



QQI

Dearbhú Cáilíochta agus Cáilíochtaí Éireann
Quality and Qualifications Ireland

QQI Submission to the Commission for Energy Regulation

November 2014

Submission Details

This submission relates to the following proposed decision papers:

1. Regulation of the Gas Installer Industry with respect to Safety from 2016
2. Regulation of Electrical Contractors with respect to Safety from 2016

Throughout the submission, the decision papers will be referred to as RGI and REC, respectively.

Following a brief introduction to QQI and a summary of the main points of concern raised in this submission, the content is organised in three parts:

- A. The need for occupational standards
- B. Technical issues associated with references to QQI awards
- C. Background information on QQI

Introduction

QQI is a state agency under the aegis of the Department of Education and Skills. It was established in November 2012. QQI has a broad remit across education and training in Ireland. Of particular significance for this consultation is the legislative basis for QQI's engagement with professional recognition bodies provided by the Qualifications and Quality Assurance (Education and Training) Act 2012. QQI is also an awarding body and sets standards (indicators of an individual's knowledge, skill and competence) for learning achievement for QQI's own awards and those made by providers to whom we have delegated authority. More significantly, QQI welcomes the opportunity to work with professional recognition and regulatory bodies in aligning their occupational standards to our academic standards.

It should be noted that QQI has moved from a state of amalgamation to an agency which is structurally very different to its predecessors and which is operating under new policy arrangements (with much additional policy in development). In the context of a rapidly changing education and training sector, the means by which QQI will liaise with its stakeholders is thus impacted.

Main Points in Submission

- QQI awards specified in RGI (Domestic Gas Safety (6U16018) and Gas Safety Domestic (6N16017)) and the academic standards underpinning them are not associated with any specific occupational standard. Indeed, these awards are subject to change and cannot be used as a proxy for occupational standards by CER. Occupational standards for both RGI and REC are required and could be usefully included in CER's respective criteria documents.
- The apprenticeship system is currently under review. QQI, in conjunction with SOLAS is exploring the possibility of regulating craft awards standards in a more general way through NFQ Award-type Descriptors. Draft awards currently being consulted on include electrical and plumbing.¹ <http://www.qqi.ie/Pages/Current-consultations.aspx>
- The education and training system in Ireland is undergoing rapid change. In this context, QQI launched a Comprehensive Policy Development Programme in 2013 and QQI's Strategy Statement covering the period 2014-2016 was published in November 2013. This first Strategy Statement represents an important communication for QQI as it provides direction and guidance for staff and stakeholders on our mission, vision, values and goals and how we intend to achieve them. It will inform the development of annual successive corporate plans.

A. The need for occupational standards

We understand that the establishment and maintenance of criteria for registering Gas Installers and Electrical Contractors is ultimately CER's responsibility. We consider that such criteria must necessarily include minimum competence requirements for

¹ Please see <http://www.qqi.ie/Pages/Current-consultations.aspx>

registration. Currently the competence requirements are not explicitly stated by CER but rather are expressed through educational awards standards maintained by QQI. QQI is not satisfied with this arrangement. Explicit occupational standards for Registered Gas Installers and Registered Electrical Contractors must be established and maintained by CER. Educational standards including QQI's must be able to rely on current and detailed occupational standards. As noted earlier, a number of apprenticeships relevant to the work of CER are currently under review.

B. Technical issues associated with references to QQI awards

A number of technical issues associated with reference to QQI awards are highlighted below for consideration. As this submission was prepared on the eve of the consultation deadline, it should be noted that the document requires systematic review by QQI as there may be additional technical issues to be resolved.

- The Advanced Certificate is a major award-type at Level 6 on the NFQ. In terms of the relevant craft qualifications, the correct nomenclature is the 'Advanced Certificate – Craft'. QQI is the current relevant awarding body here.
- In section 5.3.1 (RGI), the document states the importance of gaining “recognition” from QQI for relevant gas related courses. CER should clarify what recognition in this instance means given that CER “intends that the acceptance of courses which are not accredited by FETAC will be phased out” (p31). Please note that QQI is only one of a number of possible awarding bodies in terms of academic qualifications. This proposed decision suggests that CER believes that an academic qualification is required. CER might like to explore the possibility that individuals wishing to register with other professional courses and qualifications from abroad may already have the skills required. The responsibility for such an assessment lies with CER as the regulator as indicated on p41 (Criteria Document).
- In terms of the requirement for the Advanced Certificate – Craft (RGI) on p35, the absence of ‘or equivalent’ suggests that relevant qualifications from abroad are not

going to be considered. It is assumed that foreign qualifications do need to be considered with the responsibility for assessment of suitability lying with CER as the regulator.

- Section 6.2.1 (RGI) refers to the “advanced craft certificate in Gas Fitting”. The QQI specification for the new Domestic Gas Safety refers to Pipe Fitting. Are these referring to the same award?
- Section 5.3.1 (REC) refers to the legacy award title of National Craft Certificate. While reference may be made to this award, the current award as indicated earlier is the ‘Advanced Certificate – Craft’.
- The reference to “another suitable electrical award” in section 5.3.1 (REC p32) requires clarity. Should this be a major award? Who will establish such suitability?

C. Background information on QQI

QQI was established by an amalgamation of four bodies: the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the National Qualifications Authority of Ireland (NQAI) and the Irish Universities Quality Board (IUQB). As indicated earlier, the agency has a broad role across the education and training sector. It has a key role in the qualifications system through its custodianship of the National Framework of Qualifications (NFQ). Its work concerns learners in diverse settings - schools, adult education, English language schools, vocational training and higher education and training; providers of further and higher education and training; Government departments, State agencies and funding bodies; regulatory bodies; professional bodies; qualifications awarding bodies; sectoral and representative bodies and international bodies responsible for quality assurance and qualifications.

Also of interest for this consultation is QQI’s role in facilitating the academic recognition of foreign qualifications through its Qualifications Recognition Advice Service. This service provides a range of functions and activities that are designed to improve the recognition in Ireland of qualifications gained outside of the State and that of Irish qualifications abroad. More specifically, the service provides advice on the general academic recognition of foreign

qualifications in Ireland with final recognition decisions for the purposes of accessing continuing education and/or employment resting with education institutions, professional recognition bodies and potential employers. QQI also advises interested parties on use of the NFQ for specific purposes, for example in recruitment and the allocation of grants for continuing education and training.

QQI acknowledges the benefits of increased collaboration with professional recognition and regulatory bodies in preparing individuals for employment in regulated sectors in Ireland.

Further information on the work of QQI can be accessed at www.QQI.ie

Concluding Comments

The QQI Executive welcomes this opportunity to provide an input into CER's respective proposed decision papers relating to the regulation of Gas Installers and Electrical Contractors. We look forward to liaising further with the CER in the coming period with the expectation that the CER examine carefully the impact for the relevant industries of the changing landscape for education and training provision.

ENDS