

## **Response of the Irish Universities Association (IUA) to the recommendations arising from the Framework Implementation and Impact Study**

1. The process of contributing to the FIIS was in itself a useful developmental one, giving the opportunity for reflection on issues related to NFQ implementation and impact during the first five years of operations. The universities found that the discussions generated - both in partnership with NQAI and other educational actors, as well as in camera between university representatives, were of long-term use in developing greater understanding of current Framework operations, as well as its future potential in the ongoing modernization and reform of Irish higher education.
2. While the period 2003 – 2008 had allowed for a number of important developments to take place, the IUA submission to FIIS as well as subsequent discussions identified various items of unfinished business for the universities from what could have been considered the first round of Framework activities. Examples of such items included the complete placement of all minor, special purpose and supplemental university awards; the placement of legacy awards; the need to determine and put in place a mechanism to resolve complex issues regarding the placement of certain awards with high public profiles and important links to distinct professions; the need to continue with the roll out of a learning outcomes approach, building this fully into internal institutional academic and quality assurance processes; the need for greater focus on the potential for improved access, transfer and progression into and through higher education by full use of the NFQ; and the need for enhanced communication to stakeholders regarding the use of the NFQ. Some of these issues were picked up in FIIS Recommendation #4, which the universities welcome.
3. Many of these issues have been considerably advanced since the FIIS began in 2008. For example, the placement of minor, special purpose and supplemental awards, or enhanced mechanisms for settling complex issues regarding the placement of certain awards. In addition, the IUA/NQAI supported University Sector Framework Implementation Network has undertaken considerable work in a number of areas identified by FIIS, and the Irish Higher Education Quality Network has also undertaken useful work in a number of issues highlighted by FIIS. We are grateful to you and your colleagues in NQAI for your support and assistance in addressing many of these issues, which have required expertise and sustained effort.
4. The process of contributing a university-sector report to the FIIS study team allowed the university sector to reflect on these and other matters, particularly in terms of how the NFQ could be further integrated into each university's own academic and administrative processes, as well as into a number of sectoral initiatives. The universities therefore welcomed the acknowledgement by the FIIS that ownership of the Framework by the respective awarding bodies and providers is critical to its success, and were already engaged on a medium- to long-term process to ensure this, by building the Framework

into the mainstream operations within each institution and across areas of sectoral activity.

5. The universities pointed out, however, in their FIIS submission, that the current HE funding policies do not always encourage either institutions or students to make full use of NFQ potential. The universities look forward to working in partnership with NQAI and its successor “QA and Qualifications Agency” to ensure that future funding policies are more coherent with long-term NFQ implementation. Such an approach will help address FIIS Recommendation #2 which recommends that the new agency should “put in place a process to periodically identify and re-visit issues that may affect the integrity of the Framework or its effective operation”.
6. In terms of FIIS Recommendation #5, a number of core sets of quality assurance principles have already been developed by IHEQN for use by all higher education providers and agencies in Ireland. This work should be built upon to ensure compatible principles are in place across other parts of the education and training sectors. While core sets of common principles are useful across different types of education providers, in ensuring transparency, coherence and commonality of approach, the fundamental issue of institutional responsibility for the quality of its provision and the assurance of this should never be overshadowed.
7. In terms of FIIS Recommendation #7, the universities have been undertaking preliminary work with the NQAI in ensuring that their broader communications strategies and materials are fully cognizant of and informed by NFQ principles and practice. They look forward to continuing this in the best interests of learners and broader societal stakeholders. This is part of a broader cultural change process regarding how Irish society views and understands the various elements of education and training.
8. In terms of FIIS Recommendation # 9 and 10: the topic of RPL and its links to access, transfer and progression, has been identified as a priority for the 2<sup>nd</sup> year of operations of the University-sector Framework Implementation Network, led by NQAI and IUA, and a number of sub-projects are currently being designed around this need. This developmental FIN work will result in greater levels of awareness of existing RPL policies and practice in Ireland and elsewhere in Europe, greater coherence in the application of these within the university sector, and a practically-oriented publication in early 2011 which will contribute to enhanced understanding and practice in this field in coming years.
9. In the context of FIIS Recommendation #11, the universities do not understand the reasoning behind the development by FETAC of a new credit system, which does not appear to be immediately compatible with either ECTS or with ECVET across Europe. This will lead to learner and stakeholder confusion, as well as complications in terms of nomenclature, both in Ireland and for institutions and students in other countries wishing to ensure mobility and recognition with Irish providers.

10. In the context of FIIS Recommendation #12, the universities have noted from the start of the NFQ that this cultural shift requires sustained effort over the medium- to long-term. The NQAI and IUA-led University sector Framework Implementation Network is an element of this effort. During the first phase of FIN, considerable work was undertaken around the development and enhanced use of learning outcomes, including for assessment purposes. The FIN publication arising from this work has been welcomed by other HE providers and players as an important contribution to the field.
11. In terms of FIIS Recommendation #13, the universities have contributed to the debate around the concepts and use of learning outcomes during the first years of the NFQ, and look forward to continuing their commitment to these developments. The FIN publication referred to is also a contribution in this area.
12. Regarding FIIS Recommendation #15, the integration of Qualifications Recognition Ireland into the work of NQAI, and the more recent integration of the Higher Education Register and ACELS are seen by the universities as very positive steps in this direction. The universities strongly support the concept of rigorous quality assurance processes to underpin the recognition of international qualifications. Qualifications which do not meet these requirements should not be recognised in Ireland, and should be clearly flagged as such. Supporting measures to enhance the effectiveness of this non-recognition should also be considered – such as ineligibility for visa purposes, tax benefits, etc.
13. As noted already, the universities welcome FIIS Recommendation #16, and look forward to working with the relevant bodies to ensure its implementation.
14. The universities support FIIS Recommendation # 18. The contribution by the NQAI and other Irish players to these European developments has been substantially and universally welcomed.
15. In terms of FIIS Recommendation # 19, ongoing monitoring of the use and implementation of the NFQ is vital in its continued rollout across all aspects of Irish education and training. The universities welcome this recommendation and look forward to contributing to this monitoring and addressing any issues arising.
16. The universities would like to thank the NQAI and its staff for their valued support, expertise and practical assistance since 2003 in the ongoing implementation of the NFQ across the university sector. The initial benefits of this implementation have been clearly acknowledged by the FIIS. The universities look forward to continuing their constructive partnership approach in these issues with the NQAI and its successor agency.