



Written Submission to QQI Draft Principles for Accreditation

December 2020

About USI

The Union of Students in Ireland (Aontas na Mac Léinn in Éirinn) is the national representative body for third-level Students' Unions in Ireland. Founded in 1959, USI now represents more than 374,000 students in over thirty colleges across the island of Ireland. The goal of USI is to work for the rights of students and a fair and equal third-level education system in Ireland. USI is a full member of the European Students' Union (ESU) which represents students from 46 National Students' Unions in 39 countries and of Eurodoc, the European Council for Doctoral Candidates and Junior Researchers.

USI Response to the CORU Draft Statement of Strategy

USI welcomes the opportunity to respond to the 'Towards Principles for Programme Validation, Accreditation, and Approval, and Other Professional Engagements' document. USI has developed this response in collaboration with our member Students' Unions, through whom we collectively represent the interests of students on a range of professionally accredited programmes of education.

USI acknowledges and welcomes the programme of engagement that QQI has embarked upon with professional statutory and regulatory bodies (PSRBs) over the last two years. These bodies play an essential role in ensuring that programmes of study which lead to a professional award provide students with the professional competencies and learning outcomes necessary to enter the appropriate level of professional practice.

In executing their role, PSRBs must not engage only with QQI, and Higher Education providers, but also with the students enrolled on these programmes. This response will focus on three main areas which we believe are essential for QQI and PSRBs to consider as they move forward with this body of work.

The three main areas are:

- **Communication and Engagement**

- **Placement and Work-Based Learning**
- **Responding to Critical Incidents**

Communication and Engagement

USI welcomes the inclusion of 'Stakeholder Engagement' as one of the three main principles for professional accreditation, and particularly welcomes the explicit reference to students as one of the main stakeholders with whom professional bodies are expected to engage. USI believes that there is extensive work to be done in improving the level of engagement between professional bodies and the students enrolled on programmes for which they are responsible. USI also recognises existing practice amongst Irish PSRBs encourages PSRBs who are already engaging with students, to continue with and improve upon this practice. Further suggestions are included below.

- **Structured Engagement with Students**

On the whole, the engagement between students and professional bodies tends to be quite loosely structured beyond statutory engagements concerning a student's entry to a professional register. USI would encourage PSRBs and QQI to work together in developing structured means of engagement between PSRBs and students, such as biannual or annual feedback events or representation systems structured similarly to academic representation systems within Irish HEIs. Some best practice examples from other jurisdictions include the National Council for the Training of Journalists' (NCTJ) Student Council¹ and the UK Society of Radiographers' (UKSOR) Student Representative Forum.²

Providing a structured form of engagement for students to engage with their professional body will enable PSRBs to gather continuous student feedback on the professional programme/s for which they are responsible, providing added value to the QA and Accreditation processes for the programme/s.

- **Student-Facing Communication Channels**

The professional accreditation process can sometimes prove challenging for students to understand, particularly where programmes are undergoing accreditation approval or review throughout their studies. In order to improve awareness and understanding of the role that they play; it would be useful for PSRBs to consider the channels through which they are communicating with students.

Engagement with students could be improved through a streamlined approach to communication such as the development of a dedicated area on the PSRB's website that hosts student-facing documentation and essential information on the role of the PSRB in their education. Engaging with students in the process of developing communications,

¹ 'Student Council' in *National Council for the Training of Journalists*. 2020, viewed on 15 December 2020. Available at <<https://www.nctj.com/Awards/Studentcouncil>>

² 'Student Representative Forum' in UK Society of Radiographers. 2020, viewed on 15 December 2020. Available at <<https://www.sor.org/learning/student-zone/student-representative-forum>>

possibly through a representative system like the previous examples, would ensure that information is clear and engaging for the student audience for whom it is intended. An example of this is the UK Society of Radiographers' Student Zone³.

- Engagement between PSRBs, Providers and Students

USI recognises the importance of continued dialogue between providers and PSRBs in order to assure a high-quality student experience, as articulated in the document. In developing this dialogue, USI would encourage providers and PSRBs to clearly communicate to students the role that each stakeholder plays in overseeing their programme of education. It would be useful to consider how students might be able to engage in dialogue with providers and PSRBs on a cyclical basis, e.g., once per year. This could be combined with a structured form of engagement between PSRBs and students, as previously mentioned.

Clear communication between PSRBs, providers and students is particularly essential throughout programme approval and review processes. Students should be involved in all accreditation, approval and review processes in line with best practice in Quality Assurance, as set out in 3.1 of QQI's Core Statutory Quality Assurance Guidelines⁴, and 1.2 and 1.9 of the European Standards and Guidelines for Quality Assurance⁵. Any changes that are made to programmes as a result of programme approval or review should be clearly communicated to students and should be applied on the principle of no disadvantage to students already enrolled on the programme at the time changes are made.

Strong lines of communication between PSRBs and providers are particularly important in the oversight of placement and work-based learning which USI will discuss in the next section.

Placement and Work-Based Learning

Placement and work-based learning is an essential component of the learning experience for many students, and particularly for those enrolled on programmes which lead to a professionally accredited award, and entry to a professional register. USI recognises the need to develop clear professional standards – including professional competencies which students are supported to develop through placement and work-based learning.

- Support on Placement

Supports for students undertaking placement and work-based learning are primarily the responsibility of providers and placement providers, who may or may not be directly linked

³ 'Student Zone' in *UK Society of Radiographers*. 2020, viewed on 15 December 2020. Available at <<https://www.sor.org/learning/student-zone>>

⁴ 'Core Statutory Quality Assurance Guidelines' in *Quality and Qualifications Ireland*. 2016, viewed on 15 December 2020. Available at <<https://www.qqi.ie/Downloads/Core%20Statutory%20Quality%20Assurance%20Guidelines.pdf>>

⁵ 'Standards and Guidelines for Quality Assurance in the European Higher Education Area' in *European Network for Quality Assurance*. 2015, viewed on 15 December 2020. Available at <https://enga.eu/wp-content/uploads/2015/11/ESG_2015.pdf>

to the PSRBs. These supports may include practical supports such as access to a placement mentor/preceptor or additional supports such as payment or expenses. In developing professional standards that require students to undertake a certain number of placement hours, PSRBs and providers should engage closely to ensure that there are sufficient placements available to enable all learners to meet the required standards. Provisions should also be made to ensure that sufficient supports are in place to support learners in meeting the required professional standards. USI would also discourage PSRBs from specifically mandating against students being paid for placement. USI would welcome PSRBs' support in encouraging providers and placement providers to ensure sufficient supports are in place to enable students to meet the costs associated with placement e.g., travel and accommodation costs.

- Responding to pipeline effects on placement supply

In the current environment, it is vital to ensure that students can meet all professional standards, particularly relating to the successful completion of professional placement. This is made particularly challenging in a context where COVID-19 may have disrupted professional placements, or the supply of these placements may be impacted in future years. This is further complicated in the context of additional places being made available on professionally accredited programmes, and it is essential that providers engage with PSRBs and placement providers where additional places are being created to ensure that there are sufficient placements available to accommodate these additional students.

PSRBs and providers should work together to find suitable alternative arrangements to meet professional standards if students are unable to meet the required placement hours due to placement disruption or the pipeline effect of placement supply. USI would point towards the 'Joint Statement of Principles for the Higher Education COVID-19 Response'⁶ by Universities Australia, in collaboration with several other agencies, as an example of best practice in this regard. The following section will build upon this discussion in the context of critical incidents.

Responding to Critical Incidents

Occasionally, critical incidents arise which impact the delivery of one, or many Higher Education providers. These can range from Amber/Red Weather warnings to more permanent disruption such as the ongoing COVID-19 global pandemic. If these critical incidents impact students' ability to continue with elements of their education, including teaching and professional placement/work-based learning, providers and PSRBs must work closely to mitigate the effects of this.

- Lessons from COVID-19

⁶ 'Joint Statement of Principles for the Higher Education COVID-19 Response' on *Professions Australia*. 2020, viewed on 15 December 2020. Available at < <https://www.professions.org.au/wp-content/uploads/Joint-Statement-of-Principles-for-the-Higher-Education-Sector-COVID-19-Response.pdf>>

The COVID-19 pandemic caused unprecedented levels of disruption to the regular operation of many sections of society, and Higher Education was no exception. As mentioned in the previous section, COVID-19 significantly impacted the operation and supply of many professional placements, particularly in the initial stages in Spring 2020. The flexibility demonstrated by many PSRBs in facilitating new solutions to professional placement was welcomed. USI would encourage PSRBs to continue to engage with providers, and particularly with students in ensuring that flexible approaches can be adopted as appropriate in the context of reduced placement supply.

USI would also encourage QQI to facilitate discussion amongst PSRBs and providers to share best practice in responding to the COVID-19 pandemic, and wishes to emphasise the importance of engaging students in the evaluation of these practices.

- Consistency of Practice

In line with the importance of 'consistency of the professional accreditation standards' as noted in the document, USI wishes to underline the importance of ensuring that consistent approaches are taken to mitigating against the effects of COVID-19 on professional standards. Whilst a diversity of approaches may need to be taken by individual providers, USI would encourage PSRBs to facilitate joint discussions between providers of the same professional programmes to ensure that good practice can be adopted across all relevant programmes. For example, where a PSRB agrees to an alternative approach for assuring the integrity of online assessments in one college, this approach could be offered to all relevant programmes in other colleges. Providers, together with PSRBs should engage students at the earliest possible opportunity in designing alternative approaches to assessment or programme delivery, in line with international best practice.

- Ensuring Academic Integrity in Emergency situations

USI recognises the risks to academic integrity posed by rapid changes to assessment as a result of emergency situations such as the COVID-19 pandemic. In agreeing to alternative arrangements for assessment, it is vital that PSRBs and providers engage with students, and recognise the need to ensure flexibility, particularly where student learning has been disrupted as a result of the emergency. The use of alternative assessment approaches such as online proctoring systems should be weighed carefully against other important factors such as student wellbeing. Every effort should also be made to ensure that mitigations introduced by providers can be made available to students on professionally accredited programmes provided they still enable successful completion of the relevant professional standards.

Conclusion

USI would welcome the opportunity to engage with QQI and PSRBs on the development of these Principles for Programme Approval, Accreditation and other Professional Engagements.

If you have any questions about this submission, please contact Kevin on education@usi.ie or 086816 5498.