

Decision on the Substantive Change Report by Quality and Qualifications Ireland (QQI)

Register Committee
9 – 10 October 2024

Ref. RC44/C127

Ver. 1.0

Date 2024-10-25

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Decision of:	2024-10-11 & 2024-10-25
Result:	Take note
Report received on:	2024-07-10, 2024-09-06
Agency registered since:	2015-06-05
Last external review report:	2024-05-31
Registration until:	2029-05-31
Absented themselves from decision-making:	Lewis Purser
Attachments:	1. Substantive change Report, 2024-07-10 2. Substantive Change Report, 2024-09-06 3. Minuted clarification of 2024-10-21

1. The Register Committee considered the Substantive Change Report of 2024-07-10 and Substantive Change Report of 2024-09-06.
2. The Register Committee took note that QQI introduced the following changes in its activities:
 - A) introduced three new external QA activities:
 - European Approach for Quality Assurance of Joint Programmes
 - Awarding TrustEd International Education Mark
 - External Evaluation of Provider Listed Awarding bodies
 - B) introduced five new activities outside the scope of the ESG:
 - International Education Mark English Language (ELE) Providers
 - Non-Provider Listed Awarding Bodies (LABs)
 - Learner Protection Fund and Protection for Enrolled Learners Annual Charge
 - Due Diligence
 - Academic Integrity

A) New external quality assurance activities

A1. European Approach for Quality Assurance of Joint Programmes

3. The Register Committee noted that QQI started to implement the European Approach for Quality Assurance of Joint Programmes.
4. **Given that QQI uses the European Approach or Quality Assurance of Joint Programmes without substantial modification, the Register Committee was assured that the ESG are complied with.**

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A2. Awarding TrustEd International Education Mark

5. The Register Committee noted that QQI has started conducting procedures for awarding the *TrustEd International Education Mark (IEM)* to higher education institutions.
6. The Register Committee also noted that awarding the IEM is a complementary or add-on activity as it is only available to those providers that have already been positively externally evaluated by QQI.
7. The Register Committee requested clarification from the agency regarding involvement of students in review panels since the documentation provided did not account for that (ESG 2.4) and regarding publishing of the reports since the repository of reports is currently empty (ESG 2.6).
8. The agency clarified that the procedure will be modified to include students (ESG 2.4) and that the repository is currently empty as no reports have been produced as of yet (ESG 2.6).
9. **Based on the information provided in the Substantive Change Report and the clarification provided by the agency, the Register Committee had no prima facie concerns that the ESG are complied with.**

A3. External Evaluation of Provider Listed Awarding Bodies

10. The Register Committee noted that QQI has started conducting external evaluation of Listed Awarding Bodies (LAB); awarding bodies that do not have statutory awarding powers of Irish Qualifications Framework (IQF) awards and are therefore obliged to undergo an evaluation by QQI if they wish to have their awards included in the IQF. This evaluation assesses whether a provider meets the requirements of having their awards listed in the Irish Qualifications Framework.
11. **Based on the information provided in the Substantive Change Report, the Register Committee had no prima facie concerns that the ESG are complied with.**
12. Since the submitted Substantive Change Reports for new activities A1, A2 and A3 only refer to appeals, the Register Committee sought clarification from the agency on whether the complaints policy for these activities falls under overarching QQI complaints policy. The agency

confirmed that this is the case, as all QQI activities follow the same general complaints procedure.

13. **The Register Committee expects that the new activities A1, A2 and A3 will be analysed in full against ESG 2.1 – 2.7 as part of QQI's next review for renewal of registration.**

B) New activities outside the scope of the ESG

14. The Register Committee learned that QQI introduced five new activities deemed to be outside the scope of the ESG.
15. The Register Committee noted that QQI has started conducting procedures for awarding the *International Education Mark English Language (ELE) Providers*. Although this activity deals with certain learning and teaching elements, the Register Committee found it to be outside the scope of the ESG since it does not refer to higher education provision.
16. The Register Committee learned that QQI has started conducting external evaluation of *Non-Provider Listed Awarding Bodies (LAB)*, as a part of the same policy that is relevant for *Provider LABs* (see activity A3). Although this activity deal with awards or qualifications, the Register Committee found it to be outside the scope of the ESG since Non-Provider LABs do not deliver educational programmes themselves.
17. The Register Committee noted that under new statutory regulations, QQI is responsible for the establishment, maintenance and operation of the Learner Protection Fund and a Protection of Enrolled Learners Annual Charge. The Committee found this activity to be outside the scope of the ESG.
18. The Register Committee took note of the fact that QQI has been assigned regulatory powers to assess the business operations (governance, finance, compliance with the law) of education providers with which it engages, and has found this activity to be outside the scope of the ESG.
19. The Register Committee also took note of the fact that QQI has been designated as prosecutor for academic integrity offences, and has found this activity to be outside the scope of the ESG.
20. **The Register Committee therefore confirmed that these five activities are outside the scope of the ESG.**

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EQAR Substantive Change Report

Agency #1	Quality and Qualifications Ireland
Agency acronym	QQI
Expiry date #1	20/05/2029
Contact #1	Marie Gould
Phone #1	0876535565
Email #1	mgould@qqi.ie
Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	No
C. Changes in EQA activities	1. One or several new external QA activities were introduced
Description new/changed	<p>New procedures for the Quality Assurance of Joint Programmes based on the European Approach have been approved by QQI Board and published on our website.</p> <p>As an EQAR registered agency, QQI may be requested by an institution to conduct the external evaluation of a joint programme using the European Approach. Section 42 of the Qualifications and Quality Assurance (Education and Training) Act 2012 (as amended) enables QQI to conduct such an evaluation, these procedures are being established by QQI to facilitate such requests.</p> <p>The procedures, which were developed through a consultative process, are based on the standards and criteria as outlined in the</p>

European Approach. This is a new process for QQI. The panel reports for any evaluations undertaken within this process will be published on QQI's Monitoring and Reviews Library.

The procedures are published on QQI's website and uploaded to this report.

<https://www.qqi.ie/what-we-do/quality-assurance-of-education-and-training/european-approach-for-quality-assurance>

Focus

joint programmes using the European Approach for the Quality Assurance of Joint Programmes

ESG 2.6

1

<https://www.qqi.ie/what-we-do/quality-assurance-education-training/reviews>

D. Activity outside the scope of the ESG

No

File #1

[qp-22-procedures-for-the-quality-assurance-of-joint-programmes-based-on-the-european-approach.pdf \(152 KB\)](#)

Submit form?

I am ready to submit the change report form

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Agency acronym	QQI
Expiry date #1	20/05/2029
Contact #1	Marie Gould
Phone #1	0876535565
Email #1	mgould@qqi.ie
Other organisations?	No
A. Has the organisational identity of the registered agency changed?	No
B. Has the organisational structure changed?	No
C. Changes in EQA activities	1. One or several new external QA activities were introduced
Description new/changed	<p>Quality and Qualifications Ireland (QQI) was established in 2012 by the Qualifications and Quality Assurance (Education and Training) Act 2012. The 2012 Act was amended in 2019 and several new statutory functions were assigned to QQI. The relevant legislation enabling QQI to implement these functions was commenced in September 2024, and these functions have now come into law. The new statutory functions within the scope of the ESG include:</p> <p>(i) An International Education Mark (IEM) known as TrustEd Ireland, the aim of which is to ensure that international learners in the Irish higher education are afforded protection and a quality and consistent learning experience.</p> <p>(ii) The inclusion in the National Framework of</p>

Qualifications(NFQ) of the awards of Listed Awarding Bodies (LABs), who are responsible for the quality assurance of their associated providers. Provider LABs only- which are those organisations delivering programmes leading to awards that are proposed to be included within the NFQ, are within the scope of the ESG.

1. New EQA activity:

1	TrustEd International Education Mark
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2	Provider Listed Awarding Bodies
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Focus	study programmes or higher education institutions
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ESG 2.1	<p>(i) The TrustEd International Education Mark (IEM) for higher education is only available to those higher education institutions that have already demonstrated their institutional compliance with ESG Part 1 through external evaluation by QQI, or by their Designated Awarding Body for linked providers. The IEM is a complementary mark for higher education institutions that are fully engaged with QQI EQA processes.</p>
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(ii) The external evaluation of provider LABs confirms adherence to QQI's core quality assurance guidelines and additional sector specific guidelines for LABs. The core policy and criteria is attached to this report.

QQI's suite of QA guidelines and EQA processes are mapped to the ESG standards 1.1-1.10 (as detailed in QQI SAR February 2024).

ESG 2.2	<p>(i) TrustED IEM - Extensive consultations were conducted both before and after the public consultation phase, senior executives of QQI</p>
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engaged with representative bodies of the higher education institutions throughout the development of the scheme on the policy on authorisation for the IEM, the Higher Education Code of Practice, the TrustEd Ireland brand, and the process handbooks. A suite of white papers was published for public consultation in December 2022, the report of this consultation process is attached to this substantive change report.

(ii) LABs Scheme - Extensive consultation has also been undertaken on the development of the LABs scheme. In July 2023 a suite of white papers for consultation relating to the development and implementation of the LABs scheme. The report on this consultative process is currently published on QQI's website.

All QQI's policies and procedures are considered and approved through internal quality governance processes and committee structures with final approval by the Board. QQI's governance committees and Board have representation from key stakeholders, including students.

ESG 2.3

1

<https://www.qqi.ie/what-we-do/quality-assurance-of-education-and-training/what-is-trusted-ireland>

2

<https://www.qqi.ie/what-we-do/the-qualifications-system/listed-awarding-bodies>

ESG 2.3

(i) The IEM is only available to those HEIs that have already demonstrated compliance through external evaluation by QQI through processes that include site visits. The IEM is a complementary process, site visits are not needed to demonstrate compliance with the code

of practice criteria. Subscription to statutory QA arrangements is a statutory prerequisite for IEM application and site visits are conducted in the other external QA processes. The code of practice and criteria for authorisation to use the IEM is attached to this report.

(ii) A site visit is part of the evaluation process for provider listed awarding bodies, the process for which is outlined in the guidelines to support an application, attached this report.

ESG 2.4

(i) TrustED IEM for HE - the assessment panel will each be made up of a chair, international education expert and a secretary, appointed based on relevant experience and expertise in similar types of panels and international education in higher education. Panel training will include information on the scheme, the policy documentation, the application and assessment process, assessment criteria and completion of the assessment report, and management of the application and assessment portal.

(ii) Provider LABs - the review team will be comprised of independent evaluators with expertise in qualifications and/or qualifications frameworks, the review team will also include student member(s). QQI will exercise its judgment as to the number of evaluators that may be required in respect of the request in question and the competences required having regard to the particular awarding body and awards and the nature of the relevant proposed awards, though there will be at least three members on a panel. Training will be provided to independent evaluators where QQI considers this necessary.

QQI will select and appoint review teams on the

basis of their expertise, competence and experience and will confirm that they are free from conflict of interest and can be objective in the evaluation

ESG 2.5

(i) TrustED IEM for HE - QQI has established an Internal Review Group, made up of the Director of Development, Director of Corporate Services, Head of Provider Risk and Governance and Head of International Education, to moderate the assessment reports for consistency and application of criteria. QQI will also consider the appointment of a panel of expert auditors to ensure consistency.

(ii) Provider LABs process, - Review team training is a key tool to ensuring consistency in the application of the criteria. A member of QQI staff will be in attendance at each evaluation and will be available to provide support and guidance to the review team. The role of the Chair of the review team will be integral and the QQI Executive will work closely with the Chair in the preparation and implementation of the evaluation.

ESG 2.6

1

<https://www.qqi.ie/what-we-do/quality-assurance-of-education-and-training/what-is-trusted-ireland>

2

<https://www.qqi.ie/what-we-do/the-qualifications-system/listed-awarding-bodies>

ESG 2.7

The formal appeals for TrustED and Provider LABs is facilitated through QQI's appeals process. This is the same as in QQI's other listed EQA activities: (i) Approval of provider QA procedures (ii) Institutional quality monitoring and review (iii) Delegated authority to make awards (iv) Programme validation and revalidation (v)

Focused review

ESG 3.4/ESG 3.6

This is the same as for QQI's other listed EQA activities, (i) Approval of provider QA procedures (ii) Institutional quality monitoring and review (iii) Delegated authority to make awards (iv) Programme validation and revalidation (v) Focused review.

For the LABs scheme, as the scheme is opening on a phased basis with just 2-3 reports per year, thematic analyses will be conducted once a sufficient number reports are available.

D. Activity outside the scope of the ESG

Yes

Context

(i) International Education Mark English Language (ELE) Providers - QQI has established two codes of practice in respect of different classes of providers; in addition to HEIs, a code of practice has been established for ELE Providers (the ELE code). This code applies to providers who recruit learners in the State on ELE programmes. English language provision is not within the scope of ESG.
(<https://www.qqi.ie/sites/default/files/2024-01/code-of-practice-for-provision-of-programmes-of-english-language-education-to-international-learners.pdf>)

(ii) Non-Provider Listed Awarding Bodies (LABs) - QQI's scheme applies also to non-provider listed awarding bodies. These are organisations that engage other providers, called associated providers, to deliver the programmes leading to awards that are proposed to be included within the NFQ. As they are non-provider, they are not within the scope of the ESG.
(<https://www.qqi.ie/sites/default/files/2024-08/qp-23-core-policies-and-criteria-for-the->

(iii) Learner Protection Fund and Protection for Enrolled Learners Annual Charge - Under new statutory regulations implemented in September 2024, QQI is responsible for the establishment, maintenance and operation of the Learner Protection Fund and a Protection of Enrolled Learners Annual Charge. This regulatory process is not within the scope of the ESG. (<https://www.qqi.ie/sites/default/files/2024-08/protection-of-enrolled-learners-aug-2024.pdf>)

(iv) Due Diligence - Under the new regulations, QQI has been assigned regulatory powers to assess...

... the business operations (governance, finance, compliance with the law) of education providers with which it engages. QQI has established a due diligence process, the aim of which is to ensure that only providers with sufficient financial resources, sound business practices, and a genuine commitment and capacity to meet learners' needs will secure state recognition for the education and training provision they offer. (<https://www.qqi.ie/what-we-do/quality-assurance-of-education-and-training/corporate-fitness>)

(v) Academic Integrity - . The suite of amendments made to legislation in 2019 includes a provision that created new offences related to the facilitation of cheating, the advertisement of cheating services, and the publication of such advertisements, and assigning QQI as a prosecutor of such offences. QQI's policy approach to implementing this provision is within the context of the existing

statutory infrastructure and within the overall national academic and research integrity landscape, which includes both regulatory and enhancement-based strands. This activity is not within the scope of the ESG.

QQI has published a white paper on its policy approach to academic integrity. (https://www.qqi.ie/sites/default/files/2024-02/white-paper-on-academic-integrity_consultation_0.pdf)

File #1

[code-of-practice-for-provision-of-programmes-of-higher-education-to-international-learners.pdf](#)
(297 KB)

File #2

[qp-23-core-policies-and-criteria-for-the-establishment-of-listed-awarding-bodies-labs.pdf](#)
(427 KB)

File #3

[guidance-to-support-an-application-to-be-established-as-a-listed-awarding-body-and-include-awards-in-the-framework.pdf](#) (537 KB)

File #4

[Report-on-public-consultation-IEM.pdf](#) (325 KB)

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Substantive Change Report by Quality and Qualifications Ireland (QQI)

Register Committee

Minutes of Videocall

Ref. C127
Date 2024-10-22
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Date of the conversation:	2024-10-21
Representative of QQI:	Marie Gould
Representative of EQAR:	Aleksandar Šušnjar

1. QQI has made a Substantive Change Report on 2024-07-10 and on 2024-09-06. For practical purposes, EQAR is processing these two Reports jointly. In order to prepare the deliberations of the Register Committee on the report, EQAR Secretariat contacted QQI via a videocall to clarify the matters below.
2. QQI agreed to clarify the matter(s) by means of a videocall on 2024-10-21.

ESG 2.4 – Peer-review experts

3. EQAR representative asked the agency to clarify the panel composition of the *TrustEd International Education Mark*, specifically as it regards to involvement of student experts.
4. Agency representative explained that this is a desk-based and one time procedure. However, the agency representative also confirmed that the procedure will be amended to include student experts in the panel.

ESG 2.6 – Reporting

5. For the activity *TrustEd International Education Mark*, the online report repository is currently empty. EQAR representative therefore asked the agency to confirm that the reason for that is that no reports have been produced yet and that in the future reports will be uploaded.
6. Agency representatives confirmed that this is the case.

ESG 2.7 – Complaints and appeals

7. EQAR representative asked the agency to confirm that confirm that all three activities included in the change reports fall under overarching QQI complaints procedure.
8. Agency representatives confirmed that this is the case and that QQI has corporate complaints and statutory complaints procedures, and these activities will fall under the general complaint procedures, as is the case with all QQI activities.

9. EQAR representative thanked the QQI representative for the clarification call and the provided explanations.

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