

# Green Paper on QQI's Access Transfer and Progression Policy

Consultation Report



Dearbhú Cáilíochta  
agus Cáilíochtaí Éireann  
Quality and  
Qualifications Ireland



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# 1. Introduction

In 2003, the National Qualifications Authority of Ireland (NQAI) published the National Framework of Qualifications (NFQ)<sup>1</sup> as well as the Policies, Actions and Procedures for the Promotion of Access, Transfer and Progression (ATP). The NFQ was seen as central to facilitating the role of NQAI (and later QQI) in promoting and facilitating ATP. ATP and the NFQ are therefore closely linked and the NFQ forms the basis of many providers' ATP policies and procedures by way of providing a basis for stated learning outcomes and other specified information to learners to support implementation of ATP policy<sup>2</sup>.

In 2012, the Qualifications and Quality Assurance (Education and Training) Act, 2012<sup>3</sup>, established Quality and Qualifications Ireland (QQI) replacing NQAI, Higher Education and Training Awards Council (HETAC) and Further Education and Training Awards Council (FETAC) with one Authority. In the 2012 Act, QQI was given several responsibilities in relation to ATP. QQI has responsibilities under section 56 to establish and publish policies and criteria for ATP in relation to learners. Awarding bodies and providers have responsibilities under the act to establish policy and procedures for ATP in line with the policies and criteria set out in the national policy. QQI also has responsibilities under section 56(4) to approve ATP policies developed by relevant and linked providers. While section 56(4) does not apply to previously established universities, under section 56(11) previously established universities have responsibility to consult with QQI before establishing procedures and under 56(12) QQI shall facilitate and advise previously established universities in implementing the procedures established. QQI also has responsibilities under section 9(g) of the 2012 Act to review the implementation of procedures for access, transfer and progression<sup>4</sup>.

Considering the responsibilities of QQI in relation to ATP, a public consultation was conducted in 2013 on the original policy framework set out by NQAI. Following this consultation a re-statement of the previously published 2003 policy<sup>5</sup> was re-issued. The restatement confirms the original version and stresses that the original NQAI vision, principles and objectives for ATP remain "valid and relevant".

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<sup>1</sup> [qp-20-policy-restatement-policy-on-criteria-for-atp-in-relation-to-learners-for-providers-of-fh-et.pdf \(qqi.ie\)](#)

<sup>2</sup> [qqi-insights\\_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-and-progression-in-irish-education-and-training-2023.pdf](#)

<sup>3</sup> [Qualifications and Quality Assurance \(Education and Training\) Act 2012 \(irishstatutebook.ie\)](#)

<sup>4</sup> [Qualifications and Quality Assurance \(Education and Training\) Act 2012 \(irishstatutebook.ie\)](#)

<sup>5</sup> [qp-20-policy-restatement-policy-on-criteria-for-atp-in-relation-to-learners-for-providers-of-fh-et.pdf \(qqi.ie\)](#)

Since this policy restatement, the landscape within the education sector has changed significantly, with the establishment of the Education and Training Boards (ETBs), SOLAS and the technological universities and several other developments aimed to create a more unified tertiary education system. ATP practice and policy at awarding body and provider level has also evolved and significant improvements and enhancements are evident since the publication of the original NQAI policy.

With these changes across the sector, and considering QQI's statutory responsibilities with regards to ATP, QQI commissioned a new assessment of the landscape of ATP practice, which was completed by an independent project team and resulted in the report: *From Counting to Cultivating Successful Participation - A Review of the Landscape of Practice Supporting Access Transfer and Progression in Irish Education and Training*<sup>6</sup> which was published in 2023.

The 2023 review produced a comprehensive report examining ATP practice in Ireland, across tertiary education, and other important factors such as Recognition of Prior Learning (RPL), information provision and data gathering. This review found that ATP is often treated as separate to many elements which are central to its successful establishment, such as teaching, learning, assessment, information for learners, recognition of prior learning (RPL) and collection of comprehensive data. The recommendations of this review prompted QQI to explore the need for an updated ATP policy set out in a Green Paper for consultation with a wide range of stakeholders.

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<sup>6</sup> [ggi-insights\\_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-and-progression-in-irish-education-and-training-2023.pdf](#)

# 1. Proposal in the Green Paper

In December 2024, QQI published a Green Paper on a Revised QQI ATP Policy for consultation. This Green Paper explored the recommendations of the 2023 review and presented a proposal for an updated QQI ATP Policy.

## 1.1. Proposal for updated ATP Policy

The Green Paper proposed an updated version of the previous NQAI policy with the proposed new ATP policy building on the previous pillars of the NQAI policy.

It is hoped that the updated ATP policy will provide an overarching vision of ATP supported by a high-level principles-based approach. The proposed principles of the policy are intended to promote cultures and systems which support ATP practice. The proposed new policy will promote the ideas of Universal Design of education and training programmes and also administrative systems. This policy will also recognise the importance of recognition of qualifications and recognition of prior learning (RPL) as key enablers of ATP.

The proposed principles for the revised ATP policy build on the original principles in existing policy and are outlined in the table below.

| NQAI Policy- Pillars            | Proposed Principles for new ATP Policy                                                                                                           |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| Credit                          | Credit, <b>Credit Accumulation, Credit Transfer</b>                                                                                              |
| Information Provision           | <b>Programme Design:</b> <ul style="list-style-type: none"><li>• Entry and Exit Arrangements</li><li>• Transfer and Progression Routes</li></ul> |
| Entry Arrangements              | <b>Information Provision</b>                                                                                                                     |
| Transfer and Progression Routes | <b>Data Collection and Provision</b>                                                                                                             |

Key recommendations include:

- Ensuring organisational cultures that support access, transfer and progression for all learners.
- Expanding on definitions of Access, Transfer, and Progression as presented in the Qualifications and Quality Assurance (Education and Training) Act, 2012 to ensure common understanding of terminology
- Adopting harmonised credit systems across tertiary education.

- Proposing an approach to credit accumulation to facilitate 'stacking' of micro-credentials and other small qualifications.
- Encouraging flexible program design with clear entry and exit arrangements.
- Strengthening collaboration among awarding bodies and providers to improve transfer and progression pathways.
- Promoting universal design principles for accessible information provision and dissemination.
- Standardising data collection to evaluate ATP policy effectiveness.

## 1.2. Timeline

The Green paper was published in December 2024 on the QQI website with several in person workshops and online meetings arranged to facilitate feedback on the proposal. The deadline for consultation responses was extended until May 2025. Approval, monitoring and review of implementation of an updated ATP policy will be incorporated into existing oversight and review functions within QQI.

## 2. Overview of the Consultation

Informal versions of the Green Paper were circulated widely to stakeholders in mid-November 2024, with the official versions formally published on the QQI website in December 2024. The consultation was open until the 25<sup>th</sup> of April 2025 with additional submissions accepted in May 2025. Stakeholders were invited to submit written responses to the consultation.

Separate to the proposed ATP policy there was an addendum included to the Green Paper on ATP which examined the current Common Award Standards (CAS) system used in further education and training (FET) and a possible expansion of the Programme Derived Award Standards (PDAS). This was included alongside the ATP Green Paper as these systems are central to the functioning of ATP in FET. However, the proposed new ATP policy will not be addressing this issue or issues associated with the CAS and PDAS systems and the responses will not contribute to the thematic analysis presented in this report. Consultation responses received in respect to this addendum, and which discuss associated issues such as the Higher Education Links Scheme (HELS) will be reviewed by colleagues in QQI Awards and explored and discussed internally within QQI.

### Meetings and Engagements

To further support the consultation, QQI arranged and attended several meetings and events with stakeholders from across the sector to invite feedback and respond to queries and questions. A summary of these is provided below.

- On 20 November 2024, QQI hosted a pre-conference workshop exploring the role of qualifications at NFQ Levels 5 and 6, and access, transfer and progression (ATP) policy in building a unified tertiary system. This workshop brought approximately 30 participants from across tertiary education, including representation from public and private, independent higher education institutions (HEIs), education and training boards (ETBs) and further education providers, the National Tertiary Office (NTO), the National Apprenticeship Office (NAO) and the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) together to discuss NFQ Levels 5 and 6 and ATP. A summary of proceedings of the workshop are provided in Appendix 1.
- On 11 December 2024, QQI hosted a dedicated meeting of the Recognition of Prior Learning (RPL) Higher Education (HE) Network to discuss the two green papers. This meeting included approximately 20 representatives from across the public higher education institutions to discuss the proposals in the papers.
- On 19 December 2024, QQI met with representatives of the Irish Universities Association (IUA) Quality and Qualifications Group to discuss the proposals in the green papers.

- On 20 January 2025, QQI attended a meeting of the Education and Training Boards Ireland (ETBI) Quality Network. The meeting had over 30 attendees representing ETBI and all education and training boards (ETBs).
- On 13 February 2025, QQI presented the green paper to the Irish Quality and Qualifications Forum (IQQF) which included more than 25 representatives from across tertiary education.
- On 3 March 2025 QQI presented the proposal to 50 representatives of private and independent higher education institutions.
- On 12 March 2025, QQI hosted the EU Reference Group which is a meeting of agencies under the aegis of DFHERIS funded to complete EU projects. The afternoon was dedicated to feedback on the green papers and was attended by 40 representatives from across the education and training sector.
- On 13<sup>th</sup> March QQI attended a meeting of ETBI to present the Green Paper and invite discussion.
- On 26 March a dedicated event was held to explore the ATP landscape and provide a forum for feedback on the green paper. 59 representatives from public and private tertiary education institutions as well as other relevant state bodies and NGOs. The event was chaired by Aontas and AHEAD.
- On 29<sup>th</sup> April QQI presented the ATP Green paper to the IUA Micro-Credentials Steering Group.

## 2.1. Written Submissions Received

| Category                                             | Number Written Submission |
|------------------------------------------------------|---------------------------|
| Designated awarding body                             | 9                         |
| Education and Training Board                         | 5                         |
| Private and independent higher education institution | 3                         |
| Representative Organisation                          | 10                        |
| Individuals                                          | 1                         |
| Other                                                | 4                         |
| <b>Total</b>                                         | <b>32</b>                 |

A full list of stakeholder organisations that made a submission is set out in Appendix 2.

## 3. Overall Response

### 3.1. Support for an updated ATP policy

The overwhelming majority of responses supported the proposed update to QQI's ATP Policy. There was broad agreement that a more up to date and fit for purpose ATP policy was needed given the changes in the education and training landscape as well as the evolution of practice on the ground.

A number of responses pointed to the dedicated and innovative practice and policy already being developed by awarding bodies and providers to support and drive forward ATP. The innovations undertaken in the area of ATP by awarding bodies and education providers have meant that QQI's existing policy restatement is not reflective of ATP policy and practice which has evolved significantly since 2003 and is indicative of the need to update the national policy on this topic. Some of these responses which highlighted localised innovation indicated that a centralising vision and approach would assist in supporting innovation already undertaken while also promoting continuous improvement and more joined up approaches going forward. The two workshops delivered as part of the consultation also sought to showcase examples of good practice in ATP.

There was broad support for the high levels principles-based approach, and many responses welcomed the framing of ATP as a centralising policy underpinned by Universal Design. Many responses acknowledged the value of the proposed approach with respect to centring of learner needs and interests.

There was clear preference from the responses received for a single ATP policy as opposed to separate policies for awarding bodies and education providers. This single ATP policy should clearly detail the separate responsibilities of awarding bodies and education providers while highlighting any responsibilities which may be shared to promote more cohesive and collaborative ATP policies and procedures.

### 3.2. Key Points of Clarification on Update to ATP Policy and Universal Design

Some responses pointed out the perceived additional burden in relation to either the proposed principles overall, or in relation to certain specific principles that may be placed on awarding bodies and providers. This was never the intention of the proposed updated policy.

In considering this feedback it is important to emphasise that the proposed update to the ATP policy is intended to be a high-level policy organised around guiding principles which are

intended to enable ATP pathways and experiences for learners as opposed to a document which sets out individual provisions with which awarding bodies and providers must comply.

- **Response:** It is important to differentiate in terms of language used in the principles. While there are some principles which are mandatory (as they are set out in legislation), overall, awarding bodies and providers are encouraged to engage with all principles holistically, consider all possibilities fully, and implement in instances and in ways which are most practical.
- ✓ **Action:** QQI will ensure that the language of the principles is suitably clear around requirements vs guiding principles. With regard to the principles around data collection, it will be made clear that these principles are intended to support improvements to internal collection and use of ATP data.
- ✓ Additionally, QQI assessment of ATP policy will be incorporated into regular review and monitoring activities in order to minimise burden on education providers and awarding bodies.

Secondly it was expressed that 'standard' routes of entry for learners should not be detracted from with more emphasis on flexible access routes outlined in the proposed principles. There was some suggestion in some submissions that focus should remain on operation of 'standard' routes.

- **Response:** 'Standard' entry routes, such as the CAO are highly accessible to a wide range of learners and should not be taken for granted or overlooked. However, in taking a universal (or inclusive) design approach of 'solving for one and extending to many'<sup>7</sup> can assist in ensuring that learners who are not well served or supported are provided with opportunities to take up all pathways available to them.

A recent study from University of Bristol in the UK ([The Benefits of Hindsight: Reconsidering Higher Education Choices](#)) found that 59% of undergraduate respondents surveyed said that had the option been available they would have wanted to transfer to another course or university<sup>8</sup>. When asked about key barriers to undertaking transfer 49% stated the process was too time-consuming and 39% saying they were unaware of their options with regards to transfer (with 38% stating that there was no information available to them)<sup>9</sup>. While this data is UK specific and is focussed on transfer pathways,

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<sup>7</sup> ["Solve for one, extend to many" — Inclusive design and why it matters | by Leanne Dobson | Medium](#)

<sup>8</sup> [The-Benefits-of-Hindsight-Reconsidering-Higher-Education-Choices-2025-1.pdf](#)

<sup>9</sup> [The-Benefits-of-Hindsight-Reconsidering-Higher-Education-Choices-2025-1.pdf](#)

the 2023 review of ATP practice in Ireland included submissions from learners which echoed similar deficits in information provision existing in Ireland<sup>10</sup>. This review also found wide variance in terms of information provision to learners<sup>11</sup>. It is therefore likely that similar statistics to those found in the report from University of Bristol would be relevant in Ireland.

It is important to note that the principles of Universal Design<sup>12</sup> are intended to be used as part of an iterative process<sup>13</sup> and the proposed new ATP policy will not be setting out requirements or targets to be met in terms of pathways available etc. but rather will be encouraging and providing guiding principles which will foster and support a systems wide universal design approach.

Additionally, some submissions received stated that this proposed update to QQI's ATP policy could detract or devalue the work being done to incorporate ATP into structures and systems.

- **Response:** QQI recognises the hard work being done to support and further develop ATP practice in Ireland. Indeed, this is one of the reasons for updating this policy as the previous NQAI policy was not keeping up with practice on the ground, thus resulting in a lack of coherence of approach and implementation<sup>14</sup>.

The aim of this updated ATP Policy is to continue to support good practice and to provide a central unifying vision and approach for continuous improvement. While very good practice does exist, in the absence of data, the impacts of current practice and the benefits of improvements as well as gaps are hard to determine<sup>15</sup>.

- ✓ **Action:** QQI will ensure that the ATP policy document acknowledges and supports the hard work being done to innovate and continuously improve ATP policy and practice

Finally, some submissions highlighted that there was a perception that the principles detailed in the proposed update to ATP Policy would result in QQI expecting significant changes to

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<sup>10</sup> [2023 review of ATP landscape in Ireland | Quality and Qualifications Ireland](#)

<sup>11</sup> [2023 review of ATP landscape in Ireland | Quality and Qualifications Ireland](#)

<sup>12</sup> [The 7 Principles - Centre for Excellence in Universal Design](#)

<sup>13</sup> [What is Universal Design? — updated 2025 | IxDF](#)

<sup>14</sup> [qqi-insights\\_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-and-progression-in-irish-education-and-training-2023.pdf](#)

<sup>15</sup> [qqi-insights\\_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-and-progression-in-irish-education-and-training-2023.pdf](#)

institutional autonomy, particularly in areas such as credit accumulation and transfer as well as entry requirements.

- **Response:** In the case of Designated Awarding Bodies (DABs), relevant elements of the joint sectoral protocol arrangements around the use of credit, ATP Policy and information provision<sup>16</sup> still stand. The ATP policy is not prescriptive but rather is principles based and does not encroach on institutional autonomy. It is also important to note that within the context of higher education, the use of ECTS is a commitment under the Bologna process which at its core has the purpose of credit transfer and credit accumulation<sup>17</sup>. Similar requirements around institutional autonomy for ETBs as set out in the Code of Practice for the Governance of Education and Training Boards<sup>18</sup> and the Education and Training Boards Act, 2013<sup>19</sup> will continue to be relevant.

The principles proposed for the new ATP Policy are high-level and designed in such a way that they can be interpreted and applied in ways which will suit individual awarding bodies, education providers, and even programmes.

### 3.3. Updated ATP Policy-Timeline

A minority of responses expressed concern around the proposed update to the ATP policy.

These submissions, while supportive of an updated principles-based and learner centric ATP policy, expressed concerns around the scheduling of the proposed update to the ATP policy. Concern was expressed that the update being rolled out in at a time when QQI is exploring a number of changes and new policies such as the proposed changes to levels 5 and 6 on the NFQ and upcoming policy papers on Micro-credentials and RPL as well as external changes being expected in a number of areas (such as the planned review of the ECTS user guide scheduled for 2027) may result in the updated ATP policy becoming out of date very soon after its publication.

**Response:** An update on policy development will be published outlining that only the ATP policy is progressing to policy development in 2026.

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<sup>16</sup> [Joint-sectoral protocol DABs.pdf](#)

<sup>17</sup> [ECTS users' guide 2015 - Publications Office of the EU](#)

<sup>18</sup> [Code-of-Practice-for-the-Governance-of-ETBs.pdf](#)

<sup>19</sup> [Education and Training Boards Act 2013](#)

## 4. General Themes

### 4.1. Definitions

A number of responses received considered the definitions presented in the Green Paper, particularly those definitions around Access, Transfer, and Progression. These definitions are set out in the Qualifications and Quality Assurance (Education and Training) Act, 2012<sup>20</sup> and QQI is bound to using the definitions as set out.

Many submissions supported the clarifications provided in the green paper to the definitions in the Act and were supportive of the expanded definitions in the Green Paper with some minor changes suggested (detailed below).

Several submissions did point to the restriction of the definitions in terms of the ability to capture moves to lower levels of the framework as these are not in keeping with the definition of Transfer (a move to a programme the same level of the Framework) or Progression (a move to a programme at a higher level of the Framework). For data collection purposes these moves along the framework could be classed as a specific form of 'Access'. As explored below in the section on 'data collection and reporting' it is not the aim of QQI to create burdensome reporting requirements, however this definition will allow for data collection on moves to lower levels of the framework if there is scope to do so. It is also important that definitions acknowledge that accessing, navigating and progressing through education pathways is not a linear process<sup>21</sup>.

There were some suggestions received to improve clarity in the definitions of Access, Transfer and Progression, which are detailed below.

Additional discussions on definitions are explored in this section.

#### Access

In addition to the discussion around the inclusion of movements to lower levels of the framework, several submissions pointed to the use of 'commence' in the definition as confusing and ignores all usages of access such as advanced entry or transfer. As such the definition of Access has been slightly amended below:

“...Is the process by which a learner’s previously acquired knowledge, skill or competence is recognised, allowing them to enter onto a programme of education and training at all levels of the framework. This process is central to all elements of access,

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<sup>20</sup> [Qualifications and Quality Assurance \(Education and Training\) Act 2012 \(irishstatutebook.ie\)](https://www.irishstatutebook.ie/eli/2012/act/34/enacted/en/html)

<sup>21</sup> [Irelands Yearbook of Education 2024](#)

transfer and progression and thus also forms part of transfer and progression procedures.

This process of recognising learners' knowledge, skill or competence must include mechanisms to allow for assessment which include non-formal and informal learning and provide for advanced entry routes where appropriate or possible.

This process is distinct from 'access' as commonly used in education to describe pathways designed to widen participation from under-represented groups; however, when enacted and communicated clearly, consistently and transparently it can facilitate greater access for all to tertiary education and training.

## Transfer

From submissions there was some confusion as to whether transfer is intended for learners who received awards only or is intended to be used for learners who have either received awards or not. The definition of transfer encompasses both circumstances and can occur with or without an award. It is proposed the explanation of the definition of transfer detail programme transfer which occurs without an award as below:

"...Is an access process through which a learner's previously acquired knowledge, skill or competence is recognised, allowing them to transfer from one programme of education and training to another programme at the same NFQ level. Transfer can encompass a transfer to a programme at the same level of the framework following the achievement of an award or can encompass programme transfer which occurs when no award is achieved but credit is transferred to another programme at the same level of the framework.

Transfer can occur either within the same education provider (for example transferring from one programme to another), or it can include the transfer from one education provider to another.

The process for acknowledging learners' knowledge, skill or competence can support processes such as the 'building' of qualifications from minor awards to major awards or other types of non-major awards towards larger qualifications.

## Progression

There was some suggestion that this definition should include moves to lower levels of the framework, however, the definitions in the revised ATP policy must be guided by legislation. As

discussed above movements at all levels of the framework are incorporated into 'access', The definition of progression remains as below:

“...is an access process through which a learner’s previously acquired knowledge, skill or competence is recognised allowing them to move from one programme of education and training to another programme at a higher NFQ level.

Progression can occur within the same education provider or from one provider to another.

The process for acknowledging learners’ knowledge skill or competence for the purposes of progression can occur at all levels of the NFQ.”

### Full time vs Part time

Many submissions welcomed the clarity of the definition of part-time. The part-time classification is set out in the green paper as a learner taking a credit load of fewer than 60 ECTS credits or 120 FET credits in an academic year. However, some respondents voiced that more nuance was needed in this definition as this calculation would not be applicable at levels 1-4 on the Framework and is also not straightforward at level 10 on the Framework.

- **Response:** This distinction is important, and it will be reflected in the updated ATP policy that this definition of part-time has most relevance at levels 5-9 on the NFQ.

Related to this, there were a small number of submissions which suggested wide consultation was required on this definition. However, the definition of part-time at these levels will stand as it is flexible and the clarity provided was welcomed by the majority of submissions received.

- **Response:** As detailed in the position paper from the IUA on Part-Time/Flexible Study in Irish Higher Education<sup>22</sup> definitions beyond this can become increasingly complex and confusing. For the purposes of the high-level principles in the proposed update to the ATP policy, it would be counter-productive to overcomplicate this distinction at levels 5-9 of the framework.

There was also some concern that updates to the ECTS user guide may result in this definition not being in line with updated policy.

- **Response:** This definition is broad enough that it will be unlikely that updates to the ECTS user guide will result in changes being required. It is unlikely, however, that

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<sup>22</sup> [A-Student-is-a-Student-is-a-Student-a-Position-Paper-on-Part-Time-Flexible-Study-in-Irish-Higher-Education-Full-Paper.pdf](#)

changes to the ECTS guide will result in significant changes to the credit volumes for full time study. Significant changes are not expected and the 60 credits for full time programmes allows for a great deal of flexibility in terms of organising the credit volumes across a programme. However, following updates to the ECTS user guide several QQI policies will need to be re-visited to ensure ECTS calculations are in keeping with the user guide, the ATP policy will be subject to the same scrutiny.

- ✓ **Action: The definitions of part-time vs full time study will be revised to caveat that part-time study credit volumes of less than 60 ECTS or 120 FET Credits are most relevant to programmes at levels 5-9 of the framework.**

### General vs Specific Credit

There was no consensus amongst responses about the definitions of 'specific credit' or 'general credit'.

- ✓ **Action: as part of the revised ATP policy, a section on recognition of formal learning and credit will be drafted to provide clear information on the transfer and accumulation of credit. This will not be proscriptive but will be intended to provide clarity and guidance in implementing credit systems in relation to formal learning.**

### Exit Awards and Resumption of Studies

Several submissions indicated that exit awards were granted to learners in their institution in the instance of learners who have failed to meet all progression requirements. There was an argument in some submissions that following exit awards granted in these circumstances, re-entry into the programme should not be permitted. In some submissions which defined this usage of exit awards it was stated that these instances were the sole times when exit awards were used.

- **Response:** While the use of exit awards in the instance of not meeting progression requirements can present one use for exit awards, the purpose of exit awards is broadly to certify sets of learning regardless of reason this exit is occurring. The principles detailing how exit awards should be considered and used set out that consideration should be made at the programme design phase to determine a clear set of learning outcomes which would qualify for an exit award regardless of reason for exiting the programme.

There are a number of reasons why progression requirements may not be met which may change year on year. The option for re-entry must therefore remain in the principles set out. As detailed earlier in this consultation report, while there are some principles in

the updated QQI ATP Policy which are mandatory, overall, awarding bodies and providers are encouraged to engage with all principles holistically, consider all possibilities fully, and implement in instances and in ways which are most practical.

## Joint Awards

It was stated in the green paper that credit accumulation of micro-credentials can be retrospectively mapped to the achievement of a larger qualification. The green paper sets out that learning must be coherent to the achievement of a qualification and must be in keeping with the Grid of Level Indicators for the overall level of the award and with the relevant award-type descriptor. The green paper sets out that if such an exercise results in a new qualification, the institution must include this award in the NFQ in line with requirements of the Joint Sectoral Protocol and also be published in the Irish Register of Qualifications. The green paper suggested that this arrangement could be made as a joint award.

Some submissions pointed out, particularly in the context of Higher Education Providers that there are definitions of joint programmes used by the European Consortium for Accreditation (ECA)<sup>23</sup> and indeed QQI's Policy for Collaborative Programmes, Transnational Programmes and Joint Awards<sup>24</sup> that point to the need for design and validation of a joint programme.

- **Response:** The proposal contained in the green paper does still provide for the need for quality assurance of the programme in line with the joint sectoral protocol. It is not clear that a retrospective mapping of modules that are quality assured would be in opposition to the commonly understood definition of joint award, nor would it necessarily preclude such an award from inclusion on the NFQ. In general, an awarding body will recognise learning as part of a pathway, however, should an awarding body want to acknowledge the learning as part of a pathway through a joint award this is possible as long as each awarding body continues to monitor the quality of their respective sections of delivery.

## 4.2. Credit, Credit Accumulation and Credit Transfer

While there was broad support for the update to the principles and operational guidelines for implementation of a national approach to credit to provide clarity on the operation of credit and to consolidate operational guidelines across tertiary education, however some submissions pointed to specific proposals in relation to credit which caused some confusion and would need additional information to include in the policy. Namely,

- The proposed removal in the operational guidelines of the restriction on credit being used twice (also termed 'double counting') for the same learning achievement.

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<sup>23</sup> Recognition of qualifications from joint programmes

<sup>24</sup> (Microsoft Word - 2012 AC Approved Collaborative and Transnational Programme\205)

- The principle for timeframes of acceptance of credit (including RPL) setting out that this should be agreed upon at institutional or programme level and subsequently clearly communicated to learners as opposed to a blanket limit.
- **Response:** The principle in the document on Credit, Credit Accumulation and Credit Transfer is intended to replace the Operational Guidelines for the Implementation of a National Approach to Credi. It must be clarified that the removal of the restriction on credit being used twice in the ATP Policy's Principle on Credit does not mean that restrictions cannot be placed on credit at the awarding body, provider or programme level. It is also important to note that removal of the restriction on credit being used twice is not intended to only facilitate near or full RPL. However, such restrictions must be communicated to learners.

A similar approach applies to the timeframes of acceptance of credit, approaches can be determined at awarding body, provider, or programme level, however, time restrictions must also be communicated to learners.

There was some confusion as to what the above proposals would entail and how these could be enacted at the provider- level. To provide further guidance, additional information on the parameters of credit accumulation and credit transfer will be detailed in the updated ATP policy.

There was some suggestion that the calculation presented in the green paper of 2:1 FET to ECTS credits should be subject to wider consultation.

- **Response:** A national agreement in 2008 stated that 1 ECTS credit would equate to 20-30 hours of learner effort and evidence suggests this practice has continued<sup>25</sup> <sup>26</sup>. As this presents a simple calculation which was welcomed by a majority of responses, this calculation can be understood as ECTS compatible and will be explored further in the implementation of the update to the ECTS user guide.
- ✓ **Action:** While ensuing the ATP policy remains principles based, the White Paper will provide more detailed guidance on credit, credit transfer and credit accumulation and the use of these. This will include clarity on the recognition of formal learning, certified and uncertified, and operational parameters for the use of credit.

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<sup>25</sup> Jargon - UCD Registry

<sup>26</sup> Academic Credit System (ECTS) - Trinity Teaching and Learning - Trinity College Dublin

### 4.3. Information Provision

While there was broad support for guidelines surrounding information provision, some submissions communicated that implementation of the principles around information provision may result in too much information being provided to learners.

While the principles will result in more information being provided, the principles proposed for a new ATP policy stress that accessible information in numerous formats should be provided, and student information should be carefully considered. Innovative practices and projects underway around student information hubs were highlighted in a number of submissions as a way of clearly communicating pathways to learners. Additionally, many submissions emphasised the importance of clear, accessible language for learners around all elements of ATP.

- **Response:** It is important to note that under section 67 1(c) of the Act <sup>27</sup> that a statement of how procedures for access, transfer and progression apply to specific programmes is required. This has always been a requirement under the legislation, and we are now relating to a policy for implementation and monitoring purposes.

Additionally, evaluation, co-design, and innovative practice around information provision as promoted in the proposed ATP principles will assist in information being provided to learners in clear, accessible ways which are intuitive. Building intuitive and accessible systems for information provision will also assist administrators in updating information as required.

Several submissions highlighted the importance of guidance in navigating ATP pathways, the work of guidance professionals and the importance of keeping them informed of ATP policy and procedure is essential.

- **Response:** While QQI acknowledges the vital role guidance professionals play for learners in navigation of ATP pathways, given the legislative background of the ATP policy we cannot include guidance provision in the policy. QQI is bound by legislation which is focussed on clear information provision for learners (and by extension those that support them) thus we cannot mandate a need for guidance counsellors as part of the ATP policy.

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<sup>27</sup> Qualifications and Quality Assurance (Education and Training) Act 2012

It is also important that the principles of the ATP policy remain pertinent to learners outside the system who likely do not have access to guidance.

- ✓ **Action:** Include in the policy that where guidance services are available how to access guidance must be made clear to learners.

#### 4.4. Data collection and reporting

Several submissions were concerned about the additional burden of data collection and reporting. To clarify, QQI is not seeking to greatly increase burden of data reporting by providers and awarding bodies. QQI is conscious of existing data reporting to the HEA for higher education providers and PLSS and SOLAS for further education providers and will seek to collaborate with all relevant state agencies on data currently collected in relation to learners.

- **Response:** Principles for data will need to ensure providers and relevant bodies know what should be captured in order to ensure datasets provide insights required on all elements of ATP. Should this result in new or amended data sets for collection, QQI will collaborate with other state bodies to ensure as few data collection streams as possible. It will be set out in the updated ATP policy that principles around data collection and use are intended to support institutions in understanding and improving ATP practice as well as fulfilling reporting requested as part of regular QQI review activities.

Some submissions suggested the collection of data on access could be used to capture statistics on movements from a higher level of the framework to lower levels, as this is not captured under the legislative definition of 'transfer'.

- **Response:** There is to be no requirement on data for move from 8 to 5 for example under the updated ATP policy as we do not want to be overly burdensome. However, collection and reporting of this data can be explored under access definition by providers and awarding bodies.

#### 4.5. Timelines and Implementation

This consultation report will be presented alongside the draft policy in September 2026. Focused consultation will be undertaken with a view to finalising the policy before the end of the year.

# Appendix 1:

## Summary of ATP Workshop Event March 2025

### Introduction

On 26<sup>th</sup> March 2025, QQI hosted a workshop looking at ATP policy and practice on the ground in Ireland and using this discussion to discuss the proposal for the revision of QQI's ATP Policy.

The day began with a consultation session on the QQI Green paper on ATP, detailing the proposal in the green paper for an updated QQI ATP policy followed by a discussion on the proposal from the institutional perspective and a sharing of experiences of ATP by institutions. Following this discussion session a number of case studies showing innovative practice in ATP were presented. These case studies showcased ATP practice in a wide range of institutions.

Following the presentation of the case studies a panel highlighting the learner experience was convened to provide insight into the learner experience of navigating access, transfer and progression pathways. Following this panel another discussion session was provided in order to encourage consideration of the revised ATP policy this time from a learner perspective.

This event was attended by 58 delegates, who represented public and private further and higher education providers as well as representative bodies for education providers. The day was chaired by Dearbháil Lawless, CEO of Aontas and Dara Ryder, CEO of AHEAD. Representatives from the Wheel and the Institute of Guidance Counsellors as well as adult learners were also in attendance and offered valuable insights into the learner experience. Groups were encouraged to think about different 'learner personas' to understand the kinds of barriers to ATP faced by a wide range of learners.

Much of the feedback received on the day was reflected in the written submissions, however there was a great deal of discussion following the panel highlighting the learner experience of the cultural legacies at play which support and perpetuate institutionalised thinking about what has been done previously preventing innovative thinking about what can and should be done to eliminate barriers. It was also emphasised that while elimination of barriers was important academic integrity must be preserved to ensure the coherency and relevancy of qualifications. It was agreed that parity of esteem was very important in terms of recognition of awards on the framework and there was acknowledgment of the work being done by QQI in this regard.

## Appendix 2

### List of Responding Organisations to Consultation

|                                                                                        |                                                                                                                         |
|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| Atlantic Technological University (ATU)                                                | National Association of Principals and Deputy Principles – Further Education and Training Colleges Ireland (NAPD-FETCI) |
| Children’s Therapy Centre                                                              | National Disability Authority (NDA) and Centre for Excellence in Universal Design (CEUD)                                |
| Cavan Monaghan Education and Training Board (CMETB)                                    | National College of Ireland (NCI)                                                                                       |
| City of Dublin Education and Training Board (CDETb)                                    | National University of Ireland (NUI)                                                                                    |
| Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) | Royal College of Surgeons in Ireland (RCSI)                                                                             |
| Donegal Education and Training Board (DETb)                                            | RPL in Higher Education                                                                                                 |
| Dublin Dun Laoghaire Education and Training Board (DDLETb)                             | SOLAS                                                                                                                   |
| Dublin City University (DCU)                                                           | South East Technological University (SETU)                                                                              |
| Education and Training Boards Ireland (ETBI)                                           | Teagasc                                                                                                                 |
| Education and Training Board RPL Network                                               | Technological University Association                                                                                    |
| Higher Education Colleges Association (HECA)                                           | Technological University of Dublin (TUD)                                                                                |
| Innopharma Education                                                                   | Technological University of the Shannon (TUS)                                                                           |
| Institute of Guidance Counsellors (IGC)                                                | Trinity College Dublin (TCD)                                                                                            |
| Irish Universities Association (IUA)                                                   | University of Limerick (UL)                                                                                             |
| Kerry Education and Training Board (KETb)                                              |                                                                                                                         |
| Kilkenny Carlow Education and Training Board (KCETb)                                   |                                                                                                                         |
| Maynooth University (MU)                                                               |                                                                                                                         |
| Munster Technological University (MTU)                                                 |                                                                                                                         |