



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

PROPOSAL FOR REVISED QQI CONSULTATION FRAMEWORK

February 2022

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1. INTRODUCTION

1.1 INTRODUCTION

The Consultation Framework that was designed by QQI to indicate the standards that would be applied to its consultation with stakeholders was published in 2013. At that point, QQI was implementing a Comprehensive Policy Development Programme with an emphasis on the documentation of draft policies in green paper, white paper, and final versions. It had also transitioned from the representative boards of the amalgamating bodies to a more specialist Board established under QQI's legislation; requiring it to communicate other ways that its stakeholders could contribute their views. Since then, QQI has substantially expanded and diversified the methods and means through which it engages with its stakeholders, including with those it regulates, fellow national agencies, other regulatory bodies, professional bodies, government departments, learners, employers, and community actors.

The purpose of this project was to consider the characteristics of effective consultation described in the Consultation Framework and to develop an updated framework that reflects both current and desirable approaches to consultation. This proposal for a renewed Consultation Framework is informed by consultation with QQI, with its stakeholders, and with reference to relevant models and research.

1.2 CONSULTATION: PURPOSE AND SCOPE

QQI is recognised as being a consultative organisation. When discussing why QQI has taken this approach to fulfilling its regulatory role, the most common response internally and externally is that it must. The reasons cited for why it must, differ in accordance with who is being asked. Responses include that it has a statutory obligation to consult; it couldn't develop policy approaches in isolation; and it wouldn't be able to secure the implementation of those policy approaches without developing them in conjunction with its stakeholders. A more positive restating of this, again expressed internally and externally, is that QQI is motivated to consult because it wants to implement policies, processes and initiatives that will not only exist, but that will work. The complex network of contexts in which QQI operates perhaps makes the design of regulation that works its biggest challenge, and for most stakeholders, they see their role in consultation as helping QQI to see, understand, and acknowledge different circumstances when determining policy. This ongoing discussion through consultation, which has been taking place since QQI was established, has inevitably increased mutual understanding. It has also improved the capacity of QQI and its stakeholders to engage effectively.

In terms of scope: internally, consultation is understood by QQI as a strategic tool that incorporates a continuum or pipeline of external contact, ranging from planting ideas and generating interest amongst national actors, to bringing stakeholders together in advisory groups and standing forums, to formal consultation on published documents. It is appropriate that the renewed Consultation Framework comprehends this diversity of engagement.

1.3 THE CONSULTATION FRAMEWORK: THE NEXT STAGE OF DEVELOPMENT

The current Consultation Framework, whilst of its time in the sense it pre-dates the personality of consultation that was taken on by QQI, has continued value and relevance. In line with the good practice that it drew from, it emphasises the importance of planning, and under this heading addresses the need to determine matters such as consultation aims and purpose, intended impact, audience, processes of consultation, and appropriate consultation timeframes. It goes on to state minimum standards for consultation documentation in terms of language and clarity and the availability of consultation documentation in a variety of formats. It advises that consultation documentation is posted to the QQI website, and that information and communication technology is fully utilised to engage parties in consultation processes and to facilitate their participation. In support of openness and transparency, it requires that a report is published on the outcomes of consultation, and that the effectiveness of consultation exercises is periodically evaluated¹. Specific references are made to the Consultation Framework text throughout this report.

Whilst this proposal is focused on a revised and updated Consultation Framework, it should be acknowledged that in the approaches to consultation undertaken by QQI, it is notably superior in its approach to most, if not all, regulatory bodies in the State. This was recognised by ENQA in its 2019 commendation of QQI's *comprehensive and engaging consultation with stakeholders* (ESG 2.2). In developing its approach there are several dimensions of the Consultation Framework that QQI has implemented, including perhaps the most onerous task of publishing reports on consultation outcomes. There are others, particularly with regards to consultation planning, that require further consideration in the context of what is now known about the complexity of the nexus in which QQI operates.

It is therefore proposed that a revised Consultation Framework is adopted, that adapts and augments several of the features of the original framework and presents these in a model of guiding criteria, questions, and evaluation. Ultimately, it aims to acknowledge the diversity of stakeholders with whom QQI consults and to provide reminders and prompts in planning and executing this complex engagement. In doing so, it can support QQI in honing its craft in consultation further to ensure that it sustains stakeholder engagement and maintains the good will that is required to effectively manage these processes. The updated Consultation Framework also makes visible, internally, and externally, a model of continuously improving practice.

¹ That evaluation could take place after a substantial consultation process, or, for example, as part of a repeated annual or biennial exercise, such as the Stakeholder Engagement Survey.

1.4 CONTRIBUTIONS TO THE PROPOSED CONSULTATION FRAMEWORK

The proposed Consultation Framework has been informed by a review of documentation provided by QQI, including:

- QQI's draft Statement of Strategy (2022-2024)
- Stakeholder Engagement Research (2020)
- ENQA review of QQI (2019)
- Review of the role of the Consultative Forum (2020)
- Draft Irish Quality and Qualifications Forum terms of reference (2021)

The following sources were reviewed:

Consultation Principles and Guidelines (DPER, 2016)

A selection of consultation policies of other national and international government and regulatory bodies, including:

- Background document on public consultation (OECD, undated)
- Program for Public Consultation (University of Maryland)
- Best Practice Consultation (Australian Government, 2016)
- Guide to Consultation (NMBI, undated)

Journal articles, including:

- Can Consultation ever be Collaborative? (Johnson and Howsam, 2018)
- Stakeholder engagement as a conduit for regulatory legitimacy? (Braun and Busuoiu, 2020)

Consultation was undertaken with:

The Chief Executive and staff of QQI (in order of interview): Gráinne Mooney, Bryan Maguire, Peter Cullen, Barbara Kelly, Pdraig Walsh, and Ann Murphy.

External stakeholders (in order of interview):

- Naomi Jackson (CCT)
- Nora Trench Bowles (IUA)
- Joe Gleeson (DFHERIS)

- Ronan O'Loughlin (Chartered Accountants Ireland)
- Blake Hodkinson (CDETb)
- Michael Hannon (GMIT)
- Roisín Smith (TCD)
- Dave Collins (Chevron College)
- Patricia O'Sullivan / Diarmuid Hegarty (HECA)
- Siobhan McEntee (ETBI)
- Oisín Hassan (NStEP) and Megan O'Connor (USI)

1.5 STRUCTURE OF REPORT

Following this introduction (section 1), influences on the proposed Consultation Framework are discussed (section 2). This is followed by the guiding criteria proposed for inclusion in the Consultation Framework with accompanying rationale (section 3).

2. INFLUENCES ON PROPOSED CONSULTATION FRAMEWORK

2.1 INFLUENCES ON THE CONTENT AND FORMAT OF THE PROPOSED CONSULTATION FRAMEWORK

In reviewing documentation and research, and discussing QQI's consultation processes with QQI and externally, some impressions have formed that have influenced the content and format of the proposed Consultation Framework. The more overarching issues identified are that:

- QQI is largely acknowledged as being a consultative organisation; notably more so than most regulatory bodies with which stakeholders engage.
- It is generally, but not universally, considered that QQI takes an open and honest approach² to its consultation and is motivated to improve practice.
- Relationships between QQI and its stakeholders are reasonably strong, but the interconnected nature of QQI's work, can lead to its consultation processes creating momentum that is sometimes unpredictable. At other times, relationships are disrupted because of insufficient consultation planning.
- Stakeholders have the same expectations of QQI as QQI has of its stakeholders: it expects it to plan its consultation agenda at an organisational level; to have a coherent approach to consultation, regardless of the consultation lead; and to continuously improve, as an organisation, based on its experiences.
- Stakeholders, in deciding to dedicate scarce resources to engaging with QQI, need to understand how that commitment will benefit their organisations / sectors.
- QQI has created an expectation of consultation; this may evolve into an expectation of something closer to partnership to satisfy mutual benefit, including through joint testing and evaluation of policy approaches.

Other matters identified are that:

- Determining the audience for consultation is complex: it requires well-developed internal information sources and may require external assistance and confirmation.
- Capacity to engage with consultation needs to be increased amongst some external stakeholders and sectors.
- Matters that are not open to change through consultation processes should be identified.
- When introducing certain policies and initiatives, continuing the consultation process to support early implementation may be beneficial.
- Communication can be used more strategically to support QQI's consultation, if those responsible for this area are involved in consultation planning from the outset.

² This is supported in the Stakeholder Engagement Research findings which state that: *The highest rated service elements are around QQI's transparency and openness, promoting confidence in the integrity of qualifications and their effectiveness as a qualifications' authority.*

- Substantial external engagement by QQI needs to be known at an overarching level to avoid disconnected or parallel consultation processes taking place.
- A consultation framework requires management and governance oversight.

In its format, the proposed revised Consultation Framework has regard to these issues. It is also influenced by:

- The opportunity for QQI to acknowledge to stakeholders the importance it places on its consultation activity.
- The chance for QQI to document / publicise the cooperative approach it has taken to the implementation of its statutory regulatory functions, as a reference point for others seeking good practice in this area.
- The higher likelihood of those inside and outside the organisation referencing a succinct document rather than one that provides unnecessary detail on how it has been informed.
- The advantages of having a Consultation Framework that reflects good consultation practice but is also tailored to QQI's context and to the contexts of its stakeholders.

2.2 FORMAT OF THE PROPOSED CONSULTATION FRAMEWORK

It is proposed that the Consultation Framework is structured around 8 guiding criteria. Under each, there are questions to consider when having regard to that guiding criterion and an example of how its implementation could be evaluated.

This is in keeping with the comparable format of the European Standards and Guidelines (ESG), against which QQI is reviewed as a quality assurance regulator, and with how QQI has implemented some of its statutory QA functions: by devising guidelines that can be met in a variety of ways, depending on the context in which they are being implemented. It is also making explicit the implicit guiding criteria that the ENQA³ review panel could see in 2019: *In bringing together the four disparate policy frameworks of its antecedent bodies, QQI has effectively developed its own framework based on a single set of high-level shared principles and requirements.*

2.3 CONCLUSION

The revised Consultation Framework reflects much of what QQI is already doing. The shift that it represents, if adopted and implemented, is the application of more consistent practice for engagement with stakeholders on matters in which their opinions and inputs are required. As the guiding criteria illustrate, this doesn't require standardised approaches to consultation: and neither would this be effective. It does, however, require that a series of common issues are considered when devising and implementing consultation processes.

³ QQI is subject to external review against the ESG by the European Association for Quality Assurance in Higher Education (ENQA).

3. PROPOSED CONSULTATION FRAMEWORK: GUIDING CRITERIA AND RATIONALE

3.1 PREFACE TO THE CONSULTATION FRAMEWORK DOCUMENT

Reference is made in the proposed guiding criteria in 3.2 to the importance, when consulting, of clarifying purpose, scope, and benefit. In that spirit, it is proposed that the finalised Consultation Framework document addresses these matters in advance of presenting the guiding criteria. Draft text to that effect is proposed below:

Purpose of the Consultation Framework: To present a series of guiding criteria that reflect, prompt, and communicate QQI's approach to consultation with its stakeholders.

Scope of the Consultation Framework: The Consultation Framework's guiding criteria apply to all forms of consultation undertaken by QQI, including published documentation, working groups, forums, and other engagements.

Intended benefit of the Consultation Framework: To provide a tailored reference point to QQI when conducting consultation, the success of which can be jointly evaluated with its stakeholders.

3.2 THE PROPOSED GUIDING CRITERIA OF A REVISED CONSULTATION FRAMEWORK

The guiding criteria proposed for the body of the Consultation Framework are set out below, with accompanying rationale.

GUIDING CRITERION 1: ESTABLISHING MUTUAL BENEFIT

We believe we have a shared responsibility with others to ensure confidence in and continuous improvement of the quality of education and training. We believe that the attainment of our priorities and objectives is best pursued collaboratively and constructively with our diverse set of partners and providers. We value partnership for mutual benefit (QQI, Draft Statement of Strategy, 2022-2024).

Consultation is a resource-heavy pursuit for QQI and for the stakeholders that participate in its consultation processes. In a busy environment, the question identified by stakeholders as needing to be satisfied for each consultation process – and anticipated by the extract from QQI's draft Statement of Strategy – is the benefit to the provider, organisation, or sector. For several stakeholders, QQI analysing, identifying, and articulating this mutual benefit in the projects it chooses to advance and engage with stakeholders on, is an important next step in the relationship that requires analysis of relative cost and benefit. The need for this identification of mutual benefit, which is connected to the purpose and scope of a matter for consultation, is perhaps a natural by-product of the partnership approach to regulation that has been fostered by QQI. It could also be seen as a positive evolution where the nature of quality assurance is becoming more concrete through this interrogation and expectation of benefit.

The guiding criterion of establishing mutual benefit also extends to the decision by QQI to operate the Consultative Forum, or an alternative forum with stakeholder membership⁴. Internally, views on the value of a

4 Within the breadth of consultation engagement that QQI undertakes, and in which stakeholders participate, the positioning of a new forum in the hierarchy of consultation may need to be clarified for stakeholders; particularly those who are not included in its operation.

new forum are mixed. They include that it needs to be sustainable in its ambitions and activities. The comment was also made that consultative forums necessitate the development of a shared space amongst partners and will require QQI to loosen its hold on the agenda if it is to be successful. In discussion with stakeholders on the concept of stakeholder forums, there were also diverse views. For some, there is little recognisable merit in engaging with representatives from other sectors or sub-sectors. For others, there is an openness to collaborative working on topics of mutual interest. Overall, the decision to participate in such forums, rather than to disengage or send a proxy, will be based on perceived benefit to the stakeholder rather than perceived benefit to QQI.

Recommended text for the Consultation Framework:

Guiding Criterion: The purpose, scope and intended benefit of a matter being brought for consultation will be clearly articulated.

In meeting this criterion, QQI will consider the following:

- Has some analysis been undertaken of the relative cost and benefit of a consultation process?
- Has the purpose of the matter brought for consultation been identified and its scope defined?
- Has the intended benefit(s) of the matter under consultation been articulated in a manner that is relevant to the stakeholder group being invited to contribute?
- Has the purpose, scope, and intended benefit been documented as part of, or as a supplement to, a consultation process?
- Have the internal objectives of the consultation process been identified by QQI?

An example of indicators that could assist QQI in evaluating this criterion are:

- Stakeholders understand the purpose of the consultation, its scope, and the intended benefit of matters brought to them for consultation.
- QQI's objectives in undertaking the consultation process have been met.

GUIDING CRITERION 2: KNOWING YOUR AUDIENCE

The existing Consultation Framework places an emphasis on planning. This was generally acknowledged during internal consultation as not being a strong feature of how consultation is managed. For some, planning can restrict the capacity to avail of the opportunities that may arise as consultation processes evolve; for others, the absence of a plan for consultation impacts upon their ability to support the process.

One feature of consultation planning is identifying the appropriate audience. Knowing who to consult with contributes to the credibility of QQI as an organisation and oversights can be interpreted by stakeholders as lacking appropriate knowledge of, and insight⁵ into, their sector. When QQI is determining its consultation audiences internally, it requires some information resources, amongst them a reliable and up-to-date list of

⁵ Across sectors there is the sense that QQI need to be more in tune with providers and have people better equipped with sector specific knowledge to interpret the needs of providers (Stakeholder Engagement Research, 2020).

stakeholder contact information. The value of this was highlighted in the existing Consultation Framework, as was the importance of ensuring that this resource is maintained. From discussion internally it would appear that the quality of centralised stakeholder information is in question with a tendency towards individual rather than communal records. Whilst this may be influenced by information technology issues and preferences, it has a bearing on how QQI interacts with its stakeholders. Possibly because of this, stakeholders referenced on several occasions not receiving, or intermittently receiving notifications of information posted to the QQI website, including consultation calls and consultation reports.

When the audience for a consultation is multi-levelled within providers or organisations, more planning is required to identify those layers. It is here that those supporting the implementation of consultation processes, often those responsible for communications, will need assistance from the consultation lead, to identify sub-categories of consultation audience.

External assistance may also be required when identifying the optimum audience. The importance of QQI's approach to this collaborative planning was referenced in discussions with stakeholders. The key points arising are summarised below:

Providers with representative bodies

For representative bodies, involvement in the establishment of a consultation plan is very important. This is particularly the case in complex public sector contexts. It was noted in consultation that working together first to tease out the consultation plan enables representative bodies to satisfy themselves about:

- what is to be consulted upon and why (the guiding criterion of establishing mutual benefit)
- the scope of the matter to be consulted upon
- whose views are likely to be required, and when, to inform the consultation
- the anticipated timeframe in which the consultation will take place and how this aligns with sectoral governance arrangements and schedules.

Examples were provided in a higher education context of when this planning with the representative body did not take place and the time required to address the issues resulting.

The extent to which consultation through a representative body is appropriate will be determined by the matter under consultation; in some cases, QQI as a statutory regulatory body will wish to engage with institutions directly. However, when a policy, process or initiative is of cross-sector interest, joint planning on consultation would appear to have advantages for QQI, the representative body, and the sector.

Providers and organisations with key relationships

As noted, not all consultation is through representative bodies, and relationships directly with individuals within providers and organisations have been fostered by QQI. Some of these individuals provide a gateway to complex organisations. As part of its recording of contact information, it would be helpful to note these individuals and share information on their existence internally. It's important that these contacts are, as far as possible, informed about how QQI is consulting with their institutions, as this increases their ability to act as informed liaison points.

Learners

In this document, the word 'learners' is used to refer to all types of learners studying in many different types of learning settings across the ELE, FET and HE landscape. These include but are not limited to, apprentices, trainees, English language learners, international learners, and higher education and further education and training students. The focus here is on what all these learners have in common, namely, learning.

QQI largely facilitates its engagement with learners in consultation with organisations such as USI, ICOS, and Aontas and via the National Student Engagement Programme (NStEP). However, QQI considers there to be a need to engage more directly with learners, via providers, to reach a wider cohort. Whilst the appropriateness of QQI engaging at these levels may be in question, there could be opportunities, through consultation, to further inform and engage learners in the quality assurance of their learning experience: for instance, through focus groups on specific topics. Similar approaches could be explored in other contexts in which QQI is being assisted by external organisations to reach learners, for instance in the support it receives from Aontas in consulting with further education and training learners in Education and Training Boards (ETBs).

QQI's other challenge in audience identification is when it is seeking to consult and engage with individual providers of different sizes, experiences, and capacities; this is particularly the case in the further education and training sector. In this context, there is a danger of leaving providers behind, particularly with regards to their understanding of the advancement of the regulation of quality and qualifications in their sector. In speaking with stakeholders, the risk of not consulting effectively with these providers was identified and the need to provide clear information highlighted. The ability to do so, when working with the diversity of providers in question, was acknowledged, and it was suggested that some sub-stratification of further education and training providers as part of consultation and engagement planning was needed (e.g., by scope or type of provision). It was considered that this may avoid the confusion that can arise by covering too many contexts in communication with an audience that is less informed and ill-equipped to filter out what is relevant to them or otherwise.

Recommended text for the Consultation Framework:

Guiding Criterion: The audience to whom consultation is relevant will be established by QQI as part of its consultation planning.

In meeting this criterion, QQI will consider the following:

- Has there been analysis of the parties potentially impacted by the outcome of a consultation process?
- Where relevant, is the representative body of the sector being consulted with aware of the consultation and, if appropriate, has it contributed to the plan for consultation?
- Where consultation should include those not aligned with a formal structure or representative group, have targeted arrangements been made to include these individuals/organisations in the consultation process?

- Where there is a key relationship within an organisation, is that individual aware of a planned consultation?
- In determining consultation timelines, has consideration been given, as far as possible, to the internal governance requirements of those responding to consultations?
- Where a learner/student perspective is required, has the optimum approach to reaching these learners/students been discussed and planned?
- When engaging with smaller providers, have attempts been made to consult separately with groups with similar characteristics, so that they are receiving only information that is relevant to their context?
- Is the quality of the stakeholder data held by QQI assured?
- Have data protection, and other protocols for confidential contributions to consultation been applied?
- Where a consultation process, and its outcome(s), is published on the QQI website, are stakeholders routinely informed?

Examples of indicators that could assist QQI in evaluating this criterion are:

- where appropriate and beneficial, representative bodies confirm that they have been involved by QQI, in the planning of consultation within their sectors.
- individual providers and organisations confirm that the consultation and engagement undertaken with them has been inclusive and has had regard to their context.
- the currency and completeness of QQI's stakeholder data has been kept under review.
- stakeholders are consistently alerted to the publication of consultation documentation on the QQI website.

GUIDING CRITERION 3: PROVIDING NOTICE OF CONSULTATION

As far as possible, knowing what QQI is prioritising for consultation and engagement over a given period would be very welcome by stakeholders. This is a further result of the collaborative approach that QQI has taken to its consultation: not only does QQI need to plan its resources, so too do the organisations that it is asking to participate in those processes. More overt statements of intended consultation engagement with stakeholders could also contribute to QQI's collaboration with relevant government departments and public agencies in seeking to avoid consultation overlap and burden.

To achieve this requires QQI to confirm and publicise the known areas that it intends engaging with stakeholders on over an agreed period. In doing so, it also needs to satisfy the mutual benefit criterion; why is this thing being prioritised at this time and what is the intended benefit. The limitations of planning also need to be understood by stakeholders: there will always need to be scope to accommodate unexpected or nascent developments within the education and training environment that move up in national or regulatory priority.

Follow-through on consultation processes may become disrupted for similar reasons, and it is also important that stakeholders are informed if this is the case.

Finally, having an identifiable plan for consultation with sectors within a given period satisfies an organisational coherence for QQI that can then enable members of staff to lead out on their individual consultation processes, as part of the implementation of that agreed plan.

Recommended text for the Consultation Framework:

Guiding Criterion: QQI will confirm in advance the known areas upon which it intends consulting with stakeholders over a given period.

In meeting this criterion, QQI will consider the following:

- Do consultation plans align with undertakings given in the annual corporate plan, service level agreements with government departments, memoranda of understanding with fellow agencies, or other confirmed commitments?
- Have draft plans been communicated internally?
- Have plans for substantial stakeholder engagement been shared with other national parties with a view to avoiding consultation burden?
- Do agreed consultation plans include details of purpose, scope and intended benefit?
- Is there an agreed approach to communicating consultation plans to stakeholders?
- When follow-through on planned consultation has been delayed, have stakeholders been informed?

Examples of indicators that could assist QQI in evaluating this criterion are:

- stakeholders consider they have been given notice of the known priority areas that QQI intends consulting upon over a given period.
- stakeholders feel informed about what has happened after they have participated in a consultation process.

GUIDING CRITERION 4: EXTENDING CONSULTATION TO SUPPORT IMPLEMENTATION

The willingness of QQI to come to the table and engage with stakeholders is not in question, but providers would like to see more progress on seeing their inputs being incorporated into processes and rolled out (Stakeholder Engagement Research, 2020).

There is the potential for a gap between the intention of a policy or series of criteria and the impact of its implementation; particularly when trying to design consistent and proportionate regulation. In that regard, the routine publication of its responses to consultation outcomes, is an important step in QQI recording the

rationale for the decisions it has made and being able to revisit that rationale as needed.

In discussion with some stakeholders, the subject of piloting as a form of consultation was discussed. The process of testing re-engagement and allowing a selection of providers, and QQI, to experience and adapt the process, was considered to have been very positive. In other contexts, a similar objective may be satisfied by continuing to consult during the early implementation phase of new policies or initiatives to inform adaptation where necessary and beneficial. Building this engagement into a consultation process decreases the burden on periodic review and can address issues arising at an earlier opportunity.

With regards to formal review, stakeholders should have an opportunity to contribute to the periodic evaluation of substantial policy approaches and initiatives. This contribution could form a routine part of QQI's documented policy development, implementation, and review cycle.

Recommended text for the Consultation Framework:

Guiding Criterion: Consultation will be used to support the early implementation of a policy or initiative

In meeting this criterion, QQI will consider:

- Does the matter being consulted upon represent a substantial change in practice?
- Is the impact on QQI of the implementation of a policy approach or initiative known?
- Is the impact on those required to implement the policy approach or initiative known?
- Has a response to the themes arising in consultation outcomes been documented and published?
- Are there opportunities for stakeholders to contribute to the evaluation of policy approaches and initiatives as part of a development, implementation, and review cycle?

Examples of indicators that could assist QQI in evaluating this criterion are:

- QQI routinely gives consideration to how consultation could be used to support the early implementation of a policy or initiative
- responses to themes arising in consultation outcomes are documented and published by QQI
- stakeholders have an opportunity to contribute to the evaluation of policy approaches and initiatives as part of a documented cycle of development, implementation, and review.

GUIDING CRITERION 5: SCHEDULING CONSULTATION AND ENGAGEMENT

In discussion with stakeholders, having scheduled meetings with QQI was highlighted as being important, and part of the wider context and interpretation of consultation. The advantage described by one stakeholder was the benefit of *having continuous dialogue that doesn't require going back to zero every time*. The means

through which this is currently happening varies; it has been a longstanding feature of engagement with QQI for some sectors through annual dialogue. The expansion of this model, whilst resource intensive for QQI, has been welcomed. The representative of Professional, Statutory and Regulatory Bodies (PSRB) also identified the potential benefit of engagement on a one-on-one basis with certain PSRB that have relationships with QQI and priorities that they want to achieve through that engagement. For voluntary providers without scheduled access to QQI, online forums, amongst other initiatives, were noted as important. With the 'knowing your audience' guiding criterion being observed, and these providers being categorised by common contexts, having these engagements on a consistent and scheduled basis would help to satisfy a stated need for information and discussion; particularly amongst providers who are disinclined to interact with QQI otherwise.

Scheduled consultation and engagement can also extend to capturing the arrangements that QQI has put in place to intermittently meet with fellow national agencies, to monitor and progress memoranda of understanding.

Recommended text for the Consultation Framework:

Guiding Criterion: QQI will engage with stakeholders for whom it plays a regulatory role, and with fellow national agencies, at regular intervals.

In meeting this criterion, QQI will consider the following:

- Is there centralised organisational knowledge of QQI's scheduled engagements with stakeholders?
- Is it known to stakeholders how QQI will engage with them over a given period?

An example of an indicator that could assist QQI in evaluating this criterion is:

- stakeholders are aware of when and how they will engage with QQI over a given period.

GUIDING CRITERION 6: USING COMMUNICATION TO SUPPORT PARTICIPATION IN CONSULTATION

Greatest improvement of service elements in the past 12 months are around QQI's effectiveness of communication, contribution to improvement of qualifications and transparency/openness.

A number of providers referenced the more engaging short videos QQI have sent down social media and feel this type of format and content is more compelling.

...providers have to translate [QQI] documentation into more user-friendly language before passing on. This eats into providers' time and resources.

(Stakeholder Engagement Research, 2020)

One of the minimum standards included in the current Consultation Framework is that QQI will *aim to avoid the use of jargon or technical language, unless intended for a specific target stakeholder group*. In discussions internally, there are mixed views on the extent to which this is possible. Some feel that greater efforts could be made to avoid technical language, particularly when the subject for consultation is going to a multi-sectoral education and training audience. For others, concerns regarding legal ramifications are influencing the utilisation of language derived from the legislation. Overall, however, there is a sense internally and amongst most stakeholders spoken with externally that the business of QQI has an accompanying technical vocabulary and that precision in the utilisation of that language is important and understandable. It was also generally agreed, however, that there is room for the provision of clearer summaries of policy approaches or initiatives; including the expression of the purpose, scope and benefit to sectors that is discussed under the guiding criterion of 'establishing mutual benefit' above. This would also assist those needing to communicate a consultation process to their constituents.

The use of different formats to communicate consultation processes was considered by several stakeholders to be a positive step in QQI's approach to consultation and one to be built upon. This may include more systematic use of webinars, for instance, to respond to consultation queries, and the increased utilisation of short videos and podcasts as recorded information sources that can assist stakeholders in engaging with consultation processes. The utilisation of a diversity of methods, where appropriate, also increases QQI's endeavours as a public body to improve the accessibility of its materials.

In proposing that QQI develops clearer summaries of consultation material and considers different formats for consultation, two additional points are made:

- Those who write consultation materials are not always best placed to distil those documents. A separation of responsibilities is most likely needed: perhaps by the document author being supported in identifying the key points that will help to prepare stakeholders to participate with the consultation, and those key points being documented by another party.
- The development of communications materials in different formats, e.g., video and podcasts, is time consuming and requires internal and external expertise. The decision to commit these resources may be influenced by the breadth of the relevance of the consultation, or by its technical nature.

Finally, how QQI uses communication tools can assist it in providing coherence to the continuum of engagement that is now constituting 'consultation'. This can go beyond individual instances of consultation, and the preferences of different internal consultation leaders, to something that is recognisable at an organisational level. A suggestion made internally is that consultation, in its widest sense, could be made more visible and connected through branding and a common consultation logo. This would seem to fit well with the diversity of consultation processes at play, with the importance of organisational coherence and consistency, and with the opportunity to promote and make visible QQI's conscious good practice in this area.

Recommended text for the Consultation Framework:

Guiding Criterion: QQI will use communications strategically to support participation in its consultation processes.

In meeting this criterion, QQI will consider the following:

- Is analysis of communication supports to aid participation in consultation an identifiable stage of consultation planning?
- Has collaborative thought been given to the most appropriate communication supports to aid participation in a consultation process?
- In the context of a published document for consultation, has a summary of key points been documented?

Examples of indicators that could assist QQI in evaluating this criterion are:

- QQI has formalised the consideration of communication as a strategic stage in its consultation planning.
- stakeholders confirm they are being assisted in participating in consultation processes through the communications strategies used.

GUIDING CRITERION 7: CONFIRMING CONSULTATION PARAMETERS

QQI is consultative as a regulatory body, but it has a statutory responsibility to take courses of action that it believes are aligned with the fulfilment of those responsibilities. There are likely to be aspects of a policy approach or initiative that QQI consults upon and from which it is very unlikely to deviate, regardless of the feedback received. In these cases, a strong indication of that could be provided as part of the consultation process to both manage expectations and remind stakeholders of the requirements or standards that QQI must meet as a statutory regulatory body. Equally, in those instances in which QQI is conducting consultation on matters that are connected to ministerial/government prerogative, that should be highlighted.

Recommended text for the Consultation Framework:

Guiding Criterion: Where aspects of policy approaches or initiatives are not subject to change through consultation, this will be indicated.

In meeting this criterion, QQI will consider the following:

- Are there aspects of a policy approach or initiative under consultation that are legislatively dictated or beyond the prerogative of QQI?
- Are there aspects of a policy approach or initiative under consultation that QQI will need to fulfil

in a specified manner to be consistent with existing policies or initiatives?

An example of an indicator that could assist QQI in evaluating this criterion is:

- stakeholders believe they are clear on the areas of consultation in which they can have most impact.

GUIDING CRITERION 8: MANAGING AND GOVERNING CONSULTATION

The consistent application and evaluation of a Consultation Framework requires agreement on its management and governance.

There is a role for the Board of QQI in adopting the Consultation Framework and in receiving reports on its effectiveness. The Policies and Standards Committee could use the guiding criteria of the Consultation Framework to engage with matters before it that are subject to consultation. In terms of management, there would appear to be roles for the Executive Management Team (e.g., in agreeing consultation planning at an organisational level, and supporting better stakeholder information management); for the leaders of formal consultation processes (e.g., in working with communications to map the consultation audience and to design communications strategies to support participation, and in undertaking much of the consultation); for those managing advisory groups and other consultation forums (e.g., in the management and governance of those groups); for Stakeholder Engagement and Communications (e.g., in providing a central point of organisational oversight of external consultation, in providing continuity of engagement with key stakeholders, and in ensuring that the Consultation Framework is kept under review and is periodically evaluated); and for the relevant project and programme steering groups (e.g., in using the guiding criteria to query planned consultation processes).

This combined management and governance, if agreed and reinforced internally, can provide enough space for all parties to undertake their distinct, but overlapping roles in the implementation of the Consultation Framework.

Recommended text for the Consultation Framework:

Guiding Criterion: QQI will establish a coordinated system of governance and management to support the implementation, monitoring, and evaluation of its Consultation Framework.

In meeting this criterion, QQI will consider the following:

- Has the governance oversight role of the Board and its Committees for the Consultation Framework been confirmed and communicated?
- Have management oversight responsibilities for the Consultation Framework been confirmed and communicated?
- Have implementation responsibilities for consultation processes that take place under the

Consultation Framework been confirmed and communicated?

- Has project and programme management been harnessed to support the effective implementation of the Consultation Framework?

An example of an indicator that could assist QQI in evaluating this criterion is:

- the governance and management roles for the oversight and implementation of the Consultation Framework have been documented, communicated, and implemented.