

HECA Communication Stemming from Review of QQI Programme Validation Manual (2016) for Programmes of HET and Apprenticeships (FET and HET) Pilot Version 2.13 (edition 2.13)

Following a meeting of HECA member representatives to discuss the pilot validation manual and the guidelines therein, HECA wishes to communicate observations and some concerns in respect of the same and stemming from this.

HECA welcomes the greater clarity that is provided by the pilot validation manual and the requirement for the inclusion of specific details that are expected and required by a panel in order to make an informed decision. In particular, the intention to raise the standard of validation submissions and, by extension, programme developments which are fit for purpose, is something HECA supports.

HECA members bring the combined experience of those who have completed validation submissions using the new manual, those in the process of completing submissions, as well as those who are preparing to. Primarily it is noted that the expectations and requirements outlined within the manual are significantly greater than what has been accepted to date. Whilst HECA recognises and supports any and all attempts to enhance standards and apply best practice, there is concern about the extent of the changes and the information and documentation that will now be required as part of a validation application. Concerns relating to this include:

- the requirement to produce significant documents that would typically be informed by the validation process and become outputs from it, for example programme handbooks
- the likelihood for continual repetition within the document between different sections and between the programme document and other documents also required
- the sheer scale of documentation and detail required. This is of an even greater concern when considered in the context of validation applications for special purpose awards and awards that share extensive commonality
- the risk of deterring panel members from fully reviewing the material submitted due the enormity of the task
- the absence of training for providers and the apparent absence of any transitional period

Further to the above, specific concerns were raised relating to the mapping document and the critical self-evaluation, both of which are compulsory requirements. HECA members recognise what is being attempted by the implementation of these and welcome the intention. However, the mapping document appears as though it could result in an unwieldy document that is likely to be difficult to interpret, will incorporate significant repetition from within the programme document, and will result in the requirement for further explanatory documentation. Similarly, the critical self-evaluation, the additional guidance on which is greatly appreciated, appears to lend itself to further duplication and repetition. Greater comfort in these matters may be secured from provision of training.

Ultimately, HECA members feel that the information requirements required at the time of validation, particularly in the case of the development of smaller awards and/or responding to needs of industry based partner, will act as a deterrent to providers developing programmes leading to QQI awards. It is overly focused on risk prevention, as distinct from risk reduction, and in doing so is inhibiting innovation.

This, coupled with the existing lengthy validation application process of 25 weeks, is working to the detriment of providers as it prevents responsiveness and creativity. Furthermore, the model and approach put forward appears to give little or no consideration to small scale providers and presents a significant barrier to any potential newcomers to the higher education sector.

There is concern from some members that the manual and guidelines exemplify a shift in the relationship between QQI and private and independent higher education providers. HECA welcomes the intention of QQI to assume the role of regulator but there is an anxiety that this may be at the expense of the QQI relationship with providers in the capacity of being providers' awarding body. There is a sense of a growing mistrust of voluntary providers and this is of unknown origin. HECA would welcome any assurance that this is not the case and also that the increased regulation of voluntary providers is consistent with the regulation of other providers for whom QQI retains the same responsibility.

HECA welcomes the intention within the recently published white paper on DA that indicates the validation guidelines and manual apply to IOTs as well as private and independent providers. Further assurance on the enforcement and monitoring of the implementation of these to the same extent and rigour as what private and independent providers will be subject to would be further welcomed. Some private and independent providers seek to secure programme validation through an IoT rather than directly with QQI and HECA is therefore looking to ensure there is equity of standard and process for all providers.

HECA, along with QQI and its predecessors, has strived to establish the private and independent higher education sector as being quality and standards focused. We have collectively pushed to enhance the public perception of private higher education and sought to have the sector's value and equivalence of standards recognised nationally and internationally. There is a real concern that changes in the relationship between QQI and the private and independent sector and the imposition of unsustainable requirements is going to negatively impact the sector, with the increased likelihood of providers seeking out alternative awarding bodies, including in other jurisdictions. This is a risk to the reputation of the higher education sector as a whole including Ireland's international reputation and we expect would be of equal concern to QQI.

HECA requests QQI

- reconsiders the scale of information requirements required for smaller volume awards
- reconsiders the timing of the submission of some documentation e.g. programme handbooks could be verified as being available prior to the commencement of a programme
- reconsiders the template, post pilot phase, following receipt of submissions from a number of providers
- considers the provision of training to providers to facilitate an effective transition and reduce the seemingly high risk of potential failed applications due to the significant difference in requirements and expectations.