

A focused review of the implementation and effectiveness of the QA procedures for RPL and Assessment at City Education Group (City College Dublin [CCD] since 1 September 2025)

Background and Context

The Focused Review Process

As part of its statutory remit, QQI is empowered to carry out a focused review at institutional level under section 34(1)(b) of the Qualifications and Quality Assurance (Education and Training) Act 2012 (hereinafter 'the 2012 Act')¹ in circumstances where concerns have come to its attention in relation to the implementation and effectiveness of the provider's QA procedures¹. Such a review is intended to:

- Determine that the quality assurance procedures established by a provider under the 2012 Act have been implemented.
- Evaluate the effectiveness of a provider's quality assurance procedures for the purposes of establishing, ascertaining, maintaining, and improving the quality of education, training, research and related services offered by the provider.
- Confirm that directions issued previously by QQI in relation to the effectiveness of a provider's QA procedures have been complied with.

QQI has established Procedures for Focused Reviews on the Implementation and Effectiveness of Provider QA Procedures², which guide the focused review process.

Identification of Causes for Concern and Subsequent Engagement

In late 2023, concerns were identified by QQI, the Department of Education (DoE) and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) relating to City Education Group's (CEG) (since 1 September 2025, 'City College Dublin', or CCD) procedures for advanced entry and for assessment on higher education programmes (see detail of concerns identified on p. 5 of this report). Following engagement between QQI and the two departments, it was agreed that QQI would meet with CEG to discuss the concerns. Representatives from CEG and QQI met in January 2024; based on discussions at the meeting and the evidence that QQI had gathered prior to that meeting, QQI considered that the matter necessitated a focused review of the effectiveness of CEG's Recognition of Prior Learning (RPL) procedures and their implementation. QQI therefore initiated a focused review of the implementation and effectiveness of CEG's quality assurance procedures under section 34(1)(b) of the 2012 Act. A letter of notification was issued to CEG by QQI's CEO on 20 February 2024.

Conduct of the Focused Review Process

Terms of reference were developed by QQI and were issued to CEG on 3 April. An independent external review team was appointed, which comprised expertise in recognition of prior learning, social sciences, and quality assurance. A provider statement was developed by CEG and, following its submission to QQI in July 2024, the review team³ undertook a desk review of the statement. A site visit was held on 13 August 2024.

A report was drafted by the review team and submitted to QQI on 23 August 2024. The provider had the opportunity to comment on the report's factual accuracy and submit a formal response to the report, which it did on 30 August 2024. As part of the response, and in accordance with the terms of reference, CEG was requested to update its RPL procedures for the review team's

¹ The statutory basis for focused reviews is set out in Section 34(1)(b) of the <u>Qualifications and Quality Assurance</u> (<u>Education and Training</u>) Act, 2012

² QQI (2017), Procedures for Focused Reviews on the Implementation and Effectiveness of Provider QA Procedures.

³ The term 'review panel' (used in the original version of this report) has been changed to 'review team' throughout the report to reflect the language used within the QQI procedures and to ensure consistency of terminology in the report.

consideration and approval. The revised procedures were submitted to QQI on 11 October. The review team subsequently considered the revised procedures, and the review report was updated to reflect the review team's evaluation. CEG was asked to review the revised report for any factual inaccuracies and invited to submit a formal response to the report on 5 December 2024. A formal response was submitted by CEG on 22 January 2025, at which time CEG also confirmed that it was satisfied that the report was factually accurate.

Identification of Procedural Errors in the Conduct of the Focused Review Process

Following conclusion of the review process, QQI established that there had been procedural errors in the conduct of the review process. These errors related to the:

- 1. review objectives set out within the terms of reference, which, as outlined above, provided for the review team to consider and either approve or not approve a revised version of CEG's RPL procedures.
- 2. possible outcomes available for the review team to recommend to QQI (i.e. the review team was instructed that it could, where necessary, propose 'mandatory changes' and 'considerations', whereas the focused review procedures allow for 'directions' and 'recommendations'); the review team was not provided with the option of proposing withdrawal of the provider's QA procedures where grave deficiencies were identified.
- 3. absence of a learner representative on the review team, in spite of provision being made for same within the terms of reference for the review.

In the view of the executive, the errors identified had no impact on the substance of the review team's findings.

Actions taken to remedy Procedural Errors

The executive presented the report alongside an overview of the procedural errors to the Approvals and Reviews Committee (ARC) at its meeting of 31 March. The ARC instructed the executive to reconvene the review team to agree remedial actions to rectify the errors identified. The review team was reconvened in April/May and July 2025. The review team members agreed with the QQI executive that the errors identified did not impact the substance of their findings. It was agreed that:

- the review outcomes proposed by the review team would be reframed from 'mandatory changes' and 'considerations' to 'recommendations'. Where the review team considered mandatory changes were critical, recommendations would be directed for action as a matter of urgency.
- 2. given the significance and urgency of the review team's findings, a specific monitoring plan will be put in place to monitor CEG's response and progress in addressing the recommendations in the report. As part of the monitoring plan, CEG will be required to adhere to a specific timeframe and process to respond to and address the key recommendations. Periodic reports will specifically include quantitative data about the number of learners entering CEG programmes through RPL routes and the progression of those learners through those programmes. Monitoring meetings (to be accompanied by the submission of monitoring reports) will initially be scheduled for November 2025 and July 2026. Additional meetings and reports will be scheduled as required.
- 3. section 8 of the review report, in which the review team considered and commented upon CEG's revised RPL procedures, would be removed from the review report.

Note: It was agreed by QQI and the review team that it was not possible to remedy the absence of the learner representative, but QQI commits to ensuring that learner representation is included on all higher education review and evaluation teams going forward.

This report details the process undertaken, and the associated outcomes. Where necessary, the report has been annotated to indicate where remedial action has been taken to ensure alignment with QQI policy and procedure. The original terms of reference, alongside the site visit schedule, have been appended to the report.

2. Objectives of the Review

The review focused explicitly on the implementation and effectiveness of CEG's QA procedures in relation to RPL, when used for assigning credit and as a form of assessment on its degree programmes.

The objectives of the review were to:

- Determine that the quality assurance procedures established by City Education Group under Section 28 of the 2012 Act were being implemented, were appropriate and fit for purpose and were applied in 2022 and 2023 in relation to (i) the assignment of credit on the basis of recognition of prior learning and (ii) the process of assessment of learners who have been granted advanced entry through RPL.
- Evaluate the effectiveness of information supplied by City Education Group through the validation process to ensure that RPL would be used appropriately on its degree programmes.
- Evaluate the changes to QA and academic governance processes made by City Education Group. [Note from QQI Executive: As set out above, this objective was not appropriate to a focused review process.]

3. Review Team

The members appointed by QQI to the review team were:

- Dr Anna Kelly, Chair, Adjunct Associate Professor & Co-Director, UCD Inclusive Design Research Centre
- Dr Michael Hall, Subject Matter Expert, Head of Department in the School of Health and Social Sciences, MTU
- Ms Alexandra Anton-Aherne, Report Writer, Coordinating Consultant and Research Assistant, ThreeSixtyInsights

The review team was tasked with focusing on the internal QA processes and governance relating to recognition of prior learning (RPL) for advanced entry and for assessment.

The review team was also invited to identify any lessons to be learned both in relation to CEG's institutional systems and QQI's ex-ante programme validation process, particularly in the

4. Review Methods

The focused review was conducted using a mixture of desk research and a virtual site visit. The review team were provided with the CEG Provider Statement by QQI and additional supporting documentation. The review team met with representatives of CEG senior management and academic staff during a virtual site visit that took place on 13th August 2024.

5. Review Findings Against Objectives of Review

In Ireland, Early Childhood Education and Care is a regulated employment area, with the Department of Education and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) both having regulatory roles. The Qualifications Advisory Board (QAB) is an instrument of these departments to approve higher education qualifications in the area of Early Childhood Education and Care. In recent years, they have issued Professional Award Criteria and Guides (PACG) which these programmes must adhere to. One of the QAB's regulations, stated in the PACG, is that 'An NFQ Level 6 further education award in ECCE (or equivalent) can be deemed to have a maximum credit value of 60 ECTS for the purposes of advanced entry into a degree programme'. CEG had a Bachelor of Arts (Honours) in Early Childhood Education and Care programme approved by QAB in October 2020 and validated by QQI in April 2021.

The first Level 7 degree awards were made in August 2023 to learners who had enrolled on a part time programme in September 2022. QQI monitoring identified that learners had graduated on a 3-year Level 7 degree programme in CEG within a year of enrolment. QQI was contacted by external groups, including the QAB, with queries regarding what had been reported to them, namely that CEG was enrolling learners into year 3 of a four-year honours degree programme and that learners were exiting the programme with a Level 7 degree after one year. Both issues indicated that CEG was offering advanced entry into Stage 2, meaning year 3 of the CEG four-year programme to learners who met CEG's criteria. Having met on a number of occasions in late 2023 and early 2024, QQI and the two departments agreed that this issue needed to be investigated. QQI met with CEG representatives on 24 January 2024 for a detailed discussion of the issue, including the RPL criteria, process and quality assurance. The advanced entry process and criteria (QQI Advanced Certificate in ECCE plus at least one year's experience as Room Lead in a childcare setting) were confirmed by CEG. It emerged that there was little or no academic governance of the RPL process for advanced entry. CEG confirmed that the procedures and quality assurance of advanced entry were the same for the other Level 8 programme validated i.e. Business Studies. A focused review was initiated, and a formal process began.

The review team met on Wednesday 7th August and planned the approach that would be taken during the virtual site visit on Tuesday 13th August. It was agreed for the focus of the site visit to be two-fold, in line with the objectives of this focused review. First, the review team would aim to understand the learnings achieved by CEG with regard to RPL and the issues that have led CEG to this focused review. Second, the review team would seek to understand CEG's planned

approach for the future, including the revised RPL policy and procedure document. The outcomes of the focused review site visit are outlined below in accordance with the relevant focus areas, highlighted in Section 2 of this report.

5.1 Past Implementation of QA Procedures

Objective 1: Determine that the quality assurance procedures established by City Education Group under Section 28 of the 2012 Act were being implemented, were appropriate and fit for purpose and were applied in 2022 and 2023 in relation to (i) the assignment of credit on the basis of recognition of prior learning and (ii) the assessment of learners who have been granted advanced entry through RPL.

As indicated by objective 1 in Section 2 of this report, the role of the review team was to determine whether the quality assurance procedures established by CEG were being implemented, were appropriate and fit for purpose with regard to 2023 both in relation to the assignment of credit on the basis of recognition of prior learning and the assessment of learners granted advanced entry through RPL. The review team engaged with CEG using a conversational and scenario-based approach in order to gain understanding of the proceedings that led to this focused review. Attendees were welcomed to answer questions and support fellow colleagues' answers as needed.

The review team urged CEG representatives to summarise their understanding of what RPL offers to them as an education provider. Various CEG representatives answered, outlining that RPL wasn't always embedded or explicit within the CEG QA system and noted that RPL in general perhaps previously wasn't given enough consideration within the wider education sector. It was noted that over the last number of years, RPL has grown in importance. More awareness exists now, in terms of its opportunities but also in its challenges and limitations. It was further noted that RPL became a focus at CEG over the Covid-19 pandemic, when the group learned in more detail how RPL can be of benefit. CEG acknowledged that RPL is now deemed to be an important feature in new programme development. Representatives further explained that RPL offers education opportunities for individuals with significant experience and existing

qualifications, and ultimately brings diversity and experience into the classroom and workforce. The Bachelor of Arts (Honours) in Early Childhood Education and Care (ECEC) programme was highlighted in particular, as the first to adopt RPL-based advanced entry at CEG. It was noted that the programme has been delivered for approximately two and a half years.

The review team queried CEG's understanding of RPL as a strategic approach to advance entry. Representatives noted that RPL offers an opportunity to recognise prior qualifications and experience; offers opportunities for further development; brings rich knowledge and valuable experience into the classroom for everyone to learn from. CEG also noted that the RPL route brings students with different skillsets, for example critical thinking and communication skills, as well as students with different outlooks.

The review team were particularly interested in perceived challenges around the implementation of the RPL process, as experienced by CEG, that led to the development of the new RPL policy and procedure being presented to the review team. CEG representatives noted that the process was initiated by a query from QAB and QQI regarding the RPL process. However,

the review team was informed that processes are constantly reviewed and updated at CEG. The involvement of QAB and QQI led to the RPL process being examined in detail, with the aim of making it more robust. CEG representatives noted that the lack of regulation around RPL was challenging; they felt that their process was fair, however recognised that certain gaps existed. The need for more robust and reflective procedures was highlighted as a learning from this process by CEG representatives.

The review team sought to understand the RPL process historically. CEG representatives provided detail on the process and provided relevant examples. A challenge was highlighted by CEG representatives in terms of investigating experience based/non-certified learning. The review team had further questions around the governance of the RPL committee convened to assess eligible RPL applications. CEG representatives explained that processes in general are CEG-wide and upon reflection it was recognised that a higher governance structure would strengthen the approval process.

CEG clarified that for the NFQ Level 8 ECEC programme, Stage 1 relates to year 1 and year 2 of the programme, and Stage 2 relates to year 3 of the programme. It was noted that advanced entry to Stage 2 of the programme was available to applicants through the RPL process. CEG representatives noted that upon reflection, difficulties existed with regard to the regulatory body, allowance of credits to students with existing degrees and professional experience. CEG noted the importance of meeting stage learning outcomes and highlighted changes within the sector at the time, namely, the development of the professional award standards for the early years sector (ultimately approved by the QAB). The review team sought to understand CEG's process of reviewing admissions and RPL data with a view to the conclusions drawn and the changes that took place as a result. CEG representatives stated that there were no issues/complications with regard to the advanced entry applicants and CEG were satisfied with their overall progression through the programme.

The CEG NFQ Level 8 ECEC programme has an embedded exit award (Level 7 BA in Early Childhood and Care) which is available for students that cannot continue their studies. The review team sought clarification as to CEG's understanding of the reasons students exited the programme early. Examples noted included students gaining employment; financial difficulties; personal circumstances. It was also noted that the sector is predominantly female oriented and so maternity leave may also be an impacting factor. The review team sought to understand CEG's main learnings around the RPL process and changes for the future. Representatives from CEG stated that perhaps students coming from Further Education (FE) didn't have a good understanding of the Higher Education (HE) expectations. The need for preparedness and guidance was noted as a learning by CEG. The minimum requirement for experiential learning was also mentioned, with CEG representatives noting that upon reflection the one-year work experience requirement was perhaps not enough. It was noted that the requirement of a longer duration of experiential learning would be beneficial in future. CEG representatives further noted the need for transparency around the RPL process and acknowledged this as a further learning.

The panel sought to understand how, in practice, CEG distinguishes between certified and uncertified learning in terms of entry requirements for advanced entry. CEG noted that both certified and uncertified learning was required as part of the eligibility criteria (one year work experience as well as the NFQ FE Level 6 ECCE). The panel also sought clarification around the stages of the programme referred to throughout conversation. It was explained that CEG initially

envisaged the Level 8 ECEC programme to be an accelerated degree (three years). However, due to change in the sector, it was decided that the NFQ Level 8 ECEC programme would become a four-year programme where stage 1 was divided into two parts as follows: Stage 1 Part A (year one), Stage 1 Part B (year 2), Stage 2 (year 3). CEG noted that historically, an NFQ Level 6 FE qualification (60 ECTS) would grant access to Stage 1 Part A (year 1). An RPL assessment would then be carried out if experience was available to account for the additional 60 ECTS (Stage 1 Part B, year 2) in order to allow entry to Stage 2 (year 3). It was noted that previously access to Stage 1 Part B (year 2) was not permitted. This has been reviewed since, and the changes proposed to the procedure allow advanced entry to Stage 1 Part B (year 2). It was later clarified that advanced entry to Stage 1 Part B (year 2) was indeed possible, however never availed of, as those applicants withdrew their application when they realised that they could not advance to Stage 2 (year 3).

5.2 Effectiveness of Updated QA Procedures

Objective 2: Evaluate the effectiveness of information supplied by City Education Group through the validation process to ensure that RPL would be used appropriately on its degree programmes.

Objective 3: Evaluate the changes to QA and academic governance processes made by City Education Group.

The second session of the review team focused on the CEG proposed RPL Policy. In this session, the review team aimed to discuss and understand the effectiveness of CEG's updated QA procedures. A scenario-based line of questioning was adopted for this session. This involved a hypothetical applicant being considered through the proposed amended RPL procedure.

The review team sought to clarify and understand CEG's justification for not acknowledging the 60 credits from the NFQ FE Level 6 ECCE for the purpose of advanced entry to Stage 1 Part A (year 1). CEG representatives noted that this was a misunderstanding and that CEG do in fact accept the NFQ FE Level 6 ECCE credits toward advanced entry to Stage 1 Part B. They noted that the original NFQ FE Level 6 ECCE programme is no longer offered and that a new FE Level 6 ECC has been developed. In order to account for the gaps in professional award standards between the new programmes, bridging modules have been developed for applicants with the original ECCE qualification. These ensure that all the learning outcomes are met before admission to the degree programme. Detail was provided by the CEG team around the bridging modules.

The review team asked CEG to explain the proposed RPL policy and process. It was noted that the process begins with a pre-screening stage where the admissions office gathers applicant information in relation to eligibility. Four main questions are used to determine whether the applicant is deemed eligible at this stage and is sent the RPL application form, these are:

- Are you working in the sector?
- If relevant, how long are you working in the sector?
- If relevant, what is your role in the sector?
- If relevant, how long post qualification are you working in the sector?

The review team sought to understand whether support or guidance is available to applicants

completing the RPL application form. CEG representatives noted that support in relation to this has not been requested previously however, acknowledged that perhaps a Frequently Asked Questions (FAQ) document would be helpful to applicants, in particular to international applicants that may not be familiar with the Irish higher education context. The review team referenced CEDEFOP⁴ and highlighted the importance of counselling and guidance provision to applicants with regard to completing RPL application forms. The importance of connecting support with the procedure was further noted. CEG representatives felt that the proposed RPL policy was created in line with these guidelines, however the review team noted that the main steps in the CEDEFOP document were not reflected in detail in the CEG RPL document.

The review team sought to understand the next stage in the RPL process and asked CEG representatives to explain the procedure by which RPL applications are assessed. It was noted that once the application has been submitted, a Course Committee is convened. The first task of the Course Committee is to ensure that all necessary information is available and once satisfied, proceed to evaluate whether the applicant meets the learning outcomes per stage. CEG representatives informed the review team that an updated form exists such that the most up to date version of the proposed RPL policy now includes detailed questions within the portfolio, which map more directly to module learning outcomes. The review team did not have sight of this version in advance of the meeting and therefore could not comment on it. The review team referenced Section 10, Part D of the proposed RPL policy, with reference to the assessment of a learner's application. It is noted that 'A range of assessment mechanisms may be used (e.g. portfolios, interviews, essays, examinations, etc.). This stage must be appropriate to the application and fit for purpose'. Members of the review team queried the use of ad-hoc bespoke assessment rather than using the established module assessment strategy for the relevant module(s), which have been already validated. CEG representatives noted that they had not considered providing an assessment in that regard but welcomed the suggestion from the review team.

The review team had concerns in terms of the minimum experiential learning required for the RPL process, where duration of experience seems to be regarded more highly than quality of experience (e.g. nature of duties, diversity, etc). The review team queried whether duration is a valid criterion to so heavily influence determination of eligibility and noted that the professional award criteria guidelines state that practice placement must be supervised, structured, varied and assessed within a Tusla registered setting. The review team therefore sought to understand CEG's approach to mapping/assessing prior work experience against the professional award criteria guidelines. CEG representatives argued that in future the practice placement element will be accounted for, both on the new NFQ FE Level 6 ELC award (150 hours of work experience/placement) and via the access to year 2 pathway (300 hours of supervised placement). CEG noted that employment hours can also be counted towards placement hours/supervised work placement hours.

The review team further sought to understand CEG's proposed approach in terms of assessing certified learning, namely the process for confirming that learning outcomes for Stage 1 have been satisfied. CEG representatives stated that for advanced entry to Stage 1 Part B of the Level 8 ECEC programme, applicants would be exempted for 60 credits. The review team highlighted

⁴ Cedefop, *European guidelines for validating non-formal and informal learning*, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2801/389827

that section 8.1 of the proposed RPL policy states the following: 'CEG recognises up to 60 ECTS in respect of undergraduate advanced entry admission to a programme of 180 ECTS at NFQ Level 7, and 120 ECTS to a programme of 240 ECTS at NFQ Level 8'. The review team recommend that any exceptions to this policy be included in the policy as an appendix, for clarity. This encompasses the inclusion of professional award criteria (or other requirements) in regulated professions such as the early learning sector. The review team advised the CEG team to consider how the QAB and other regulatory bodies might be consulted in the case of RPL in regulated programmes.

In terms of credit recognition for module exemption, the review team outlined that various sections of the proposed RPL policy make reference to certified prior learning being 'typically' required (sections 7.2, 8.1, 9.2). The inclusion of language such as 'typically', 'normally', 'should', 'may' was queried by the review team. The review team encouraged CEG to review the language used in the policy, for example the use of the word 'typically' because such terms may suggest non-binding elements to a procedure, which is not appropriate in this context. Furthermore, the review team noted that the proposed policy does not reference informal learning and sought to understand whether this was a purposeful limitation or an error. CEG representatives noted that the intention was to create a policy representative of all programmes while also being more conservative. The CEG team were encouraged to consider the consequences of this potential limitation to the RPL policy, as presented. Upon review, CEG representatives stated that the new resources, processes and procedures need to be pilot tested to ensure transparency.

The review team expressed concern in regard to the assessment procedure for RPL and the lack of transparency around the mapping of learning outcomes process in the proposed procedure. The review team were of the view that the scoring rubrics provided, for the assessment of learning outcomes, did not contain enough information and detail and generally lacked transparency that would be needed to ensure consistency. CEG representatives noted that the scoring rubric has been further enhanced and developed since the submission of documentation for the focused review. The review team understood that a maximum of 100 marks can be awarded, and a minimum of 50 marks must be reached to be eligible for an offer. A score above 50 is interpreted to mean that the minimum level of stage learning outcomes has been satisfied. Those with a score of below 50 have not met the minimum learning outcomes. The panel encouraged CEG to provide feedback to applicants that are not deemed eligible for RPL, keeping in line with the CEDEFOP guidance and counselling guidelines discussed earlier.

The review team queried the appeals process, noting a contradiction in section 12 of the proposed RPL policy; section 12.1 states that an applicant may appeal an unsuccessful RPL decision if it is believed that an error was made in the RPL review process, whereas section 12.3 states that an appeal will only be considered on the basis of new RPL evidence that was not submitted in a previous application. CEG representatives acknowledged that this is an error and would be amended.

The review team sought clarification from CEG representatives in relation to the RPL training for CEG staff. It was noted that RPL training will be provided to relevant staff at annual training days. It was also noted that certain CEG staff have completed digital badges in RPL, and further training would be envisaged, particularly to staff that would be directly involved in the RPL process. The review team support this and recommend that all staff involved or potentially involved in RPL at CEG partake in relevant training so as to create a pool of such staff.

The review team highlighted that the Provider Statement makes reference to maintaining flexibility. It is therefore important to be mindful of imposing limitations on the process. The

review team further noted the importance of maintaining confidence in the assessment process as the core element of valid recognition of prior learning and encouraged CEG to collaborate more closely with the QAB in the process of approving RPL applications. The review team outlined the importance of transparency across the RPL process such that every detail can be traced back to a particular step of the process for each applicant.

5.3 Other Matters Identified in the Terms of Reference

The review team was asked to consider what, if any, changes or improvements could be made to QQI's RPL policy approach. A wealth of QQI RPL-related material exists and the QQI website offers a wide range of key information and guidance.

Having reflected on potential gaps, the review team advises the following:

- More clearly signpost RPL on the QQI website homepage
- Update relevant publications, including,
 - Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training June 2005,
 - QQI Policy Restatement Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training, 2005
- Consider closer alignment and links with RPL developments in the tertiary education sector, including, the <u>Recognition of Prior Learning and Lifelong Learning in Higher</u> <u>Education Project</u>, sponsored by the IUA and THEA.

6. Summary of Findings

6.1 Summary of review team observations

It is clear that CEG is at the early stages of its RPL journey. The review team is of the view that the RPL experience has been both challenging and instructive to CEG.

The review team are of the view that that proposed RPL procedures warrant amendment, as specified in the proposed recommendations outlined in Section 6.2 of this report.

6.2 Summary of review team recommendations:

The review team recommends that QQI make the following **recommendations to the provider, to be implemented as a matter of urgency**:

- 1. Align CEG RPL policy and processes with QQI RPL criteria (see QQI, Assessment and Standards, Revised 2022: QQI Policy Restatement Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training, 2005).
- 2. Align CEG RPL policy and processes with CEDEFOP RPL requirements, which highlight the importance of counselling and guidance provision to applicants with regard to completing RPL application forms. The importance of connecting support with the procedure was further noted.
- 3. Align CEG RPL policy and processes with the criteria and requirements of relevant regulating/validating/professional bodies, such as, QAB, QQI module learning outcomes and/or any professional standards as relevant.
- 4. Ensure that the RPL approach is embedded in the CEG QA system.
- 5. Use established assessment strategies for assessing module learning outcomes rather than ad-hoc bespoke assessments.
- 6. Review the language used in the RPL policy to ensure consistency and clarity.
- 7. Develop a process for the provision of feedback to applicants that are not deemed eligible for RPL, keeping in line with the CEDEFOP guidance and counselling guidelines.
- 8. Review the RPL process for transparency **and** flexibility, while ensuring a robust and rigorous approach to assessment is in place.
- 9. Review the RPL policy to ensure that it is clear and free of errors.
- 10. Require all CEG staff involved in RPL undertake relevant RPL training.
- 11. As this programme relates to a regulated area, any requirements stipulated by the relevant regulating body should be adhered to as a condition of validation.

⁴ Cedefop, *European guidelines for validating non-formal and informal learning*, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2801/389827

The review team proposes that QQI make the following recommendations to the provider:

- 1. Be mindful of exceptions to policies, and where relevant include any possible exceptions within the policy as an appendix.
- 2. Include a glossary of terms in the appendix.
- 3. Review communication arrangements to strengthen RPL knowledge and awareness among CEG's community.

6.3 Overall Commendations

The review team commended CEG for:

- Their recognition of the value that a diverse student group that brings rich knowledge and valuable experience into the classroom and offers opportunities for enhanced learning for all.
- The supply of CEG RPL documentation, including the self-assessment report.
- The active participation and engagement with panel members throughout the virtual site visit.
- The positivity and cooperation of CEG representatives to recommendations/ suggestions made by panel members.

6.5 Review Team Recommendation to QQI on CEG's QA of RPL/Advanced Entry

The review team finds the proposed RPL procedures inadequate, and in need of amendment in accordance with the directions detailed in Section 6.2 of this report. These directions should be implemented within a six-month time period. The review team recommends that RPL needs to be explicitly embedded in CEG's QA systems.

7. Concluding Remarks

The Chair, on behalf of the review team, thanked the CEG representatives for their active engagement and contribution to the process. Acknowledging the challenges surrounding the review context, she commended their commitment and willingness to address the issues arising. Indeed, the review team was encouraged by the ongoing work of CEG to amend the RPL process and procedures: however, the Chair stressed that the panel could only review material that had already been submitted to QQI.

This review is undertaken against the backdrop of the national commitment⁵ to RPL. The panel underscores the importance of this feature of the Irish education landscape, in particular, its potential to offer diverse student cohorts additional pathways to formal study. The national RPL architecture has been established by QQI and the criteria published⁶. RPL is increasingly recognised as a legitimate route to formal learning. The review team emphasises that RPL is not a 'back' door but rather, another 'door' to higher education, and encourages CEG to frame its approach to RPL in this context.

The panel also wishes to emphasise the importance of the implementation of RPL at provider level. This demands a robust systematic process, and a thorough assessment against the published QQI criteria and approved module outcomes. The assessment process must also

reflect the standards of relevant professional bodies, as well as offering a supportive experience to potential students. Such a transparent approach will demonstrate integrity, fairness, and will help engender the confidence of stakeholders in the provision of RPL at CEG.

Signed:

Dr Anna M. Kelly, Chair, Review Team

Date: 30 August 2024

⁵ Recognition of Prior Learning for Providers, https://www.qqi.ie/what-we-do/qqi-awards/recognition-of-prior-learning-provider.

⁶ QQI, Assessment and Standards, Revised 2022: QQI Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training June 2005: QQI Policy Restatement Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training, 2005;

Revised version of the review report approved 8 July 2025:

Dr Anna M. Kelly, Chair, Review Team

Date: 8 July 2025

Appendices

Appendix A – Terms of Reference for the Focused Review

Review of the implementation and effectiveness of the QA procedures for RPL and Assessment under section 34(1)(b) of the Quality and Qualifications

Act 2012

at City Education Group

Terms of Reference

March 2024

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1. Introduction

As part of its statutory remit, QQI is empowered to carry out a focussed review at institutional level in circumstances where concerns have been raised through its monitoring function regarding the implementation and effectiveness of a provider's QA procedures. QQI has established Procedures for Focused Reviews on the Implementation and Effectiveness of Provider QA Procedures

A focussed review of City Education Group is being initiated on the basis of concerns relating to procedures for advanced entry and for assessment on higher education programmes.

These concerns arose following

- (i) QQI monitoring of awards data.
- (ii) communications from Department of Education (DoE) and Department of Children, Equality, Disability, Integration and Youth (DCEDIY) who have joint responsibility for degree programmes offering qualifications for those working in early learning and care sector.

2. Context for the Review

- Early Childhood Education and Care is a regulated employment area, with the Department of Education and the Department of Children, Equality, Disability, Integration and Youth (DCEDIY) both having regulatory roles.
- The Qualifications Advisory Board (QAB) is an instrument of the departments to approve higher education qualifications in the area of Early Childhood Education and Care. They have issued Professional Award Criteria and Guides (PACG) which these programmes must adhere to.
- One of the QAB's regulations, stated in the PACG, is that 'An NFQ Level 6 further education award in ECCE (or equivalent) can be deemed to have a maximum credit value of 60 ECTS for the purposes of advanced entry into a degree programme'.
- City Education Group (CEG) had a Bachelor of Arts (Honours) in Early Childhood Education and Care programme approved by QAB in October 2020 and validated by QQI in April 2021.
- The programme was validated to have part-time and full-time versions with two intakes per year i.e. February and September. The first intakes were in February and September 2022.
- The first Level 7 degree awards were made in August 2023 to learners who had enrolled on a part time programme in September 2022.
- QQI monitoring identified that learners had graduated on a 3-year Level 7 degree programme in City Education Group within a year of enrolment.
- The two departments contacted QQI to query what had been reported to them i.e. that City Education Group was enrolling learners into year 3 of a four-year honours degree programme and that learners were exiting the programme with a Level 7 degree after one year.
- Both issues indicated that City Education Group was offering advanced entry into Stage 2 i.e. year 3 of a four year programme to learners who met CEG's criteria.
- Having met on a number of occasions in late 2023 and early 2024, QQI and the two
 departments agreed that this issue needed to be investigated.
- QQI met with CEG representatives on 24 January 2024 for detailed discussion of the issue, including the RPEL criteria, process and quality assurance. The advanced entry process and criteria (QQI Advanced Certificate in ECCE plus at least one year's experience as room lead in a

childcare setting) were confirmed by CEG. It emerged that there was little or no academic governance of the RPL process for advanced entry.

- Learners with no previous experience in HE are given entry to the third year of a L8 degree and were assessed for exit with an ordinary degree after one academic year, a significant portion of which was on placement.
- CEG confirmed that the procedures and quality assurance of advanced entry were the same for the other Level 8 programme validated i.e. Business Studies.
- Prior to the initiation of this review QQI directed that CEG should suspend the practice of advanced entry to Stage 2 of Level 8 programmes.

3. Terms of Reference for the Review Process

3.1. Purpose

The purpose of this focussed review is to confirm that the recognition processes related to recruitment, admission and assessment on City Education Group's higher education programmes are quality assured and subject to effective academic governance.

3.2. Appointment of Review Team

QQI will establish an external review team to undertake a focussed review of City Education Group's processes. The review team will comprise:

- (i) A chairperson who is a senior leader in a higher education and training provider.
- (ii) A coordinating reviewer with experience and understanding of QA in the higher education sector and a familiarity with providers of similar type.
- (iii) A student representative selected from a provider of similar type

The review team will focus on the internal QA processes and governance relating to recognition of prior learning (RPL) for advanced entry and for assessment and will determine if corrective actions have now been satisfactorily implemented.

The review team will also be invited to identify any lessons to be learned both in relation to CEG's institutional systems and QQI's ex-ante programme validation process particularly in the context of professional accreditation.

3.3. Objectives of the Review

The review will focus explicitly on the implementation and effectiveness of CEG's QA procedures in relation to RPL, when used for assigning credit and as a form of assessment on its degree programmes.

The objectives of the review are to:

- a) determine that the quality assurance procedures established by City Education Group under Section 28 of the 2012 Act were being implemented, were appropriate and fit for purpose were applied in 2023 and 2023 in relation to (i) the assignment of credit on the basis of recognition of prior learning and (ii) the assessment of learners who have been granted advanced entry through RPL.
- evaluate the effectiveness of information supplied by City Education Group through the validation process to ensure that RPL would be used appropriately on its degree programmes.

c) evaluate the changes to QA and academic governance processes made by City Education Group.

3.4. Possible Outcomes of the Review

Following its evaluation of the QA procedures in CEG, the review team may recommend that:

- (i) QQI issues directions to the provider in relation to the effectiveness of that provider's QA procedures.
- (ii) QQI approves any amended QA procedures presented by CEG.
- (iii) QQI refuses to approve any amended QA procedures presented by CEG.
- (iv) QQI initiates a full review of the validation of one or more programmes. This would be where the review team finds that there are serious deficiencies in the implementation of the provider's QA procedures in respect of one or more programmes.

In the interests of equity and reliability, the review team will set out in its report the grounds for each of its findings and recommendations.

Where appropriate, the review team will commend the provider's QA procedures and their effectiveness.

3.5. Inputs to the Review

- a) QQI will submit that information, pertinent to the terms of reference, which it holds on record, e.g. documentation relating to the QA approval of CEG, programme validation reports, Annual Quality Reports and any other information held by QQI that is sought by the review team.
- b) The provider will submit a provider statement by the agreed date to the review team.
- c) The provider will submit updated or new QA procedures for RPL to be considered by the review team.

3.6. Review Team Report

For this review the coordinating reviewer will take responsibility for producing the report on behalf of the review team and in consultation with QQI.

The report will set out the key findings of the review team in relation to:

- (i) The past implementation of QA procedures.
- (ii) The potential effectiveness of updated quality assurance procedures, with particular reference to any areas of concern identified in the terms of reference.
- (iii) any other matters identified in the terms of reference.

⁷ The Provider Statement, referred to in <u>Procedures for Focused Reviews on the Implementation and Effectiveness of Provider QA Procedures</u> is a self-evaluation of the implementation and effectiveness of a provider's QA procedures, to be prepared by the provider and submitted as part of the review. The Statement will be developed with reference to the ToR for the review.

Based on its findings, the review team will make recommendations to QQI regarding directions to be issued to CEG concerning the implementation and effectiveness of its quality assurance procedures.

3.7. Provider Response to the Review Team Report

- a) CEG will receive a copy of the draft review report and will have two weeks to comment on matters of factual accuracy contained therein.
- b) CEG will also be invited to prepare a response to the review team report. The response, to be submitted within a month of receipt of the review report, may include a plan for the implementation of any recommendations made by the review team. That response and implementation plan will be subject to the approval of the provider's Academic Board (or equivalent) prior to submission to QQI for its consideration.

3.9. Consideration of the Outcomes of the Review by QQI

The review team's report, the factual accuracy confirmation (if any) and provider response (if any) will be considered by QQI. Following consideration, QQI may:

- (i) Approve CEG's updated procedures for RPL;
- (ii) Refuse to approve, outright or with mandatory changes, CEG's updated procedures for RPL;
- (iii) propose a review of the validation of one or more programmes.

3.10. Publication of Review Documentation

QQI will publish the terms of reference, the review team report, and any response to the report provided by CEG. All relevant agencies and bodies with a vested interest in CEG or its programmes will be informed of the review and its outcomes.

3.11. Post-Review Follow-Up

At the conclusion of the review, QQI will agree with CEG a timeline and process to follow up any directions imposed, or recommendations made during the review. Initial follow-up will occur not later than 12 months following the review.

4. Appendix A – Enrolments to date onto CEG L8 programmes

Programme	Intake date	Total intake number	P/T or F/T	Entry to Year 1 i.e. no advanced entry	Advanced Entry to Year 2	Advanced Entry to Year 3	L7 (exit award) Awarded date(s)		# Awarded	L8 Awarded date(s)		# Awarded
BA (Hons) in	Feb-22	13	F/T	13								
Business Studies		N/A										
	Sep-22	66	F/T	30		36				Oct-23		34
		N/A										
	Feb-23	26	F/T	13	1	12	N/A					
		N/A				IN/A						
	Sep-23	30	F/T	11		19						
		N/A										
	Feb-24	44	F/T	27	3	14						
		N/A										
BA (Hons) in	Feb-22	17	F/T	17								
Early Childhood Education and		18	P/T	10		8						
Care	Sep-22	17	F/T	17								
Care		9	P/T			9	Aug-23	Oct-23	9			
	Feb-23	8	F/T	8								
		4	P/T		4							
	Sep-23	8	F/T	8								
		28	P/T			28						
	Feb-24	14	F/T	14								
		0	P/T	0								

Appendix B – Site Visit Schedule

Focused Review

City Education Group's RPL Policy and Process for RPL for Advanced Entry onto Higher Education Programmes

as applied and as proposed13 August 2024

Meeting Agenda

09:00 Private Meeting of Panel

09:30 Meeting 1

Introductions

Purpose and potential outcomes of the meeting (Chair)

History of issue i.e. CEG to present with interaction from panel

- CEG 2019 policy and process for RPL
- RPL process and criteria as applied to degree programmes, particularly L8 ECEC
- Issues arising
- Self-evaluation process and findings
- Independent evaluation process and findings

10:30 Private Meeting of Panel

10:45 Meeting 2

CEG to present revised policy and process for RPL (Appendix 8 of document and associated documents)

Panel to discuss policy, section by section

12:15 Private Meeting of Panel

12:30 Meeting 3

Panel feedback on RPL process as applied previously and

Panel feedback on revised RPL policy and process and

Panel recommendation to QQI on approval of revised RPL policy and process.

12:45 Meeting ends

Appendix C – Provider Response to Review Report



City Education Group Wicklow House 84-86 South Great George's St., Dublin 2 D02 TX84

Mairead Boland, Quality and Qualifications Ireland (QQI) 26/27 Denzille Lane Dublin 2, D02 P266

21st July 2025

Dear Mairéad

Thank you for your email of 18th July 2025.

We fully support the objectives you outlined regarding Early Childhood Education and Care (ECEC) programmes, specifically:

- Ensuring CEG graduates of ECEC programmes have demonstrably achieved the knowledge, skills and competence required for working with vulnerable individuals in this regulated area, and
- Equipping learners enrolled on these programmes with the experience and learning that makes it possible for them to succeed.

As we outlined at our meeting and subsequent email of July 7th we are committed to resolving all the issues surrounding RPL expeditiously.

Since receiving the Panel report in August 2024 and engaging in subsequent exchanges through December 2024, we have significantly enhanced our RPL systems with input from nationally recognised experts. We are confident that our processes now fully comply with:

- QQI (formally NQAI) Principles and Operational Guidelines for the RPL (2005) (Guidelines)
- QQI Policy and Criteria for Access, Transfer and Progression (2015) (ATP Policy and Criteria, Restated 2015)
- QQI Assessment and Standards (Revised 2022) (Assessment and Standards, Revised 2022)
- European guidelines for validating non-formal and informal learning, Third Edition (2023) (Cedefop & European Commission)
- · The recommendations of the QQI Panel

We welcome the opportunity to collaborate through the monitoring plan and appreciate QQI's approval for CEG to implement its RPL procedures for the 2025/26 academic year. This confidence in CEG is well placed, and we are prepared to demonstrate our compliance during the upcoming review. I will reach out to you after the ARC meeting to plan and schedule how you would like to handle this.

Regarding the foregoing, we would like you to present this letter and the supporting documents to the Approvals and Reviews Committee on a without prejudice basis for their consideration on August 7th 2025, when considering the Appendix 3. Final_CEG Focused Review Report_271124_updated 13 May 2025.

The supporting documents are attached, namely:

- QMS-02-010 TOR for Course Committee for RPL at City Education Group
- QMS-05-002 Recognition of Prior Learning Policy
- QMS-05-003 RPL Guidance Document
- QMS-05-004 RPL Assessors Tool Kit

In relation to each item in Section 6.2 now reframed as recommendations, we have (since April 2025) implemented the changes mentioned above and you can see that they address the panel's recommendations as follows:

1	Align CEG RPL policy and processes with QQI RPL criteria							
	We have rewritten our relevant documents to address this point and we would draw your							
	attention to Section 11 in QMS-05-002 Recognition of Prior Learning Policy and Section							
	6 in QMS-05-003 RPL Guidance Document							
2	Align CEG RPL policy and processes with CEDEFOP RPL requirements							
	Please refer to Section 5 of QMS-05-003 RPL Guidance Document and the learner							
	assistance that our admission office will provide to all RPL applicants as stated in QMS-05-							
	002 Recognition of Prior Learning Policy section 6, 7, 8 10 etc.							
3	Align CEG RPL policy and processes with the criteria and requirements of relevant							
	regulating/validating/professional bodies, such as, QAB, QQI module learning outcomes							
	and/or any professional standards as relevant.							
	 Please refer to Section 3 of QMS-05-002 Recognition of Prior Learning Policy 							
	 In relation to module learning outcomes, we would refer you to Section 5 of QMS-05-003 							
	RPL Guidance Document, and section 8 of QMS-05-002 Recognition of Prior Learning							
	Policy							
4	Ensure that the RPL approach is embedded in the CEG QA system.							
	As you can see we now have a structured Quality Management System which is available to							
	all staff for which they have received training. RPL processes are imbedded in the system							
	through the attached Documents. These documents specifically address the Panels							
	comments on Support and Guidance for the applicants							
5	Use established assessment strategies for assessing module learning outcomes rather							
	than ad-hoc bespoke assessments.							
	Section 5 of QMS-05-003 RPL Guidance Document highlights how we use Module Learning							
	outcomes as well as our approach to non-formal / informal learning. We fully support the							
	appropriate use of Module Learning Outcomes as well as the appropriate use of Stage							
	Learning Outcomes.							
	Section 6 of QMS-05-003 RPL Guidance Document provides information to the applicant							
	on what constitutes evidence of prior learning attainment.							
	QMS-02-010 TOR for Course Committee for RPL ensures that there is a consistent approach							
	to the evaluation of the submitted evidence .							
6	Review the language used in the RPL policy to ensure consistency and clarity.							
	We have restructured all our documents in relation to RPL and specifically generated an							
	applicant focused RPL Guidance Document (QMS-05-003) to ensure consistency and							
	clarity for all readers.							
7	Develop a process for the provision of feedback to applicants that are not deemed eligible							
	for RPL,							
	 Please refer to Section 11, Stage 3 of both QMS-05-002 Recognition of Prior Learning Policy 							
	and QMS-05-003 RPL Guidance Document							
	We have trained members of our Admissions team to provide dedicated guidance and							
	support to all RPL applications as well as to provide empathetic feedback to unsuccessful							
	applicants. They will support the unsuccessful applicant through the appeals process and							
	can engage our student support officers to provide counseling as necessary,							
8	Review the RPL process for transparency and flexibility, while ensuring a robust and							
	rigorous approach to assessment is in place.							
	The creation of QMS-05-003 RPL Guidance Document is specifically to ensure that the RPL							
	process is as open and transparent to all users. This document will be available to all							
	potential applicants through the web site. A copy of it will be sent to all potential RPL							
	applicants. The assessment process is clearly outlined and is flexible while assuring							
_	academic excellence.							
9	Review the RPL policy to ensure that it is clear and free of errors.							
	The RPL documents attached are the result of taking on the comments of the QQI							
	assembled Panel through the Panel report as well as the informal feedback received from							
	them.							
	The documents have been reviewed and are supported by recognized RPL experts who have							
	represented Trinity College and SETU Carlow at the National RPL in HE Project.							

10 Require all CEG staff involved in RPL undertake relevant RPL training.

- All staff involved in assessing RPL applications through the Course Committees receive detailed instruction on these documents and their application by our nationally recognized RPL expert.
- Many senior members of staff have completed the RPL Digital Badge and RPL Facilitator Badge training provided by the National Forum for the Enhancement of Teaching and Learning in Higher Education. All staff will be encouraged to engage with the RPL Digital Badge (full programme) offered by National RPL in Higher Education project.
- CEG have designed a customised RPL training course aligned to the learning outcomes of the RPL Digital Badge, but further customised to CEG policy, processes and procedures. The CEG RPL training course was provided to all RPL stakeholders in January 2025.

As this programme relates to a regulated area, any requirements stipulated by the relevant regulating body should be adhered to as a condition of validation.

- CEG remain committed to remain current with all the regulations set out by all our regulatory bodies and we will ensure that all our policies, procedures and practices are routinely updated as these regulations evolve.
- We are confident that we meet this recommendation today and will on receipt of the forthcoming guidance on RPL from QAB incorporate it into our Quality Manual / Systems.

We are confident these measures address the Panel's recommendations comprehensively and look forward to a positive outcome from the ARC meeting on 7 August 2025.

Should you require further information, please do not hesitate to contact me. I look forward to continuing our productive collaboration.

Tony Kennedy
Chair of the Academic Board for City Education Group.

Appendix D – Independent Expert Observations on Revised City Education Group Draft RPL Procedures

Independent expert observations on revised City Education Group RPL procedures, submitted following the focused review of 13 August 2024
21 August 2025

Introduction

In July 2025, QQI requested that two independent expert evaluators undertake a review of City Education Group's (CEG) revised RPL procedures and associated documentation. This review of the procedures was undertaken in the context of a focused review of the implementation and effectiveness of the Quality Assurance (QA) procedures for RPL and Assessment at CEG carried out in August 2024, with a report issued on 13 August 2024.

The version of the revised procedures for consideration was submitted to QQI by CEG on 21 July 2025 in response to the focused review report – version of 8 July 2025.

The independent expert reviewers are:

- Dr Deirdre Goggin, Recognition of Prior Learning and Work Integrated Learning,
 Munster Technological University
- Martina Needham, Independent Quality Assurance and Education Consultant

Both reviewers have confirmed that they have no conflict of interest in respect of the provider, and the provider has also confirmed that they are not aware of any conflict of interest in relation to either reviewer.

The reviewers' observations within this document are intended to inform the determination of the Approvals and Reviews Committee in relation to the focused review of the effectiveness and implementation of CEG's RPL and assessment procedures.

Context

Recognition of Prior Learning (RPL) is an important assessment process within education and training. It gives formal recognition to the learning an applicant has prior to registering on a programme of study. CEG implements the RPL process to facilitate non-standard entry, advanced entry and exemption.

In this context, CEG's RPL policy, process and procedures underpin the integrity of the award, with implications for CEG as a provider and for learners.

This review was conducted with reference to the eleven focused review recommendations that proposed to be implemented as a matter of urgency (see focused review report – version of 8 July 2025 and appendix below). The following three linked documents formed the focus of the review activity:

- 1. RPL policy (April 2025),
- 2. RPL Guidance Document (April 2025) and
- 3. RPL Assessors Toolkit (April 2025).

The reviewers were also provided with the:

- 1. Terms of reference for CEG's Course Committee for RPL (April 2025),
- 2. the letter from CEG to QQI that accompanied the policy documentation and

- explained the changes made on foot of the focused review recommendations,
- additional detail provided by CEG (in the form of a meeting note excerpt) that set out further CEG comments with regard to the proposed focused review recommendations,
- 4. draft report of the independent panel who undertook the focused review on QQI's behalf.

Review methodology

The reviewers considered the documentation provided and have provided their assessment as to whether each of the recommendations proposed by the focused review panel has been 'met', 'partially met', or 'not met'. Comments under each recommendation provide a rationale for the reviewer's assessments. Where a recommendation has been found to not have been met, or to have been met partially, the comments highlight some of the issues identified within the review. These are not intended as an exhaustive list but are indicators of where some improvements can be made. To avoid any contradictions in information provided, updates made in one document will need to be carried through to all documents.

General comment

The reviewers acknowledge that adjustments/amendments and auto correct can lead to unnoticed errors and misalignment of numbering and lettering in documents. All documents presented by CEG would benefit from robust editing and proofing to ensure that they are error free and that information is both accurate and consistent.

Reviewers' observations			
Recommendation	Met/		
	Met partially/		
	Not met		
CEG Comment:	Not met		
1 Align CEG RPL policy and processes with QQI RPL criteria			
We have rewritten our relevant documents to address this point, and we			
would draw your attention to Section 11 in QMS-05-002 Recognition			
of Prior Learning Policy and Section 5 & 6 in QMS-05-003 RPL			

Expert reviewers' observations:

Guidance Document

A review of the CEG policy and process documents (QMS-05-002, QMS-05-003, QMS-05-004, QMS-02-010) against QQI's criteria indicates that additional information is needed to ensure effective, consistent and transparent RPL practice. NQAI (2005), Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training emphasise the need for clearly defined roles and responsibilities for all stakeholders involved in the RPL process. CEG's documents reference the following stakeholders:

- Director of Quality
- Course Director
- Course Committee
- Admissions Officer
- Applicant
- RPL Support Staff
- RPL Assessor

Some key points for further clarification/amendment/proofing. Please note that this list is not exhaustive and other relevant points may exist.

- Clarification of the Cedefop Guidelines (page 7 of policy document (QMS-05-002), points D and E ('credit towards an award'). Elaboration will clarify if this refers to general credit.
- The example provided in CEG's Guidance Document (QMS-05-003) – Appendix B – states that 120 ECTS Higher Certificate is considered as equivalent to 60 credits for a cognate programme. This example is progression as per the National Framework of Qualifications (NFQ), but difficult to relate to RPL given the discipline area i.e. Business.
- Page 10 of QMS-005-004 incorrectly states that a level 8 is an Ordinary bachelor's degree. An ordinary bachelor's degree is a Level 7 award on the NFQ.

- Numbering in the policy document (QMS-05-002) is out of sequence. This can easily happen when working on a multi-page document and needs to be amended.
- There is a reference within QMS-05-003 to stage 2 (year 2) and stage 3 (year 3), but Stage 1-B in one course is year 2. Ensuring that CEG's RPL documents relate to all programmes provided by CEG, and including reference to the years and stages, will help eliminate any misunderstandings in relation to advanced entry.

Not met

2. Align CEG RPL policy and processes with CEDEFOP RPL requirements
Please refer to Section 5 of QMS-05-003 RPL Guidance Document and the
learner assistance that our admission office will provide to all RPL
applicants as stated in QMS-05-002 Recognition of Prior Learning
Policy section 6, 7, 8 10 etc.

Expert reviewers' observations:

The purpose of an RPL guidance document is to provide advice, instructions and support for applicants that clarify the processes and procedures, particularly in relation to the completion of the application form. The review of CEG's guidance document (QMS-05-003) and assessor's toolkit (QMS-05-004) highlights some areas for further clarification. In highlighting these areas, it is acknowledged that an email address is provided, and Admissions, where assistance can be accessed is referenced.

- The distinction between assessment standards and how they are applied needs clarification. While assessors are subject matter experts (SMEs), lack of clarity can make the process difficult and call into question the integrity of the process.
- A clear distinction between the process for access and the process for exemptions is necessary across all documents.
- Additional information on what a portfolio of learning is and how it should be developed will enhance the guidance document (QMS-05-003).
- Reference to a dialogue or professional conversation between an SME and the applicant should be noted in all relevant documents.

Within the policy document (QMS-05-002) and guidance document (QMS-005-003): To align with Cedefop guidelines, the four phases (*Cedefop's European guidelines for validating non-formal and informal learning 2023 – Chapter 2*) need to be emphasised, with more detailed information to enhance the information and strengthen the document:

- Identification (Phase 1): The use of the word 'formal' recognition needs clarification as it suggests recognition for an 'award'. The policy clearly states that CEG does not offer RPL for an award.
- Documentation (Phase 2): the requirement for the applicant to map their own learning to the entry / exemption award standards needs to be emphasised. The documented learning should build trust about the learning achieved and its transferability (Cedefop 2.2.2)
- Assessment (Phase 3): see first bullet point above.

In the application form:

 Learners have a role in identifying how their learning meets the standards for entry or advanced entry to the programme. It should be emphasised that the personal statement or a self-assessment tool that outlines the standards can be used for this. Include an example of awards gained through engagement with Further Education and Training (FET) as well as those awarded through Higher Education.

- 3. Align CEG RPL policy and processes with the criteria and requirements of relevant regulating/validating/professional bodies, such as, QAB, QQI module learning outcomes and/or any professional standards as relevant.
- Partially met
- Please refer to Section 3 of QMS-05-002 Recognition of Prior Learning Policy
- In relation to module learning outcomes, we would refer you to Section 5 of QMS-05-003
- RPL Guidance Document, and section 8 of QMS-05-002 Recognition of Prior Learning Policy

Expert reviewers' observations:

There is acknowledgement that under some circumstances additional standards or requirements may influence the extent to which RPL is available or the standards that learning must be presented against. As the requirements of Qualification Bodies or professional bodies can have significant consequence, the reviewers would expect to see greater clarity and robustness within the policy and guidance document than is currently incorporated when it comes to programmes regulated or approved by such bodies.

CEG comment:

4. Ensure that the RPL approach is embedded in the CEG QA system.

- As you can see we now have a structured Quality Management System which is available to all staff for which they have received training. RPL processes are imbedded in the system through the attached Documents.
- These documents specifically address the Panels comments on Support and Guidance for the applicants

Expert reviewers' observations:

Embedding RPL within a QA system underpins the credibility of qualifications and promotes confidence in the qualification and in the provider. In reviewing CEG's process, it is evident that the outcome of the assessment is presented to the Director of Quality who is the final evaluator of an application (cf. QMS-05-002).

This review, however, indicates that additional information on the process across all documents would enhance the transparency of the process and avoid any questions or misunderstandings. These areas are:

- Clarify how RPL fits within the broader QA of CEG.
- Confirm that RPL is an assessment method.
- Provide information on how RPL applications are managed in compliance with CEG's general QA and assessment procedures and principles.

Partially met

Not met

- 5. Use established assessment strategies for assessing module learning outcomes rather than ad-hoc bespoke assessments.
- Section 5 of QMS-05-003 RPL Guidance Document highlights how we use Module Learning outcomes as well as our approach to non-formal / informal learning. We fully support the appropriate use of Module Learning Outcomes as well as the appropriate use of Stage Learning Outcomes.
- Section 6 of QMS-05-003 RPL Guidance Document provides information to the applicant on what constitutes evidence of prior learning attainment. QMS-02-010 TOR for Course Committee for RPL ensures that there is a consistent approach to the evaluation of the submitted evidence.

Expert reviewers' observations:

Established assessment strategies are important in guaranteeing a fair, transparent, and consistent approach to assessing an applicant's learning against the award standards. Importantly, it facilitates mapping the learning to appropriate NFQ level and placing a value on it to support advanced entry or exemptions. A review of the CEG's documents identified areas where the process could be optimised. Some of the areas listed below are already referred to under previous recommendations, but worth listing here also. These areas are:

- International qualifications section requires greater clarity as to what is required, particularly around equivalency.
- Section 5 (QMS-05-003 RPL Guidance Document) is a repetition from the policy document which could result in inconsistencies in the future if amendments are made to one document but not carried over to the other.
 - In section 5.1- Access there is not a corresponding section in the policy document QMS-05-002 pertaining to access but to advanced entry. It is therefore unclear the extent to which informal and non-formal learning is regarded for entry.
 - Section 5.2 of QMS-05-003: It is unclear when the different approaches come into play. It appears that it is up to the Admissions office to determine when module/ stage learning outcomes are used? It is recommended that an SME would decide what set of standards would be used rather than the Admissions office. Once a process has been used for an applicant and a similar applicant subsequently applies, the same approach or standards should be used.
- Application form (section 5 of QMS-05-003)
 - The guidance document does not provide sufficient direction to a learner or applicant on how to complete the application and align their learning with the programme they are applying for. The language should be accessible, particularly in the achievement section (page 11).

- Clearer information is needed on how judgements are made about allowing or not allowing RPL.
- The rationale for facilitating a stage learning outcome approach versus a module learning outcome approach should be clear within the policy (QMS-05-002).
- The information provided within the Guidance Document (QMS-05-003) suggests that there are two programmes that allow Advanced Entry. The reference to 'prior learning evidence' or 'applicant evidence' makes it unclear if the approach is determined by the prior learning of the learner or by the programme (Appendix A)
- QMS-005-003 sections 5 and 6 the forms within section 5 refer to
 evidence and section 6 contains a list of relevant evidence. In the
 forms outlined in section 5, the reference to 'evidence' is this a list of
 documentation or is it a narrative of an applicant about the learning
 they have relevant to a stage/module learning outcome including
 explanation as to how prior formal learning addresses these? It is not
 clear from section 6 if this is a requirement.
 - As this has relevance to the appeals procedure, which states that you cannot request an appeal on the evidence already submitted, it is important that an applicant or learner knows exactly what they are being asked to do within an application form.
- There is a lack of consistency within the Guidance Document (QMS-05-003) and in the Policy (QMS-05-002) regarding informal and non-formal learning.
 - To what extent does CEG accept informal and non-formal learning, and how consistent is it across all programmes. This determination needs to be reflected in the application form and clearly outlined and synchronised across all documents.
 - The exceptional circumstances referred to in 5.2 (QMS-05-003) 'informal and non-formal learning can also be considered during the RPL review process in exceptional circumstances' and Section 7 of QMS-005-02 need to be clearly outlined.
 - The relevance of FET prior learning needs to be included. 5.2 of QMS-05-003 and QMS-05-002 only references Higher Education formal learning.
 - QMS-05-003 (5.3) states that 'CEG expect formal certified learning to be presented in this type of application, but informal and non-formal learning can also be considered' for module exemptions. These inconsistencies need to be addressed.
- Providing examples of the type of evidence provides guidance and direction QMS-005-003(Section 6). However, evidence is determined by the learning of an individual and so an exhaustive list is not feasible.

Not met

6. Review the language used in the RPL policy to ensure consistency and clarity.

We have restructured all our documents in relation to RPL and specifically generated an applicant focused RPL Guidance Document (QMS-05-003) to ensure consistency and clarity for all readers.

Expert reviewers' observation:

Consistent language across all CEG's RPL linked documents is absolutely essential to the clarity of the provider's processes and the experience of the applicant/learner who must navigate these. Consistent language and alignment of documents presents clear and accessible information. It was noted that a number of areas within the policy and the guidance document would benefit from a revisit. Some examples of areas requiring attention include the following:

- Ensure all acronyms are in spelt out in full the first time they are included in a document.
- Language within the policy (QMS-05-002) and other supporting documents has relevance within a broader education and training context (e.g. within other providers) but not necessarily within CEG. The policy should align with the broader CEG policy and procedures. An example is a reference to Postgraduate (PG) level study, but CEG do not currently offer PG programmes.
- Definitions of formal, informal and non-formal learning need a revisit across all documents.
- Language such as typically, normally and sometimes should be revisited, as this introduces uncertainty and – potentially – inconsistency for learners.
- QMS-05-002 5.3 could be strengthened with reference to QAB and Professional body requirements. Section 6.3 of the policy is clearer and so perhaps that is the best sentence to use rather than 5.3.
 However, it is unclear if they are intended to mean the same thing?
- Acceptance of all forms of learning is clear as a statement however in policy document (QMS-05-002) section 7 it notes that informal and non-formal learning evidence is considered under exceptional circumstances. This is also repeated in section 8 and 9 of the policy.
- In QMS-005-003 RPL Glossary of Terms, page 26, RPL for exemptions and credits, it is stated that prior formal learning is recognised, rather than accredited. In section 7.2 (QMS-05-002) a grade equivalent is recommended for prior learning contributing to an award classification which contradicts the view expressed. It is also unclear from the guidance and assessor toolkit how that would be accomplished.
- Section 8 of the policy (QMS-05-002) focuses on prior formal learning, so it is unclear if prior informal and non-formal learning is accepted.

• It is unclear from the title of the sections and the information contained within what is the difference between section 7 and 9 in the policy document (QMS-05-002).

7. Develop a process for the provision of feedback to applicants that are not deemed eligible for RPL

Met

- Please refer to Section 11, Stage 3 of both QMS-05-002 Recognition of Prior Learning Policy and QMS-05-003 RPL Guidance Document
- We have trained members of our Admissions team to provide dedicated guidance and support to all RPL applications as well as to provide empathetic feedback to unsuccessful applicants. They will support the unsuccessful applicant through the appeals process and can engage our student support officers to provide counselling as necessary

Comment

Providing feedback to applicants who are not accepted for the RPL process should imbue confidence in the process and clarify knowledge, skills and competence level and motivate applicants to address gaps in their learning. A structured and guided self-assessment approach will lead learners to reflect on their learning and to understand why their learning is not at the required level/standard. The involvement of a subject matter expert (SME) from the outset gives confidence in the process and may reduce the number requiring guidance following an unsuccessful application.

Not met

- 8. Review the RPL process for transparency and flexibility, while ensuring a robust and rigorous approach to assessment is in place.
- The creation of QMS-05-003 RPL Guidance Document is specifically to ensure that the RPL process is as open and transparent to all users.
 This document will be available to all potential applicants through the web site. A copy of it will be sent to all potential RPL applicants.
- The assessment process is clearly outlined and is flexible while assuring academic excellence.

Expert reviewers' observations:

The purpose of a RPL guidance document and assessment toolkit is to ensure that the process of gaining and assessing recognition is clear to applicants, students and staff. As RPL is determined by the prior learning that an individual has undertaken, variation between applications is expected. Using published academic standards and an agreed process to document prior learning contributes to a robust and rigorous approach to RPL assessment.

Some points and areas that will enhance both documents have been identified in the previous recommendations. Additional areas that should be strengthened are:

- Outline all form of prior learning (formal, non-formal and informal) individually at point 10 of QMS-05-002 Assessment Principles.
- Provide an appendix to outline 'exceptions' or 'exceptional circumstances' (QMS-05-002 and QMS-05-003).
- The rubric in Appendix F of QMS-05-004 uses the NFQ level 8 generic graduate attributes. The level indicators for the level of skills, knowledge and competency required for advanced entry/access should be used. A self-assessment document with the module learning outcomes would provide clarity for the applicants.
- QMS-005-003: It is not clear what is included in an application or how it is structured beyond the CV element of it.

It is unclear how an award standard is selected as the most appropriate/suitable when constructing an application

- QMS-005-004: It is not clear to an assessor how they should assess an application against each of the potential award standards for which rubrics are provided as per the review panel within the review report, a 50% standard was mentioned as being CEG's basis for a successful application, but this is not evident in the documentation provided.
- Deadlines and timelines for the submission/consideration/determination of an application are also absent. These will vary depending on the application type as the exemptions for existing students will be post entry.

- It appears from the lists of documentation to be provided for each form of RPL, that prior formal learning is the basic requirement, and informal and non-formal learning are only to be considered in exceptional circumstances. However, there is inconsistency and a lack of clarity on this matter within all documents.
- The RPL process appears clearer for entry and advanced entry than for exemptions. Consideration of an individual learner (and the potential for variation in their specific circumstances and contexts) within the process is not evident in the documented process.

9. Review the RPL policy to ensure that it is clear and free of errors.

- The RPL documents attached are the result of taking on the comments of the QQI assembled Panel through the Panel report as well as the informal feedback received from them.
- The documents have been reviewed and are supported by recognized RPL experts who have represented Trinity College and SETU Carlow at the National RPL in HE Project

Expert reviewers' observations:

The accuracy of the language within a RPL policy document is paramount as it sets out how prior learning is to be recognised. This includes the processes of recognition, assessment and post-assessment and how they fit and align with the broader policies of a provider.

As RPL is an assessment method, the policy must ensure the academic integrity and rigour of the RPL process within the provider's broader assessment infrastructure.

To aid the process, some examples that this review identified are set out below. Some of these have already been highlighted under previous recommendations.

- Spelling errors need to be addressed across all documents.
- Glossary of terms (QMS-05-003) needs to be revisited for accuracy for example, exemptions should be granted for modules completed at the same level, not at a higher level; the definition of a module is incorrect – refer to Donnelly & Fitzmaurice. Non-formal learning is not always industry training.
- Language, numbering, and definitions need to be reviewed across all documents, and consistency applied. For instance, assembly of an application (QMS-05-003) – it is not clear how CEG conducts this process – further detailed information is required. Application form v's application pack – inconsistent language.
- The description of the Cedefop 4-stage process needs to be checked for accuracy – ref pg. 15 of Cedefop document – information and guidance/support are part of the broader process but not a stage.

Not met

- Reference to reflective process in documentation is not elaborated upon in the guidance document (QMS-05-003) or assessor's toolkit (QMS-05-004).
- QMS-05-002, section 10, section E Certification (a): credit towards an award – does this relate to general credit? Is CEG doing this within a programme? If so, is this in keeping with QQI's requirements?
- Language such as 'Target programme requirements' or Target levels'
 (e.g. within QMS-05-002) on the National Framework of
 Qualifications are not helpful. RPL must be measured against defined
 standards.
- The process for appealing unsuccessful applications is not consistent across QMS-005-002, QMS-005-003 and QMS-005-004.
- QMS-05-002, Stage 1 Part B(II) and QMS-005-004 Stage 1 Part B(II): how is the right form determined in terms of Advanced Entry and what is the skills assessment form as it is included in QMS-005-004 and not QMS-005-002.
- The flowchart in QMS-05-002 (section 11) is not clear and is missing elements described in the document.
- QMS-05-002, Part C(I)(b) (approval of the RPL application form for further processing): this seems to be another step which isn't in the flowchart?
- Across all documents: Timeframe of the RPL process is unclear and it
 is also unclear if there is variation between the different forms of
 application non-standard entry, advanced entry and exemption in
 keeping with the overall assessment deadlines for ratification by
 examination boards.

10. Require all CEG staff involved in RPL undertake relevant RPL training.

- All staff involved in assessing RPL applications through the Course Committees receive detailed instruction on these documents and their application by our nationally recognized RPL expert.
- Many senior members of staff have completed the RPL Digital Badge and RPL Facilitator Badge training provided by the National Forum for the Enhancement of Teaching and Learning in Higher Education. All staff will be encouraged to engage with the RPL Digital Badge (full programme) offered by National RPL in Higher Education project.
- CEG have designed a customised RPL training course aligned to the learning outcomes of the RPL Digital Badge, but further customised to CEG policy, processes and procedures.
- The CEG RPL training course was provided to all RPL stakeholders in January 2025.

Expert reviewers' observations:

Staff training is central to the successful implementation of the RPL process. Training supports staff to understand the RPL process, provide

Partially met accurate information, manage applications, support applicants, assess applications (and portfolios) against national standards. Different RPL roles and responsibilities for different members of staff within CEG will require varying degrees of training due to support effective implementation of the RPL process. There is reference to the digital badge and customised training. Nevertheless, there are different roles within RPL as outlined in the policy (see recommendation 1) and it is not clear if this is reflected in the training.

11 As this programme relates to a regulated area, any requirements stipulated by the relevant regulating body should be adhered to as a condition of validation.

- CEG remain committed to remain current with all the regulations set out by all our regulatory bodies and we will ensure that all our policies, procedures and practices are routinely updated as these regulations evolve.
- We are confident that we meet this recommendation today and will on receipt of the forthcoming guidance on RPL from QAB incorporate it into our Quality Manual / Systems.

Expert reviewers' observations:

Ensuring graduates of programmes achieve and can demonstrate they have achieved the standards of programmes and of regulatory or professional bodies is essential for the future of graduates, of society, of employers and of the integrity of a provider and their awards. This is referred to within the policy document but could be reinforced and strengthened in the guidelines and toolkit to ensure all staff are consistently applying the policy and procedures of RPL in CEG in keeping with regulatory requirements.

Partially met

Appendix [to Expert Observations]

Recommendations of the Focused Review Team (see Focused Review Report – version of 8 July 2025)

The review team recommends that QQI issue make the following recommendations to the provider, to be implemented as a matter of urgency:

- Align CEG RPL policy and processes with QQI RPL criteria (see QQI, Assessment and Standards, Revised 2022: QQI Policy Restatement Policy and Criteria for Access, Transfer and Progression in Relation to Learners for Providers of Further and Higher Education and Training, 2005).
- 2. Align CEG RPL policy and processes with CEDEFOP RPL requirements, which highlight the importance of counselling and guidance provision to applicants with regard to completing RPL application forms. The importance of connecting support with the procedure was further noted.
- 3. Align CEG RPL policy and processes with the criteria and requirements of relevant regulating/validating/professional bodies, such as, QAB, QQI module learning outcomes and/or any professional standards as relevant.
- 4. Ensure that the RPL approach is embedded in the CEG QA system.
- 5. Use established assessment strategies for assessing module learning outcomes rather than ad-hoc bespoke assessments.
- 6. Review the language used in the RPL policy to ensure consistency and clarity.
- 7. Develop a process for the provision of feedback to applicants that are not deemed eligible for RPL, keeping in line with the CEDEFOP guidance and counselling guidelines.
- 8. Review the RPL process for transparency and flexibility, while ensuring a robust and rigorous approach to assessment is in place.
- 9. Review the RPL policy to ensure that it is clear and free of errors.
- 10. Require all CEG staff involved in RPL undertake relevant RPL training.
- 11. As this programme relates to a regulated area, any requirements stipulated by the relevant regulating body should be adhered to as a condition of validation.

The review team proposes that QQI make the following recommendations to the provider:

- 1. Be mindful of exceptions to policies, and where relevant include any possible exceptions within the policy as an appendix.
- 2. Include a glossary of terms in the appendix.
- 3. Review communication arrangements to strengthen RPL knowledge and awareness among CEG's community.

Appendix E – Provider Response to Independent Observations on City Education Group RPL Procedures

Dear Mairéad,

Thank you for your email below, dated 21st August, and for sharing the document titled "Observations of the Independent Expert Reviewers on CEG's Revised RPL Procedures and Associated Documentation." We have taken the time since then to carefully review the feedback.

We would like to express our sincere thanks to the independent reviewers for their thoughtful and constructive observations, which we found both helpful and insightful. We are happy to revise our documents to incorporate the clarifications and corrections suggested.

We fully acknowledge the concern regarding the dispersion of policy and procedures across multiple documents, and agree that this could potentially lead to inconsistencies over time. In response, we will consolidate all RPL-related policies and procedures into a single, comprehensive document within our Quality Management System. This will also address the reviewers' comments regarding consistency.

We will adopt the definition of a module as outlined by Donnelly & Fitzmaurice and will also provide clearer definitions of the roles and responsibilities of stakeholders involved in the RPL process.

The observations have already been shared with all relevant personnel involved in the Autumn 2025 RPL process, to ensure that best practices are consistently applied during this cycle.

Our next step will be to revise our RPL documentation in line with the reviewers' feedback and input from stakeholders as the current term's applications progress. We also plan to engage an independent RPL advisor to further enhance the quality and effectiveness of our approach.

We anticipate completing these revisions by the end of September 2025. At that point, we will share the updated documents with you, along with the actual outcomes of the RPL process. This will ensure that you have sufficient time to review everything ahead of the planned Monitoring Meeting in November, as referenced in your email of 17th July.

City Education Group remains fully committed to implementing best-in-class policies and procedures that support transparency and consistency throughout the student journey and we greatly value QQI's continued guidance as we enhance our systems.

We would appreciate it if you share the above with the ARC on 12th September.

Yours sincerely,

Tony Kennedy Chair of the Academic Board City Education Group