

SUBMISSION TO THE NATIONAL ACCESS PLAN 2022-2026 CONSULTATION PAPER

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QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Adding Value to Qualifications

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Introduction

QQI welcomes this opportunity to contribute to the consultation on the development of the fourth National Access Plan, providing for equity of access measures to higher education. The successful growth in increased participation across the Framework, including by communities, families and individuals who would not previously or typically have enjoyed opportunities associated with higher education without the work of successive National Access Plans, communities of practice, policy and the breadth of stakeholders is acknowledged at the outset.

QQI is finalising a fourth Statement of Strategy which outlines how we will contribute to shaping Ireland as an island of innovation, talent, international leadership, inclusion and engagement, fully aligned to the ambitions of the Department of Further and Higher Education, Research, Innovation and Science. QQI will collaborate to meet the challenges faced nationally over the period of the next Access Plan, including through supporting the development of an integrated approach to the diversity of quality and qualifications across a dynamic tertiary education and training system - including further and higher, education and training, public and private stakeholders.

Towards a nationally coherent approach to access, transfer and progression

Specific recent actions¹ by QQI in stewarding the qualifications system have laid the groundwork for a modern, integrated system that will accommodate digital qualifications, micro-credentials and the recognition of both previously credentialed and non-formal and informal learning. This work, including the quality assurance of a growing diversity of programmes and education and training services and the provision of better information for learners, is an essential scaffold for the context and ambitions outlined in the HEA Consultation Paper, and signalled in the Progress Review and Priorities to 2021. QQI because of our unique role, takes a whole-of education and lifelong learning perspective. QQI and HEA both share commitment to fostering and supporting enhanced system coherence in relation to access, transfer and progression.

¹ [NFQ Referencing Report 12-2020.pdf \(qqi.ie\)](#) Also [Green Paper on the Qualifications System-Final.pdf \(qqi.ie\)](#)



QQI, access, transfer and progression policies and criteria as implemented- our contribution

QQI has statutory responsibility for determining policies and criteria for access, transfer and progression in relation to learners^[1]. Providers establish policies and procedures based on QQI policies and criteria. QQI monitors the effectiveness of procedures established by providers as a core objective in Cinnte^[2] and other provider reviews. QQI reviews the procedures as established and implemented by the Institution. These may or may not reflect a widening access and participation agenda.

HEA policy refers to publicly funded Institutions. Access data also can be enriched from practices in the independent sector which can be nimbler and more agile. Our engagement with the independent higher education sector provides for both programme and Institutional evaluation, including with reference to access, transfer and progression arrangements as implemented in programmes and services. It would be possible to add value to the national understanding of successful participation, progression and persistence informed by robust data, including for flexible and part time provision.

Pathways and Diversity

An inclusive higher education system is one which can equitably accommodate multiple cohorts of learners who will have achieved a diversity of awards, both as types and as qualifications. QQI aims to enable the development of more diverse types of qualifications (including micro-credentials) in the NQF which will give learning achievement widespread recognition including by employers and potentially open increasingly diverse access pathways to higher education. Apprenticeships also provide pathways through FET-HE. The challenge of access, efficiency, permeability and scarcity is discussed in the Green Paper on Qualifications, underlining the necessity of appropriate pathways for diverse learners.

Recent developments in practices in work integrated learning across all sectors, related validation of prior experiential learning and reflections on the learning from the Study of Mature Student Participation in Higher Education in relation to barriers and enablers for participation in the context of economic upturn and downturn, suggest that access

^[1] [ATP Policy Restatement FINAL 2018.pdf \(qqi.ie\)](#) and [Core Statutory Quality Assurance Guidelines.pdf \(qqi.ie\)](#)

^[2] [Institutional Reviews \(qqi.ie\)](#)



policies and practices need to give greater consideration to workplaces as sites of learning. Potentially this delivers all three of the identified support structures identified in the Study of Mature Student Participation in Higher Education, in-reach, out-reach and flexibility² for a diverse learner cohort. Structured engagement with employers, sectoral bodies and social partners has the capacity to support greater inclusion and diversification and ultimately a universal design approach not just to teaching and learning, but to access itself.

Nationally a good deal has been learned about disrupted learning over our experience in responding to COVID. In 2020 the Council of Europe/UNESCO encouraged flexibility in arrangements for academic recognition for those whose educational progress was interrupted. Additionally, moving on from the Lisbon Recognition Convention, the Global Recognition Convention is coming into play with at this stage a small number of signatory countries. QQI supports these processes specifically through work with ENIC-NARIC and through its policy remit relating to the Recognition of Prior Learning (RPL). RPL is an important enabler in widening participation and enhancing access in this and other contexts, including for access, for the achievement of credit and for partial and complete awards.

Providers Access policies and procedures are not only about widening access but equally address the sometimes challenging fundamentals of standards for access and inclusion within programmes as a basis for successful participation rather than as means of mitigation of the impacts of the scarcity of resources.

A greater emphasis on transparency of standards or core competences required for successful participation, on the diversity of pathways and the opportunities of diverse routes (as signalled in the study on mature learners participation) could at minimum rebalance some pressure points across the system as a whole.

QQI as an awarding body

QQI is also an awarding body, making awards at NFQ level 5 and 6, some of which provide systematic ab initio access to certain programmes within higher education through the Higher Education Links Scheme³. While the operation of the scheme itself is transparent, both links and quotas assigned by HEIs to various programmes would

²[Layout 1 \(hea.ie\)](#)

³[Central Applications Office \(cao.ie\)](#) and [Progression Opportunities into Higher Education HELS.pdf \(qqi.ie\)](#)



benefit from increased transparency and an approach focused on the core competences at the entry point needed for successful participation in a programme.

This is particularly important both as the trend towards the adoption of quota-based application for admission increases and in the context of a rising demographic of school leavers competing also for full time participation in similar programmes.

Data infrastructure

The national data infrastructure informing targeted access considerations and underpinning the identification of candidates for whom additional support measures including funding is relevant, is complex, exposing potential risks of inequitable application and challenges in being person centred. QQI is willing to share data as appropriate.

QQI has a significant volume of data including relating to how learners participate, achieving certification over time in FET⁴. It is clear that disadvantaged learners participate in initial FET and are under-represented in higher level FET and HE; transition from FET to HE is more likely to occur from higher level FET qualifications, and therefore the FET transition from initial to higher qualifications is of interest within the broad concern to increase access and participation.

QQI is currently completing a review of standards at levels 1-4. This will renew pathways and create opportunities for more diverse progression routes than here-to-fore to intermediate levels within the Framework and the greater release of the 'talent pipeline' particularly among those target groups least likely to have experienced opportunity previously.

QQI has also commissioned an Evaluation of the Comparability of the Advanced Certificate and Higher Certificate Qualifications, both at Level 6 (publication pending). This study found that not all providers collate progression data, particularly in regard to the progression onto Level 7 for holders of AC qualifications. Better data is necessary if progression is to be optimised.

⁴ [QQI Certification Data 2020.pdf](#)



Recent papers on progression from FE by sub-groups of the Transitions Group⁵ and the IUA Access Steering Group can be built on within this plan but also support the proposition that further interagency research is necessary to inform the Access Plan from a lifelong learning perspective, including for those with VET qualifications. The work of the sub-groups demonstrates the effectiveness of collaboration and sharing of information on progression routes and practices. Further progress in access and widening of participation is within grasp, with appropriate recognition of learning, with increased permeability between FET and HE sectorally and with the diversification of awards. Models for bridging programmes do not necessarily involve yearlong major awards and should capitalise on experiential learning.

A culture of research and evaluation into access and participation

Because the widening participation agenda is complex and multidimensional, policy and practice must be evidence informed. Policymakers should commit to establishing and maintaining a comprehensive evidence base of what works to achieve greater social mobility and a widening of participation in higher education on a collaborative basis. There is little evidence to date of interventions and approaches being systematically evaluated in Ireland. Systematic reviews of existing research use explicit, accountable and rigorous research methods. Such reviews synthesise vast numbers of studies into a manageable form, increasing the reliability of findings. The results of systematic reviews of the international evidence available on relevant interventions should be available in accessible forms for decision makers to use as they review and plan. Systematic reviews can help answer questions about the effectiveness of interventions, for example what is the evidence of the effectiveness of financial incentives, mentoring programmes, on-campus summer schools, or quotas for underrepresented groups, on widening participation in higher education. Such systematic reviews would also help to make the action plan more accountable and transparent. A good example of the methodology employed in a systematic review can be seen in the analysis undertaken by the [Education Policy Institute](#). This systematic review presents a clear conceptual framework, includes criteria for what counts as evidence, specifies the search, screening and sorting criteria and the method for synthesising evidence.

⁵ [PG \(transition.ie\)](#)



Previous national access plans have introduced a strong evaluative culture. Given the significance of the agenda and the investment involved, it is imperative that decisions need to be based on the best available expertise and advice.

Interagency collaboration that examines the richness of the interaction of factors which create enablers and barriers to access and participation is an area of interest for QQI, e.g. in understanding better the impact of the contribution of programmes leading to awards on the Framework. Noting again, the Study of Mature Student Participation and CAO data, many of those progressing to higher education under different access streams have obtained QQI awards, with some achieving highly. It would be useful to disaggregate the elements which efficiently contribute to successful progression. QQI has observed growing commitment to universal design for teaching, learning and assessment; in parallel, an increasingly diverse range of specific access initiatives, funding programmes and actions which may risk fragmentation and place significant burdens on applicants penetrating schemes. Universal design for access is of interest to QQI.

Core research topics of shared interest with QQI might include e.g.:

- how widening participation and student success measures are experienced by students and staff across tertiary education and training
- whole-of-system implications for the equitable management of access from the strengthening of the National Framework of Qualifications; Diversity of modes, models and qualification types
- international education and learners needs in the broader context of diversification and of the new internationalisation strategy

A desirable outcome of research and evaluation would be a set of principles to inform and guide future decisions around widening participation.

QQI would welcome opportunities for future collaboration in support of the development of diverse high-quality tertiary education opportunities that enable learners to reach their potential through achieving widely valued qualifications.