

White Paper

QQI Monitoring Policy and Framework

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Dearbhú Cáilíochta
agus Cáilíochtaí Éireann
Quality and
Qualifications Ireland

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Introduction

Quality and Qualifications Ireland's (QQI) core functions encompass the oversight of quality and qualifications within the broad tertiary education system. This includes higher education (HE), further education and training (FET), and English language education (ELE)¹ and encompasses both public and private providers. Monitoring is a core element of QQI's broader cycle of engagement with providers within these sectors.

The [Qualifications and Quality Assurance Act 2012](#) outlines the statutory functions of QQI; the [Qualifications and Quality Assurance \(Amendment\) Act 2019](#) expands these functions² and strengthens some of QQI's existing regulatory responsibilities. The Act also imposes statutory obligations on providers³.

Monitoring is the process of collecting and analysing quantitative and qualitative data to give QQI and the public assurance that providers are fulfilling their regulatory obligations and to evaluate the effectiveness of providers' policies, processes and practices in respect of quality assuring their activity and assuring the integrity, relevance and currency of their qualifications.

This document sets out QQI's policy and overarching framework for monitoring. Detailed monitoring processes and procedures are provided in separate documents. The following sections describe QQI's methodology for monitoring, including the principles, types, and outcomes of monitoring, as well as the comprehensive framework that guides these activities.

¹ 'English language learning is recognised as a dynamic and diverse area of further education which underpins access to, and successful completion of, other programmes of education leading to formal qualifications, as well as to employment opportunities. (p.6 [QQI Code of practice for provision of programmes of English language education](#))

² Additional functions assigned in the 2019 Act include

- Authorisation to use the TrustEd Ireland quality mark
- Approval of Listed Awarding Bodies and inclusion of awards on the Framework
- [Due Diligence](#)
- The establishment, maintenance and operation of a Learner Protection Fund

³ Provider means 'Relevant Provider'. According to the Qualifications and Quality Assurance (Education and Training) (Amendment) Act 2019, a relevant provider means a provider of programmes of education and training, or a provider of a programme of education and training, that leads to an award which is included within the National Framework of Qualifications (NFQ). This includes both Further Education and Training (FET) and Higher Education (HE) providers.

Legal Context

The Qualifications and Quality Assurance Act 2012, as amended 2019, sets out the responsibilities of QQI and the obligations of education and training providers. The Act explicitly requires QQI to monitor:

- The effectiveness of providers' QA procedures (Section 9(c)).
- Validated programmes, including re-validation (Section 9(d)).
- Delegated authority (DA) to make awards (Section 9(f)).
- Implementation of providers' procedures for Access, Transfer and Progression (ATP) (Section 9(g)).

In addition, providers have specific obligations under the Act. They are required to assist QQI in the performance of its functions⁴ and to furnish any information requested by QQI, including data on completion rates⁵. The Act also mandates that designated awarding bodies must notify QQI of awards they include in the National Framework of Qualifications (NFQ).

⁴ Section 13 (1) (3)

⁵ Sections: 9 (1), (c), (d) (f) (g); 13 (1),(3); 28(4)(d); 29A-29C; 33(3); 43(3) – (5); 55F(8)

Monitoring

Monitoring enables QQI to conduct analysis and gain insights into practice within individual providers and the overall tertiary education system. This in turn informs QQI and national policy approaches. The findings and outcomes from monitoring activities may be used to demonstrate compliance with QQI regulatory requirements and/or to identify enhancement initiatives aimed at improving the quality of education and training.

QQI's monitoring framework presents a streamlined and structured approach to monitoring that encompasses specific procedures and tools to systematically collect, analyse, and utilise data for both compliance and enhancement monitoring activities in the areas related to QQI's statutory functions.

QQI's approach to monitoring is multifaceted and is intended to:

- a) Support public confidence in the National Framework of Qualifications (NFQ), the awards within it and the providers offering programmes leading to these awards.
- a) Confirm provider compliance with their obligations under the 2012 Act.
- b) Provide data and insights for institutional and systemic risk management, and to allow QQI to identify system-level issues, trends and developments relating to quality and qualifications.
- c) Support transparency with regard to the effectiveness of providers' procedures related to quality and qualifications and provide public insights into the education and training system.
- d) Provide information and data through publishing sector-wide and provider-specific data (or, where relevant, summaries or syntheses), enabling benchmarking and comparative analysis to enhance quality.
- e) Follow up on recommendations arising from, and/or outcomes of, QQI external QA activities.

QQI monitoring may have positive and/or negative consequences for providers. QQI monitoring may also involve engagement and the sharing of information with other bodies (other agencies and government departments for example).

Scope

QQI monitors providers in different ways depending on their relationship with QQI (and to the NFQ) across its regulatory functions and associated obligations. The scope of QQI monitoring extends to the:

- a) Inclusion of awards in the National Framework of Qualifications (NFQ).
- b) Effectiveness of providers' internal quality assurance.
- c) Implementation of validated programmes.
- d) Implementation of access, transfer and progression procedures.
- e) Compliance with the Code of Practice for the Provision of Programmes of Higher Education to International Learners and/or the Code of Practice for Provision of English Language Education and use of the TrustED Ireland mark.
- f) Operation of delegated authority and the overall operation and management of the provider.
- g) Listed Awarding Bodies (LABs) scheme and the relationships of LABs with any associated providers they may have.
- h) Completion rates.
- i) Learner enrolment and progression rates for QQI validated programmes.
- j) International learners enrolled on higher education programmes leading to awards within the NFQ.
- k) International learners enrolled on English language education programmes.
- l) Ongoing Due Diligence⁶ compliance.
- m) Maintenance and operation of the learner protection fund⁷.

The matrix in figure 1 below illustrates the different provider-types and the scope of monitoring engagements with QQI.⁸

⁶ [QQI due-diligence-guide-for-specified-providers-1.pdf](#)

⁷ [Protection-of-enrolled-learners-aug-2024.pdf](#)

⁸ The matrix reflects the status of policy and regulation, the scope for monitoring individual providers may change in line with regulatory implementation and the evolving nature of their engagement with QQI.

Relevant Provider Type	Provider-Level QA	ATP	QQI Awards	TrustEd Mark	Due Diligence	PEL	NFQ	Delegated Authority
Designated Awarding Bodies (DABs)	✓	✓	-	✓	-	-	Joint Sectoral Protocol ⁹	-
Linked Providers	-	✓	-	✓	✓ (Non-public funded)	✓ (Non-public funded)	-	-
Private/Independent HEIs (Delegated Authority (DA))	✓	✓	-	✓	✓	✓	Inclusion of awards in the NFQ ¹⁰	Operation of DA
Private/Independent HEIs (Non-DA)	✓	✓	✓	✓	✓	✓	-	X
Public FET	✓	✓	✓	X	-	-	-	-
Private/Independent FET	✓	✓	✓	X	✓	✓	-	X
Listed Awarding Bodies (LABs) (Provider)	✓	✓	-	✓	✓ (Those that are not exempt)	✓ (Those that are not exempt)	Inclusion of awards in the NFQ	X
LABs (Non-provider)		✓	-	-	-	-	Inclusion of awards in the NFQ	X
English Language Providers	✓	✓	✓	✓	✓	✓	-	X

Figure 1 Provider Type and Scope of Monitoring

⁹ The [Joint-sectoral protocol](#) provides for the formal inclusion of awards made by designated awarding bodies within the National Framework of Qualifications (NFQ).

¹⁰ QQI regulations for DA set out specific requirements and standards for the inclusion of awards in the NFQ.

Data

The implementation of QQI's monitoring framework involves identifying and collecting key data elements to ensure provider compliance with QQI's regulatory requirements, support process enhancements, and identify risks and trends. It may involve using or sharing data with third parties. QQI operates on an open data principle. These data may include, but are not limited to:

- Learner-count data.
- Provider-level data.
- Academic-unit-level data.
- Programme-level data.
- Certification data.
- Process specific data.
- Topic specific data.
- Other data.

The frequency and method of data reporting are specified for monitoring within each regulatory process and are conducted in line with QQI's data strategy. Data within QQI's processes will be shared internally with appropriate considerations for GDPR compliance.

In implementing the framework, QQI will:

- Establish cohesive and streamlined monitoring processes across all functions.
- Leverage digital tools to enhance efficiency and data reliability.
- Maintain a consistent approach to monitoring processes, tools and resources.

Provider self-monitoring

Internal monitoring, review and self-evaluation are fundamental components of a provider's quality assurance system. Providers are expected to have an internal monitoring system that includes:

- quality measures,
- key performance indicators,
- setting and gathering evidence on the achievement of objectives, and
- identifying and acting on outcomes and findings¹¹.

¹¹ Expectations on provider self-monitoring, evaluation and review are outlined in [QQI's Core Statutory Quality Assurance Guidelines](#)

The outcomes of internal monitoring processes are used by providers to ensure the effective implementation of approved QA procedures and the continued improvement and enhancement of processes.

QQI is reliant on accurate and honest information from providers for monitoring. QQI's monitoring framework is a trust-based system operating with core underpinning principles.

Principles

This monitoring policy and framework is underpinned by the following core principles:

Principle	Description
Trust	Trust underpins QQI's monitoring policy. QQI recognises the importance of trust, honesty, mutual respect, and integrity in all interactions between providers and QQI.
Integration and streamlining	QQI will develop integrated processes and systems, aiming to streamline reporting and, where feasible, alleviate the administrative burden on providers.
Collaboration	QQI will collaborate with stakeholders, other state agencies and departments, to share data where necessary and feasible, and establish common data definitions and system-wide consistency.
Proportionality and Fairness	QQI will conduct monitoring activities in a fair and impartial manner that is proportionate to the risks and context of the providers.
Robust Data Management ¹²	QQI will implement comprehensive data collection and management practices to ensure data quality.
Transparency	QQI will ensure transparency in its monitoring processes, decision-making, and the outcomes of monitoring.
Evidence-based	QQI will use reliable, evidence-based data for informed analysis and decision-making.
Balance	QQI will balance regulatory compliance with support for enhancement and development in its monitoring activities.

¹² All data collected by QQI may be used for monitoring and analysis purposes unless otherwise agreed in writing.

Types of monitoring

QQI monitoring includes processes and tools to ensure regulatory compliance and promote continuous improvement and enhancement. Monitoring may be routine, event-driven, or thematic and focused. It may often result from data analysis from QQI activities, such as certification. The types of monitoring are summarised below.

Note: Providers are obliged to inform QQI about any incidents or risk factors that might impact learners. This may include for example, financial issues, capacity constraints, upcoming media disclosures, changes in ownership, financial instability, and other concerns related to academic quality.

Types of monitoring	Description
<p>Routine reporting</p>	<p>All providers are required to report to QQI on a regular routine basis.</p> <p>The nature and timeframe for reporting is determined by the provider's relationship with QQI and the types and levels of awards its offers on the NFQ.</p> <p>This routine reporting may take different forms, such as:</p> <ul style="list-style-type: none"> ▪ The maintenance of provider information/the provider profile/information, ▪ Data returns/uploads, ▪ Response and follow-up to EQA processes, and ▪ Submission of quality reports.
<p>Episodic and event driven</p>	<p>From time to time, QQI may seek data from providers to support QQI in fulfilling its functions.</p> <p>Providers are obliged (in different ways, depending on their type of activity) to provide information to QQI. This may include for example:</p> <ul style="list-style-type: none"> ▪ Information on system or sectoral topics, themes or instruments. ▪ Information and statistical data relevant to the institution and/or education and training system. ▪ Information that providers (and their programmes leading to awards in the NFQ) are operating in a way that is consistent with safeguarding the integrity and reputation of the national qualifications system. ▪ Responses to QQI queries arising, and/or causes for concern received about a provider or its programmes.

	<ul style="list-style-type: none"> ▪ Cooperation with a focussed review.¹³ <p>QQI may also periodically monitor the information that providers make public about their procedures and provision or respond to notifications about information made public by a provider.</p>
System-wide analysis and insights	<p>With a view to enhancement, QQI conducts analyses of processes, outcomes and data generated through the performance of its functions to identify sector and/or system-level trends and issues.</p> <p>In addition, QQI may seek data from providers to conduct discrete investigations and evaluations on existing and emerging system-level issues and/or on topics and areas of interest. The latter may be conducted in partnership with our stakeholders.</p>
Data generated through QQI functions	<p>QQI functions generate various types of data, which may be used for monitoring by QQI and to support internal monitoring by providers.</p> <p>These data include (but are not limited to) grade distribution and certification data through QQI's certification of awards, and data gathered from validation reports and external quality assurance reports.</p>

¹³ QQI may conduct a focused review of a provider's QA procedures from time to time, as it considers appropriate, or in response to concerns that have come to its attention in relation to the implementation and effectiveness of a provider's QA procedures. [Procedures for Focused Reviews by QQI of the Implementation and Effectiveness of Provider QA Procedures.pdf](#)

Causes for concern

Monitoring may also occur due to a cause for concern. Causes for concern may be brought to QQI's attention through various means, such as:

- The outcomes of any type of QQI monitoring activity or any other statutory engagement with a provider,
- Concerns from learners or third parties,
- Concerns raised by another agency or body,
- Protected disclosures by provider employees.

A cause for concern is anything that could credibly question a provider's ability or willingness to meet its statutory obligations to QQI and its learners, potentially harming the integrity and reputation of the NFQ.

Causes for concern may include (but are not limited to):

- Indication of a failure by a provider to effectively implement QA procedures as approved by/notified with QQI.
- Failure by a provider to deliver a programme as validated by QQI.
- Concerns regarding the quality of education and training provision or assessment and standards attained by learners.
- Failure by a provider to follow-up on conditions and recommendations arising from statutory engagements.
- Breach by a provider of the terms of the 2012 (as amended 2019) Act, or other law.
- Failure by a provider to engage with QQI or act on its commitments to QQI in a timely manner and according to its agreed schedule.
- Failure by a provider to pay fees and / or other charges to QQI within the timeframes specified.
- Failure to communicate significant changes in the provider's ownership, management, QA or business structure(s).
- Significant changes in the provider's ownership, management, QA or business structure(s), which may impact on the integrity and reputation of NFQ awards made in respect of programmes offered by the provider, the provider's QA system or the national qualifications system.

In relation to causes for concern whether complaints, concerns or protected disclosures, QQI will:

- seek to establish the veracity of the cause for concern,
- protect the confidentiality of the source of the cause (where possible and appropriate),
- take action to protect learners and the integrity and reputation of the education and training system.

If a cause for concern is legitimate, QQI will begin a series of engagements with the provider to address the issue. If QQI deems the cause for concern to be of a sufficiently serious nature, it may immediately, or following additional interactions with the provider, initiate a focused review. The initiation of a focused review will be ratified by QQI's Programme and Awards Executive Committee.

Outcomes of monitoring

It is expected that monitoring will result in enhancement-oriented actions by providers and QQI and will both identify and contribute to the dissemination of effective practice through the education and training system.

The outcomes of monitoring will inform QQI's decisions in relation to its statutory functions concerning a provider. Within the monitoring framework, these decisions and outcomes will depend on the specific function and the relationship between QQI and the provider.

QQI will simplify monitoring tools to reduce data collection and reporting burdens on providers. Review outcomes from QQI monitoring will be public. Monitoring data may remain confidential for personal or commercial reasons. Regular thematic and sectoral reports will be published.

Provider Level Outcomes

Monitoring outcomes inform QQI decisions on its statutory functions related to providers, such as validation, QA approval, and review. Follow-up actions and outcomes arising from monitoring will depend on the provider's circumstances and the relationship with QQI. The outcomes of monitoring will necessarily inform QQI's statutory engagements with a provider.

Potential outcomes include (but are not limited to):

- Providing additional information to QQI.
- Imposing conditions through statutory processes.
- Restricting or withdrawing access to learner certification.
- Initiating a statutory review under the 2012 Act.

System Level Outcomes

Information obtained through monitoring may be used to produce system-level reports and analyses aimed at enhancements for the education and training system. This type of monitoring assists in tracking and identifying system level challenges faced by learners, providers, or other stakeholders. It can also identify potential issues early on before they escalate into significant national concerns. Access to high-quality data from providers is crucial for QQI to efficiently perform its monitoring functions.

Sharing and using information

The outcomes of QQI monitoring may be made public. Thematic and sectoral-level reports will be published on a regular basis. QQI will share and make use of publicly available information coming from engagements (statutory and non-statutory) that providers have with other bodies (agencies, funders, government departments etc.) as well as with QQI.

Where QQI and a third party have relevant non-public information about a provider, the sharing (or not) of this information will be governed by data protection and freedom of information law and national policy on sharing of information.

The Monitoring Framework

QQI's monitoring framework as illustrated below, is designed to ensure the effectiveness and accountability of education and training providers. This framework supports the continuous improvement of the education system in quality assurance and qualifications, by systematically collecting and analysing data that confirms compliance, highlights both effective practice and identifies areas in need of enhancement.

QQI Monitoring Framework

