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Internationalisation in a changing world. New trends and challenges for QA

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Short bio:

Órla Barry is Senior Manager for Qualifications Information and Learning Opportunities at QQI, a member of the European Qualifications Framework Advisory Group and National Correspondent for QF-EHEA. She is also a member of the Regulation Committee of Council for the Curriculum, Examinations and Assessment (CCEA) in Northern Ireland. She has extensive experience in education quality assurance, academic governance, and higher education regulation. Órla is currently developing a new scheme in Ireland that will establish a new type of awarding body and provide voluntary, regulated access to the National Framework of Qualifications.

Proposal

Title: Collaboration & partnership to quality assure international awarding bodies in Ireland

Abstract:

QQI is establishing a new statutory scheme to provide voluntary, regulated access to the National Framework of Qualifications (NFQ) to a new type of awarding body, named Listed Awarding Bodies (LABs). This new scheme allows professional, sectoral, and international awarding bodies to include their awards in the Irish NFQ, for the first time. Establishment as a LAB will require the body to develop and implement quality assurance procedures that are ESG compliant. This has the effect of extending the ESG to new types of awarding bodies across a wider range of higher education awards in Ireland. The scheme will significantly benefit learners by ensuring they have trust and confidence in these awarding bodies, the quality of their education provision and the reputation of their qualifications.

In the case of international awarding bodies already subject to a similar type of quality assurance oversight in another jurisdiction, QQI will work collaboratively with that quality assurance body in the approval, monitoring, and review of the awarding body. The policy approach to enable international

cooperation and collaboration will be outlined and two specific examples of proposed working relationships with ENQA members will be outlined. This approach has the potential to reduce regulatory burden, avoid duplication of effort and encourages deeper relationships with peer agencies.

Introduction to QQI

Quality and Qualifications Ireland (QQI) is the state agency responsible for promoting the quality, integrity, and reputation of Ireland's further and higher education system; ensuring that learners achieve qualifications that are valued nationally and internationally; and providing trusted information on the qualifications included in the National Framework of Qualifications.

QQI is responsible for institutional level quality assurance for public higher education, programme validation and certification of further education and training and private higher education, and the Irish National Framework of Qualifications (NFQ).

Currently, only QQI and the higher education institutions (universities, technological universities, and institutes of technology) have statutory awarding powers to make awards on the Irish NFQ.

QQI issues Quality Assurance (QA) guidelines which apply to all awarding bodies and providers. These are used to inform the development of provider owned quality assurance procedures which describe how an institution implements processes to assure and enhance the quality of education and associated services.

QQI conducts periodic review, typically once every 7 years, of all relevant providers which includes public and private higher and further education providers.

Listed Awarding Bodies

Amending legislation enacted in 2019 introduced several interconnected regulatory tools focused on protection and confidence. One such tool to promote confidence in qualifications and their awarding bodies was the establishment of a new type of awarding body, named Listed Awarding Bodies (LABs). LABs are professional, sectoral, technical, and international awarding bodies that do not have awarding powers to make NFQ awards that will seek voluntary, regulated access to the NFQ. QQI is required to approve the establishment of Listed Awarding Bodies and include their awards in the National Framework of Qualifications. Policy and criteria to support these two decisions, as well as sector specific Quality Assurance (QA) Guidelines have been developed¹ and will be issued to applicant awarding bodies. QQI will be required to conduct periodic review, once every 7 years, of all LABs. There will also be annual monitoring of quality assurance and related activities.

Listed Awarding Bodies are not homogenous, are already operating in the State and meeting a known learning need. In many cases, they derive their awarding power from another jurisdiction, from historical and legacy legislation in Ireland or through professional representation. They can be characterised as trusted, reputable organisations already significantly contributing to the education and training sector in Ireland. The establishment of Listed Awarding Bodies has the effect of extending the ESG to new types of awarding bodies across a wider range of higher education awards. This includes the legal professions, accountants, and other key professional areas. It will significantly benefit learning by ensuring the have trust and confidence in these awarding bodies, the quality of the provision and the reputation of qualifications.

¹ [Current consultations | Quality and Qualifications Ireland \(qqi.ie\)](#) Subject to final Board approval in December 2023

Purpose of the Scheme

The agreed purpose and value proposition of the Scheme is important to ensure that prospective LABs understand the value of submitting to voluntary regulation:

- To provide learners with a greater **choice** of quality assured awards
- To provide assurance and **confidence** to learners about awards being undertaken and the awarding bodies delivering them
- To **recognise** the learning already being undertaken by learners by providing a mechanism to include such awards in the Framework.
- To ensure the National Framework of Qualifications remains **relevant and responsive** in a changing education and training landscape.
- To **preserve** alignment with international frameworks such as the European Qualifications Framework

It is expected that there are several benefits of being a LAB including; strengthened quality assurance, enhanced reputation, and improved access to recognition of prior learning, mobility and recognition for learners and graduates. Although not yet formally implemented in policy, there is an expectation that public funding, supplied through a variety of sources, will be dependent on qualifications being quality assured and included in the NFQ.

All LABs and their awards will be published in the Irish Register of Qualifications.²

'International' Higher Education Institutions

Though Listed Awarding Bodies will be established across both further and higher education, this proposal focuses on higher education institutions. There are two types of higher education institution likely to apply for LAB status and those are domestic providers without statutory awarding powers, such as St Patrick's Pontifical University, Maynooth and international providers, predominantly those established in the UK such as the Open University. The legislation provides the opportunity for QQI to work with agencies outside the State who regulate, or quality assure an awarding body for the purposes of periodic review. It is important to note that although St Patrick's is in Ireland, it derives its powers from outside the State through the Holy See.

Both St Patrick's and the Open University are already subject to quality assurance reviews by ENQA registered agencies; AVEPRO and QAA respectively. The legislation permits cooperation with these agencies, and such cooperation is in keeping with the '*Principles for Professional Engagements with Education Providers, including Programme Validation, Professional Accreditation and Approval*'³ developed by QQI and endorsed by several key stakeholders. The principles include the harmonisation of academic and professional approval processes, the avoidance of unnecessary duplication and overlap between related processes and the reduction of administrative burden on academic providers subject to many forms of accreditation and regulation. As such QQI is committed to collaboration with such QA agencies to avoid duplication of effort and to reduce administrative burden; both for the QA agencies and the providers themselves.

QQI is still finalising the Memorandum of Understanding (MOU) which will underpin this collaboration. The case studies presented in this report represent the probable outcome. This is the

² www.irg.ie

³ [Towards Principles for Accreditation and other Professional Engagements.pdf \(qqi.ie\)](#)

ideal opportunity to present the approach to quality assurance colleagues and peers, to receive feedback about the proposed approach.

It is important to note that in the establishment, monitoring, and review of LABs, QQI is exercising its role as both a quality assurance agency and a qualifications authority. This proposal, and the approach focuses only on the quality assurance aspect of the scheme. There is scope and a plan for QQI to also work collaboratively with relevant qualification authorities, such as Office for Students (OfS), The Office for Qualifications and Examinations Regulations (Ofqual) and the Council for the Curriculum, Examinations and Assessment (CCEA) in the establishment of LABs and inclusion of awards in the Framework. This will be underpinned by the UK and Ireland Qualifications Frameworks and Policy Group ('Five Countries'), the Qualifications Can Cross Boundaries Guide,⁴ QF-EHEA and the EQF.

Rationale for Collaboration

As mentioned, the legislation permits collaboration with agencies outside the State for the purposes of review, but it does not mandate it, and the Principles for Accreditation encourage harmonisation of processes.

Another significant reason for seeking to collaborate is to ensure that the LABs scheme is sufficiently attractive to legitimate, well regulated awarding bodies already meeting a need in the State. The inclusion of these awards in our Framework strengthens the NFQ, making it a more comprehensive qualifications framework. There is a need for QQI to strike a balance between assuring itself of the capacity and capability of an awarding body to implement quality assurance procedures to protect the integrity of the scheme and the burden associated with this voluntary regulation. QQI seeks to leverage and utilise intelligence and existing regulatory relationships to strike this balance.

Additionally, the relevant regulators are trusted peer agencies already aligned to the European Standards and Guidelines, further emphasising the opportunity for collaboration.

Case Study 1: The Open University (and other UK Universities) and QAA

Several UK universities deliver programmes leading to their awards in Ireland. This might be directly, as in the case of the Open University (OU) or indirectly through public and private providers. As such, there is potential for these types of awarding bodies to apply to become a LAB and have their awards formally included in the Irish Framework.

The OU and other universities are already subject to a periodic review by QAA, aligned with the ESG.

Proposal: QAA to conduct periodic review of OU (and other UK universities, as relevant) and to advise QQI of outcome.

QQI to require the submission of annual quality reports (AQRs) in line with existing monitoring policy.

Action: Update existing MOU to outline roles and responsibilities, expectations, intelligence sharing and general cooperation

Case Study 2: St Patricks Pontifical University, Maynooth and AVEPRO

St Patrick's Pontifical University, Maynooth is a higher education institution in Ireland, without autonomous awarding powers. It derives its awarding powers from the Holy See and its canonical degrees are included in the qualification's framework of the Holy See. St Patrick's currently offers

⁴ [Qualifications can Cross Boundaries \(qqi.ie\)](http://qqi.ie)

joint degrees in some areas with Maynooth University, an autonomous awarding body. St Patrick's is currently subject to periodic review by AVEPRO.

Proposal: AVEPRO and QQI to undertake a joint review of St Patrick's Pontifical University Maynooth., with QQI acting as the lead agency. There is a suggestion for an independent review panel of four, with three appointed by QQI and one by AVEPRO. QQI, as lead agency, will provide the administrative and logistical support to the review.

There will be a terms of reference established to meet the needs of both agencies. Both QQI and AVEPRO are concerned with institutional QA, while AVEPRO has specific remit to quality assure the canonical degrees. One self-evaluation report will be submitted, and one review. Both agencies will submit the report and recommendations through their own governance structure, resulting in one, single, shared review report.

QQI to require the submission of annual quality reports (AQRs) in line with existing monitoring policy.

Action: Develop an MOU to outline roles and responsibilities, expectations, intelligence sharing and general cooperation

Challenges, Benefits & Other Considerations

The **benefits** to such an approach are clear as it reduces overlap of regulatory oversight, reduces regulatory burden to the provider and avoids duplication of effort. Increased collaboration between regulatory agencies strengthens QA and provides a platform for further cooperation. This approach reduces the barriers to entry to the scheme significantly and should act as an incentive to legitimate awarding bodies as there is an associated cost saving.

The **challenges** of this type of collaboration for QQI is that it focuses only on the QA aspect, and not qualifications. Though QQI can utilise intelligence sharing with other agencies to overcome this challenge. None of the existing review methodologies used by QAA explicitly cover provision in Ireland, though this can be managed through a clear MOU and a clear agreement with individual LABs subject to such a collaborative arrangement.

A key **consideration** for QQI is communicating this collaborative arrangement to the public and interested stakeholders. The IRQ will need to be able to describe different types of QA review to ensure it is clear which organisation is taking responsibility for review. If a LAB doesn't consent to collaboration and intelligence sharing between agencies, they will be subject to full review by QQI regardless of other similar review requirements.

It is worth noting that although no case study is presented, QQI is also willing to take on the role of lead reviewing agency in a collaborative arrangement, if such a solution was indicated.

Timelines

The policy and criteria and QA guidelines underpinning the scheme are scheduled to be approved in December 2023. The scheme will open to applications in June 2024, on a phased basis, with higher education prioritised in phase 1. These two awarding bodies should be established, subject to meeting all relevant requirements and being formally approved through QQI governance structures, by early 2025. A review must happen once every 7 years, which means the first review must be concluded no later than 2032. However, the review could happen earlier than that to facilitate timelines of other QA agencies.

Conclusion

The Listed Awarding Body scheme represents an innovative and novel approach to collaboration and partnership in the quality assurance of international awarding bodies in Ireland. Negotiations between QQI and AVEPRO and QAA respectively are at an advanced stage with an intention to confirm MOUs to underpin such collaboration in early 2024.