifications, is needed to address inequalities in education and qualifications among Irish citizens.

Parity of esteem for all levels of the National Framework of Qualifications is not sufficiently covered. Levels 1 and 2 remain under utilised, and in some cases are simply not available to citizens, while Level 3 (FETAC) awards declined in 2012.

There should be a priority in the strategy to use plain English. The QQI should make a commitment to use clear communications, particularly to the public and learners.

The QQI should ensure that a national system for the recognition of prior learning (RPL) is available to Irish citizens, particularly at NFQ levels 1-4

Are there key areas relating to our impact on stakeholders that should be considered?

The key areas are addressed included in the submission above.

SUBMISSION BY:

National University of Ireland

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

National University of Ireland

Mission, Vision and Values

We accept that these preliminary statements are of their nature general, given the very broad remit of QQI. It is hard to disagree with anything in them but we suggest that they might usefully be expanded and developed to convey a greater breadth of mission, vision and values and a greater level of awareness of the contribution of institutions. The Mission Statement seems rather narrow and might usefully be expanded by the addition of 'and in the interests of public confidence in Irish education and training.' 'High-quality education and training opportunities' seems an unduly reductionist encapsulation of the richness and diversity of the Irish education and training system. There is nothing in the list of values to suggest that QQI places a value on knowledge and its expansion, on intellectual and personal formation, or on what is the essence of the system whose quality QQI seeks to safeguard.

Goals

We suggest the following addition after 3:

Base our relations with designated awarding bodies on a shared understanding of high standards, the promotional of educational values and the enhancement of learning.

Enablers

The actions listed as 'enablers' relate almost exclusively to internal organisational measures. There is no indication that the achievement of QQI's goals will involve partnership and dialogue with external organisations.

Challenges and Opportunities Facing QQI

We suggest that an additional challenge for QQI as a new agency is to promote public awareness of QQI and gain public confidence in its operations.

Priorities Associated with Goal 1

We would suggest that there are far too many priorities giving the impression that QQI may be trying to do too much too soon on its own.

NUI participated in the dialogue on which the IUA response was based and accordingly endorses the content of that response. As a designated awarding body, we considered it appropriate to make this short further response.

SUBMISSION BY:

National University of Ireland Galway

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

National University of Ireland Galway

We wish to welcome this opportunity to offer feedback on QQI Strategy Statement. We are aware of the diverse range of functions that QQI is addressing. Overall, this Strategy Statement is very well developed for such a complex set of missions. No Strategy Statement can be perfect, so please accept the feedback comments below in this light.

Your mission is to 'safeguard quality'. This suggests that quality is definable or can be achieved. Consider the word 'assure' that suggests that quality is a relative concept that needs to be continuously improved and strived for.

Your vision to achieve 'high quality education and training'. This does not resonate fully with Universities that also need to improve the quality of research and creation of new knowledge. Consider the word 'learning' rather than 'education'? The vision statement is also very focused on 'attainment' rather than a culture of 'continuous change' and improvement that may be far more empowering for your stakeholders.

In your goals you talk about 'policies and processes'. Did you mean to say 'procedures'? Procedures typically guide the implementation of policies as opposed to processes that are more generic? You can give your stakeholders a 'procedure' in the form of a document but can you give them a 'process'?

You set out five key goals. These are very comprehensive. We would humbly suggest that you strengthen your goals around how you (i) develop your own internal processes to make them leaner, more efficient and responsive, (ii) develop the skills and promote creativity in your own staff that can empower and enable them, (iii) develop a comprehensive engagement and information exchange process with all of your stakeholders. You have already started this very well.

We hope that these comments may be helpful and thank you again for the opportunity to offer feedback.

SUBMISSION BY:

National University of Ireland Maynooth

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

National University of Ireland Maynooth

General Observations:

We welcome the opportunity to comment on the draft Strategy Statement though the timing of the consultation process is not ideal. With many colleagues on vacation at different times in July it is difficult to develop a collective institutional response.

Our overarching response is that the language of the draft strategy tends to convey a defensive and custodial type perspective with insufficient attention to proactive promotion of the quality standards that are already being achieved by many providers. The QQI, as a body independent of the providers, has a unique opportunity and responsibility to provide objective assurance of the quality standards applied and achieved by providers.

Specific comments

The following are specific comments on sections of the draft strategy.

p.2 the Introduction would benefit from a succinct statement of the overall purpose of QQI

p.2 Mission: the very first word 'safeguard' which is also the only verb is too restrictive as a role and the end of the sentence implies that learners are the only stakeholders. We suggest

'promote, assure and enhance the quality of education and training programmes and the qualifications standards applicable to all approved providers in Ireland'

p. 2 Vision: there is no direct or indirect reference to the role of research in relation to the quality of education provided by universities

As an alternative statement we propose

Vision: quality assured education and training, learning and knowledge creation opportunities that are aligned with the best national and international standards.

Values:

Learner Centredness – final sentence reads like it is responding to learners' needs. An alternative might be:

Our focus is on enabling learners to achieve their potential through quality assured education and training, learning and knowledge creation opportunities and the related qualifications.

Collaboration - *Supporting* might be more appropriate

Other Values that might be added include:

(a) Consultation and communication with all stakeholders

(b) Diversity – we recognise the diversity of providers and how it can enrich the overall quality of the range of education and training opportunities provided to differentiated groups of learners

p.3 Goals – we propose the following rewording

2. *Enable learners to achieve their potential through our policies and actions and our relations with stakeholders in the area of quality of assurance*

3. *Provide appropriate supports to enable providers maintain and improve quality assurance processes that are benchmarked against international standards*

4. *Promote coherence within and across the education and training systems in collaboration with stakeholders including relevant State agencies, based on*

5. *Publish reliable, relevant and timely information on all programmes and qualifications under the remit of QQI*

6. *Add new item: Promote international awareness of the roles and responsibilities of QQI and disseminate information on the effectiveness of the NFQ and quality assurance procedures in Ireland.*

p. 5 Enablers

On People and Structures

Pt. 5 amend to Effective *internal and external* communications

Add *Consulting regularly with all stakeholders*

Governance is an appropriate heading but the actions are not all what might be expected under this heading. Consider adding the following:

- Adopt Strategy Statement for period 2014-2016 – clarify does this refer to academic or calendar years. Preference is for academic year
- Oversight will be provided by the QQI Board.
- Publish annual report prepared by the CEO for the Board
- Develop and implement performance framework regarding the Strategy (ie an internal QQI performance framework that builds on your third point. It needs to be more than just quantitative indicators. Consider also summary narratives of changes in process etc)
- QQI will monitor implementation of its Strategy and comply with external auditing requirements to assure all stakeholders that QQI is implementing procedures to ensure quality standards that are benchmarked against the best internationally.

p. 6 Challenges and Opportunities

We wonder if this is more appropriate for an internal draft planning exercise and it may not be necessary to retain in the final published version of the strategy.

If it is retained we suggest:

- (a) Prepare a full SWOT rather than a C&O approach
- (b) Distinguish between internal and external contextual matters
- (c) Items such as 'Implementing public service reform' and 'supporting the national recovery programme' are very high level contextual matters that might form part of an introduction, they are not unique to the work of QQI

P.7 onwards

Consider replacing 'priorities' with 'actions' – reduce the total number by grouping some together under new headings linked to the Goal. For each action identify expected outputs, outcomes, performance measure, and timeline. Consider a matrix layout for this section.

We hope you find these observations helpful.

SUBMISSION BY:

Pobal

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

Pobal

Dear Pdraig

As per your recent letter to Seamus Boland, Pobal Chair, please see below his comments on your first Strategy Statement 2014 - 2016.

Thank you for the opportunity to comment on your draft strategy.

As you may be aware, Pobal's mission is to promote social inclusion, reconciliation and equality through integrated social and economic development within communities. With this in mind, we would suggest that your draft strategy would benefit from the addition of statements in respect of commitment to Social Inclusion and Equality of Access. Ideally this may be as a stand-alone statement within your section on values, but there may also be other sections where the principle can be elaborated upon.

Examples are given below in italics

Values

Possibly as a stand-alone Value:

Inclusion and Equality - to use all appropriate measures procedures and powers to promote access for all and remove barriers experienced by disadvantaged learners.

Or perhaps more simply an elaboration of your statement re Learner Centredness,:

We promote access *for all*, responsiveness, flexibility, trust and quality in education and training programmes and qualifications. Our focus is on meeting *all* learner's needs in relation to quality and qualifications.

Goals

Goal 2: Prioritise the needs of learners, *with due regard to equality issues*, in our policies and actions and in our relations with stakeholders,.

Challenges and Opportunities:

Supporting the Education and Social Inclusion measures set out in the National Development Plan 2007-2013 Transforming Ireland – A Better Quality of Life for All

I hope that these few comments help in the formulation of your strategy and wish you well with the establishment and development of your new Authority.

SUBMISSION BY:

Private Security Authority

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Private Security Authority

Challenges and Opportunities Facing QQI

External quality assurance structures and processes should be clear and understandable. The requirements attaching to same should be accessible and in plain language.

Priorities Associated with Goal 2

A clear, written complaint process should be in place to address any issues around the quality of delivery of programmes. Such a process should be supported by published policies and procedures.

Priorities Associated with Goal 3

Quality assurance should encompass a process which ensures a consistently applied and implemented quality of delivery by providers.

SUBMISSION BY:

Road Safety Authority

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

Road Safety Authority

Thank you for sending a copy the draft strategy document to the RSA for comments. It may be helpful in the introduction to include some narrative outlining how this fits in with other qualification bodies E.g. does it subsume HETAC, FETAC etc. so a bit of context in the document would be useful for those in other sectors who may not fully understand the context.

SUBMISSION BY:

Royal College of Surgeons in Ireland

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Royal College of Surgeons in Ireland

Do have any general or specific feedback?

This is a clear and comprehensive statement of QQI strategy.

Do you think the key elements are appropriate and clear?

Yes.

Are there areas that you think are important?

Priorities linked to Goals #1 & #4:

I suggest that the statements referring to 'professional recognition bodies' [Goal #1, Priority #8 & Goal #4, Priority #6] should be amended to refer to 'professional recognition and training bodies'. This will capture the professional training bodies (e.g. those in the medical specialties) as well as the statutory accreditation bodies (e.g. the Medical Council of Ireland).

SUBMISSION BY:

State Examinations Commission

*Please note this response appears as received
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State Examinations Commission

A Chara,

Having reviewed the draft QQI Strategy Statement, the State Examinations Commission (SEC) wishes to confirm that it has no issue with its contents.

SUBMISSION BY:

St Patrick's College, Drumcondra

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

St Patrick's College, Drumcondra

Submission: Quality and Qualifications Ireland QQI Strategy Statement 2014-2016

I make this submission on behalf of St. Patrick's College, Drumcondra, and the College Quality Promotion Committee. We warmly welcome the opportunity to engage in the development of the Quality and Qualifications Ireland (QQI) Strategy Statement 2014-2016.

This submission reflects our feedback on the proposed draft circulated end of June, 2013;

- **General:** Given the significance of the value of 'learner-centredness' a key area where the emphasis in the strategy statement could be enhanced is in relation to the acknowledgement of the diversity of learners, their strengths and needs – suggest that the term 'diverse' precede that of 'learner/s' throughout.
- **General:** Consideration to be given to the order of presentation of lists/bullet points in the strategy statement – are these ranked in order of priority? If not then suggest that this may need to be stated.
- **Mission:** the term 'safeguard' which could suggest reacting to/preserving – alternatives could include ensure/promote/enhance.
- **Values:** although referenced under 'Integrity' the centrality of the value of 'openness' (transparency/communication) could be additionally considered.
- **Goals:** Clarification as to whom the term to 'stakeholders' refers to.
- **Goals:** in respect of Goal 5 to consider a wider expression of the function of public service than that of 'provision of information...to the public'
- **Priorities Associated with Goal 4:** Suggestion for insertion: 'Encourage and facilitate innovation and responsiveness in qualifications and programmes to meet [diverse] societal and cultural needs.
- **Enablers- People and Structures:** consider replacing the term 'reduced' to that of 'available'
- **Enablers:** Clarification needed as to whether these enablers refer to internal operations/external relations or both. Eg. 'Effective communication' is that referring to internal/external/both?
- **Challenges and Opportunities:** Alongside the matter of order of priority and a similar comment to that made in preceding bullet point – whether the points listed refer to internal/external challenges and opportunities.

SUBMISSION BY:

Teachers Union of Ireland

*Please note this response appears as received
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Teachers Union of Ireland

Introduction

The Teachers' Union of Ireland (TUI) represents close to 15,000 teachers and lecturers working in post-primary schools, in further and adult education contexts and in third level colleges. It has long experience and strong knowledge of qualification issues and current quality assurance practices at each of these levels of education and of how former awarding and quality assurance bodies operated. Most particularly, it has a strong knowledge and understanding of practitioner views (teachers, lecturers, organisers and managers) on a range of relevant issues. These embrace the perspectives of those involved in managing, developing and delivering programmes of study (part-time and full-time), designed to meet a wide range of learners and delivered in a variety of contexts. As the representative body of professional practitioners it has much to contribute to the framing of new policies and procedures by the QQI.

General Remarks

- Although the public consultation process that is now underway is welcome TUI re-iterates its earlier message to QQI (communicated verbally and in writing) that the consultation process must include specific and regular consultation meetings with key stakeholders, including the union. It understands that the QQI has plans to set up a stakeholder forum in the near future and it welcomes the recent communication suggesting a discrete meeting with TUI in the autumn period. It respectfully recommends that a stakeholder forum should be representative in nature and manageable in size. Such a forum should meet on a regular basis – at least three-four times a year, especially during the phase when new policies and procedures are being explored and agreed. It further recommends that provision should be made for discrete meetings, as necessary, with particular stakeholders, such as TUI, that have a robust and dynamic connection with qualification and quality assurance issues at a number of levels.
- TUI accepts that public consultation events such as those scheduled in May of this year play an important role in accommodating wide engagement in the development of new QQI policies and procedures as these evolve and as QQI functions consolidate. Such events provide an important opportunity for a variety of stakeholder organisations and interested parties to share perspectives and build an understanding of the entire qualifications and quality assurance landscape and associated issues. However, it is important that such consultation events are appropriately notified, well in advance of closing dates for submission to all possible contributors. It is also critical that consultation events are scheduled at times that accommodate maximum and meaningful participation.
- Likewise, written feedback and submissions play an important part in gleaning perspectives from the public, specific groups and organisations. In this regard, notifications and consultation materials must issue well in advance and timelines for the submission of observations must be reasonable and appropriate. In this regard, TUI notes disappointment and frustration at the timing of the recent public consultation events (May) and the timelines for written submissions and on-line feedback (material provided in mid-late May with submission dates in early June and mid-Sept). These dates and times are in direct conflict with time bound responsibilities of relevant personnel, most notably examinations and end of year or commencement of year events. Therefore, they do not allow adequate opportunity for TUI, as a representative organisation, to consult widely and thoroughly with its membership. This approach should be avoided in the future as it will only serve to render the consultation process less meaningful and useful and will frustrate positive relationships with the QQI. Therefore, TUI respectfully requests that the date for submission of feedback on the second phase of the green papers be extended to the end of September.

QQI Strategy Statement 2014-2016

Broadly, TUI sees the strategy statement as comprehensive, clear, relevant and accessible and offers the following brief remarks to assist in strengthening the statement and make it more relevant and meaningful.

Mission

Safeguarding quality is an important mission statement but a question arises as to whether the QQI would, in the first instance, not have to ensure the development of quality.

It is fitting that quality and the recognition of programmes and qualifications are central to the mission of QQI. However, while these ultimately benefit learners they also benefit providers and also support society in general.

Vision

It is somewhat disappointing that reference to '*flexible access to*' high quality education and training opportunities is not integrated into the vision statement. This is a central plank of the National Framework of Qualifications (NFQ) of which the QQI is custodian.

Values

Learner centredness and meeting learner needs are legitimate and expected core values. However, it is providers with which the QQI will work closely with to ensure these values are embraced. Therefore, it is somewhat remiss not to refer in some manner to strong, effective and healthy relationships with providers in this section.

Collaboration: Reference to collaboration is valid but weak as currently set out; working with individuals or particular agencies or bodies will not in itself lead to collaborative practices.

Integrity: Honesty and reliability could usefully be included in the brief explanation.

Goals

TUI questions why the NFQ is flagged as the central organising feature for establishing QQI policies and processes as opposed to one of a number of features. The NQF primarily represents the levels of qualifications and the knowledge, skills and competence associated with each level of qualification; not the quality assurance measures and processes attaching to its implementation.

While the needs of learners should be a priority, the needs of and relations with providers should also be a priority. Some re-wording of goals 2 and 3 is advised to capture this.

Goal 5 could be usefully expanded to include providers as well as the public.

Enablers

Under governance reference to the development of mechanisms and committee structures to engage effectively with stakeholders is welcome and TUI looks forward to further engagement in this regard in the near future. This will be critical in embracing stakeholder expertise, knowledge and ideas into draft policies for deeper consultation. TUI advises that a commitment to effective engagement be further strengthened by including this in the list under the column on People and Structures (page 5).

Effective mechanisms for meaningful communication, stakeholder engagement and consultation will avoid misunderstandings about how future policies were framed and agreed. They will also ensure early notification to key stakeholders about the timing and timelines for submissions in respect of policies and procedures under development.

Challenges and Opportunities

As set out on page 6 the challenges and opportunities reflect the current and immediate short term context with respect to structural changes, national priorities and constraints in the public service.

Priorities in Relation to Goals

While the range of priorities set out in pages 8 -11 are extensive and comprehensive TUI believes it would be remiss of QQI if particular attention is not made given to the provision of guidelines for the recognition of prior learning (RPL). At a minimum RPL should be referenced under the priority to provide guidelines for access, transfer and progression under goal 2. RPL could prove an important aspect of supporting access and progression for some learners. However, it a complex concept and implementation can be quite problematic depending on learner needs, provider focus and available resources and support. Clear guidelines will be critical to guide how and which learners can best or appropriately benefit from RPL. In the absence of clear policy and practice guidelines learner expectations may be unrealistic, access to RPL may vary enormously depending on provider approach and capacity and the rigour applied may be inconsistent across providers - which could serve to undermine standards and trust in the process overtime.

A further area of work that may merit being listed under priorities refers to the review of the Leaving Certificate with a view to providing greater clarity as to how achievement in the Leaving Certificate is linked to the NFQ. Currently, there is little capacity under the framework to denote the real difference that exists in student achievement at this level.

Another sensitive area is the 'shared space' i.e. Level 6 awards provided under further education and training and third level. Ultimately, an award at Level 6 should have parity of esteem and value, irrespective of which provider delivered the programme or where the learning was undertaken. This is an important area, especially with reference to seamless opportunities for progression to further study. In addition, a number of issues arise as a consequence of all programmes under the apprenticeship scheme being located at the same level. This is problematic and should be addressed.

In conclusion, TUI advises that the above comments should be taken as preliminary observations. They will be further explored as part of a discrete meeting with QQI officials in the near future.

SUBMISSION BY:

Tyrrell, Bernie (Individual)

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

Tyrrell, Bernie (Individual)

I find it to be okay and well written. There is one thing, students that have completed modules previous to the new ones being introduced..... How long can they be used to go towards a full fetac level four?

SUBMISSION BY:

University College Cork

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University College Cork

Mission, Vision and Values

The Introduction to the document and the section on mission, vision and values are very dense. The purposes referred to in the Introduction are not clearly identifiable later in the document (e.g. the challenges and opportunities facing QQI are stated but not necessarily addressed).

The language used throughout the document is that of policing rather than enabling and facilitating. UCC recognises the diversity of providers with which QQI is working and understands that it is extremely difficult to write a single strategy document covering all types of provider; for that reason, it suggests that it would be sensible to state, at the beginning of such a document that QQI recognises the diversity of providers with which it is dealing.

Mission: could the word 'safeguard' be replaced by the word 'assure'? There is nothing about enhancement or improvement in the mission statement.

The first value about learner centredness - what does "...meeting learners' needs..." mean? Might this read, "...enabling learners to achieve their potential?"

There is no mention of communication in the values.

Goals

In the introductory statement, leave out the words, "...designed to be..."

Goal 3: this is not well articulated and should be reworded. Words such as 'proportionate' and 'appropriate' might be useful - "Provide appropriate support to providers..." the Universities have a role in promoting the quality of Irish higher education and would expect QQI to support them in this. The language is compliance-focused. Meeting robust standards does not necessarily lead to an improvement of the quality of the student experience.

Goal 5: what is meant by 'authoritative'? From a user perspective, information needs to be timely, relevant and reliable. The word 'authoritative' may actually create difficulties for QQI in the future. Is there a potential expectation that, if QQI's information is deemed to be such, then it could be used to produce rankings? This is not the role of the national agency.

Enablers

This is quite an inward-looking section - some aspects, such as effective communication, are both internal and external.

Some of the enablers listed under 'Governance' do not really fall into that category.

Should there be something in this section about the publication of information/transparency?

Challenges and Opportunities Facing QQI

Is this section appropriate in a strategy document? (Unless a direct link is made between these bullets and the actions set out in the lists of priorities?) The scope of QQI's agenda could be stated as a challenge (or made explicit under the first bullet).

It is sometimes unclear which of the bullets are challenges and which are opportunities (maybe all of them are both!)

Are the fourth and seventh bullet points appropriate for this document?

The fifth bullet point should be a two-way process - providers themselves have a role to play in maintaining confidence and trust in the quality of (higher) education.

Priorities Associated with Goal 1

In general, this is a confusing part of the document. The lay out of the priorities and some of the terminology and language used do not facilitate comprehension or ease of reference. Looking at the five goals as a whole and the number of priorities against each, QQI might consider prioritising the priorities! This might be considered in the light of responses to the consultation on the goals themselves

Goal 1: there are implications for the NQF if it is to be the 'central organising feature' of QQI's policies and processes. There will need to be total confidence in the NQF's capacity to fulfil this role in the new context. In which case, the second priority might move to first position.

4th bullet: what does this mean?

Priorities Associated with Goal 2

From a University perspective, we would suggest that the 7th bullet should be a higher priority.

Priorities Associated with Goal 3

Some of the language in this sections needs to be reconsidered. For example, the first bullet, "Relate with providers based on..."

Again, the language is one of policing rather than partnership.

Priorities Associated with Goal 4

No specific comments.

Priorities Associated with Goal 5

Reiterate the point about 'authoritative information' and about tone of language (see bullet 4.

Do have any general or specific feedback?

To reiterate our key general points: the tone of language is one of policing/compliance that may not be appropriate in QQI's relations with all providers;

The document is somewhat complicated, particularly at the level of priorities for the individual goals.

Do you think the key elements are appropriate and clear?

See comment above regarding the somewhat complicated structure of the document.

Are there areas that you think are important?

Enhancement/improvement is not an obvious theme in the document.

Are there key areas relating to our impact on stakeholders that should be considered?

No specific point to make here other than to suggest that the document could be clearer regarding the fact that providers are also stakeholders.

SUBMISSION BY:

University College Dublin

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

University College Dublin

Mission, Vision and Values

Mission

May need to define what is meant by 'quality'. Replace 'safeguard' with assure? Should 'enhancement' be embedded in this section?

Vision

reference is made to education and training - this does not resonate fully with university activity eg research and the creation of knowledge.. Perhaps 'earning' should be used instead of 'education'.

Values

this section should perhaps also include 'communication' - does QQI not have a role in communicating and supporting?

Overall QQI should consider inserting a clear statement regarding its purposes and functions.

Goals

Goal 2 - perhaps use 'enable learners

Goal 3 - suggest 'provide appropriate support...'

Goal 5 - replace 'authoritative information' with eg ..publish reliable, timely and relevant information..

Enablers

As a general statement, many of the enablers appear to be inward looking.

People and structures - this should also include 'internal and external communication'

Technology and Processes - maybe broaden the title to 'operations'

Governance - this might also include eg publishing information and transparency; developing strategy and overseeing implementation; consulting with stakeholders; mechanisms for review; annual reports etc.

Challenges and Opportunities Facing QQI

Should this section be in a strategy document? Some of the challenges appear to be more contextual than challenge.

Priorities Associated with Goal 1

This section on priorities needs to be reworked. Are these all priorities? How will QQI deliver on these? QQI need to take care not to create a problematic agenda for itself. Perhaps the 'priorities' need to be 'prioritised'? Maybe the priorities should be referred to as 'actions'?

Do you think the key elements are appropriate and clear?

Some sections need more work, particularly the priorities section

There should be some formal acknowledgement that the sector within which QQI operates is very diverse and that future frameworks/models will have to take cognisance of that.

As a general point, the language used throughout the document would probably benefit from being 'tighter'. By not referencing the diversity of the sector and perhaps trying, as a result, to create a generic frame work document the document risks using inappropriate language eg under goals there is a reference to 'robust standards' - what does that mean in the university sector which works within a QA framework that promotes enhancement? Does the reference to 'standards' infer compliance against KPIs or other metrics?