December 2024

QQI GREEN PAPER

Green Paper on QQI's Access, Transfer and Progression Policy



Co-funded by the European Union



Dearbhú Cáilíochta agus Cáilíochtaí Éireann Quality and Qualifications Ireland

PREFACE

The Qualifications (Education and Training) Act (1999)¹ first established the legal basis for national policies for access, transfer and progression (ATP) in Ireland.

In 2003, the National Qualifications Authority of Ireland (NQAI) published Policies, Actions and Procedures for the Promotion of Access, Transfer and Progression. In this policy, the NQAI set out its vision, operational principles and objectives for ATP in addition to actions and procedures for itself, the national awards councils Higher Education and Training Awards Council (HETAC) and Further Education and Training Awards Council (FETAC), awarding bodies and providers.

The NQAI devised its ATP policy around four key areas:

- Credit underpinned by an integrated National Framework of Qualifications (NFQ).
- Entry arrangements which ensure learners can avail of fair and consistent entry arrangements.
- Transfer and progression routes which ensure that learners have opportunities to transfer between programmes and progress to higher levels of the NFQ and;
- Information provision which ensures that learners can access accurate and reliable information on all elements of ATP.

This policy also recognised that the National Framework of Qualifications (NFQ)² was central to facilitating the role of NQAI (and later QQI) in promoting and facilitating ATP as set out in legislation. ATP and the NFQ are therefore closely linked and the NFQ forms the basis of many providers' ATP policies and procedures by way of providing a basis for stated learning outcomes, credit and other specified information to learners to support implementation of ATP policy³.

In 2012, the Qualifications and Quality Assurance (Education and Training) Act, 2012⁴, established Quality and Qualifications Ireland (QQI) replacing NQAI, HETAC and FETAC with one Authority. In the 2012 Act QQI was given several responsibilities in relation to ATP (expanded on later in this Green Paper.)

Considering the responsibilities of QQI in relation to ATP, a public consultation was conducted in 2013 on the original policy framework set out by NQAI. The results of this consultation demonstrated that the policy was viewed as important and necessary, but that there was no need for immediate change.

¹ Qualifications (Education and Training) Act, 1999 (irishstatutebook.ie)

² gp-20-policy-restatement-policy-on-criteria-for-atp-in-relation-to-learners-for-providers-of-fh-et.pdf (qqi.ie)

³ gqi-insights_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-andprogression-in-irish-education-and-training-2023.pdf

⁴ Qualifications and Quality Assurance (Education and Training) Act 2012 (irishstatutebook.ie)

Following this consultation a re-statement of the previously published 2003 policy⁵ was reissued. The restatement confirms the original version and stresses that the original NQAI vision, principles and objectives for ATP remain "valid and relevant". Despite this restatement, the original policy is no longer publicly available and the QQI restatement does not detail the original vision, principles and objectives. Without these details, the broader ambition for ATP, previously articulated by the NQAI, is currently absent from the ATP policy landscape.

Since this policy restatement, the landscape within further and higher education has changed significantly, with the establishment of the education and training boards (ETBs), SOLAS and the technological universities. The area has continued to evolve at pace with the consolidated QQI policy and criteria for Quality Assurance Guidelines, the establishment of the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS), the new apprenticeship models and the creation of a National Tertiary Office (NTO)⁶ within the HEA. These developments aim to create a more unified tertiary education system in which ATP should be central.

With these changes across the sector, and considering QQI's statutory responsibilities with regards to ATP, QQI commissioned a new assessment of the landscape of ATP practice, which was completed by an independent project team and resulted in the report: From Counting to Cultivating Successful Participation - A Review of the Landscape of Practice Supporting Access Transfer and Progression in Irish Education and Training⁷ which was published in 2023.

The 2023 review produced a comprehensive report examining ATP practice in Ireland, across FET and HET, and other important factors such as Recognition of Prior Learning (RPL), information provision and data gathering.

This Green Paper is the start of the conversation with stakeholders about this new policy and we are keen to hear from diverse and varied perspectives to ensure that we have addressed all the relevant issues and that the proposed policy is fit for purpose. Following the end of the consultation process, we will publish the findings, a thematic analysis of the feedback and our response. The next step will be to formalise the proposed approach in a White Paper for a final round of feedback before confirming QQI's new ATP policy.

^{5 &}lt;u>qp-20-policy-restatement-policy-on-criteria-for-atp-in-relation-to-learners-for-providers-of-fh-et.pdf (qqi.ie)</u>

⁶ gov.ie - Unified tertiary system (www.gov.ie)

⁷ gqi-insights_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-andprogression-in-irish-education-and-training-2023.pdf

1. EXECUTIVE SUMMARY

The Qualifications and Quality Assurance (Education and Training) Act 2012 empowers Quality and Qualifications Ireland (QQI) to develop policies and criteria in relation to access, transfer and progression. This Green Paper outlines an updated approach to a new ATP policy, highlighting its role in creating pathways for learners to access, transfer between, and progress within educational programmes.

Background

Ireland's ATP policy was first established in 2003 by the National Qualifications Authority of Ireland (NQAI), emphasizing credit systems, fair entry arrangements, and transfer and progression opportunities. While a 2015 restatement of ATP policy reaffirmed its importance, significant changes in the education landscape now necessitate an updated approach.

Key Issues

A 2023 review identified challenges in ATP implementation, such as fragmented practices, insufficient focus on Recognition of Prior Learning (RPL), inconsistent information for learners, and inadequate data collection. These gaps hinder equitable learner access and effective policy evaluation.

Principles of the New Policy

The proposed principles for the revised ATP policy build on the original principles in existing policy and are outlined in the table below.

NQAI Policy- Pillars	Proposed Principles for new ATP Policy
Credit	Credit, Credit Accumulation, Credit Transfer
Information Provision	Programme Design:
	Entry and Exit Arrangements
	Transfer and Progression Routes
Entry Arrangements	Information Provision
Transfer and Progression Routes	Data Collection and Provision

Proposed Changes

Key recommendations include:

- Ensuring organisational cultures that support access, transfer and progression for all learners.
- Adopting harmonized credit systems across further and higher education.
- Proposing an approach to credit accumulation to facilitate 'stacking' of micro-credentials and other small qualifications.

- Encouraging flexible program design with clear entry and exit arrangements.
- Strengthening collaboration among awarding bodies and providers to improve transfer and progression pathways.
- Promoting universal design principles for accessible information provision and dissemination.
- Standardizing data collection to evaluate ATP policy effectiveness.

Next Steps

Stakeholders are invited to submit feedback by March 21, 2025. The insights gathered will inform the development of a White Paper, with the goal of implementing a robust ATP policy that supports diverse learner needs and aligns with Ireland's evolving educational landscape.

2. INTRODUCTION

This Green Paper (a discussion paper) outlines the proposed review of existing ATP policy and development of a new high level, principles-based ATP policy and outlines specific, known issues and impacts arising from the proposal. These issues and impacts will be briefly discussed, and specific solutions will be proposed.

It is important that all stakeholders are engaged in this discussion including but not limited to:

- higher education institutions (HEIs)
- further education providers, including education and training boards (ETBs)
- Teagasc
- Private and independent providers
- Stakeholders involved in craft and consortia led apprenticeships
- Department of Further and Higher Education, Research, Innovation and Science (DFEHRIS)
- Department of Education
- Central Applications Office (CAO)
- Higher Education Authority (HEA)
- SOLAS
- National Council for Curriculum and Assessment
- National Tertiary Office (NTO)
- National Apprenticeship Office (NAO)
- Irish Quality and Qualifications Forum (IQQF)
- RPL Practitioners Network
- Student Universal Support Ireland (SUSI)
- AHEAD
- AONTAS
- Union of Students in Ireland (USI) and other learner representative organisations
- Professional, statutory and regulatory bodies
- Irish Universities Association (IUA)
- Technological Higher Education Association (THEA)
- Higher Education Colleges Association (HECA)

2.1. ROLE OF QQI

QQI has a statutory function under section 56 of the 2012 Act to establish and publish polices and criteria for access, transfer and progression in relation to learners and to approve ATP policies developed by relevant providers, other than previously established universities, and linked providers.

QQI also has a role under section 9(g) of the 2012 Act to review the implementation of procedures for access, transfer and progression⁸. At present this monitoring by QQI of providers' implementation of access, transfer, and progression primarily occurs through provider QA approval processes, programme approval (validation) and in combination with cyclical review of providers' quality assurance systems⁹. The legislation does not specify the method or frequency of review.

Additionally, QQI has several responsibilities with regard to information provision and the publication of information regarding awards included in the NFQ and achieves this through the Irish Register of Qualifications (IRQ)¹⁰. QQI also has a function to promote, maintain, further develop and implement the NFQ, and to provide information on comparability of international qualifications through the National Academic Recognition Information Centre (NARIC). The values and principles of the NFQ are key to promoting and supporting ATP and ATP is also considered to be a central policy in relation to the NFQ. QQI's role with regards to the NFQ is therefore an important cornerstone related to its functions associated with ATP.

QQI also has a responsibility for ensuring providers make clear and accessible information available to learners as detailed in section 67 of the Act. The functioning of a navigable ATP process which serves all learners is reliant on provision of information that is accessible and easy to understand. The responsibilities surrounding information provision are also closely linked to data collection and provision. Information provision can lead to clearer pathways for learners to navigate and clearer parameters for administrators to assist in data collection. QQI commits to exploring data sharing that can provide better information to learners concerning ATP procedures, policies and pathways.

As QQI is the primary awarding body for all public FET and many private and independent FET and HET providers, QQI will ensure that providers of validated programmes are appropriately implementing ATP procedures. In its role as an awarding, QQI has prepared an Addendum which is included to this green paper on the review of the Common Awards System (CAS) and the proposed move in FET from using CAS to a Programme Derived Award Standards (PDAS) model. This addendum is attached to this green paper as the CAS model has been identified as a barrier to progression for some learners. Stakeholders are invited to read this addendum and provide their feedback.

2.2. RATIONALE

The 2023 review From Counting to Cultivating Successful Participation - A Review of the Landscape of Practice Supporting Access Transfer and Progression in Irish Education and

⁸ Qualifications and Quality Assurance (Education and Training) Act 2012 (irishstatutebook.ie)

⁹ gqi-insights_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-andprogression-in-irish-education-and-training-2023.pdf

¹⁰ Qualifications and Quality Assurance (Education and Training) Act 2012 (irishstatutebook.ie)

Training examined the current landscape of implementation of ATP in the education and training landscape and determined that ATP is treated as separate to many elements central to its successful establishment; such as teaching, learning, assessment, information for learners, recognition of prior learning (RPL) and collection of comprehensive data.

As such, ATP operates in practice in a kind of 'patchwork' landscape and approach which presents a number of difficulties to learners trying to navigate ATP routes in accessing further and higher education and training. This also presents difficulties to further and higher education providers, policy makers and QQI in trying to assess the operation of ATP in practice, identify gaps and determine future directions for policy.

Additionally, as part of the 2023 review, the independent project team examined QQI's responsibilities under section 9(g) of the Act. The project team conducted a review of QQI QA approval reports as the main output of QQI's monitoring of ATP policies and procedures. This review determined that ATP was not a significant focus in the QA approval and review process and that the QA process seeks to determine only that relevant policies and procedures are in place and did not examine any meaningful information or data concerning ATP which would demonstrate implementation of high-level, effective policies¹¹.

This review recommended that QQI should either consider another restatement or articulate an updated vision and set of objectives for ATP which enables successful participation as a core principle.

This review contained other key recommendations which would support a more successful implementation of ATP policy and procedures which could be addressed through review, consultation and development of a new ATP policy. A full list of the recommendations is detailed in Appendix 1; however, some recommendations of the report would be outside the scope of this policy as it is focused primarily on Section 56 of the 2012 Act.

Key recommendations which could be addressed through development of a new ATP policy are as follows:

- Ensure that ATP is appropriately integrated into all relevant QA Guidelines, policies, procedures and criteria.
- Support and complement work being undertaken by QQI to ensure better parity of treatment of NFQ Levels 5 and 6 major awards for progression purposes.
- Support and complement work being undertaken by QQI to develop a national policy approach to RPL to support consistency of practice across the tertiary education sector through ensuring that it is made clear that RPL is an enabler of all aspects of ATP and stating that the ATP policy will support RPL in all environments and systems.
- Initiate and lead discussions with other awarding bodies in the State and education and training providers to consider current notions of part-time and full-time study with a view to bringing clarity and consistency of definitions and practice thus enabling flexible learning opportunities that meet the needs of learners.

11

ggi-insights_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-andprogression-in-irish-education-and-training-2023.pdf

- Consider how routine monitoring of ATP can be facilitated and enhanced and how current monitoring policies and approaches can be improved.
- Continue work with relevant Government Departments and State agencies as well as other stakeholders to ensure that appropriate ATP data (both qualitative and quantitative) is collated and available to assist in assessing the impact of access initiatives and interventions made to date, identify gaps and vulnerabilities in ATP practice and inform future policy, strategy and funding decisions related to ATP.

Following on from the 2023 review and the associated recommendations, the importance of QQI's policy on ATP remains central with the introduction of the Qualifications and Quality Assurance (Education and Training) (Amendment) Act 2019 as procedures for ATP now form part of the statutory requirements for providers seeking authorisation to use the International Education Mark (IEM)¹² which is now referred to as TrustEd Ireland¹³.

ATP policies and criteria are also a key requirement for designated awarding bodies (DABs) under the joint sectoral protocol¹⁴. ATP is also a key driver of the Listed Awarding Bodies¹⁵ scheme and a requirement to have ATP procedures forms part of the criteria to become a Listed Awarding Body. ATP procedures are also included in the *Core Policies and Criteria for the Inclusion of Awards within the Framework*¹⁶.

Several initiatives and programmes which aim to promote and re-vitalise principles at the heart of ATP have also been introduced and are being promoted within further and higher education, for example new apprenticeship programmes, tertiary programmes and micro-credentials. With increasing variety of options as well as a push towards more flexible learning opportunities, clarity around transfer and progression and the system of credit accumulation has become even more important to learners.

In addition to these developments, in the QQI Statement of Strategy 2025-2027¹⁷, future proofing of the NFQ as the authoritative information source for quality-assured tertiary qualifications is identified as a key priority. Work on a new ATP policy would underpin this strategic priority and would complement other avenues of work supporting the future proofing of the NFQ. Identified actions to support this strategic priority are the undertaking of a statutory review of individual provider adherence to access, transfer and progression policy and the appropriate recognition of prior learning which, while a separate project, directly links in with and could be informed by a new ATP policy. Another key area of work underpinning this strategic priority is the proposal to establish a single major award at NFQ Level 6 which will be strongly related to the credit system proposed in the new ATP policy. It will also support providers and awarding bodies in particular in facilitating clearer routes for transfer and progression.

Given these developments and considering the findings of the 2023 ATP report, it is an opportune time for QQI to develop and publish a comprehensive ATP policy for the first time.

² policy-on-authorisation-to-use-the-international-education-mark_0.pdf (qqi.ie)

¹³ What is TrustEd Ireland? | Quality and Qualifications Ireland (qqi.ie)

¹⁴ Joint-sectoral protocol DABs.pdf (qqi.ie)

¹⁵ Core Policies and Criteria for the Establishment of Listed Awarding Bodies.pdf (qqi.ie)

¹⁶ Core Policies and Criteria for the Inclusion of Awards within the Framework.pdf (qqi.ie)

^{17 &}lt;u>qqi-statement-of-strategy-2025-27.pdf</u>

QQI's statutory responsibilities regarding ATP policy are not directly involved with learners but rather focus on systemic strategies. This will be the focus of a new ATP policy. Thus, QQI's new ATP policy will not be able to focus on individual challenges which may arise or address current issues which exist around particular transfer and progression routes. However, it is hoped that by focusing on strategy and policy with high level principles, clear definitions and responsibilities it can encourage change in how ATP is viewed by all stakeholders and implemented by providers leading to improvements in the experience of learners in navigating ATP.

2.3. CONSULTATION

We hope that the consultation process for this Green Paper will be an opportunity for the diverse stakeholder group to identify additional challenges and unidentified or unintended consequences and to provide feedback on the approach proposed by QQI.

A list of all questions in this Green Paper can be accessed in Appendix 2 of this Green Paper.

The deadline for written responses to the Green Paper is 21 March 2025.

Submissions can be made to nfq@qqi.ie with the subject line ATP Policy Review Response.

3. OVERVIEW OF ACCESS, TRANSFER AND PROGRESSION

ATP applies to programmes and programme delivery is the responsibility of providers.

While the functioning of ATP is supported by the NFQ it is important to understand the distinction that the NFQ is related to awards while ATP is in relation to programmes specifically.

The definitions of Access, Transfer and Progression are explored later in this Green Paper.

Though the concept of ATP is seemingly quite straightforward, there are several key aspects to consider which will require clarity to produce a policy that is fit for purpose, and which will support the collection of useful and useable data. These very simple concepts will also have to be fit for a complex educational landscape and suitable for use across very different programmes which have very different structures and entry requirements.

The principles of equity and social inclusion are at the root of any ATP policy and should support lifelong learning. ATP should operate in such a way that it supports and facilitates widening participation initiatives (while being distinct from these initiatives). With this in mind, it is essential to consider the importance of universal design in the context of processes, systems and information with regards to ATP in order to support more accessible navigation of ATP processes for everyone.

It is important to note that while QQI has very specific legal responsibilities regarding ATP, it is not the only national body with significant responsibilities in this area. Others with an important role in enabling and supporting successful implementation of ATP include the Higher Education Authority (HEA), SOLAS, DFHERIS and a range of other government departments and agencies. The HEA commits in its Strategic Plan 2023-2026¹⁸ to progressing the interests of students from undergraduate to postgraduate, and across lifelong learning and research and to support further access and build more diverse pathways into higher education. The HEA also has new legislative responsibilities under Section 47(2) of the Higher Education Authority Act 2022¹⁹ to support the implementation of ATP procedures by designated higher education institutions. SOLAS is committed to simplifying structures and learning pathways and facilitating easier access to education and training for all learners in every community in Ireland²⁰. DFEHRIS is committed to ensuring that public investment and policy in the areas of further and higher education give opportunities to everyone, including the most vulnerable in society²¹.

Given the complexity of the education and training landscape as well as the range of stakeholders and responsibilities involved in the implementation of ATP, and keeping with QQI's legislative responsibilities with regard to ATP, this new policy will focus on a principle - based, high level approach. It is proposed this new policy will expand on definitions, formalise processes and establish parameters and responsibilities for the collection of distinct data on ATP that enables the monitoring of the effectiveness of ATP policies and procedures with a view to supporting government departments, state bodies and agencies and education providers in a more robust and comprehensive implementation of ATP procedures.

18 [Online Bilingual] HEA Corporate Strategy 23-26

¹⁹ Higher Education Authority Act 2022 (irishstatutebook.ie)

²⁰ solas_fet_strategy_web.pdf

²¹ gov.ie - What the department does

3.1. QQI LEGISLATIVE RESPONSIBILITIES

As outlined in Section 56 of the Act, QQI is required to establish policies and criteria for access, transfer and progression in relation to learners.

Each relevant provider and linked provider are required to establish and implement procedures for ATP in accordance with QQI's policy and criteria. Each relevant provider, except a previously established university, and linked provider must submit draft ATP procedures to QQI for approval. Providers must publish and implement these ATP procedures.

Associated providers, of Listed Awarding Bodies, are also required to establish ATP procedures in accordance with QQI's policy and criteria and Listed Awarding Bodies have a duty to ensure this is done.

Under Section 57 of the Act, QQI is required to conduct a review of the implementation of these ATP procedures at least once every 7 years. Following such a review, QQI may issue directions or withdraw approval of ATP procedures, where relevant.

Providers are required to have established ATP procedures under Section 56 in order to:

- · Submit an application for validation of a programme of education and training
- Request delegation of authority to make awards
- Apply for authorisation to use the international education mark.

Under Section 67 of the Act, providers that are required to have ATP procedures in place are required to publish a statement about how the procedures apply to individual programmes as part of information provided to learners.

4. PROPOSAL FOR A NEW QQI ATP POLICY

4.1. WHAT WILL BE THE PURPOSE OF THE NEW ATP POLICY?

While it is proposed that the new ATP policy will be a high-level principles-based document, it is important that the principles proposed are underpinned by an overarching vision. The original 2003 NQAI ATP policy stated a vision for ATP:

The learner should be able to enter and successfully participate in a programme, or series of programmes leading to an award, or series of awards in pursuit of their learning objectives. The National Framework of Qualifications and associated programme provision should be structured to facilitate learner entry and to promote transfer and progression, so that learners are encouraged to participate in the learning process to enable them to realise their ambitions to the full extent of their abilities.

As noted in the 2023 review of ATP, this vision statement is absent from the 2015 QQI ATP policy re-statement. As such, it is proposed that an overarching vision will be an important component for any new policy as it will provide a unifying foundation for all principles detailed in the policy.

In developing a new policy, it is proposed that the central vision of the NQAI policy is retained and the following vision statement to underpin the principles detailed in the policy is suggested:

The central vision of this ATP policy is to ensure that there is an education and training system in place that recognises and validates all learning for the purpose of access, transfer and progression (ATP).

The primary purpose of ATP is to enable learners to enter and successfully participate in a programme or series of programmes leading to an award, or series of awards in pursuit of their learning objectives. The purpose of an ATP policy is to provide clear guiding principles for awarding bodies and providers in order to facilitate clearer and more accessible navigation of ATP for all learners.

The QQI ATP policy aims to inform ATP policy, procedure and practice within awarding bodies and in providers, supporting them in providing clear ATP pathways and continued improvements in ATP practice by supporting change and promoting reporting on progress. ATP should not be a focus on adherence to processes and procedures but rather should promote a dynamic iterative approach to ATP policy, process and practice.

The National Framework of Qualifications and associated programme provision is structured to facilitate learner entry and to promote transfer and progression, so that learners are encouraged to participate in the learning process to enable them to realise their ambitions to the full extent of their abilities. Education providers and awarding bodies should make use of this flexibility to the greatest extent possible to support learners' navigation of a variety of pathways.

4.2. TO WHOM WILL THE ATP POLICY APPLY?

Each relevant provider and linked provider are required to establish, publish and implement procedures for access, transfer and progression in accordance with QQI's ATP policy.

A relevant provider is defined in the Act and means:

- A previously established university
- An educational institution established as a university under Section 9 of the Universities Act of 1997²²
- a technological university
- the Royal College of Surgeons in Ireland
- a provider whose programme of education and training is validated under section 45,
- a provider who has entered into an arrangement with an awarding body under section 48
- a provider to whom authority to make an award has been delegated under section 53
- a provider who is authorised to use the international education mark under section 61
- an Institute of Technology
- an education and training board
- a listed awarding body providing one or more programmes leading to its own awards that are awards included within the Framework

As detailed in the introduction, the new ATP policy will be high-level and principles based, however, these principles will have clear implications with regards to implementation.

It is vital to ensure that the learner is at the centre of any new ATP policy, while the ATP policy principles and associated criteria will not apply to learners directly, the reason for establishing a new ATP policy is to benefit them. Generally speaking, in legislation, QQI has responsibility for 'learners' overall whereas providers have responsibilities to 'enrolled learners'. When 'learners' are referred to with regards to ATP in the Act, it is important to acknowledge that the term 'learner' is not defined, (as opposed to "enrolled learner", which in the Act means a learner who has enrolled in a programme of education and training²³). In the absence of the specifier 'enrolled', the requirements around ATP and given the role of ATP, it is reasonable to interpret 'learner' to mean both enrolled and prospective learners.

It is also important to acknowledge the different kinds of bodies involved in the implementation of ATP. Although all providers are required to have ATP procedures in place, those providers that are also awarding bodies will have additional responsibilities in terms of designing and implementing systems that support the implementation of ATP. Some awarding bodies will be required to ensure that ATP is implemented for each programme delivered by other providers such as linked providers, associated providers and some collaborative partners.

22 <u>Universities Act, 1997</u>

²³ Qualifications and Quality Assurance (Education and Training) Act 2012 (irishstatutebook.ie)

Given the definitions of the elements of transfer and progression in particular, (explored later in this paper) it must be noted that principles associated with these elements will be largely applicable to taught programmes only (as opposed to research programmes). However, the principles underpinning ATP will apply universally.

In addition to ensuring that all kinds of provider and awarding body are included in ATP policy a new ATP policy must facilitate all types of learning, including short qualifications and microcredentials. This will be further explored in terms of principles underpinning credit. Additionally, English language providers that have been authorised to use the IEM, will be required to have ATP procedures in place. Not all aspects of the ATP policy will apply to such a provider, but they must have regard to the sections that are relevant.

Effective functioning of ATP requires cohesive understanding and cooperation across a number of bodies including QQI, other awarding bodies, education providers, public bodies and Government Departments. It must be noted that some providers are also awarding bodies while some providers have a separate awarding body (such as QQI). Awarding bodies are well placed to oversee ATP policy development and implementation of procedures at a high level. Differentiations in organisational structures and responsibilities particularly in respect of awarding bodies and education providers are important to consider when exploring definitions of ATP and the principles outlined in this Green Paper.

In considering the different kinds of bodies involved in the support and implementation of ATP it is also important to ensure that definitions of providers and awarding bodies encompass bodies more associated with 'non-formal learning' for example, private providers and listed awarding bodies who provide more short courses and/or learning that is geared towards industry specific training. ATP must ensure equity of access for learners from non-traditional routes and the principles (discussed below) must be determined in such a way that supports this.

In order to ensure the principles and associated criteria are clear and easy to enact, the new ATP policy will need to be clear in terms of principles for awarding bodies and detail what the principles set out mean in terms of criteria to be met by providers. QQI's unique role as a national quality assurance and regulatory body as well as an awarding body will also be acknowledged in the new ATP policy. The table below gives some information around ATP responsibilities with regards to awarding bodies and providers.

Table 1- Key Responsibilities for ATP

Key Responsibilities				
Providers with awarding powers	All providers			
Development and implementation of a system of credit, credit transfer and credit accumulation in line with ATP policy	Development of institutional ATP procedures to be implemented for each programme.			
Development and implementation of systems for programme design, development, approval and review that are in line with ATP policy	Publication of ATP procedures and ATP information for programmes in formats that are easily accessible to learners.			
Development and implementation of systems for programme design, development, approval and review that explicitly prioritise the establishment of entry and exit arrangements and transfer and progression pathways	Communication of and training about ATP procedures to all key institutional personnel.			
The development of an institutional recognition of prior learning that outlines procedures for RPL for access, advanced entry, credit exemptions and full award.	Collection and reporting of relevant ATP data.			
The approval and review of ATP procedures of linked, associated and any third-party providers.	Internal monitoring and review of effectiveness of ATP procedures.			

 It is acknowledged that awarding bodies and providers have different responsibilities when implementing ATP, but it is proposed that one policy can clearly outline these roles and responsibilities sufficiently. Stakeholders are invited to express their views on this approach.

4.3. WHAT IS THE ROLE OF RECOGNITION AND RPL IN ATP?

ATP is a process which recognises learning and experience in order to grant access to a programme through ATP pathways. For the purpose of this green paper and for discussions related to ATP, the term recognition will be used to indicate recognition of learning and experience in order to grant access to programmes. As such, ATP it is a central aspect of admissions. The term 'recognition' in this paper is inclusive of recognition of prior learning but not limited to it.

Recognition and RPL are enablers of ATP. There is therefore a strong connection between ATP processes and procedures and an institution's RPL policy. Of particular importance is the role of RPL in ensuring that non-formal and informal learning are recognised and can be used as part of the admissions process. Access (as defined below) is a result of the admissions process so admissions processes will form a central focus of ATP.

There are some important distinctions to note between how recognition works in the context of ATP as opposed to in RPL. ATP policy and procedures are related specifically to programmes whereas recognition with regards to RPL is not limited in this way. For this reason, RPL for a full award does not fall under ATP however this is still a valid and appropriate application of RPL.

Some non-formal qualifications (such as those offered by Listed Awarding Bodies and Delegated Authority Awarding bodies) will be included within the NFQ via QQI validation of programmes, Listed Awarding Bodies and Delegated Authority Awarding Bodies and such non-formal qualifications should be treated in the same manner as any other qualifications included in the NFQ.

Previously, the RPL policy framework was detailed in the NQAI ATP policy restatement²⁴. Work is underway to develop national RPL guidelines and this is a separate activity to the development of an ATP Policy. As such, there is no specific policy to point to currently. However, institutions must have an RPL policy in place and this should have regard to any relevant national policy and guidelines that may be issued.

It is therefore proposed that QQI's new ATP policy will set out that recognition of knowledge, skill and competence is central to ATP and that recognition forms a key part of ATP. The new policy will also state that recognition procedures, particularly the Lisbon Recognition Convention and RPL policies, facilitate recognition of a wide range of learning; including recognition of foreign qualifications as well as non-formal and informal learning and providers should make use of the wide range of recognition mechanisms available.

4.4. HOW WILL ATP BE DEFINED?

As detailed above, the 1999 Act provides the basis for the definitions of ATP used in the current ATP Policy Restatement²⁵. These existing definitions will provide the basis for definitions under the new QQI ATP policy, and it will be made clear in any new ATP policy developed that these are the definitions underpinning the policy and associated principles; however, these definitions must also be clear and precise in order to support efficient implementation of ATP as well as data collection. These definitions are explored below:

Access: "... the process by which learners may commence a programme of education and training having received recognition for knowledge, skill or competence acquired"²⁶.

Simply put, this means the process by which learners can begin an education or training programme considering knowledge, skill or competence gained prior to entry onto that programme. Admissions processes are the main mechanism through which learners can access programmes. This definition includes all methods of accessing an education or training programme, including advanced entry routes.

It should be noted that this definition is distinct from how "access" is often discussed and promoted by education providers, funders and policy makers (i.e. in the context of widening participation amongst under-represented groups within further and higher education). While the aim of ATP is to ensure equitable access and participation within further and higher education, "access" in the context of ATP is a distinct definition.

²⁴ ATP Policy Restatement FINAL 2018.pdf (qqi.ie)

²⁵ Access, transfer and progression | Quality and Qualifications Ireland

²⁶ Qualifications (Education and Training) Act, 1999

It is also important to note that "access" as defined above isn't distinct from the other elements of ATP, in fact all elements of ATP involve an access process (detailed below). For example, entry into further or higher education programmes following completion of the leaving certificate would encompass access but may also be considered progression.

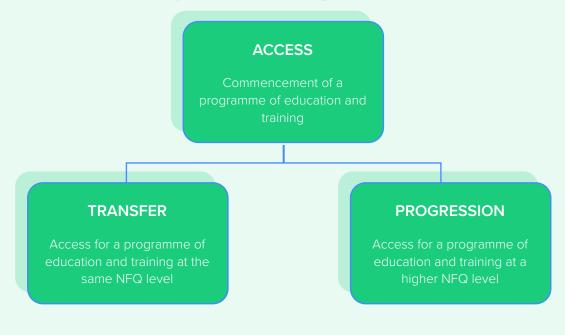


Figure 1-Access Transfer and Progression

It is therefore proposed that the definition of access in the new ATP policy read as follows:

Access: is the process by which a learner's previously acquired knowledge, skill or competence is recognised, allowing them to commence a programme of education and training. This process is central to all elements of access, transfer and progression and thus also forms part of transfer and progression procedures.

This process of recognising learners' knowledge, skill or competence must include mechanisms to allow for assessment which include non-formal and informal learning and provide for advanced entry routes where appropriate or possible.

This process is distinct from 'access' as commonly used in education to describe pathways designed to widen participation from under-represented groups; however, when enacted and communicated clearly, consistently and transparently it can facilitate greater access for all to further and higher education and training.

• Stakeholders are invited to submit their views and recommendations on the proposed definition of 'access' with respect to ATP.

Transfer: "...the process by which learners may transfer from one programme of education and training to another programme having received recognition for knowledge, skill or competence acquired"²⁷.

Transfer is, therefore, an access process which details the process by which learners can move from one education and training programme to another following recognition of their knowledge, skills and competence.

Unlike progression (defined below) transfer can represent a lateral move between programmes and does not encompass moving from one programme to another programme at a higher NFQ level.

For example, transfer can involve a transfer from a science programme to a medicine programme or could apply to someone transferring between providers. Arguably, because the definition of progression (defined below) relates only to a higher level on the Framework, transfer could also be considered movement at the same level on the NFQ (i.e. Honours Bachelor's Degree to Higher Diploma). There is also nothing in the definition above which precludes transfer relating to a move by a learner to a programme on a lower level: however, for the purposes of the ATP policy, "transfer" will be interpreted to apply only between programmes at the same NFQ level. Accessing education and training at a lower NFQ level below will be considered under "access".

It is important to be mindful of the common transfer routes in use which would result in, for example, building minor awards to major awards or accumulation of micro-credentials and how these fit into the definition of transfer. It is therefore proposed that the building of minor awards to major awards be included in this definition of 'transfer'. While we do not have reliable data available for this, it is likely that this occurs mainly at levels 1-6 on the NFQ, though we are interested in having a better understanding of transfer at NFQ levels 7-9.

Transfer is most commonly understood in terms of learners who are already pursuing education and training.

It is therefore proposed that the definition of transfer in the new ATP policy read as follows:

Transfer: is an access process through which a learner's previously acquired knowledge, skill or competence a is recognised, allowing them to transfer from one programme of education and training to another programme at the same NFQ level.

Transfer can occur either within the same education provider (for example transferring from one programme to another), or it can include the transfer from one education provider to another.

The process for acknowledging learners', knowledge, skill or competence can support processes such as the 'building' of qualifications from minor awards to major awards or other types of non-major awards towards larger qualifications.

• Stakeholders are invited to submit their views and recommendations on the proposed definition of 'transfer' with respect to ATP.

Progression: "... the process by which learners may transfer from one programme of education and training to another programme where each programme is of a higher level than the preceding programme"²⁸.

Progression can therefore be understood as a specific form of access which can only occur from a lower-level programme to a higher-level programme. It should be noted that this is distinct from another common usage of 'progression' to mean progressing from one year of a multiyear programme for example. This definition of progression is specific to progression from one programme to another. The use of the word 'transfer' in the definition above is confusing: it is not transfer in the way that the ATP policy defines transfer, so it is proposed we remove the use of the word with regards to progression to make the definition clearer.

It is therefore proposed that the definition of progression in the new ATP policy read as follows:

Progression: is an access process through which a learner's previously acquired knowledge, skill or competence is recognised allowing them to move from one programme of education and training to another programme at a higher NFQ level.

Progression can occur within the same education provider or from one provider to another.

The process for acknowledging learners', knowledge skill or competence for the purposes of progression can occur at all levels of the NFQ.

• Stakeholders are invited to submit their views and recommendations on the proposed definition of 'progression' with respect to ATP.

4.5. HOW CAN SYSTEMS FOR CREDIT ACCUMULATION AND TRANSFER SUPPORT ATP?

In March 2003, the NQAI as part of its policies and procedures for access, transfer and progression, determined principles and objectives for a national approach to credit. The general purpose of credit is to recognise learning achievements which have value in themselves, and which may be used to gain an award. As a further step in its implementation, the main benefits of a national approach to credit in higher education and training are set out in *Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training*²⁹.

These principles were developed to guide institutions and awarding bodies to develop their own credit systems to complement the NFQ and establish a "common currency" of credit in higher education and training with a view to providing a similar basis for credit across further education and training.

²⁸ Qualifications (Education and Training) Act, 1999

²⁹ principlesandoperguidelinesgreen.pdf

These principles acknowledged that it would take time to establish trust between institutions for credit to operate and that the NFQ would support this building of trust. Since the publication of these principles and guidelines in 2006, the NFQ has become widely used, embedded and trusted across the education and training landscape. Despite this, these principles and guidelines have never been extended to further education and training. This might be because QQI is the primary awarding body in the FET space, so the FET credit system is operated only by QQI. However, the introduction of Listed Awarding Bodies and the expansion of the awarding activities of universities will increase the number of awarding bodies making awards at lower levels of the NFQ. It is also worth noting that the NFQ was built to be flexible and incorporate all kinds of learning, however, with increased focus and funding opportunities becoming available for small volumes of learning (i.e.: micro-credentials) it has become clear that certain clarifications regarding the credit principles underpinning the NFQ would assist in smooth running and better understanding of these kinds of programmes.

A separate but related *Green Paper on Intermediate Qualifications at NFQ Levels 5 & 6* proposes changes to the framework which impacts the credit systems underpinning awards at both NFQ Level 5 and Level 6.

With these developments in mind, as part of the development of a new ATP policy, it is proposed that Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training³⁰ be revoked, ensuring that the new ATP policy will be the definitive source of credit policy in the Irish education and training landscape.

It is however, also proposed that the principles detailed in *Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training* be largely retained. These principles are as follows.

Credit systems or arrangements in higher education will:

- be simple, clear and comprehensive
- be compatible with the European Credit Transfer and Accumulation System (ECTS)³¹
- encourage learner participation and mobility by facilitating access, transfer and progression
- support the attainment of awards as well as indicating achievement of outcomes in smaller units of learning (i.e. the achievement of credit will indicate progress towards an award)
- maintain the standards of awards in the National Framework of Qualifications
- support the comparability and recognition of higher education and training awards
- facilitate, as appropriate, the development of the education and training systems including the design and/or redesign of learning units and awards
- accommodate and facilitate change in curricula and in delivery systems
- enable stakeholders (including funding bodies, awarding bodies and providers) to exercise their rightful responsibilities
- be cost-effective, and involve as little bureaucracy as possible
- respect the autonomy of providers and/or awarding bodies in the design of their programmes and awards systems and awards regulations

with some key updates suggested below:

- The principles and operational guidelines should now make clear that they apply to
 both further and higher education contexts with credit calculations for FET applying to
 qualifications at levels 1-4 and ECTS credits being used for qualifications from levels 5-10
 (pending the acceptance of proposed changes outlined in the *Green Paper on Intermediate Qualifications at NFQ Levels 5 &6*). Common calculations of 2:1 FET to ECTS credits can be
 applied to facilitate progression from levels 1-4 to levels 5-10.
- An update to the credit profiles table which sets out the meaning of attribution to credit to awards of the same type (page 11 of *Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training)* to include detail of credit at level 5. The change to this description and associated table will be dependent on the outcome of the Green Paper on Intermediate Qualifications at NFQ Levels 5 & 6.
- Remove the following from the guidelines: "Credit shall not be earned twice for the same learning achievement (in the sense that this should not lead to two awards at the same level for essentially the same learning)" from the document. This impedes work on the review of award types at level 6 and impacts the accumulation of credit (commonly understood as the 'stackability' of awards) which is presenting difficulties in practical terms for learners and awarding bodies, particularly with the rise in popularity of short cycle programmes such as micro-credentials. This stipulation does not support the principles associated with the NFQ and ATP which support recognition of all learning.
- Stakeholders are invited to express their views about the revocation of Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training and for policy on credit to be updated as described above. This will enable the introduction of the single major award type at Level 6 and facilitate credit accumulation associated with small qualifications and micro-credentials.
- Stakeholders are invited to provide feedback on the suggested changes to Principles of a National Approach to Credit detailed above.

The principles surrounding the harmonisation of credit accumulation, credit transfer and credit systems across tertiary education will be discussed further below.

In progressing with a white paper on an ATP policy, QQI notes that language around the use of credit may be unclear. The terms credit transfer and credit accumulation are often used interchangeably when there is likely a useful differentiation.

Credit transfer should be used to describe when credit is used to transfer from one major award to another at the same level. This might be transfer from one programme leading to a major award before or after completion of the programme. Examples include transfer after Year 1 of a General Science Degree to a Medical Degree, or a Postgraduate Diploma to a Master's Degree. Generally, in the case of credit transfer, all the credit achieved is used towards the new award.

Credit accumulation relates, most often, to non-major awards. Learners accumulate smaller volumes of learning, usually also at the same NFQ Level but not always, towards a larger qualification. The larger award does not have to be a major award. For example, three 10 credit

modules might accumulate to a Certificate in X or three 30 credit modules might accumulate to a Master's Degree. In credit accumulation, not all the credit accumulated might be used towards the larger award.

• Stakeholders are invited to submit any preferences regarding the terminology used to indicate the usage of credit.

The use of general or specific credit applies to both credit transfer and credit accumulation. This paper does not propose definitions for general or specific credit as there may be different definitions in use across the sector. The paper does not outline when general or specific credit should be used in credit transfer, credit accumulation or for RPL. However, it should be noted that the use of general or specific credit may have significant impacts on the classification of awards achieved by learners, especially in situations of credit accumulation.

It would be useful to get more information about the definitions and applications of general and specific credit which can inform the ATP policy and will be detailed further in the White Paper.

- Stakeholders are invited to outline how they define general versus specific credit and describe the implementation of general versus specific credit.
- Stakeholders are invited to suggest guidelines for the use of general and specific credit in credit transfer, credit accumulation and RPL.

5. DEVELOPING A NEW ATP POLICY

5.1. SUPPORTING ATP

To ensure that ATP arrangements are most beneficial to the widest possible range of learners it is important that providers and awarding bodies promote a culture which supports the effective implementation of ATP policy and procedure.

This includes supporting learners through all aspects of ATP including access to programmes thorough a variety of pathways and mechanisms which enables successful participation of learners in programmes leading to awards on the NFQ. Mechanisms should include admissions procedures designed to determine capacity to succeed and a wide range of student supports. Incorporation of the Universal Design for Learning (UDL)³² framework and guidelines into programme design but also administrative functions like policy development and communication are essential to effective and inclusive ATP.

Central to ensuring a culture of ATP is embedded is to acknowledge the role of awarding bodies and providers in supporting ATP. It is vital that clear and accessible information is provided to learners to help them to navigate all aspects of ATP. Information provision with regards to ATP specifically is detailed below, however, information provision around ATP isn't simply information around policies and procedures or available transfer and progression pathways, but also signposting of staff available to assist in navigating ATP (such as access teams for example). It is also important that these teams have proper training in order to ensure they have the appropriate information, knowledge and skills to support learners through all aspects of ATP on an inter and intra institutional basis.

As ATP policy and procedure are often centrally developed institutional policy, but decisions about admissions and access generally are made locally, it is essential that all decision makers are appropriately trained about ATP policy, procedures and pathways. As some applications might be more complex than others, it is essential that decision makers can access support and advice to ensure that decisions are fair, equitable and transparent.

5.2. OPERATIONAL PRINCIPLES FOR ATP

In QQI's 2015 restatement there is reference made to the NQAI's original policy being presented alongside operational principles and objectives for ATP. As noted in the review completed in 2023 these operational principles and objectives are absent from the policy restatement, and it is unclear what the originally stated principles were.

As discussed previously in this green paper, QQI's new ATP policy will be based on high-level principles designed to promote and enable the implementation of ATP on the ground which will have real impact for learners.

NQAI's policy and QQI's 2015 policy restatement of same were arranged around 4 key areas: credit, entry arrangements, transfer and progression routes, and information provision with the aim to increase opportunities for entry. The 2015 restatement, however, focussed more on criteria associated with these areas, in developing a new QQI Policy framework for ATP we wish to focus first on the principles underpinning key areas of delivery before exploring criteria.

The proposed principles detailed in this paper build on and expand the key areas stated in the NQAI policy. These proposed principles, once finalised, will form the basis for criteria for the implementation of ATP.

The table below provides an overview of the main changes to existing principles and proposed new principles for inclusion which will be expanded on in this green paper. All principles associated with the proposed new policy will be updated even if the principle itself remains the same.

NQAI Policy- Pillars	Proposed Principles for new ATP Policy	
Credit	Credit, Credit Accumulation, Credit Transfer	
Information Provision	Programme Design:	
	Entry and Exit Arrangements	
	Transfer and Progression Routes	
Entry Arrangements	Information Provision	
Transfer and Progression Routes	Data Collection and Provision	

Table 2- Proposed Principles for new ATP Policy

Credit, Credit Accumulation and Credit Transfer

As stated in the Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training, the general purpose of credit is to recognise learning achievements which have value in themselves, and which may be used to gain an award ³³. Transparent frameworks of qualifications are closely linked with credit systems. They can enable flexibility for learners who can choose learning paths scaled in a common credit system (such as European Credit Transfer and Accumulation System credits or ECTS) which can be accumulated and used to access other education and training programmes through progression and transfer routes thus promoting mobility and understanding of what knowledge, skills and competencies have been gained during study³⁴.

The adoption of ECTS across most of the European Higher Education Area (EHEA) introduced a common currency in facilitating the recognition of academic workload and achievement, thereby promoting mobility and ensuring transparency. It is also a mechanism through which learners can better understand the expectations of the workload³⁵. As stated in the Bologna Declaration,

³³ principlesandoperguidelinesgreen.pdf (qqi.ie)

³⁴ ESU-BWSE-2024-1.pdf

³⁵ ECTS User's Guide 2015 (europa.eu)

the ECTS credit accumulation system is based on three cycles- short cycle, undergraduate and graduate³⁶.

FET credits are calculated in a different manner, 1 FET credit is equated with 10 hours of 'learner effort'³⁷, whereas 1 ECTS credit is cited to mean 25-30 hours of notional learner effort. However, a national agreement in 2008 stated that 1 ECTS credit would equate to 20-30 hours of learner effort and there is some evidence that this practice has continued^{38 39}. Learner hours in both ECTS and FET must be understood to include not just contact hours (i.e.: in classroom settings) but also includes hours of self-directed learning, working on assignments, preparation for assessment and assessment itself.

The centrality of the qualification framework and associated credit system is a key component of ATP. A clear and transparent framework, underpinned by a credit system, can easily integrate both non-formal and informal learning, facilitate a number of learning pathways and access routes and provides a clear guidance and information framework for learners in choosing their study programmes.

A review of the working of ECTS conducted in 2024 by the European Students' Union (ESU) was published as part of the 'Bologna with Students Eyes' series. This review determined that while the quality assurance procedures should encompass a regular assessment and monitoring of ECTS use and allocation,⁴⁰ this does not seem to be happening in practice. Furthermore, the way ECTS are determined are often not in line with the ECTS Users' Guide with principles not translating properly and not reflecting the reality of workloads involved in coursework⁴¹.

QQI will continue to operate under the national agreement on credit in which supports the calculation of FET to ECTS to be understood as equating to 2:1. As discussed in the Tirana Ministerial Conference⁴² there is a commitment to review the ECTS Users Guide by 2027 to strengthen its key features and adapt its use to current developments such as micro-credentials. While awaiting this update to the Users' Guide it is useful to consider 60 ECTS as being one full-time academic year.

This does raise a question regarding full-time vs part-time learning, definitions of which have remained a challenge. A report conducted by the IUA identified several variables used to characterise part-time/flexible learners with a range of nuances and discrepancies existing around these characterisations⁴³. As part of this work, the IUA subgroup determined after discussions that the most equitable and clear definition they could agree on is that "a part-time student" is simply a "student who is not a full-time student"- therefore, any learner who is availing of a credit load of fewer than 60 ECTS credits or 120 FET credits in an academic year may be classed as "part-time".

In addition as we see more accumulation of small volumes of learning possibly building towards a qualification (through micro-credentials for example), often referred to as 'stacking' by providers

- 38 Academic Credit System (ECTS) Trinity Teaching and Learning Trinity College Dublin (tcd.ie)
- 39 Jargon UCD Registry

43 A-Student-is-a-Student-is-a-Student-a-Position-Paper-on-Part-Time-Flexible-Study-in-Irish-Higher-Education-Full-Paper.pdf (iua.ie)

³⁶ THE EUROPEAN HIGHER EDUCATION AREA (ehea.info)

³⁷ a-guide-for-listed-awarding-bodies-to-support-referencing-existing-qualifications-to-the-national-framework-of-qualifications.pdf

⁴⁰ ECTS User's Guide 2015 (europa.eu)

^{41 &}lt;u>ESU-BWSE-2024-1.pdf</u>

⁴² eua looks forward to the tirana ministerial conference and the next work programme of the european higher education area.pdf

(QQI considers 'stacking' as a form of credit accumulation which is easily provided for in ATP and will be explored later in this green paper) it may become necessary to articulate the 'shelf-life' of credit in terms of use for ATP specifically. This may be programme specific (for example, some fields of study remain largely static when compared to dynamic fields of study such as computer programming), however, a shelf-life for credit for the purposes of ATP should be incorporated into policies and procedures used by education providers to ensure consistency of approach and also transparency to learners. It may be that some modules on a programme for example, have a shorter 'shelf-life' than others.

A recent study conducted by the Quality Assurance Agency (QAA) in the UK examined the practice of credit transfer with regards to RPL and found that across the UK there was a variance across providers in terms of time limits attached to credit for the purposes of transfer⁴⁴. QQI acknowledges that a similar kind of variance will also exist in Ireland and may also exist at programme level. What is evident from this study is that the credit time limits used by a large percentage of providers studied was unclear. Shelf-life must be fair, reasonable and related to the learning area. While there may be a desire for a standardised rule to apply in terms of time limits for credit, this may not be possible due to the diversity of provision and awards. Although the ATP policy and associated principles for the operation of credit which will accompany it cannot be too prescriptive in terms of time limits or acceptable amounts of credit to be transferred, QQI can apply principles around information provision which will ensure that learners are clear on whether or not their credit accumulated can be transferred and if so, what the maximum amount of credit allowed for transfer is.

In consideration of the important role credit plays in realisation of ATP, QQI proposes the following principles:

- National approach to credit is compatible with the use of both ECTS credit and FET credit both of which support the NFQ.
- Credit volumes across HE and FE are calculated with the same assumption of learner effort and is done according to academic year for major awards - with FET courses being 120 credits for one academic year full-time and HET courses being 60 ECTS for one academic year full-time (therefore a calculation of 2:1 should be applied to FET credit to ECTS).
- Part-time study is considered any credit volume less than full academic year credit volumes. Credit volumes should be calculated on the basis of notional learner effort in line with that described for small qualifications or short programmes.
- For non-major awards, micro-credentials and short programmes learning hours should be used to calculate credit. 1 FET credit is equated with 10 hours of 'learner effort', whereas 1 ECTS is cited to mean 20-30 hours of notional learner effort.
- Credit systems must operate in accordance with the principles originally articulated in
 Principles and Operational Guidelines for the Implementation of a National Approach to
 Credit in Irish Higher Education and Training which will be restated in the new ATP policy
- The use and recognition of credit should provide as much flexibility to learners as possible and be compatible with RPL policy.
- Awarding bodies and providers agree to common recognition of credit across both further and higher education and provide mechanisms for recognition of both systems for the purposes of ATP.

⁴⁴ Achieving credit transfer at scale: An analysis of UK university policies (gaa.ac.uk)

- Responsibility for assigning credit volumes will reside with the awarding bodies.
- Responsibility around regular monitoring of credit volumes will also reside with awarding bodies.
- Considerations for pathways of credit transfer should be considered early on and not be dealt with as an afterthought.
- A timeframe of acceptance of credit for ATP (including RPL) must be agreed upon either on an institutional or programme level and communicated to learners. An approach to shelf-life of credit must be fair, reasonable and transparent.
- There must be clear communication with learners surrounding the maximum amount of credit transfer available to learners and if any time limits applied to credit accumulated prior to application to a programme
- Credit accumulation is vital to facilitating micro-credentialling and accumulation of credit to lead to qualifications. Accumulation of micro-credentials and other small volumes of learning can be dealt with in the following ways:
 - Pathways for credit accumulation of micro-credentials should be identified prospectively and mapped out and made clear to learners. This is likely only possible within an institution. It is possible for institutions to prospectively recognise micro-credentials from another institution in their pathways.
 - 2. Credit accumulation of micro-credentials can be retrospectively mapped to the achievement of a larger qualification. The learning must be coherent to the achievement of a qualification and in keeping with the Grid of Level Indicators for the overall level of the award and with the relevant award-type descriptor. If this results in a new qualification, the institution must include this award in the NFQ in line with requirements of the Joint Sectoral Protocol. This qualification must be published in the Irish Register of Qualifications to be considered an award included in the NFQ. This would be possible within and between institutions and could be made as a joint award. There is not necessarily a need to design a programme, beyond the existing accumulation of smaller awards, to lead to this qualification.
 - Credit accumulation of micro-credentials can be treated as a Recognition of Prior Learning for access to a programme of education and training or for the achievement of a full award but must be detailed in an organisational RPL policy. This would be possible within and between institutions.
- Stakeholders are invited to express their views about the proposed common credit system and associated requirements and responsibilities for credit with regards to ATP.
- Stakeholders are invited to express their views on principles highlighted around flexibility, adaptability and use of credit.
- Stakeholders are invited to express their views around the method of credit accumulation and identify if others are available.

Programme Design

Key to ensuring programme design facilitates ATP is a clear knowledge and understanding of the values and principles underpinning the NFQ (Equality and Accessibility, Transparency and Simplicity, Relevance, Quality and Comprehensiveness and Coherence⁴⁵) and how these are supported by proper use of the framework. While the NFQ is now an important and central part of the qualifications landscape in Ireland these values and principles may not be well understood or may be discounted in favour of commonly held assumptions (for example that moving through the framework only consists of progression up the framework). Understanding and embedding these principles into programme design and planning will support ATP.

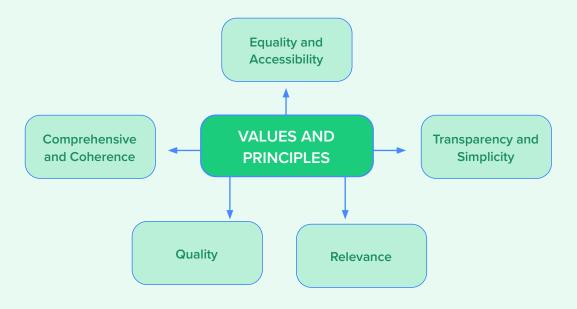


Figure 2- Values and Principles underpinning the NFQ in 2003

Under the principle of Programme Design it is proposed that two sub-principles will be included; Entry and Exit Arrangements and Transfer and Progression pathways. Both entry and exit arrangements and transfer and progression pathways must be considered at the programme design phase. Exit arrangements can also be considered as partial completion of programmes and awards.

As discussed previously part-time delivery of programmes can support ATP for a wide range of learners. The feasibility of part-time or other flexible delivery modes should therefore be considered at the programme design phase, bearing in mind that a part-time learner is to be understood as a learner who is taking on the programme with anything less than the full credits for the academic year. While constraints to flexible delivery may exist due to existing administrative structures, staff capacity and funding, all possible avenues of flexible programme delivery should be explored at programme design phase. Flexibility should also be considered in terms of timetabling and making use of summer months, either in the delivery of programmes or in making content available early to enable preparation and engagement and reduce the burden on learners at busier times of the year. Also considering flexibility in programme design, the accumulation of credit from any nonmajor awards (including micro-credentials) should be considered at programme design phase. It is important to determine the ways in which credit can be accumulated to ensure that this information is clear to learners when they enrol on any programme leading to a qualification. Pathways for credit accumulation can also be built retrospectively but these pathways must be clear, consistent and communicated, and an ad hoc approach should be avoided.

Collaboration between programmes, schools, and providers at programme design phase should be encouraged through policies and procedures across programme design, development, and quality assurance. Awarding bodies should promote collaboration on this level and engage in collaborative planning themselves.

Collaboration to identify and build pathways across all elements of ATP will assist with ensuring smooth transfer and progression and clearer entry and exit routes available to learners (detailed later in this paper).

Collaboration in programme design can also assist with ensuring common understandings of the NFQ and associated principles, entry requirements, exit routes, flexible programme delivery, credit accumulation, flexible learning and information provision which will all assist learners in navigating ATP. Collaboration should occur nationally and across and between further and higher education but should also be considered by geographic location as well.

The following principles are proposed by QQI in relation to Programme Design:

- Collaborative practice at programme design level is crucial. Collaboration can include collaborations within providers, across providers and between awarding bodies.
- Methods of flexible programme delivery should be explored at the programme design phase. Flexible programme delivery should aim to target learner groups under-represented in enrolment; this kind of focus will ultimately benefit all learners. Any flexibility available to learners should be clearly communicated to all learners.
- Flexibility should be ensured to the greatest extent possible across all aspects of programme design. Timetabling, delivery, independent learning opportunities, organisation of teaching and learning and assessment can all contribute to meeting diverse learner needs
- NFQ values and principles should be central to all programme design for programmes which lead to awards on the NFQ. These should, however, also be considered for any programmes which will award FET or ECTS credits to enable ATP.
- QQI is conscious that there are good practice examples of exercises in mapping of entry and exit routes, flexible programme design and/ or collaborative practice at the programme design phase. QQI recognises that it may be useful to have best practice examples of programme design facilitating and promoting ATP detailed in case studies as part of or alongside a new ATP policy.

 Institutions are invited to provide QQI with examples of good practice to be highlighted as potential case studies for the new ATP Policy.

Entry and Exit Arrangements

The centrality of RPL within ATP has previously been highlighted in this green paper and it is worth re-iterating its importance when considering principles for entry and exit arrangements. For entry arrangements it is important that clear RPL policies are in place and that these policies align with any national policy on RPL. While the ATP policy will not act as or replace any national RPL policy, it is important that entry requirements enable recognition of different kinds of learning through a variety of experiences. It is also worth considering the expansion of recognition of transversal skills (such as communication, critical thinking, problem solving etc.) through the admissions process to facilitate a wider range of entry routes.

At the programme design phase, minimum requirements for programme entry through a variety of routes should be considered. It must be noted that minimum requirements are one component of recognition of knowledge, skills and competencies and that short-listing criteria and policies should also be considered at the programme design phase in order to assist with assessment of capacity to succeed. Any short-listing criteria should be detailed along with minimum requirements to ensure that the process is as transparent as possible to learners.

Entry routes should be identified early on in programme design and clearly set out to prospective learners with transparent allocation procedures which promote fairness and equal consideration for all. An appeals process should form part of the entry arrangements procedure.

Entry routes should encompass general entry, advanced entry and any exemptions which may be availed of on application to the programme. Advanced entry routes are key to enabling ATP and should be considered where possible.

Entry requirements for programmes leading to awards on the framework will be varied as programmes may have a wide range of necessary skills and information required to ensure that learners have the capacity to succeed in the programme. However, it is advised that overly specific entry requirements should be avoided where possible to avoid creating unnecessary barriers to ATP routes but particularly with regards to transfer as this can present a barrier to advanced entry, for example.

Exit routes as well as entry routes should be considered during programme design. It is advised that programme design should be undertaken with clear award provision at various transition points in a programme sometimes known as exit points- interim/intermediate awards should be included in design to facilitate easier transfer and progression from the programme. The Tertiary Degrees are a good example of this, where awards are available at the end of most years of the programme. This ensures a greater recognition of learning, and learners leave with a recognised, valuable award rather than an accumulation of credit that may be difficult to use in the future. Furthermore, the awarding of a qualification at exit points may provide a learner with a qualification that entitles them to increased employment and labour market opportunities. As with entry routes, the necessary learning outcomes associated with the respective awards which will form part of the award should be considered at programme design phase.

QQI therefore proposes the following principles for entry and exit arrangements to support ATP:

- RPL is central to the process for admission onto a programme.
- Advanced entry is also a central component of successful ATP practice.
- Entry routes should be fair, logical and consistent; should be clear to all learners; and should encompass a variety of entry routes. Entry routes should provide clear pathways for entrants from all possible pathways including but not limited to CAO, advanced entry, RPL and from FET to HET.
- Minimum requirements and short-listing criteria should be incorporated at programme design phase. These can help inform entry and exit arrangements which should also be considered during programme design.
- Entry routes should facilitate the consideration of non-formal and informal learning and take into account a wide range of skillsets including transversal skills and should encompass advanced entry and exemptions where possible.
- Entry requirements should allow for flexibility in demonstrating necessary knowledge and skills and overly-specific entry requirements should be avoided where possible
- Exit routes as well as entry routes should be considered with clear award provision provided for at exit and/or transition points which may lead to interim/intermediate awards to facilitate transfer and progression.
- Exit awards must not exclude the opportunity for the learner to re-enter the programme later, usually picking up at the exit point and not required to go back to the start. This must be communicated to learners.
- Clear and accessible information on all exit awards available from a programme should be
 provided to learners.

Although there are a wide range of possible entry routes to programmes at all levels of the NFQ, they are somewhat finite. As such, it is possible that the new ATP policy could standardise the information collected and published about entry arrangements to programmes. This would make it clear which entry routes are available, and those that are not and would allow for effective data monitoring for improved availability of entry routes in the long term.

• Stakeholders are invited to express their opinion about whether standardised information about entry routes and access pathways should be published.

Transfer and Progression Pathways

As mentioned in the introduction to this green paper, access and progression are more commonly used and understood terms and policies with transfer being an element of ATP which is perhaps least understood. Transfer, as is proposed to be understood from minor to major awards at the same NFQ Level, for example, is becoming increasingly important in the Irish education sector. It is therefore necessary for QQI's ATP policy to set out clear principles surrounding transfer to assist awarding bodies and education providers in implementing comprehensive ATP policies.

While progression is a more commonly used and understood element of ATP in the Irish education landscape with many associated national policies to support progression, it is a vital component of ATP and a lack of clarity around principles for progression could result in barriers

to learners. In the new ATP policy, it is proposed that programme design will be recognised as a key stage during which transfer and progression routes should be considered and built into programmes. Transfer and progression should, where possible, list specific programmes and not simply provide information on general award types and/or NFQ levels.

At present the transfer and progression pathways for each award type are detailed in the Outline National Framework of Qualifications- Determinations made by the National Qualifications Authority of Ireland. These options are detailed in the table below.

QQI is conscious this document was published in 2003 and as much has changed in the education and training landscape, proposed amendments to the progression and transfer arrangements are detailed above. QQI is particularly conscious of the first-cycle QF-EHEA awards which would encompass the Ordinary Bachelor Degree at Level 7 and the qualifications at Level 9.

Title	Class of Award Type	Level	Progression and Transfer	Proposed Amendments
Level 1 certificate	Major	1	Progression to programme leading to a Level 2 Certificate or at a higher level if appropriate	
Level 2 Certificate	Major	2	Progression to programme leading to a Level 3 Certificate or at a higher level if appropriate	
Level 3 Certificate	Major	3	Progression to programme leading to a Level 4 Certificate or at a higher level if appropriate	
Junior Certificate	Major	3	 Progression to programme leading to Leaving Certificate Progression to programme leading to Level 4 Certificate or at a higher level 	
Level 4 Certificate	Major	4	Progression to programme leading to a Level 5 Certificate or at a higher level if appropriate	
Leaving Certificate	Major	4/5	 Progression to programme leading to a further education and training award at level 5, or at a higher level Progression to programme leading to a higher education and training award at level 6, or at a higher level 	
Level 5 Certificate	Major	5	Progression to a programme leading to an Advanced Certificate or a higher education and training award at Level 6,7 or 8	As proposed as part of the introduction of a Single Major Award at NFQ Level 6 the Higher Certificate and Advanced Certificate may change to a single award at level 6 and progression from a level 5 certificate may lead to this single award type as opposed to an Advanced Certificate or Higher Certificate

Table 3- Award Type Transfer and Progression Pathways

Advanced Certificate	Major	6	 Transfer to a programme leading to a Higher Certificate Progression to a programme leading to an Ordinary Bachelor Degree or to an Honours Bachelor Degree 	As proposed as part of the introduction of a Single Major Award at NFQ Level 6 the Higher Certificate and Advanced Certificate may change to a single award at level 6 and progression will then be to an Ordinary or Honours Bachelors Degree
Higher Certificate	Major	6	 Transfer to a programme leading to an Advanced Certificate Progression to a programme leading to an Ordinary Bachelor Degree or to an Honours Bachelor Degree 	As proposed as part of the introduction of a Single Major Award at NFQ Level 6 the Higher Certificate and Advanced Certificate may change to a single award at level 6 and progression will then be to an Ordinary or Honours Bachelors Degree
Ordinary Bachelor Degree	Major	7	 Progression to programme leading to an Honours Bachelor degree or to a Higher Diploma Progression internationally to some second cycle (i.e. 'Bologna Masters') degree programme 	Progression to programme leading to an Honours Bachelor degree, to a higher diploma or programmes leading to awards at Level 9
Honours Bachelor Degree	Major	8	 Transfer to programmes leading to Higher Diploma Progression to programmes leading to Masters Degree or Post- graduate Diploma, or in some cases programmes leading to a Doctoral Degree Progression internationally to second cycle (i.e.: 'Bologna masters') degree programmes 	
Higher Diploma	Major	8	Progression to programmes leading to Masters Degree or Post-graduate Diploma	
Masters Degree	Major	9	Progression to programmes leading to Doctoral Degree or another Masters Degree or a Post-graduate Diploma	Described as progression however a move to a Masters or Post-graduate Diploma would constitute a transfer and is not progression. Amendment suggested in order to clarify this distinction.
Post- graduate Diploma	Major	9	May exempt from part of the programme leading to a Masters Degree	
Doctoral Degree	Major	10		

• Stakeholders are invited to provide any views on the progression and transfer arrangements detailed above and suggest any amendments they feel are necessary.

Providers and awarding bodies both have responsibility for identifying transfer and progression routes onto all programmes leading to awards in the framework ⁴⁶. Cooperation between awarding bodies and providers is key to ensuring clear and easy to access transfer and progression routes for learners. Cooperation must encapsulate both further and higher education provision and should also include private and independent providers and must work across all areas of education to ensure operation of transfer and progression routes at all levels of the NFQ.

There can be numerous transfer and progression pathways onto or leading from a programme which leads to awards on the framework. These routes must be considered at the point of programme design and again at programme entry or exit. Transfer arrangements in particular should be designed in such a way that does not disadvantage learners with regards to entry onto a programme.

QQI proposes the following principles to support transfer and progression:

- Transfer should be recognised as a key component of ATP and acknowledgement of the role transfer plays in accumulation of credit should form a key part of ATP policies and procedures.
- Transfer routes should not disadvantage learners and should follow the same entry arrangements as learners looking to access the programme for the first time.
- ransfer should be considered as a solution to known key transition points in programmes.
 For example, the end of year 1 of bachelor's degrees. The availability of programme transfer, both inter and intra institutionally should be considered a priority and these transfer options should be published.
- Providers and awarding bodies should be committed to collaborative practice both with one another and across the education system to develop clear and easily accessible transfer and progression pathways.
- Programme design should be recognised as central to facilitation of transfer and progression.
- Pathways for transfer and progression should be consistent and logical and should incorporate RPL.
- Part time learners must be considered where possible in programme design as this is central to flexible programme delivery.

Information Provision

Having clear, accessible information available to learners concerning entry and exit routes, RPL and ATP procedures are all essential in ensuring that ATP can be successfully navigated by learners. In the review of the ATP landscape conducted in 2023 it was determined that while the policy restatement from QQI required providers to make information regarding entry arrangements, criteria for programmes and transfer and progression pathways available to learners "in a clear, straightforward and consistent manner" this is not monitored or assessed in any detail by QQI presently⁴⁷.

Perhaps as a result of this, and also due to a variety of widening participation initiatives, entry pathways and variance in practice across providers, the review found that information publication on entry routes, exit routes, advanced entry and transfer and progression pathways was inconsistent in terms of availability and detail available to learners⁴⁸. As information is the clear starting point for many learners in navigating and using ATP the gaps and inconsistencies here must be addressed.

Alignment of ATP policies with the principles and the resulting criteria expressed in QQI's new ATP policy will assist in providing consistency in resulting policies and procedures across awarding bodies and education providers. A commitment to accessible universally designed communications can assist in ensuring that information can be easily accessed and understood by a wide range of learners. This includes ensuring that terminology is similar across all providers and awarding bodies, both in relation to ATP but also in terms of admissions procedures, award type descriptors, programme title etc. Consideration should also be given to names of awards and how these may disadvantage learners in terms of transfer or progression in particular, e.g. it would be advisable that the NFQ level (if applicable) is clear in programme titles.

Also central to addressing the current variance in terms of information available to learners is the understanding that ATP is the central policy for admissions and should be seen as a lynchpin policy. RPL policies should be clearly linked with ATP and support ATP practice- the link between the two should be communicated. Learners should also be provided with clear information on if/ how credit is awarded for small volumes of learning and how credit from small volumes of learning can be accumulated or transferred.

Other enablers of ATP such as entry arrangements, advanced entry, flexible learning (i.e.: part time options for learning), transfer and progression routes, any alternate exit awards provided for in the programme should all be made clear to learners.

In addition to providing learners/potential learners with clear, accessible and comprehensive information on admissions procedures, awarding bodies and education providers should make use of and promote tools which will enhance readability and comparability of awards. For example, the Diploma Supplement has been recognised by the EHEA forum as an important transparency tool which can help to communicate learning across borders thereby enhancing the readability and comparability of awards^{49 50}. While the Diploma Supplement is applicable

- progression-in-irish-education-and-training-2023.pdf
- 49 <u>Microsoft Word Communiqué_final.docx (ehea.info)</u>
- 50 <u>untitled (ehea.info)</u>

⁴⁷ gqi-insights_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-andprogression-in-irish-education-and-training-2023.pdf

⁴⁸ gqi-insights_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-and-

to undergraduate and graduate degrees, learning undertaken as part of FET through initiatives such as Erasmus + is captured using the Certificate Supplement. These are some tools which could assist in providing clear information to facilitate ATP and should be considered as part of certification and admissions processes.

As mentioned above, QQI does have responsibilities with regards to information provision, specifically under section 79 of the 2012 Act and amended under the Qualifications and Quality Assurance (Education and Training) (Amendment) Act 2019 ⁵¹ which requires QQI to establish and maintain a database providing information on programmes of education and training which lead to awards included within the Framework. Providing a clear source of information on awards included in the framework is central to facilitating ATP and the principles of the proposed new ATP policy should recognise the IRQ as well as tools such as the NARIC database as central to ensuring that achieved learning is recognised in a way which will facilitate ATP.

Additionally, section 67 of the 2012 Act⁵² places statutory obligations on all providers to provide specific information to enrolled learners prior to commencement of an education and training programme and processing payments including information on how ATP policies apply to programmes.

This section of the Act also requires providers to make clear to learners whether the programme will lead to an award recognised within the framework or not. This requirement regarding information provision concerning recognition of awards on the framework is especially important in the context of micro-credentials. If a programme does not lead to an award on the framework, not only must this be communicated to learners as set out in Section 67, but also learners should be provided with clear information about transfer and progression routes following on from that programme.

QQI therefore proposes the following principles for information provision to support ATP:

- ATP policy should be viewed as a central policy around which other supporting policies and procedures for admissions should be built or coordinate
- Awarding bodies' ATP policies, and associated ATP policies and procedures used by providers, must align with QQI's ATP policy
- Information on ATP procedures and associated enabling processes around entry arrangements, advanced entry, flexible programme delivery, RPL and alternative exit awards should be clear, accessible and universally designed to ensure that the information is available and understandable to learners
- ATP policies and procedures should be designed in a way which will be compatible with and/or encourage use of tools which enhance the readability and comparability of awards
- In line with Section 67 of the Act providers must make clear to learners whether the
 programme will lead to an award recognised within the framework or not. If a programme
 does not lead to an award on a framework learners should be provided with clear
 information about transfer and progression pathways from this programme should be
 provided to learners.
- Requirements outlined in Section 67 are applicable to micro-credentials as well as full programmes

⁵¹ Qualifications and Quality Assurance (Education and Training) (Amendment) Act 2019 (irishstatutebook.ie)

⁵² Qualifications and Quality Assurance (Education and Training) Act 2012 (irishstatutebook.ie)

- Centralisation of information on ATP and associated policies, procedures and funding initiatives to promote widening participation will assist with ensuring that information is clear. Central sources of information should be promoted at all levels of programme delivery.
- The IRQ should be used as a centralising resource for information on ATP, entry and exit routes

Data Provision and Collection

53

The absence of regularly reported data, particularly data available to QQI or through a centralised source was identified in the 2023 review as a clear barrier to comprehensive and efficient enactment of ATP as it prevents analysis of usage and impact of ATP⁵³. Data can assist awarding bodies, and providers in measuring the effectiveness of ATP approaches and identifying clear gaps or barriers which may need to be addressed. Data is also necessary for QQI to fulfil its statutory obligation to monitor and review the implementation of ATP and could assist in informing policy decisions related to ATP. It is envisaged that greater clarity around the data which should be collected, and the subsequent reporting of this data, would help to demonstrate how ATP is working in practice and will provide a clearer picture as to how learners are navigating through the NFQ. These insights will not only help policy makers but will also help awarding bodies and providers to address barriers and assess demand.

Clear definitions of all elements of ATP (as explored above) will provide necessary background to providers and awarding bodies for the collection of meaningful data on ATP. Agreement on these definitions and clear understanding of what each element of ATP looks like in practical terms will foster a consistent approach to data collection and reporting across providers and awarding bodies.

It is envisaged that data collection methods and ultimately data on ATP will form part of QQI's monitoring of ATP as set out in s9 (g) under this new ATP policy. This could place an additional requirement on awarding bodies and providers to develop processes, procedures and begin data collection in accordance with the definitions of ATP.

QQI is conscious that this may require some lead in time to implement; however, it is probable that many providers will already be collecting data on 'access' through admissions procedures which may also provide data on progression. It is therefore likely that reporting requirements can be met with minimal interventions and changes from awarding bodies and providers in these regards. It is likely, however, that further work may be required to support understanding and data collection amongst awarding bodies and providers around transfer – for both inter and intra institutional transfer.

In addition, it would be useful to have information on when applications of ATP were not successful (for example how many applicants for transfer were rejected). QQI is also proposing that completion rates are included in data collection as this data will provide some high-level insights into learner navigation of pathways in further and higher education and make evident trends or gaps in pathways.

QQI will have a role in monitoring data collection and reviewing data recorded, however the monitoring and reporting on data will also be the responsibility of education providers and

gqi-insights_from-counting-to-cultivating-successful-participation-a-review-of-the-landscape-of-practice-supporting-access-transfer-andprogression-in-irish-education-and-training-2023.pdf

awarding bodies. Monitoring this data will allow all stakeholders to gain a better understanding of how learners are engaging with pathways to programmes and be able to analyse trends regarding the most and least used pathways.

QQI therefore proposes the following principles for data collection to support understanding of the impacts of ATP policy and practices:

- Data must be understood as key to the implementation and improvement of ATP.
- Awarding bodies and providers should ensure that information on the IRQ is accurate and up to date with regards to programmes which lead to an award on the NFQ.
- Awarding bodies and providers must ensure that data is collected across all aspects of ATP.
- Awarding bodies and providers should also keep records of rates of completion of
 programmes leading to awards, including recording data on early exit from a programme
 and whether this exit leads to an award or not in order to provide additional context into the
 learner experience and provide information about the availability or absence of pathways
 leading to awards.
- Awarding bodies and providers should keep records of numbers who were not permitted access, transfer or progression. This is likely to be limited to direct applications in the first instance and would not include routes such as CAO.
- Cooperation and collaboration between awarding bodies and across providers is key to ensuring comprehensive data collection.
- QQI will use data provided by awarding bodies and providers to assess the impacts of ATP procedures both within awarding bodies and nationally.

Data collection and reporting will be introduced on a phased basis and QQI will collect information from providers and awarding bodies as well as other stakeholders as to what data is collected and reported and through what mechanisms. QQI will also be considering data collection requirements in its evaluation and redevelopment of the IRQ.

 Stakeholders are invited to provide information on what data is currently collected/ reported, how this data is recorded, and where this is currently reported (i.e.: internally or externally).

Proposed Principles

With regards to the principles overall, QQI requests input on the following:

- Stakeholders are invited to provide comments as to whether the principles outlined will result in changes which will impact the experience of learners?
 - If not, stakeholders are invited to provide detail on other considerations which would result in changes which will positively impact the experience of learners navigating ATP?
 - If not, are common principles enough or should QQI be more specific in terms of guidance specific to FET providers, HEIs, for example?

6. IMPLEMENTATION OF A NEW ATP POLICY

The introduction of a new ATP policy is an important factor in supporting the proper use of the NFQ. New data collection requirements will also have implications for awarding bodies and providers. It will benefit the wider sector by increasing the availability of consistent, centralised data on high level trends and gaps in ATP delivery.

6.1. TIMELINE

It is proposed that consultation on this green paper runs until March 2025.

Following the consultation on the green paper QQI will consider the feedback received and develop a white paper which will be subject to public consultation.

Following the consultation on the white paper, QQI will take responses into account and will finalise the new ATP policy and develop an implementation plan with dissemination planned for December 2025.

6.2. IMPLEMENTATION

The development of a revised QQI ATP policy is the first time that QQI will invoke Section 56 of the legislation. As outlined previously in this paper, QQI has legislative responsibilities to approve and review ATP procedures of most relevant and linked providers.

It is proposed that such approval of ATP procedures will be conducted as part of routine monitoring and review activities such as the submission of annual quality reports and institutional reviews. Previously established universities and other designated awarding bodies will also notify QQI of updates to ATP procedures as part of these routine activities. A formal approach to monitoring will be detailed in a policy that is currently being developed. A timeline for this will be agreed with all providers.

For English language providers that are authorised to use the IEM, approval of ATP procedures will be conducted as part of cyclical review.

Where providers apply for new or enhanced responsibilities (i.e. delegated authority) QQI may reserve the right to review ATP procedures as part of the application process.

 Stakeholders are invited to provide their views on the proposed implementation of the new ATP policy, in particular the proposal that approval of ATP procedures be included in part of routine activities such as quality reports and institutional reviews and in the case of providers applying for new or enhanced responsibilities review of ATP procedures may form part of the application process.

6.3. IMPACTS

There are several known impacts to the roll out of a new ATP policy. As set out in the rationale section of this green paper, the aim of introducing a new QQI policy on ATP is to promote high level principles which will result in positive changes in practical terms for learners navigating ATP.

An updated ATP policy will result in updates to Determinations for the Outline National Framework of Qualifications at all levels with regards to ATP.

QQI is conscious that the data gathering and reporting requirements will have an impact on providers and awarding bodies. However, it is likely that some elements of ATP, particularly access, are covered by information gathered by providers already.

Data reporting will be another important impact to consider and reporting structures, data retention and data reporting responsibilities will have to be carefully considered as part of implementation of the new ATP policy.

The increased availability of data and reporting on the function of ATP will provide policy makers with more information concerning ATP practice in Ireland which may assist policy decisions.

Any new ATP policy should be considered in any assessment, update or development of funding models and initiatives to ensure that all funding initiatives work well with and support the functioning of ATP in practice. It is hoped that by developing and implementing a new ATP policy, more information on how ATP operates would be available and may inform funding and public policy to further support ATP.

 Stakeholders are invited to express their views about the highlighted impacts and to identify any additional impacts not presented in this green paper which QQI should consider in the development of a new ATP policy.

6.4. QQI STRATEGIC COMMITMENTS

The *QQI Strategy 2025-2027* sets a priority to future-proof the NFQ and a confirmed action is to undertake a statutory review of individual provider adherence to access, transfer and progression policy and the appropriate recognition of prior learning. A Green Paper for a Model for Review of ATP will be developed and published by the end of 2025 and such a review will be mindful of the timelines regarding the implementation of the updated QQI ATP Policy. Such a review will be considered a periodic or cyclical review of the effectiveness of ATP procedures as provided for in Section 57 (1)(a) of the Act.

5.5 FOCUSED REVIEW OF ATP PROCEDURES

It is proposed that a review of ATP procedures undertaken in line with Section 57 (1)(b) of the Act would be considered a focused review of the effectiveness of ATP procedures. This is in keeping with the approach used for focused reviews of quality assurance procedures⁵⁴. It is proposed that the Procedures for Focused Reviews by QQI would be amended to include focused reviews of the implementation and effectiveness of provider ATP procedures under Section 57. Such a review may result in the withdrawal of ATP procedures in line with Section 58 of the Act.

gp-19-procedures-for-focused-reviews-by-gqi-of-the-implementation-and-effectiveness-of-provider-ga-procedures.pdf

7. CONCLUSION AND NEXT STEPS

This Green Paper sets out a proposal for the development of a new Policy to support education providers and awarding bodies in a process of continuous improvement of their policies and procedures around access, transfer and progression.

A clear, national policy will promote ATP in practice, provide clear definitions and principles around all aspects of ATP, and ensure a standardised approach to credit accumulation, recognition and transfer as well as data collection and reporting. With this new policy QQI hopes to make navigation of ATP more accessible and easily understood to learners and will create more equitable ATP pathways for all learners.

This new ATP policy will lead to QQI undertaking monitoring responsibilities outlined under section 9(g) in the 2012 Act. This will be a phased approach and will allow time to develop and implement processes and procedures and any data collection mechanisms which may need to be put in place prior to any monitoring. It is envisaged that monitoring of the new ATP policy will focus less on adherence and more on iterative improvements to ATP policy and practice over time. It is also likely that interventions to improve pathways and address barriers will be dynamic.

As part of the development of this new policy QQI is proposing including (in a separate document or other format) details of case studies and examples in order to detail common barriers experienced by learners in navigating and understanding ATP pathways as well as highlighting examples of best practice across all principles.

QQI has also committed to conducting a review of ATP as stipulated in section 9(g) of the 2012 Act. This review will take place during the lifetime of the QQI Strategy 2025-2027 with a model proposed for consultation by the of 2025. A model for review of ATP will be cognisant of the new ATP policy and will aim to support the adaption of ATP procedures in line with the new policy.

- Stakeholders are invited to provide feedback on the proposed introduction of a new QQI policy on ATP and provide their views on how QQI should plan for the introduction and roll out of a new ATP policy.
- Stakeholders are invited to provide feedback on the inclusion of case studies as part of a new ATP policy.
- It is envisaged that this policy will be approved before the end of 2025. After this time QQI would expect providers to review and update their procedures in line with the new ATP policy.

APPENDIX 1- CONSIDERATION OF KEY RECOMMENDATIONS FROM 2023 ATP REVIEW

Recommendation 1	Following consultation with key stakeholders, QQI should restate the origina vision or articulate an updated vision and set of objectives for ATP that emphasises enabling successful participation as a core principle.	
Within scope?	Yes, clearly within scope	
Key considerations/actions	The restatement should provide adequate details of key objectives and vision, building on the restatement published in 2013 and providing detail which was not carried forward from the 2003 NQAI policy. However, objectives and principles outlined should be high-level. This is to ensure ongoing and future policy development undertaken by QQI does not result in contradictory information or rendering of the ATP policy out of date.	
	The core principle of enabling successful participation can be enabled by several supporting principles.	
	Consultation -both internal and external will be key to generate a cohesive vision and shared understanding.	
Recommendation 2	In order to ensure coherence of approach and support successful implementation of ATP in practice, QQI should seek to ensure that ATP is appropriately integrated into all relevant QQI QA Guidelines, policies, procedures and criteria. For example, ensuring that inclusive practice considerations and universal design are brought to the fore in general, and are a particular emphasis within guidelines pertaining to programme development and approval, staff development, teaching and learning, assessment, information and supports for learners.	
Within scope?	Yes, this will be within remit of QQI with regards to QQI's own policies, procedures and guidelines. This recommendation for other awarding bodies and all providers can be addressed through wider principles.	
Key considerations/actions	Many considerations will need to go into ensuring coherence of approach and implementation, however, there are some policies and guidelines which may fall outside of our remit.	
	Consistency of information will be a key consideration with regard to integration. This will include emphasis on universally designed communications. This will also mean an emphasis on promotion of information to be made available to learners (such as the Europass supplements.)	
Recommendation 3	In its role as custodian of the National Framework of Qualifications, QQI should take all necessary steps to ensure parity of treatment of NFQ Levels 5 and 6 major awards for progression purposes.	
Within scope?	Some work can be done within scope however, a review of the NFQ will be outside of the remit of the ATP policy.	

Key considerations/ actions	Capacity building in terms of understanding of NFQ levels amongst providers should be undertaken.	
	ATP policy must be closely linked with NFQ and support the framework; however, the policy should focus on principles rather than the complexities of use of the NFQ	
Recommendation 4	QQI should evaluate the continued benefits of maintaining two national credit systems and whether having two credit systems acts as an enabler o a barrier to successful access, transfer and progression of learners through the qualifications system	
Within scope?	Not within scope of this project and would be outside the remit of this policy.	
Key considerations/actions	As previously mentioned, keeping ATP policy very much principles and objectives based on a high level should be undertaken to avoid getting weighed down by the complexity of the two credit system. The ATP policy may result in minor changes to operational policies concerning credit and transfer and progression routes as required in order to improve operation o ATP.	
Recommendation 5	QQI is encouraged to continue the progress towards the development of a national policy approach to RPL to support consistency of practice across the tertiary education sector.	
Within scope?	Not within the scope of this project, this is a separate project being undertaken by QQI.	
Key considerations/actions	While QQI will have a separate RPL policy it is important the RPL is recognised as an enabler of all of ATP and the ATP policy will support RP all environments and systems.	
Recommendation 6	QQI is encouraged to initiate and lead discussion with other awarding bodies in the State and education and training providers to consider the current notions of part-time and full-time study with a view to bringing clarity and consistency to definitions and practice and enabling flexible learning opportunities that meet the needs of learners.	
Within scope?	Yes, within scope.	
Key considerations/actions	There is some complexity here in terms of how providers define 'part time' – there is no consistent approach or understanding and this present barriers to facilitation of ATP.	
Recommendation 7	In its review of its current monitoring policy and approach, QQI is strongly encouraged to give consideration to how routine monitoring of ATP can be facilitated and enhanced.	
Within scope of project?	Yes, within scope.	
Key considerations/actions	While policy will be high level and principles based, measurable objectives would help to facilitate monitoring of ATP.	
	In particular, assessment of accessible and consistent information, resources and certification available to learners as well as data collection and reporting by providers could be incorporated into existing review activities.	

Recommendation 8	8. QQI is strongly encouraged to continue its work with relevant Government Departments and State agencies, as well as other relevant stakeholders, to ensure appropriate ATP data (quantitative and qualitative) is collated and available to:		
	a. Confirm the impact of access initiatives and interventions made to date		
	b. Identify gaps and vulnerabilities in current ATP practice, including lack of capacity to meet learner demand for places		
	c. Inform future policy, strategy and funding decisions related to ATP		
Within scope?	Working with Departments, agencies and relevant stakeholders to ensure appropriate ATP data is collected is within scope, the aim of this new policy will be to attain useful data to facilitate analysis of impact of ATP policies and procedures and inform policy and strategy at all levels.		
Key considerations/actions	As detailed above, careful consideration of what is to be considered (and subsequently logged) as access or transfer or progression is required.		
	There will need to be thought and consultation around what data- quantitative and qualitative is most useful to measure impacts of ATP, identify gaps, and inform future policy, strategy and funding decisions.		
	Work on this review will also have to consider and explore how ATP data can be collected with minimal additional burden placed upon providers (i.e. exploration of existing systems used for collecting and reporting admissions data)		
Recommendation 9	9. QQI is encouraged to take steps to ensure that, to the extent possible, evidence-informed ATP considerations are presented and considered at national-level discussions on the further development, regulations and funding of the qualifications system.		
Within scope?	Partially		
Key considerations/actions	This is an important recommendation; however, this is more to do with the implementation of ATP policy.		
	Will be considered as a desired outcome of the policy and also will be at least partially addressed with regards to data collection and reporting.		

APPENDIX 2 - LIST OF QUESTIONS POSED IN THIS GREEN PAPER

Section 3.4

- Stakeholders are invited to submit their views and recommendations on the proposed definition of 'access' with respect to ATP.
- Stakeholders are invited to submit their views and recommendations on the proposed definition of 'transfer' with respect to ATP.
- Stakeholders are invited to submit their views and recommendations on the proposed definition of 'progression' with respect to ATP.
- Stakeholders are invited to express their views about the revocation of *Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training* and for policy on credit to be updated as described above.
 This will enable the introduction of the single major award type at Level 6 and facilitate
 credit accumulation associated with small qualifications and micro-credentials.

Section 3.5

- Stakeholders are invited to provide feedback on the suggested changes to Principles of a National Approach to Credit detailed above.
- Stakeholders are invited to submit any preferences regarding the terminology used to indicate the usage of credit.
- Stakeholders are invited to outline how they define general versus specific credit and describe the implementation of general versus specific credit.
- Stakeholders are invited to suggest guidelines for the use of general and specific credit in credit transfer, credit accumulation and RPL.

Section 4.2

- Stakeholders are invited to express their views about the proposed common credit system and associated requirements and responsibilities for credit with regards to ATP.
- Stakeholders are invited to express their views on principles highlighted around flexibility, adaptability and use of credit.
- Stakeholders are invited to express their views around the method of credit accumulation and identify if others are available.
- Stakeholders are invited to express their opinion about whether standardised information about entry routes and access pathways should be published.
- Stakeholders are invited to provide any views on the progression and transfer arrangements detailed above and suggest any amendments they feel are necessary.
- Stakeholders are invited to provide information on what data is currently collected/reported, how this data is recorded, and where this is currently reported (i.e.: internally or externally).

- Stakeholders are invited to provide comments as to whether the principles outlined will result in changes which will impact the experience of learners?
 - If not, stakeholders are invited to provide detail on other considerations which would result in changes which will positively impact the experience of learners navigating ATP?
 - If not, are common principles enough or should QQI be more specific in terms of guidance specific to FET providers, HEIs, for example?

Section 5.2

 Stakeholders are invited to provide their views on the proposed implementation of the new ATP policy, in particular the proposal that approval of ATP procedures be included in part of routine activities such as quality reports and institutional reviews and in the case of providers applying for new or enhanced responsibilities review of ATP procedures may form part of the application process.

Section 5.3

 Stakeholders are invited to express their views about the highlighted impacts and to identify any additional impacts not presented in this green paper which QQI should consider in the development of a new ATP policy.

Section 6

- Stakeholders are invited to provide feedback on the proposed introduction of a new QQI policy on ATP and provide their views on how QQI should plan for the introduction and roll out of a new ATP policy.
- Stakeholders are invited to provide feedback on the inclusion of case studies as part of a new ATP policy.

QQI also invites comment on the Addendum on QQI awards developed outside of the Common Awards System – Implications for CAO scoring and Higher Education Entry Requirements.

ADDENDUM

NEW QQI PROGRAMME DERIVED AWARDS AT NFQ 5 AND 6 – IMPLICATIONS FOR THE COMMON POINTS SCALE AND FOR HIGHER EDUCATION ENTRY REQUIREMENTS

As the national awarding body for further education and training (FET), QQI has maintained the Common Awards System (CAS), developed by FETAC, as the main system for the development of awards at NFQ levels 1-6. CAS is a national system, open to all FET providers to use as the basis for development of programmes which will be certified by a CAS award(s). CAS is a unitised awards system i.e. it comprises *Certificates* (major, special purpose and supplemental awards), each of which is made up of minor awards, also termed *Components*. To achieve a Certificate, a learner must achieve a defined combination of components specific to that certificate. CAS major awards at level 5 and 6 comprise 120 FET credits of learner effort, this typically corresponds to one academic year of full-time education. Learners can achieve a certificate 'all at once' or as an accumulation of units and credit over time and even across providers and programmes.

CAO ROUTE TO HIGHER EDUCATION ENTRY FOR HOLDERS OF QQI AWARDS

The Higher Education Links Scheme (HELS) was developed to provide an agreed basis for central evaluation of CAO applicants holding QQI major awards at level 5 and 6 seeking access to first year of selected higher education programmes. <u>Twenty-five higher education institutions</u> currently offer HELS opportunities based on QQI level 5 and some QQI level 6 awards.

There are two related but distinct elements of the HELS scheme, the Higher Education Institutions Common Points Scale for QQI FE L5/6 QQI awards (the common points scale); and HEI entry requirements for holders of QQI awards.

The common points scale for QQI awards

The <u>common points scale for QQI awards</u> is based on the CAS. The common points scale is calculated based on the grades achieved in the specified required components contributing to a CAS major award at level 5 or 6 together with the weighted credit value of those components. Based on this formula the maximum common points scale that can be achieved by a relevant QQI award is 390.

The CAO has developed detailed guidance for applicants presenting QQI awards and both agencies have collaborated to develop standard operating procedures for the annual CAO common points scale processing and data exchange on behalf of CAO applicants presenting QQI awards.

HEI entry requirements for holders of QQI awards

Pre 2019 Universities, Technological Universities, Institutes of Technology, and private higher education providers offering QQI awards all participate in the HELS. A full list of the HEIs participating in the HELs and their published entry requirements for holders of QQI awards is available <u>here</u>. The basis for the development of a common approach by HEIs and central evaluation by CAO is the availability of central, uniform, consistent & comparable qualification data

which can be related to a HE application. All other qualifications presented for consideration for entry to HE are evaluated manually by the HEIs.

In terms of setting entry requirements for centrally evaluated QQI awards, the CAS structure of QQI awards is widely used. Some higher education programmes in HEI's require achievement of specified grades, named component awards, or additional awards such as mathematics or a language. Certain HE programmes include a portfolio assessment as part of their entry requirements. Participating HEIs indicate whether they require a common points scale result for QQI awards achieved in a single sitting or if they accept awards achieved over more than one sitting. Many HEIs offer places from a reserved quota for QQI award holders, others offer places based on any QQI award in open competition with Leaving Certificate candidates. HEIs use both quota and non-quota routes reserving places for QQI award holders in specific programmes e.g. certain nursing degree programmes.

WHAT HAS CHANGED?

Since 2016 QQI policy has facilitated the development of QQI awards in FET outside of the CAS. This policy change has led to an increase in QQI FET awards that do not conform to CAS specifications and are not designed around the specified achievement of 'component awards'

A recent review⁵⁵ highlighted deficits in CAS awards and recommended the need for reform.

QQI has experienced growing demand for more flexible and responsive approaches to the development of fit for purpose QQI awards. The CAS, as currently designed, is not well suited to responding to the nature and scale of this demand.

QQI awards developed outside the CAS are known as Programme Derived Awards. These awards are developed by sectors, groups of providers or single providers in the process of developing and validating associated programmes. Unlike CAS awards, Programme Derived Awards are not centrally developed by QQI.

QQI has already awarded Programme Derived Awards at levels 5 and 6, and it is likely that the numbers of these award in circulation will increase. At the same time, QQI will continue to deactivate little used and outdated CAS award standards.

With exception of a Programme Derived Award in Early Learning and Care (see below), any new QQI awards, not developed within the CAS are ineligible for the HELS.

The Advanced and Level 5 Certificates in Early Learning and Care are like all other Programme Derived Awards in that they are established through validation of programmes. The minimum intended programme learning outcomes were written to align with the <u>Professional Award Type</u> <u>Descriptor annotated with specific details for Early Learning and Care</u>. This alignment together with a proposed modular design is externally evaluated in a validation exercise and where approved, this results in the creation a new QQI award. New programme derived awards share the same 120 credit value as CAS major awards at levels 5 and 6, they also use the same grading system of pass, merit, and distinction, which applies in the CAS. The key difference is that the new

⁵⁵ outline-action-plan-for-review-and-renewal-of-qqi-common-award-standards.pdf

Early Learning and Care awards are made up of six modules of varying credit volumes, as distinct from eight common 15 credit 'components' or minor awards that are typically specified in CAS major awards.

To accommodate this difference the CAO, the HEIs and QQI worked to agree an adapted the common points scale process for these awards and the HEIs added these new awards to their listings for central clearing. This adapted process built on the <u>existing algorithm for calculating a</u> <u>common points scale</u> result for QQI CAS awards, which was already capable of accommodating awards with varying module credit size within the 120-credit ceiling. QQI and the CAO agreed a process whereby QQI would collect module grades from providers offering the new awards and would calculate a CAO common points scale result for onward transmission to the CAO as it does for all CAS award holders that have indicated their intention to make a CAO application each year. The maximum common points scale result achievable for a programme derived award remains at 390. The summary performance, in CAO terms, of graduates from the Advanced and Level 5 Certificates in Early Learning and Care is outlined in Annex 1.

The common points scale solution for the new Early Learning and Care awards only applies to ETB enrolled learners and not to learners in other providers who have validated programmes based on the same award standard.

It is worth noting that the new Early Learning and Care award offered within the ETBs is effectively a national programme with standardised design, delivery, and assessment. Other programme derived awards may be unique to a single provider and may include provider specific units, subjects and minor awards as part of the overall major award.

	Common Awards System	Programme Derived Awards
Credit	120 FET credits	120 FET credits
Unit structure	Components (minor awards)	Modules (may or may not be accredited as awards in their own right)
Unit Credit Range	5, 10. 15, 30	5, 10, 15, 30
Grading Scheme	Pass (50-64%)	Pass (50-64%)
	Merit (65-79%)	Merit (65-79%)
	Distinction (over 80%)	Distinction (over 80%)
Overall Grade determination	Determined centrally by QQI	Determined by provider
Maximum common	390	390 (based on new Early Learning and
points scale result		Care Award)
Award Standard	Award standards	Award standard determined at
	pre-determined as <u>CAS award</u> <u>specifications</u>	programme validation

A comparison of key features of the Common Awards System and Programme Derived Awards for QQI FET major awards developed at levels 5 and 6.

In the context of progression to HE, the emergence of QQI Provider Derived Awards is likely to have implications for central evaluation and the common points scale and for the specification of subject based higher education entry requirements.

IMPLICATIONS AND PROPOSED WAY FORWARD

Recent changes to the structure and design of QQI major awards at levels 5 and 6 will have implications for progression to higher education. These implications should be identified and managed in the context of the ongoing review of national policy on access, transfer, and progression. Recent programme derived awards in Early Learning and Care (5M21473 and 6M21471) have been centrally evaluated based on an agreed process for calculating a common points scale result for a specified cohort of learners, however the prospect of extending this solution to a wider range of new QQI Programme Derived Awards has not undergone any detailed examination. That kind of engagement is timely to ensure transparent, equitable and efficient mechanisms are in place to support the HE progression opportunities for holders of all QQI major awards at NFQ levels 5 and 6.

Proposed questions for engagement with key system actors:

- 1. What specific issues/challenges do QQI programme derived awards present for central evaluation and for setting subject specific entry requirements to HE?
- 2. What options are available for supporting systematic progression pathways from QQI programme derived awards to first year entry in HEIs?
- 3. What are the pros and cons of the available options identified in Q2?
- 4. Which option/s are considered to most effectively address identified issues/challenges?
- 5. How will agreed solutions be implemented, monitored and evaluated?

ANNEX 1

Graduation and CAO performance data since 2022 for Early Learning and Care (5M21473 and 6M21471)

Of 1,959 graduates, 86% made a CAO application. The average common points scale score was 347 compared to the average common points scale score for all QQI major awards at NFQ 5 and NFQ 6 during the same period of 269.

39% of 5M21473 graduates received the maximum common points scale score of 390. 64% of 6M21471 graduates received the maximum common points scale score of 390.



Co-funded by the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them.