



JOINT SELECT COMMITTEE ON
LOCAL AUTHORITIES, SERVICE COMMISSIONS
AND STATUTORY AUTHORITIES
(INCLUDING THE THA)

16th Report

on an

**Inquiry into the Efficiency and Effectiveness of the
Accreditation Council of Trinidad and Tobago (ACTT)**

Fifth Session (2019/2020), 11th Parliament

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Of the

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Accreditation Council of Trinidad and Tobago (ACTT)**

Fifth Session (2019/2020), Eleventh Parliament

HOR PAPER NO:

SENATE PAPER NO.:

PARL NO:

Ordered To Be Printed

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ACRONYMS AND ABBREVIATIONS

ABBREVIATION	MEANING
ACTT	Accreditation Council of Trinidad and Tobago
EQAA	External Quality Assurance Agencies
GATE	Government Assistance for Tuition Expenses Programme
MOE	Ministry of Education
NTA	National Training Agency
SAM	School of Accounting and Management Limited
SBCS	School of Business and Computer Studies
TVET	Technical and Vocational Education and Training
UWI	University of the West Indies

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EXECUTIVE SUMMARY

1.1. At its thirty-fourth meeting held on September 25 2019, the Committee resolved to inquire into the Efficiency and Effectiveness of the Accreditation Council of Trinidad and Tobago (ACTT) and agreed that the following three (3) objectives would guide the inquiry:

- 1. To evaluate the efficiency and effectiveness of the ACTT in executing its mandate;**
- 2. To determine whether the resources, systems and procedures of the ACTT are sufficient to allow it to operate efficiently; and**
- 3. To evaluate the performance of ACTT in assuring quality in the delivery of tertiary and post-secondary education by local schools affiliated with foreign institutions.**

1.2. To this end, the Committee obtained oral and written evidence from the ACTT, the Ministry of Education and affiliated tertiary institutions. Some of the major issues which were highlighted/identified during the course of the inquiry included:

- i. Registration with the ACTT is mandatory for local post-secondary or tertiary educational institutions. It gives the institutions the legal authority to operate.**
- ii. Foreign institutions providing education programmes in partnership with local institutions must apply for recognition. Recognition indicates that both institutions have the capacity to deliver the programme locally.**
- iii. Accreditation is a higher measure of educational quality that requires an institution to undergo a rigorous evaluation process over two to three years;**
- iv. Accreditation is a voluntary process and approximately fourteen (14) local institutions have been accredited.**
- v. Pre-requisites for accreditation include: having registration status for three years, providing locally developed, approved programmes and one cohort of students that graduated from the programmes;**
- vi. There are some institutions that have withdrawn from the accreditation and/or registration process due to various circumstance including an inability to satisfy registration requirements.**
- vii. It is illegal for unregistered institutions to offer post-secondary/tertiary qualifications. If found liable for such a breach, an institution may be subject to an**

initial fine of \$25,000, followed by \$5,000 for every day the institution continues to operate.

- viii. Accreditation has educational and employment benefits since it allows local qualifications to be internationally recognized.
- ix. The ACTT's membership in international quality assurance networks allows for mutual acceptance of accredited qualifications earned in any of the member countries.
- x. Consideration is being given to the accreditation of online programmes, professional development courses and continuing education courses.
- xi. The ACTT regulates institutions offering programmes at level 3 (certificate, diploma and higher qualifications), while the National Training Agency (NTA) regulates level 1 and 2 programmes (below the certification level).
- xii. Of the 145 non-registered institutions identified by the ACTT, 115 are not within the purview of the ACTT but are regulated by the NTA.
- xiii. The ACTT monitors the activities of institutions before, during and after registration/accreditation status is awarded. Information is gathered from official documents submitted by the institutions, newspaper reports and feedback from the public.
- xiv. Resource constraints have hindered the filling of 20 vacancies within the ACTT.
- xv. During the past three years, 30 complaints from students were submitted to the ACTT. Thirteen (13) complaints were received within the last year.
- xvi. Statutory approvals and health and safety provisions are generally required for registration. However, an "alternative" option allows institutions to provide "evidence requirements to meet the standards.

1.3. Based on the evidence received and the conclusion derived from such evidence, the Committee has proffered recommendations which it believes will appropriately address the issues highlighted. A summary of these recommendations follow this Executive Summary.

1.4. We anticipate that the Parliament, ACTT and the Ministry of Education would give due consideration to the findings and recommendations contained in this Report with a view to making the ACTT a more efficient and effective organization that will invariably result in a

more progressive and efficient tertiary education sector. The Committee looks forward to reviewing the Council's and the MOE's response to this Report, which becomes due, sixty (60) days after it is presented to the Houses of Parliament.

SUMMARY OF RECOMMENDATIONS

The following is a consolidated list of recommendations proposed by the Committee:

- i. ACTT should develop a public education campaign that clearly communicates the following:
 - a. the benefits of Registration and Accreditation to both institutions and students;
 - b. that any local institution seeking to deliver/administer post-secondary or tertiary level programmes MUST prove that they are ACTT registered and encourage students to request such proof;
 - c. the minimum infrastructural, Health and Safety standards.
- ii. The ACTT should incorporate the registration and accreditation of online education / programmes into its strategic plan and mandate.
- iii. The ACTT and NTA should establish and publish a clear division of responsibilities with regard to institutions that fall under their purview.
- iv. The ACTT should conduct a comprehensive audit of the post-secondary education sector to investigate institutions' registration status.
- v. Urgent consideration should be given to establishing a tier or ranking system for post-secondary and tertiary institutions under the remit of the ACTT.
- vi. The ACTT's capacity to effectively monitor and oversee the institutions under its remit can be enhanced through the creation of an internet-based portal/share point programme that can be accessed by all institutions for the purpose of *inter alia* submitting documents, material and other reporting stipulations via the internet.
- vii. That the Ministry of Education, adopt the necessary contingency strategies to avoid lengthy delays in the appointment of Members of the ACTT's Board.
- viii. The complaints procedure needs to be clearly communicated to all students.

- ix. The introduction of a more robust system of continuous assessment of institutions who have demonstrated a propensity to have challenges in meeting health and safety requirement.
- x. As a regulator, the actions of the ACTT should aim to fortify and reiterate the stipulations of other State regulatory bodies such as the OSH Agency/Authority.
- xi. An electronic records management system is needed to keep track of all applications and the requisite staff to monitor and review accordingly.
- xii. While self-review is an acceptable form of performance management, the Ministry of Education must ensure that stakeholder feedback is included in the evaluation of the ACTT's performance.
- xiii. The ACTT should engage its affiliate institutions in a consultative process to improve ACTT's processes and procedures.
- xiv. The ACTT should seek to minimize duplicated requests for documentation and evidence required of clients seeking continuing registration. This approach to reduce the apparent administrative burden of applicants/clients should not compromise the ACTT's due diligence processes and procedures.
- xv. In lieu of site visits to the country of origin the Committee recommends the continued and expanded use of video-conferencing technologies to meet with officials of foreign-based institutions (headquartered overseas) pursuant to its assessment of affiliated institutions operating locally.
- xvi. Guidelines for recognition of overseas programmes should be clearly stated.
- xvii. The ACTT should conduct a tracer survey to evaluate the level of employability/performance of graduates from overseas affiliated institutions in comparison to graduates from locally based institutions/ programmes.

INTRODUCTION

Background⁴

Regulatory Framework

- 2.1. The Accreditation Council of Trinidad and Tobago (ACTT) is a statutory body established by ACTT Act Chapter 39:06⁵ as the principal body in Trinidad and Tobago responsible for the quality assurance of post-secondary and tertiary level institutions, programmes and awards. The Act creating the Council was proclaimed in 2004, and the organisation was launched in November 2005. The Council currently operates three (3) offices. Its head office is located in Port of Spain, with sub offices in San Fernando and Tobago⁶.

Appointment of the Board of the ACTT

- 2.2. Section 4 of the Act provides for the appointment of the **Board of Directors of the Council consisting of 10 to 13 members** appointed by the President. These members are to include:
- a) two or three persons nominated by tertiary, or technical vocational institutions, including a nominee of the association most representative of tertiary education institutions in Trinidad and Tobago;
 - b) two persons with expertise in accreditation and quality assurance at the tertiary level;
 - c) one or two persons nominated by professional associations involved in the discipline of education;
 - d) one person nominated by the Ministry;
 - e) one person nominated by the organizations most representative of employers and one person nominated by the organizations most representative of trade unions;
 - f) two representatives of the general public; and
 - g) the Executive Director, who shall be an *ex officio* member of the Council.

⁴ <http://mbtt.org/index.htm>

⁵ http://rgd.legalaffairs.gov.tt/Laws2/Alphabetical_List/lawspdfs/39.06.pdf

⁶ <https://www.actt.org.tt/index.php/about-actt>

- 2.3. In addition to the **Executive Director**, the President may appoint a **Chairman and Deputy Chairman**. Except as provided in Section 5(3)⁷ and 13(2)⁸, every member of the Council shall hold office for a maximum term of three years, but is eligible to be re-appointed. Additionally, Council members are to be paid remuneration and allowances as approved by the Minister of Education⁹. The Council, however, is empowered to determine the remuneration, allowances and terms and conditions for the Secretary and other staff (Section 14[2]).¹⁰

Functions of the Council

- 2.4. Section 8(2) of the Act outlines 24 functions of the ACTT related to accreditation and regulation of the local tertiary education institutions and recognition of foreign institutions. The ACTT's website¹¹ outlines 6 of its main functions as follows:
- i. **Conferment of institutional title;**
 - ii. **Registration of higher education institutions¹²;**
 - iii. **Accreditation of higher education institutions and programmes¹³;**
 - iv. **Recognition of foreign qualifications and awarding bodies¹⁴;**
 - v. **Programme Approval; and**
 - vi. **Quality enhancement.**
- 2.5. Other selected sub-functions of the Council include (Section 8[2]):
- To maintain a list of accredited post-secondary and tertiary institutions, programmes and awards offered in Trinidad and Tobago¹⁵;

⁷ Resignation from the Council.

⁸ The Executive Director may hold office for a maximum term of five years.

⁹ Notwithstanding this provision, salaries for the Secretary and other staff in excess of \$120,000 per annum must be approved by the Minister. This limit may be increased by an Order of the Minister.

¹⁰ A list of departments and staff of the ACTT is available on its website: <http://actt.org.tt/index.php/about-actt/the-team>

¹¹ <http://actt.org.tt/index.php/about-actt>

¹² "Register" means to confer legal authority to operate a post secondary or tertiary level institution in accordance with established standards and criteria.

¹³ "Accredit" means to evaluate and determine whether a registered institution, its programmes or awards meet established standards and "accreditation" shall be construed accordingly. Details of the accreditation criteria are available on the ACTT's website: <http://actt.org.tt/index.php/services/accreditation/criteria-for-accreditation>

¹⁴ "Recognize" means to evaluate and approve the quality of foreign awards.

¹⁵ A list of 14 accredited institutions is available on the ACTT website: <http://www.actt.org.tt/index.php/services/accreditation/list-of-accredited-institutions>

- To ensure that the appropriate standards set by the Council are being maintained and improved;
- To protect the interests of students and other stakeholders;
- To undertake audits, reviews and evaluations independently, or in co-operation with other bodies as the Council may consider necessary; and
- To withdraw or cancel approval, recognition or title granted to or conferred on any institution or provider for good and sufficient cause, after evaluation by the Council.

Appeals Committee

- 2.6. Section 11 of the Act establishes an **Appeals Committee** comprised of three persons approved by the President. This Committee is responsible for conducting hearings based on appeals against Council's decisions that relate to assessments, accreditation and recognition of institutions and programmes. The decisions of this Committee are final and the Committee is empowered to make rules relevant to its functions, with the approval of the line Minister.

Accountability Structures

- 2.7. Section 22 of the Act indicates that the Council's financial accounts must be audited annually by the Auditor General, and a copy of these audited accounts along with an annual report is submitted to the line Minister. The most recent Administrative Reports were laid in Parliament for the fiscal years 2012-2013, 2013-2014, 2014-2015 and 2016-2017¹⁶. Auditor General Reports were available for the years 2008 and 2009. Annual Reports for the years 2005 and 2006 are available on the ACTT's website.¹⁷

Conduct of the Inquiry

- 2.8. Two public hearings were held with the relevant stakeholder organisations at which time the Committee interviewed the representatives on issues relevant to the inquiry objectives. At these public hearings, the organisations represented were as follows:

¹⁶ Laid in the Senate ON 23.06.20 and in the House of Representatives on 26.06.20

¹⁷ <http://www.actt.org.tt/index.php/media-centre/publications>

First Public Hearing- 22nd November 2019

- i. Ministry of Education (MOE)
- ii. The Accreditation Council of Trinidad and Tobago (ACTT)

Second Public Hearing - Friday February 28th 2020

- i. The Accreditation Council of Trinidad and Tobago (ACTT)
- ii. Omardeen School of Accountancy Ltd.
- iii. Professional Institute of Marketing and Business Studies Ltd. (PIMBS)
- iv. University of the West Indies (UWI), St. Augustine Campus
- v. School of Accounting and Management (SAM Caribbean Limited)
- vi. School of Business and Computer Science (SBCS)

- 2.9. The Minutes and Verbatim Notes relevant to the Committee's public hearing with the MOE, ACTT, Omardeen School of Accountancy Ltd., PIMBS, SAM Caribbean Ltd. and SBCS are attached as Appendices II-V.

Summary of Evidence Together with Findings and Recommendations

Objective 1: To evaluate the efficiency and effectiveness of the ACTT in executing its mandate

Registration, Accreditation and Recognition

Matters related to the execution of the ACTT's Mandate

3.1.1. The Core responsibilities of the Accreditation Council of Trinidad and Tobago's (ACTT) are outlined in Section 8(2) of the Act and includes *inter alia* the services of **registration, programme approval and accreditation**. These services require a series of steps for completion¹⁸.

3.1.2. **Registration with the ACTT is mandatory for local post-secondary or tertiary educational institutions**. It gives the institutions the legal authority to operate.

The three of the nine steps involved in **registration** include:

- 1) The submission of a letter of intent to ACTT by the applicant;
- 2) An Institutional Data Form (IDF) is sent to the applicant;
- 3) If the institution / provider wants to be registered with the protected titles, ACTT's approval is required is if was established after the proclamation of the ACTT Act on July 08, 2004;
- 4) Once all relevant application documents are submitted a letter of acknowledgement is sent from the ACTT;
- 5) The applicant is then required to submit an application with an application processing fee;
- 6) Site visit by ACTT's External Evaluators;
- 7) Once granted registration status, a certification fee is paid;
- If denied the institution must wait one year before reapplying;

¹⁸ ACTT Submission, November 15, 2019, pages 14-19

- 8) The Institution is required to enter into the General Conditions of Registration of Post-Secondary and Tertiary Institutions and Trademark Licence Agreement.
- 9) ACTT publishes the institution's accredited status in at least two local daily Newspapers at the expense of the institution.

3.1.3. During the November 22, 2019 hearing, the Committee was advised that approved programmes offered by an accredited institution are also subsumed under the accreditation status. However, the ACTT later stated that it does not currently accredit individual programmes, only institutions. Institutions that are already accredited by the ACTT are able to receive approval for individual programmes.

3.1.4. The two (2) steps for **programme approval (accredited institutions)** are:

- 1) Institution submits evidence of the approval of the programme employing its internal mechanism and structures.
- 2) ACTT reviews the evidence to verify whether the institution's internal programme approval mechanisms were employed.

3.1.5. **Registered institutions** can also apply for the approval of their programmes by the ACTT. This process evaluates the quality of the programmes against set standards. Some of the main steps involved in this ten (10) step process for **programme approval include:**

- 1) Applicant submits a letter of intent to ACTT;
- 2) External Evaluator conducts evaluation of programme and submits draft report to ACTT of the institution's satisfaction of the criteria along with a recommendation on the status to be awarded; and
- 3) The ACTT Board of Directors makes decision on status to be awarded.

3.1.6. The ACTT website¹⁹ also lists **36 post-secondary and tertiary level institutions** which are registered with the organization. A list is also provided of the 19 institutions with expired

¹⁹ Accessed on June 15 2020

registration status, 10 whose continuing registration is pending (awaiting evaluation or approval), and one new applicant for initial registration.

3.1.7. The combined cost of registration, evaluation and certification can range from \$10,000 to \$15,000 or higher. Comparatively, these fees are only 5-25% of the international average. The ACTT has been working to get unregistered institutions registered through direct engagement. In accordance with Section 26 of the ACTT Act, it is illegal for unregistered institutions to offer post-secondary/tertiary qualifications. They would be subject to an initial fine of \$25,000, followed by \$5,000 for every day the institution continues to operate.

3.1.8. Only programmes accredited by ACTT are eligible for GATE funding. Technical and Vocational Education and Training (TVET) programmes for Level III and above may receive GATE funding. The MoE conducts a further evaluation on eligible programmes before approving them for GATE funding.

3.1.9. In a November 15, 2019 submission, the ACTT indicated that of the twelve (12) GATE Standing Committee members, there is one (1) representative from the ACTT²⁰. The role of the Standing Committee includes the following:

- 1) Reviewing applications for GATE funding of new programmes made by institutions;
- 2) Making recommendations to the Ministry of Education;
- 3) Recommending the discontinuation of funding for any programme or institution;
- 4) Recommend adjustment of tuition for any programme based on supported research.

3.1.10. Of the 145 non-registered institutions identified by the ACTT, 115 are not within the purview of the ACTT but are regulated by the National Training Agency (NTA). The NTA, in its December 23, 2019 submission noted that the ACTT Act gives the legal authority for the registration of all post-secondary educational institutions solely to the ACTT. **The ACTT regulates institutions offering programmes at level 3 (certificate,**

²⁰ ACTT Submission, November 15, 2019, page 43

diploma and higher qualifications), while the NTA regulates level 1 and 2 programmes (below the certification level).

3.1.11. In light of the NTA's mandate, the Agency established a process of Centre Approval for Technical and Vocational Education and Training (TVET) institutions desirous of awarding the Trinidad and Tobago National Vocational Qualification or the Caribbean Vocational Qualification (TTNVQ/CVQ). The decision to place TVET institutions under the remit of the NTA was taken by Cabinet. However, in recognition of the potential overlap by some training and educational institutions, the ACTT and the NTA entered into a Memorandum of Agreement on September 4th, 2015 to co-operate and facilitate best practices throughout the quality assurance system governing education and training in Trinidad and Tobago.

3.1.12. **Accreditation** is a higher measure of educational quality that requires an institution to undergo a rigorous evaluation process over two to three years. Some of the main steps involved in the accreditation process include:

- 1) Institution submits letter of intent to ACTT;
- 2) Pre-candidacy interview conducted by panel appointed from ACTT senior staff;
- 3) Institution prepares and submits its self-study plan for Institutional Accreditation, which is reviewed by ACTT and feedback is given for improvement;
- 4) Institution undergoes an external evaluation (site visit) by a team of External Evaluators assigned by the ACTT;
- 5) Evaluation team prepares preliminary report;
- 6) Accreditation Review Committee (ARC) reviews Evaluation Team's Report, considers their recommendation and forwards recommendation on status to be awarded to the ACTT Board;
- 7) The Board can make the decision to either extend an institutions candidacy, award accreditation status or deny accreditation;
- 8) If accreditation is awarded, ACTT publishes the institution's status in at least two (2) daily newspapers circulating in Trinidad and Tobago.

3.1.13. It was also submitted that the pre-requisites for accreditation include: having registration status for three years, providing locally developed, approved programmes and one cohort of students that graduated from the programmes.

3.1.14. Accreditation is a voluntary process and fourteen (14) local institutions have been accredited. These institutions are:²¹

- 1) Arthur Lok Jack Global School of Business (ALJGSB);
- 2) Cipriani College of Labour and Co-operative Studies (CCLCS);
- 3) Caribbean Nazarene College (CNC);
- 4) College of Science, Technology & Applied Arts of Trinidad and Tobago (COSTAATT);
- 5) MIC Institute of Technology;
- 6) National Energy Skills Center (NESC);
- 7) St. Andrew's Theological College (SATC);
- 8) Tobago Hospitality and Tourism Institute (THTI);
- 9) Trinidad and Tobago Hospitality and Tourism Institute (TTHTI);
- 10) The University of Trinidad and Tobago (UTT);
- 11) The University of the West Indies (UWI), St Augustine Campus;
- 12) University of the Southern Caribbean (USC);
- 13) UWI School of Business and Applied Studies Limited (UWI-ROYTEC);
- 14) West Indies School of Theology (WIST).

3.1.15. The ACTT educates the public on its **Statement on Recognition** service. This Statement indicates whether a programme is locally recognized and/or accredited. In its November 15, 2019 submission, the ACTT indicated that **4,510 statements on recognition** in relation to qualifications granted by foreign awarding institutions or bodies were issued between October 2014 and September 2019.

²¹ <http://www.actt.org.tt/index.php/services/accreditation/list-of-accredited-institutions>

Monitoring and Oversight Arrangements

3.1.16. The ACTT advised that it monitors the activities of institutions before, during and after registration/accreditation status is awarded. Information is gathered from official documents submitted by the institutions, newspaper reports and feedback from the public²². Monitoring is also conducted through site visits and mid-term reviews to assess the progress or gaps in the institution performance compared to set standards. In its November 15, 2019 submission, the ACTT indicated that the monitoring measures outlined are consistent with quality assurance and monitoring policies and practices of international External Quality Assurance Agencies (EQAAs). Reports required include Annual Reports, Progress Reports, Monitoring Reports, Contingency Reports and Quality Enhancement Visit Reports. ACTT's Legal Unit also investigates complaints and queries from members of the public.

3.1.17. At the November 11, 2019 public hearing the Committee also learnt that consideration is being given by the ACTT to the accreditation of **online programmes**, professional development courses and continuing education courses.

3.1.18. In the November 11, 2019 hearing, the ACTT acknowledged that some institutions that have withdrawn from the accreditation and/or registration process. Within the five-year period (2014-2019), 17 institutions withdrew from the registration process, none were suspended and 4 were denied registered status.²³ Reasons cited for withdrawal included prohibitive fees and institutions determining that the process was too rigorous and they did not have the necessary systems and resources in place to continue²⁴.

Governance and Strategic Planning

3.1.19. During the public hearing held on February 28, 2020, the Committee learnt that within the past five (5) years, ACTT did not have a Board for a period of two-and-a-half (2 ½)

²² ACTT Submission, November 15, 2019, pages 28-29

²³ ACTT Submission, November 15, 2019, page 40

²⁴ Verbatim Notes, November 22, 2019 hearing, page 24

years.²⁵ Delays in the appointment of members to the Board of the ACTT were due to bureaucratic issues within the Ministry of Education. However, during its appearance before the Committee, the Ministry confirmed that the Board of the ACTT is currently fully constituted.

3.1.20. During the February 28, 2020 hearing, the Committee learnt that the absence of ACTT's board had a negative effect on several institutions. For example, the School of Accounting and Management, Caribbean Limited (SAM) noted that they were unable to receive their registration certificate. Given that attending a registered institution is required for employees' tuition to be paid by their employers, which led to employers not paying for their employees to attend courses at the institution and subsequent loss of revenue for SAM.²⁶

3.1.21. Similarly the Professional Institute of Marketing and Business Studies Ltd. (PIMBS) indicated that the absence of ACTT's board delayed their registration certificate, which meant that they were unable to engage students during that period²⁷.

External Affiliations

3.1.22. The ACTT entered into a MoU with the Quality Assurance for Higher Education (UK). The benefits of this MoU include recognition of decisions related to quality assurance, access to information on best practices in quality assurance in higher education, availability of resource persons who can serve as external evaluators, access to expert training, networking and collaboration opportunities.

3.1.23. The ACTT benchmarks with the following international Accreditation bodies²⁸:

1. Quality Assurance Agency for Higher Education in the UK,;
2. the Higher Learning Commission in the United States and;
3. Southern Accrediting Agency in the United States.

²⁵ *Ibid.*, pages 33-34

²⁶ *Ibid.*, page 65

²⁷ *Ibid.*, page 32

²⁸ Verbatim Notes, February 28, 2020 Hearing, page 21.

Findings

Based on the evidence set out in this section, the Committee concluded the following:

- i. The lengthy delay in the appointment of members of the Board of the ACTT board has significantly impeded the service delivery of institutions requiring board approval.
- ii. The benefits of accreditation are not clearly articulated or communicated and there is little incentive or motivation for institutions to become accredited. The high fees and rigorous process required for accreditation is a significant deterrent to institutions becoming accredited. ACTT therefore needs identify options to both encourage institutions to become accredited and mitigate against withdrawal from the process.
- iii. Some institutions have lamented that no distinction is made between small, medium or large institutions with regard to payment of fees to ACTT.
- iv. Given the increasing relevance of online education, the ACTT must seriously consider incorporating the registration and accreditation of online programmes into its mandate.
- v. There is a need to rectify areas of overlap between the mandate of the ACTT and the NTA.
- vi. There is a need to further investigate whether there are educational institutions that are not registered with either the ACTT or National Training Agency (NTA) and are therefore liable to penalties.
- vii. Some ambiguity was detected with regard to the interpretation and application of the ACTT's rules, policies and guidelines related to the registration process. In this regard, the Committee suggests that more certainty and predictability must be established. This may be achieved through the enactment of Regulations as is prescribed by Section 27 of the Act. The Committee was extremely concerned that after 15 years in existence the ACTT and the Ministry of Education had not formulated and submitted such regulations for the approval of the Parliament.

- viii. Based on its written submission it appears that the ACTT has developed a robust oversight and reporting system for the purpose of monitoring the level of compliance by the institutions under its remit. Whether the ACTT is currently executing ongoing monitoring in an effective manner will require a more in-depth examination.

Recommendations

1. ACTT should develop a public education campaign that clearly communicates the following:
 - a. the benefits of Registration and Accreditation to both institutions and students;
 - b. that any local institution seeking to deliver/administer post-secondary or tertiary level programmes MUST prove that they are ACTT registered and encourage students to request such proof;
 - c. the minimum infrastructural, Health and Safety standards clients/students should expect from post-secondary or tertiary institutions.

The methodologies used to deliver this campaign can include: brochures, manuals, short videos features among other forms of media. This recommendation should be executed within 4 months of the presentation of this report.

2. The ACTT should incorporate the registration and accreditation of online education / programmes into its strategic plan and mandate. Subject to the execution of the necessary stakeholder consultations, this recommendation should be executed within 8 months of the presentation of this report.
3. The ACTT and NTA should establish and publish a clear division of responsibilities with regard to institutions that fall under their purview. This recommendation should be executed within 3 months of the presentation of this report.

4. The ACTT should conduct a comprehensive audit of the post-secondary education sector to investigate institutions' registration status. This recommendation should be executed within 6 months of the presentation of this report.
5. Urgent consideration should be given to establishing a tier or ranking system for post-secondary and tertiary institutions under the remit of the ACTT. The criteria for such ranking may include:
 - a. Number of students enrolled;
 - b. Number and type of programmes offered;
 - c. Number of class rooms and or locations.
6. The ACTT's capacity to effectively monitor and oversee the institutions under its remit can be enhanced through the creation of an internet-based portal/share point programme that can be accessed by all institutions for the purpose of *inter alia* submitting documents, material and other reporting stipulations via the internet. The necessary cyber security features can be developed in consultation with iGovTT.
7. That the Ministry of Education, adopt the necessary contingency strategies to avoid lengthy delays in the appointment of Members of the ACTT's Board. To this end, consideration should be given to establishing a roster of experts/technocrats who are willing to serve on the ACTT's Board.
8. The ACTT should proceed with its proposal to introduce public affirmations as a method of soliciting concerns or complaints from the public about educational institutions.
9. That the Ministerial Response to this report must contain a status update on the following:
 - i. preparation of the ACTT's strategic Plan for the period 2020-2025;
 - ii. the formulation of recommendations for legislative changes to the ACTT Act and the submission of said recommendations to the MoE.

Objective 2: To determine whether the resources, systems and procedures of the ACTT are sufficient to allow it to operate efficiently.

Human Resources, Training and Development

- 3.2.1. As at October 2019, 42 persons were employed with the ACTT. In the ACTT's November 15, 2019 submission, it was reported that the organisation's staff complement was not adequate for the effect delivery of the organisation's mandate²⁹. It was reported that there were 20 vacancies within the organisation. Resource constraints have hindered the filling of 20 internal vacancies. The approved organisational chart has a complement of sixty-four (64) staff positions (**Please see Appendix VI**).
- 3.2.2. In its submission dated November 15 2019, the ACTT reported that thirty-five (35) of those positions are filled and the responsibilities associated with another eight (8) positions are being executed by persons in the form of extra duties.
- 3.2.3. ACTT has engaged On-the-Job Trainees to provide support in critical areas as reflected on the Organisational Chart and the Annual Operational Plan for ACTT. ACTT has a complement of nine (9) OJTs who perform duties at various levels. The organisation is mapping its workflows, re-aligning its positions, duties and responsibilities in keeping with the proposed strategic direction of ACTT, and benchmarking with national public service and international accrediting organisations.
- 3.2.4. The ACTT outlined the areas in which staff received training for the period 2008-2019. These training interventions included: Financial Management, Effective Report Writing, Quality Assurance, Process Mapping and Project Management.³⁰
- 3.2.5. ACTT does not at this time provide outsourced staff development/training workshops due to financial constraints. However, it was reported that qualified staff do provide

²⁹ ACTT November 15, 2019 submission, pages 66-67

³⁰ *Ibid*, page 70

relevant training to employees in the organisation. Further in order to mitigate costs training has been limited to local and online workshops/conferences only. Some staff were trained in areas that the Council would usually outsource with the aim of developing the skills internally.

3.2.6. Based on the impetus of the Executive Director, the ACTT has developed a staff training plan for the period July 2019 to March 2020. A series entitled 'Rebuilding Workplace Culture' was introduced by the newly installed Executive Director to focus the organisation on its core values. Staff have been exposed to the following:

- i) Workplace Forgiveness and Reconciliation;
- ii) Integrity and Ethics in the Workplace;
- iii) Financial Literacy; and
- iv) Conflict Resolution.

3.2.7. Over the period 2014-2019, the ACTT hired 7 consultants for the provision of 9 different services. Costs ranged from TT \$3,500 to TT\$ 56,250. Some of the benefits of these consultancies outlined by the ACTT included provision of expertise in credit rating, credential and CV fraud, recruitment of an Executive Director and learning how to prevent unwanted litigation³¹.

Financial Resources

3.2.8. Details of the Recurrent Expenditure of the Accreditation Council for the period 2016 - 2019 are outlined in Table 1 below:

Table 1: Recurrent Expenditure of the ACTT 2016-2020.

2016 (Actual) ³²	2017 (Actual)	2018 (Actual)	2019 (Revised Estimate)	2020 (Estimate) ³³
\$18,156,200	\$16,543,300	\$12,747,875	\$10,000,000	\$12,000,000

³¹ ACTT Submission, November 15, 2019, page 83

³² <https://www.finance.gov.tt/final-estimates-of-the-recurrent-expenditure-2018/>

³³ <https://www.finance.gov.tt/wp-content/uploads/2019/10/Numbered-Draft-Recurrent.Expenditure-Book-2020.pdf>

3.2.9. During the public hearing convened on November 22, 2019, the Ministry of Education indicated that the allocation to the ACTT was increased from \$10 million to \$12 million for fiscal year 2020. However, the ACTT contended that subventions from the Ministry of Education are insufficient to sustain its operational activities³⁴. Even though ACTT engages in revenue-generating activities, derived from “service fees”, this represents approximately 0.6% to 3% of the overall income for the period under review³⁵. This revenue is inadequate to cover the ACTT’s expenditure.

3.2.10. The organisation’s revenue-generating activities including new products and services will be introduced over the next 2 years. Cost-cutting measures are also being considered.

3.2.11. At the November 22, 2019, Public Hearing, the Committee learnt that the combined cost of Registration, Evaluation and Certification can range from \$10,000 to \$15,000 or higher. Comparatively, these fees are only 5-25% of the international average. The Committee also learnt that the ACTT submitted an application for funding under the European Development Fund via the MOE. Funding of TT \$500,000 will be used to conduct an employability study.

Processes and Procedures

Complaints Procedure

3.2.12. The ACTT has an 8-step complaints procedure which students may utilise to lodge complaints concerning the institution of learning to which they are affiliated³⁶.

These steps include:

- i. Student submits written complaint;
- ii. Review conducted to determine whether the ACTT has jurisdiction to determine the complaint;
- iii. Advice provided by the Legal Unit;

³⁴ *Ibid*, page 72

³⁵ *Ibid*.

³⁶ *Ibid.*, page 74

- iv. If decision is taken to process complaint, correspondence sent to institution detailing allegations made and request for response;
- v. Review conducted of response.

3.2.13. In relation to avenues available to seek redress further to decisions of the ACTT, the committee was advised by the MOE that discussions are currently being held with the ACTT to establish an **Appeals Committee**, which is stipulated by Section 11 of the Act. In the absence of this Committee, the ACTT indicated that aggrieved institutions and or individuals would have to seek redress via the Courts.

Statutory Approvals

3.2.14. The current and past procedures used by the ACTT to verify whether an institution was in possession of the necessary statutory approvals was closely examined during this inquiry. During the first public hearing the Ministry of Education expressed the view that statutory requirements and standards especially in the area of health and safety should be obtained by institutions prior to approaching the ACTT to be registered. The ACTT submitted that it verifies whether an institutions has obtain statutory approval during the execution of site visits while screening the applicant seeking registration. The Executive Director advised that it would be “helpful” if an applicant had those approvals. However, the Committee was further informed that ACTT had implemented an “alternative” option that allows institutions to provide “evidence requirements to meet the standards”.

3.2.15. ACTT submitted that institutions are required to implement several occupation, health and safety arrangements and produce a suite of related documents including:

- i. Student access to learning facilities;
- ii. Adequate classroom facilities;
- iii. Adequate library facilities;

- iv. Master Plan For facilities;
- v. Provision of adequate ventilation and lighting;
- vi. Adequate space allocation for learners, staff and stakeholders;
- vii. Plans for the acquisition of furnishings and equipment;
- viii. Evacuation Procedures and maps.

3.2.16. During the February 28, 2020 public hearing, the Omardeen School of Accountancy Ltd (“Omardeen”) alleged that the school had been subjected to illegal practices by the ACTT with regard to health and safety requirements for registration purposes. The school contended that it expended a significant amount of resources (at all of its locations) in order to comply with statutory approval which it was informed was a prerequisite for registering with the ACTT. The school also reported that it changed locations on several occasions in order to be in compliance with the statutory approval requirements. Conversely, the ACTT refuted any allegation that its operations are illegal and stated that all operations comply with its governing Act (Chapter 39:06), and by extension all laws of the country.

3.2.17. Omardeen further submitted that in 2010, the school was advised that the ACTT no longer required statutory approvals. Notwithstanding, the Committee learned that as at 2016, statutory approvals were listed in Omardeen’s evaluation report at that time but Omardeen was not able to obtain information in writing from ACTT to verify when the policy regarding statutory approvals was changed. In 2019 Omardeen learnt through the Freedom of Information Act that the ACTT’s policy regarding statutory approvals was changed on September 21, 2006. **(See Appendix VIII)** They were previously unaware of the changes. Further to its FOI requests, Omardeen was able to obtain documentary evidence including Evaluation Reports relevant to several other TLIs that offered accounting programmes. It was based on an analysis of this information that Omardeen claimed that it was the only accounting institution to comply with the statutory requirements at the time and as a consequence this created unfair competition as other institutions did not have to incur expenses in this area.

- 3.2.18. Omardeen also believes that if there is a level playing field where all schools are subject to the same requirements, they would be able to re-open the school. Omardeen was established in 1978 and last conducted classes at the end of 2018 due to financial issues. Omardeen underscored the importance of taking health and safety standards seriously by substantiating claims of statutory approvals with evidence.
- 3.2.19. At the said hearing the ACTT responded further and submitted that in 2005, a cabinet decision determined that all institutions falling under the purview of the ACTT needed to have statutory approval for the buildings they occupied. This stipulation was subsequently reviewed and amended on September 21, 2006 by Cabinet minute #2280 of 2006. Data collected by ACTT (f.t.p. 2005-2006) indicated that **approximately 80% of institutions would not have met the statutory approval requirements.** As such the requirements were relaxed to give them adequate time to comply.
- 3.2.20. Statutory requirements were therefore no longer necessary for registration purposes. ACTT stated that up until July 11, 2008, when Omardeen School of Accountancy Ltd. was registered, fourteen (14) other institutions had undergone a similar approval process. All institutions were required to provide a checklist to demonstrate that they accepted the requirements that ACTT established.

Financial Management Systems

- 3.2.21. ACTT contracted auditing firm *Deloitte and Touche* to perform a review of the Council's financial management processes. Some of the key recommendations which were presented in the audit report included:
- a. Limiting deposits to direct bank deposits only, to create a "no-cash" place of business;
 - b. Appointing a Member with an accounting or finance background as the head of the Finance Sub-Committee;
 - c. The discontinuation of using personal credit cards for online purchasing;
 - d. The implementation of a procurement software that interfaces with the accounting software to allow for greater efficiency within the process;

- e. The issuance of petty cash vouchers by two different officers in order to ensure the proper segregation of duties.

3.2.22. The total cost expended by ACTT on the contract was TT \$86,250.00 VAT inclusive. The contract lasted from February 18, 2013-March 13, 2013³⁷.

Legislative Framework

3.2.23. The ACTT stated that the **current legislation is inadequate to meet its mandate and operations.** In its November 15, 2019 submission, the organisation indicated that “Preliminary research and analysis of shortcomings of the current legislation, Chapter 39:06, have engaged the attention of Executives, some Technical Officers and Legal personnel at ACTT. However, these research findings have not been referred to, reviewed or endorsed by any corporate governance body such as the Board of Directors, the line Ministry, or any other relevant stakeholder(s) who may be affected by or may wish to proffer advice to support the preliminary information.”³⁸ The effect of these shortcomings were still to be determined by the ACTT at the time of submission to the Committee (November 15, 2019).

Performance Evaluation

3.2.24. As at November, 2019, ACTT had not yet done its **three-year performance review exercise** and were in the process of doing so at the time of submission. Some of the hindrances to submitting the performance evaluation report included inability of CARICOM to set up regional Accreditation body for National Accreditation Agencies, lack of board approvals and lack of financial resources³⁹.

3.2.25. Some of the challenges that exist in regular monitoring and evaluation of local educational institutions and programmes include the shortage of personnel, physical

³⁷ *Ibid.*, page 76

³⁸ ACTT Submission, November 15, 2019, page 73.

³⁹ *Ibid.*, page 84

and financial resources, need for upgrade of current information management systems, non-declaration, withholding and incompleteness of submissions and substantive changes in institutions such as changes in ownership, change in vision and change in programme offering⁴⁰.

Findings

One of the aims of the committee's examination of the ACTT was to determine whether its resources, systems, procedures and processes were properly streamlined and configured to allow the organisation to efficiently and effectively fulfil its mandate as state in Section 8(2) of the Act. In this regard, the Committee's findings are as follows:

- i. Similar to several other state bodies that were examined by this committee, the ACTT has a notable number of vacancies which have adversely impacted the delivery of its services.
- ii. It was commendable that staff were trained in areas that the Council would usually outsource with the aim of developing the skills internally. This demonstrates innovation in the organisation's human resource strategy.
- iii. The Committee was not convinced that the ACTT's complaints procedure was being effectively communicated to the public and in particular students who attend TLIs.
- iv. Arguably, the removal of statutory approvals as a mandatory requirement for registration may have been done in good faith as means of facilitating the further expansion and growth in the Tertiary Education sector at the time. However, based on the evidence received from the ACTT and other stakeholders. The Committee concluded as follows:
 - a. that the change in this requirement to attain registration (criterion 1.0, Standard 1.2) was not effectively communicated to the ACTT's clients;
 - b. It appeared that the 'statutory and regulatory requirements' were not consistently and or strictly applied by ACTT officials as a condition for registration and/or continuing registration;

⁴⁰ *Ibid*, page 86

- c. Given the advent of the OSH Act and the operational mandate of the OSH Agency, it is imperative that all State bodies should partner with the OSH to ensure that the entities that fall under its purview are adhering to the stipulations of the OSH Act.
- v. The current Executive Director has made attempts to engage clients/institutions with long standing grievances. However, the results of these consultations are still to be confirmed and evaluated by this Committee.
- vi. Following an evaluation by the ACTT or its external evaluators some TLIs may become complacent and fail to maintain the prescribed standards. To counteract this practice, the ACTT may need to develop an appropriate arrangement/strategy to conduct continuous monitoring of institutions based on the appropriate risk assessments.
- vii. The absence of an Appeals Committee as is prescribed by Section 11 of the Act has left a serious void in the options available to persons aggrieved by decisions of the ACTT to seek redress. This situation must be urgently rectified with the direct support of the Ministry of Education.
- viii. The greater application and or incorporation of technology is needed to enhance the efficiency and effectiveness of ACTT's systems, procedures and processes.
- ix. Systems and processes used to evaluate the ACTT's performance need to be more consistent.

Recommendations

1. **The complaints procedure needs to be clearly communicated to all students. A more robust communication strategy that aims to target the ACTT's primary audience must therefore be implemented with alacrity.**
2. **Given that satisfying the criteria for registration would require the applicant to expend significant time and resources, the ACTT must ensure that all information related to this process is clearly and effectively communicated to institutions/applicants.**

3. The introduction of a more robust system of continuous assessment of institutions who have demonstrated a propensity to have challenges in meeting health and safety requirement. The selection of the institutions/clients to be subjected to greater scrutiny can be determined via an appropriate risk assessment.
4. As a regulator, the actions of the ACTT should aim to fortify and reiterate the stipulations of other State regulatory bodies such as the OSH Agency/Authority.
5. An electronic records management system is needed to keep track of all applications and the requisite staff to monitor and review accordingly.
6. While self-review is an acceptable form of performance management, the Ministry of Education must ensure that stakeholder feedback is included in the evaluation of the ACTT's performance.
7. The ACTT should engage its affiliate institutions in a consultative process to improve ACTT's processes and procedures.
8. That the Ministerial Response also include an update on the following deliverables:
 - i. completion of the audit of ACTT's financial statements by Price Waterhouse Cooper for the period 2010-2016;
 - ii. The mapping of workflow processes, re-alignment of positions, duties and responsibilities and benchmarking with national public service and international accrediting organisations;
 - iii. The organisation's revenue-generating activities including the introduction of new products and services.

Objective 3: To evaluate the performance of ACTT in assuring quality in the delivery of tertiary and post-secondary education by local schools affiliated with foreign institutions.

Statistics Related To Local Institutions Affiliated With Foreign Universities

- 3.3.1 According to the MOH submission, there exists a strong robust legal framework for the regulation of this industry. The provisions of the Pharmacy Board Act Chapter, 29:52, the Food and Drugs Act, Chapter 30:01, the Antibiotic Act Chapter 30:02 and the Dangerous Drug Act Chapter 11:25 and the Regulations thereunder are adequate to treat with the current realities of the pharmaceutical industry and advances in the practice of medicine. The MOH stated that no modifications were necessary to strengthen the provisions of this Act.
- 3.3.2 There are currently 19 local institutions affiliated with foreign awarding bodies (as at November 2019)⁴¹. The ACTT does not accredit local entities affiliated with foreign universities because the programmes offered are expected to already be accredited in the country of origin. However, because these institutions are not accredited by the ACTT, they are no longer eligible for GATE funding.
- 3.3.3 As at November 2019, there were fourteen (14) programmes at these institutions listed as awaiting recognition from the ACTT.⁴² For the period 2014-2019, ACTT received twenty (20) applications for recognition of individual transnational programmes⁴³. Within that 5-year period, ACTT reviewed 195 Annual Reports of recognised foreign institutions.

⁴¹ ACTT Submission, November 15, 2019, page 48

⁴² *Ibid.*, page 58

⁴³ *Ibid.*, page 59

Registration/Recognition Process

- 3.3.4 ACTT ensures that programmes in the fields that require a license to practice are accredited by the relevant specialised Professional and Statutory Regulatory Bodies in the country of origin before delivery in Trinidad and Tobago.
- 3.3.5 Foreign institutions providing educational programmes in partnership with local institutions must apply for recognition. Recognition indicates that both the local and foreign institutions have the capacity to deliver the programme locally. The procedure for recognition of transnational programmes includes site visits to the overseas locations of the awarding institution. In its November 2019 submission, ACTT indicated that from 2014-2019 they conducted thirteen (13) site visits at local institutions for continuing recognition of twelve (12) transnational programmes, eleven (11) of which would have undergone the process twice⁴⁴.
- 3.3.6 The School of Business and Computer Sciences (SBCS) in their submission dated February 19, 2020 indicated that while ACTT's quality standards are not overly strident or unrealistic, the same standards are examined in the same way for each subsequent re-registration, resulting in submissions that are overly voluminous. They indicated that for a registration status lasting 3 years, it takes approximately 2 years to prepare the documentation for the next registration event.
- 3.3.7 The School of Accounting and Management, Caribbean Limited (SAM) expressed in their submission (received on February 19, 2020) that the quality standards of the ACTT are not significantly different to the regulatory bodies based in the United Kingdom (UK). They expressed the view that while the UK regulators have changed and updated their systems and procedures over a period of time, the ACTT has been very slow to change. SAM also expressed concern that ACTT requires them to expose confidential material to external evaluators, who are in most part their competitors. Some of this confidential information includes syllabus and course structure information.

⁴⁴ *Ibid*, page 62

Quality Control

3.3.8 Quality Assurance procedures to monitor the operations of affiliated institutions include:

- a. demonstrating compliance with ACTT's criteria and standards for recognition;
- b. documentation of any substantive changes;
- c. provision of data and documentation of the performance of local partner institutions and students; and
- d. reviewing of annual reports.

3.3.9 The Accreditation Council of Trinidad and Tobago is a member of the International Network for Quality Assurance Agencies in Higher Education. That agency has over 200 members worldwide.⁴⁵ The ACTT's membership in international quality assurance networks allows for mutual acceptance of accredited qualifications earned in any of the member countries.

3.3.10 There are plans by the ACTT to develop benchmarked standards for online programmes, particularly for foreign institutions that operate online only⁴⁶.

3.3.11 The procedure regarding complaints related to foreign awarding bodies is enshrined in the ACTT Act. Notably, ACTT received only 1 complaint in a 3-year period regarding a foreign-affiliated institution, this complaint was related to the institution's terminating agreements with local institutions.⁴⁷

Findings

Based on the evidence set out in this section, the Committee concluded the following:

- i. The process for registration and recognition of overseas programmes is a time-consuming one that needs to be streamlined.

⁴⁵ Verbatim Notes, November 22, 2019 public hearing, page 12

⁴⁶ *Ibid*, page 14

⁴⁷ ACTT Submission, November 15, 2019, page 60

- ii. There is a duplication of processes required by the overseas awarding bodies and the ACTT. There is therefore a need to reduce some of the overlap in the recognition process.
- iii. Greater transparency is needed the evaluation and award of recognition.
- iv. The ACTT's membership in international quality assurance networks allows for mutual acceptance of accredited qualifications earned in any of the member countries. This is a key valued added element of the ACTT's operations.
- v. There is a greater need for monitoring and evaluation of overseas-based programmes offered locally.

Recommendations

1. The ACTT should seek to minimize duplicated requests for documentation and evidence required of clients seeking continuing registration. This approach to reduce the apparent administrative burden of applicants/clients should not compromise the ACTT's due diligence processes and procedures.
2. In lieu of site visits to the country of origin the Committee recommends the continued and expanded use of video-conferencing technologies to meet with officials of foreign-based institutions (headquartered overseas) pursuant to its assessment of affiliated institutions operating locally.
3. Guidelines for recognition of overseas programmes should be clearly stated.
4. The ACTT should conduct a tracer survey to evaluate the level of employability/performance of graduates from overseas affiliated institutions in comparison to graduates from locally based institutions/ programmes.

The Committee respectfully submits the foregoing for the consideration of the Parliament.

Dr. Varma Deyalsingh
Chairman

Ms. Ramona Ramdial, MP
Vice-Chairman

Mrs. Jennifer Baptiste-Primus
Member

Mr. Esmond Forde, MP
Member

Mr. Nigel De Freitas
Member

Ms. Khadijah Ameen
Member

Mr. Darryl Smith, MP
Member

Dr. Lovell Francis, MP
Member

June 29, 2020

Appendices

Appendix I

List of Officials

List of officials who appeared and provided oral evidence to the Committee.

Name of Official	Portfolio	Organization
Public Hearing Held on Friday November 22, 2019		
Dr. Eduardo Ali	Executive Director	The Accreditation Council of Trinidad and Tobago
Mr. Curtis Floyd	Director, Accreditation and Quality Enhancement	
Ms. Emily Pascal	Director, Finance and Administration	
Ms. Lesley-Ann Brathwaite	Director, Qualifications and Recognition (Ag.) Research Officer – Legal Assessment Officer	
Mr. Junior Nagassar		
Ms. Sharon Delochan		
Mr. Kurt Meyer	Permanent Secretary	Ministry of Education
Ms. Bhagwati Manick	Director, Finance and Accounting	
Ms. Carol Bickram	Director - Research, Planning and Technical Services (Ag.)	
Mr. Urban Huggins	Deputy Director, Funding and Grants Administration Division	

Name of Official	Portfolio	Organization
Public Hearing Held on February 28, 2020		
Dr. Eduardo Ali	Executive Director	The Accreditation Council of Trinidad and Tobago
Mr. Curtis Floyd	Director, Accreditation and Quality Enhancement	
Ms. Emily Pascal	Director, Finance and Administration	
Mr. Junior Nagassar	Research Officer – Legal	
Mr. Graham Newling	Director	Professional Institute of Marketing and Business Studies Ltd. (PIMBS)
Mr. Frank Cowie	Chairman	
Mr. Nestor Dinnoo-Alloy	Deputy Corporate	
.Mr. Idrees Omardeen	Managing Director	Omardeen School of Accountancy Ltd
Mrs. Sohaila Omardeen	Director	
Dr. Dawn-Marie De Four-Gill	Campus Registrar	University of the West Indies (UWI)
Dr. Sandra Gift	Senior Programme Officer	
Dr. Nigel Fulchan	Director	School of Accounting and Management (SAM)
Mr. Kumar Bobby-Sookram	Senior Manager, Quality Assurance	School of Business and Computer Science (SBCS)
Mr. Kevon Allen	Academic Manager	

Appendix II

Minutes of the 35th Meeting

**MINUTES OF THE 35TH MEETING OF THE JOINT SELECT COMMITTEE APPOINTED
TO INQUIRE INTO AND REPORT ON LOCAL AUTHORITIES, SERVICE
COMMISSIONS, STATUTORY AUTHORITIES
(INCLUDING THE THA)
HELD IN THE ARNOLD THOMASOS ROOM (EAST), LEVEL 6 AND
THE J. HAMILTON MAURICE ROOM, MEZZANINE FLOOR,
OFFICE OF THE PARLIAMENT, TOWER D, 1A WRIGHTSON ROAD, PORT OF SPAIN
ON FRIDAY NOVEMBER 22, 2019**

PRESENT

Members

Dr. Varma Deyalsingh	Chairman
Ms. Ramona Ramdial, MP	Vice-Chairman
Mr. Esmond Forde, MP	Member
Mr. Nigel De Freitas	Member

Secretariat

Mr. Julien Ogilvie	Secretary
Ms. Khisha Peterkin	Assistant Secretary
Ms. Terriann Baker	Graduate Research Assistant

ABSENT/ EXCUSED

Mrs. Jennifer Baptiste-Primus	Member (Excused)
Mr. Darryl Smith, MP	Member (Excused)
Ms. Khadijah Ameen	Member (Excused)
Dr. Lovell Francis, MP	Member

THE FOLLOWING PERSONS WERE ALSO PRESENT:

The Accreditation Council of Trinidad and Tobago

Dr. Eduardo Ali	Executive Director
Mr. Curtis Floyd	Director, Accreditation and Quality Enhancement
Ms. Emily Pascal	Director, Finance and Administration
Ms. Lesley-Ann Brathwaite	Director, Qualifications and Recognition (Ag.)
Mr. Junior Nagassar	Research Officer – Legal
Ms. Sharon Delochan	Assessment Officer

Ministry of Education

Mr. Kurt Meyer
Ms. Bhagwati Manick
Ms. Carol Bickram

Mr. Urban Huggins

Permanent Secretary
Director, Finance and Accounting
Director - Research, Planning and
Technical Services (Ag.),
Deputy Director, Funding and Grants
Administration Division

PUBLIC HEARING

- 6.1 The Chairman reconvened the meeting (*in public in the J. Hamilton Maurice Room -*) at 10:26 a.m. and welcomed both the listening and viewing audience.
- 6.2 The Chairman highlighted the objectives of the inquiry and introductions were made.
- 6.3 The Chairman then invited the lead official of each delegation to make a brief opening statement.
- 6.4 The following are the main issues highlighted during discussions with the **Ministry of Education** (*for further details, please see the Verbatim Notes*):
- The MoE indicated its satisfaction with the performance of the ACTT.
 - The allocation to the ACTT was increased from \$10 million to \$12 million for fiscal year 2020.
 - The ACTT Board is now fully constituted. There were delays in the appointment of members to the Board of the ACTT due to bureaucratic issues within the Ministry.
 - The need to examine whether there are educational institutions that are not registered with either the ACTT or National Training Agency (NTA) and therefore liable to penalties.
 - The MoE has not received any complaints from students who may have completed an educational programme and subsequently discovered that the institution was not registered or accredited.
 - Key requirements for receipt of Government Assistance for Tuition Expenses Programme (GATE) funding are (i) programme approval (ii) institutional registration and (iii) accreditation with the ACTT. The Ministry also conducts a further evaluation on eligible programmes before final approval.
 - Discussions are currently being held with the ACTT to establish its Appeals Committee, which is long overdue.
- 6.5 The following are the main issues highlighted during discussions with the **Accreditation Council of Trinidad and Tobago (ACTT)** (*for further details, please see the Verbatim Notes*):

- xvii. Registration with the ACTT is mandatory for local post-secondary or tertiary educational institutions. It gives the institutions the legal authority to operate.
- xviii. Foreign institutions providing education programmes in partnership with local institutions must apply for recognition. Recognition indicates that both institutions have the capacity to deliver the programme locally.
- xix. Accreditation is a higher measure of educational quality that requires an institution to undergo a rigorous evaluation process over two to three years.
- xx. Accreditation is a voluntary process and approximately fourteen (14) local institutions have been accredited.
- xxi. Pre-requisites for accreditation include: having registration status for three years, providing locally developed, approved programmes and one cohort of students that graduated from the programmes.
- xxii. The approved programmes offered by an accredited institution are also subsumed under the accreditation status. However, the ACTT later stated that it does not currently accredit individual programmes.
- xxiii. There are some institutions that have withdrawn from the accreditation and/or registration process.
- xxiv. It is illegal for unregistered institutions to offer post-secondary/tertiary qualifications. They would be subject to an initial fine of \$25,000, followed by \$5,000 for every day the institution continues to operate.
- xxv. Accreditation has educational and employment benefits since it allows local qualifications to be internationally recognized.
- xxvi. The ACTT's membership in international quality assurance networks allows for mutual acceptance of accredited qualifications earned in any of the member countries.
- xxvii. Resource constraints and capacity limitations prevent some institutions from seeking accreditation.
- xxviii. Efforts to edify the public in relation to the functions of the ACTT and the importance of registration, recognition and accreditation is ongoing.
- xxix. Consideration is being given to the accreditation of online programmes, professional development courses and continuing education courses.
- xxx. There are plans to develop benchmarked standards for online programmes, particularly for foreign institutions that operate online only.
- xxxi. Notwithstanding the above, local providers of online programmes must seek registration with the ACTT.

- xxxii. The ACTT regulates institutions offering programmes at level 3 (certificate, diploma and higher qualifications), while the NTA regulates level 1 and 2 programmes (below the certification level).
- xxxiii. Of the 145 non-registered institutions identified by the ACTT, 115 are not within the purview of the ACTT but are regulated by the NTA.
- xxxiv. The ACTT is not aware of any institution that falls within its purview and that is in breach of Section 26 of the ACTT Act.
- xxxv. Due to internal limitations, some institutions opt to withdraw from the registration process.
- xxxvi. A comprehensive list of all registered and accredited institutions and programmes is publicly available on the ACTT website.
- xxxvii. The ACTT educates the public on its services including the issuing of Statements of Recognition. This Statement indicates whether a programme is locally recognized and/or accredited.
- xxxviii. All registered and accredited institutions are permitted to utilise the ACTT's official trademark that allows them to advertise their affiliation with the ACTT.
- xxxix. Registered institutions can apply for the approval of their programmes by the ACTT. This process evaluates the quality of the programmes against set standards.
 - xl. The combined cost of registration, evaluation and certification can range from \$10,000 to \$15,000 or higher. Comparatively, these fees are only 5-25% of the international average.
 - xli. The aforementioned registration fees are prohibitive for some institutions. However, other institutions do not complete registration due to the perception that the required standards are too rigorous to uphold.
 - xl.ii. The ACTT monitors the activities of institutions before, during and after registration/accreditation status is awarded. Information is gathered from official documents submitted by the institutions, newspaper reports and feedback from the public.
 - xl.iii. Monitoring is also conducted through site visits and mid-term reviews to assess the progress or gaps in the institution performance compared to set standards.
 - xl.iv. Consideration is being given to introducing public affirmations as a method of soliciting concerns or complaints from the public about educational institutions.
 - xl.v. The ACTT currently accepts written concerns from the public which are investigated and addressed with the institution where relevant and applicable.
 - xl.vi. Resource constraints have hindered the filling of 20 vacancies within the ACTT.

- xlvi. The ACTT submitted an application for funding under the European Development Fund via the MoE. Funding which is valued at TT \$500,000, will be used to conduct an employability study.
- lviii. Revenue-generating activities including new products and services will be introduced during the next 2 years. Cost-cutting measures are also being considered.
- lix. The Strategic Plan for 2020-2025 is being prepared.
 - i. During the past three years, 30 complaints from students were submitted to the ACTT. Thirteen (13) complaints were received within the last year.
 - ii. There are plans to submit recommendations for legislative changes to the ACTT Act to the MoE in the future.
 - iii. Since its inception, there have been no legal proceedings were initiated against the ACTT related to its decisions concerning institutions and programmes.
 - iiii. Statutory approvals and health and safety provisions are generally required for registration. However, an “alternative” option allows institutions to provide “evidence requirements to meet the standards.”

ADJOURNMENT

7.1 The Chairman thanked all present for attending.

7.2 The meeting was adjourned at 12:06 p.m.

I certify that the Minutes are true and correct.

Chairman

Secretary

February 14 2020

Appendix III

Minutes of the 36th Meeting

**MINUTES OF THE 36TH MEETING OF THE JOINT SELECT COMMITTEE APPOINTED
TO INQUIRE INTO AND REPORT ON LOCAL AUTHORITIES, SERVICE
COMMISSIONS, STATUTORY AUTHORITIES
(INCLUDING THE THA)
HELD IN THE ARNOLD THOMASOS ROOM (EAST), LEVEL 2 CABILDO BUILDING
OFFICE OF THE PARLIAMENT, ST. VINCENT STREET, PORT OF SPAIN
ON FRIDAY FEBRUARY 28, 2020**

PRESENT

Members

Dr. Varma Deyalsingh	Chairman
Ms. Ramona Ramdial, MP	Vice-Chairman
Mr. Esmond Forde, MP	Member
Mr. Nigel De Freitas	Member

Secretariat

Mr. Julien Ogilvie	Secretary
Ms. Khisha Peterkin	Assistant Secretary
Ms. Terriann Baker	Graduate Research Assistant
Ms. Nicole Brown	Parliamentary Intern

ABSENT/ EXCUSED

Mrs. Jennifer Baptiste-Primus	Member (Excused)
Ms. Khadijah Ameen	Member (Excused)
Dr. Lovell Francis, MP	Member
Mr. Darryl Smith, MP	Member

THE FOLLOWING PERSONS WERE ALSO PRESENT:

The Accreditation Council of Trinidad and Tobago

Dr. Eduardo Ali	Executive Director
Mr. Curtis Floyd	Director, Accreditation and Quality Enhancement
Ms. Emily Pascal	Director, Finance and Administration
Mr. Junior Nagassar	Research Officer – Legal

Professional Institute of Marketing and Business Studies Ltd. (PIMBS)

Mr. Graham Newling	Director
Mr. Frank Cowie	Chairman
Mr. Nestor Dinnoo-Alloy	Deputy Corporate

Omardeen School of Accountancy Ltd.

Mr. Idrees Omardeen	Managing Director
Mrs. Sohaila Omardeen	Director

University of the West Indies (UWI)

Dr. Dawn-Marie De Four-Gill	Campus Registrar
Dr. Sandra Gift	Senior Programme Officer

School of Accounting and Management (SAM)

Dr. Nigel Fulchan	Director
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School of Business and Computer Science (SBCS)

Mr. Kumar Bobby-Sookram	Senior Manager, Quality Assurance
Mr. Kevon Allen	Academic Manager

PUBLIC HEARING

- 7.1 The Chairman invited the other officials to join the meeting at 10:41 a.m. and welcomed both the listening and viewing audience.
- 7.2 The Chairman highlighted the objectives of the inquiry and introductions were made.
- 7.3 The Chairman then invited the lead official of each delegation to make a brief opening statement.
- 7.4 The following are the main issues highlighted during discussions with the **ACTT** (*for further details, please see the Verbatim Notes*):
- The absence of a comprehensive data sensitive tertiary education system;
 - Resource limitations have rendered ACTT unable to adequately respond to stakeholders' needs;
 - Stakeholders' needs have grown beyond ACTT's current capacity;
 - ACTT seeks to protect the citizens of Trinidad and Tobago from both local and international "diploma mills";
 - During the period 2004/2005, the Ministry of Science, Technology and Tertiary Education had the responsibility for evaluating whether private tertiary institutions fulfilled the requirements for government funding. The statutory requirements were established by the Ministry;
 - The ACTT was established in 2005 and was not fully functional until 2006. Therefore, requirements stipulated by the then Ministry of Science, Technology and Tertiary Education should not be confused with those established by the ACTT;
 - ACTT requires institutions to have the following in place:
 - Student access to learning facilities

- Adequate classroom facilities
 - Adequate library facilities
 - Master Plan For facilities
 - Provision of adequate ventilation and lighting
 - Adequate space allocation for learners, staff and stakeholders
 - Plans for the acquisition of furnishings and equipment
 - Evacuation Procedures and maps.
- The ACTT benchmarks with the following agencies: Quality Assurance Agency (UK), Higher Learning Commission (USA), Southern Association of Colleges and Schools;
 - The ACTT's requirements are similar to those of the overseas bodies identified above with regard to the qualifications required for health and safety staff; safety, emergency and disaster plans; emergency procedures and evacuation plans; inspection reports; corrective actions; policies on health and safety training; and safety committee meetings;
 - Ownership of a property is defined by the ACTT as the institution being able to access the property by legitimate means;
 - ACTT refutes any allegation that its operations are illegal and states that all operations comply with its governing Act (Chapter 39:06), and by extension all laws of The Republic of Trinidad and Tobago;
 - In 2005, a cabinet decision determined that all institutions falling under the purview of the ACTT needed to have statutory approval for the buildings they occupied. This stipulation was subsequently reviewed and amended on September 21, 2006 by Cabinet minute #2280 of 2006;
 - Data collected by ACTT (2005-2006) indicated that approximately 80% of institutions would not have met the statutory approval requirements. As such the requirements were relaxed to give them adequate time to comply;
 - The ACTT's board took the decision on September 21, 2006 to simplify the process for applicants. Statutory requirements were therefore no longer necessary for registration purposes;
 - ACTT stated that up until July 11, 2008, when Omardeen School of Accountancy Ltd. was registered, fourteen (14) other institutions had gone through a similar approval process. All institutions were required to provide a checklist to demonstrate that they accepted the requirements that ACTT established;

- ACTT states that statutory approvals were never listed as requirements up to the point when Omardeen School of Accountancy Ltd. was registered;
- ACTT does not agree that there has been a relaxation of standards. They do however, acknowledge that the possibility exists for an institution to deteriorate after ACTT evaluators make their initial assessment;
- ACTT is aware that some institutions have the safety standards in place for the purpose of the evaluation but later regress once approval is granted;
- The ACTT is in the process of revising their standards. They have made institutions under its purview aware of this process;
- With regard to Occupational Health and Safety, there was no legislation in place in 2008. However, given the subsequent introduction of legislation, the ACTT will look at revising their relevant requirements. This should take place between 2020 and 2021.
- The Executive Director, ACTT stated that upon assumption of duties 6 months ago, he made contact with Omardeen School of Accountancy Ltd with the aim of discussing the issues at hand. However, they were met with Freedom of Information requests and therefore unable to meet with the institution without legal intervention;
- ACTT has made attempts to meet with all institutions that have longstanding grievances with the Council;
- ACTT was unable to issue registration and accreditation certificates to institutions due to intervals of time when there was no Board of Directors in place;
- Reasons for institutions not receiving a statement of recognition include: application being incomplete, incorrect mailing address given, incorrect email address given;
- ACTT noted that the Auditor General's Department did not have adequate personnel to conduct an audit of its financial statements. As a consequence, Price Waterhouse Cooper has been engaged to conduct an audit for the 2010-2016 time period;
- Institutions are registered for a three-year period. They then must go through a continuing registration process;
- ACTT states that they have been in communication with PIMBS regarding their registration status. They are currently awaiting Board approval to confirm the institution's continuing registration status.

7.4 The following are the main issues highlighted during discussions with the **Omardeen School of Accountancy Ltd.** *(Please see the Verbatim Notes for further details):*

- liv. Omardeen School of Accountancy Ltd. believes that they have been subjected to illegal practices by the ACTT with regard to health and safety requirements for registration purposes;
- lv. Compliance with the requirement for statutory approvals proved difficult for Omardeen School of Accountancy in cases where the institution occupied rental facilities;
- lvi. In 2007 and 2008 Omardeen School of Accountancy ensured that they were in compliance with statutory approval requirements at all three of their locations. However, in 2010, they were told that ACTT no longer required statutory approvals;
- lvii. A significant financial outlay was required for Omardeen to meet the statutory approval requirements;
- lviii. The school also had to change locations on several occasions in order to be in compliance with the statutory approval requirements;
- lix. Up to 2016, statutory approvals were listed in Omardeen's evaluation report;
- lx. Omardeen was not able to obtain information in writing from ACTT to verify when the policy regarding statutory approvals was changed;
- lxi. In 2019 Omardeen learnt through the Freedom of Information Act that the ACTT policy regarding statutory approvals was changed on September 21, 2006. They were previously unaware of the changes;
- lxii. Omardeen is of the belief that because they were the only accounting institution to comply with the statutory requirements of the time, this created unfair competition as other institutions did not have to incur expenses in this area;
- lxiii. Omardeen believes that if there is a level playing field where all schools are subject to the same requirements, they would be able to re-open the school;
- lxiv. Omardeen was established in 1978 and last conducted classes at the end of 2018;
- lxv. Omardeen underscored the importance of taking health and safety standards seriously by substantiating claims of statutory approvals with evidence.

7.6 The following are the main issues highlighted during discussions with the **Professional Institute of Marketing and Business Studies Ltd. (PIMBS)** *(Please see the Verbatim Notes for further details):*

- i. PIMBS has had challenges with receiving guidance from ACTT when they seek clarification on matters. Getting the information in a timely manner has been a problem. They cannot move forward without ACTT's approval and this therefore affects the institution's bottom line;
- ii. The institute has received their registration certificate after the expiry date has passed. This has caused them to miss the opportunity to work with students during the period;

- iii. The institute is unsure about their registration status with ACTT;
 - iv. It was submitted that they were not made aware of the changes outlined under Chapter 2 of ACTT's policy on registration;
 - v. The institute lamented that smaller institutions are at a disadvantage with regard to payment of fees to ACTT as the amount paid is the same as larger institutions.
- 7.7 The following are the main issues highlighted during discussions with the **University of the West Indies (UWI)** *(Please see the Verbatim Notes for further details):*
- i. UWI has had an overall positive experience with the ACTT;
 - ii. UWI has been a client of ACTT since 2008, when they received registration status.
 - iii. UWI's accreditation was renewed in 2018 for an additional 7-year period;
 - iv. ACTT's accreditation process has enhanced the quality assurance culture of the University;
 - v. UWI noted that graduates seeking jobs have more confidence knowing that their programmes have been accredited;
 - vi. UWI Recommends that ACTT should grant provisional site registration status for new sites to institutions with mature quality management systems and with a demonstrated capacity to satisfy statutory requirements;
 - vii. UWI also recommends that ACTT conduct a review of the adequacy of its Human Resources;
 - viii. All programmes at UWI have been accredited.
- 7.8 The following are the main issues highlighted during discussions with the **School of Accounting and Management Studies, Caribbean Ltd. (SAMS)** *(Please see the Verbatim Notes for further details):*
- i. SAM describes their relationship with ACTT as a cordial one;
 - ii. SAM has a challenge with the registration process requiring them to release confidential information as part of the peer review process. Documentation released to competitors during this process includes syllabus and course structure information.
 - iii. SAM considers ACTT to be a beacon of best practice in the area of institutional accreditation and registration. ACTT's standards are comparable with the overseas accreditation bodies they interface with.
 - iv. Students Registered with institutions offer transnational programmes such as SAM are no longer able to receive GATE funding as accreditation is now a requirement for GATE. SAM currently

has registration status with ACTT as they offer transnational programmes already accredited in the country of origin.

7.9 The following are the main issues highlighted during discussions with the **School of Business and Computer Studies (SBCS)** (*Please see the Verbatim Notes for further details*):

- i. Accreditation is not of immediate concern as SBCS offers primarily transnational programmes which require only registration.
- ii. SBCS has developed local diploma programmes that have run within the past year. They have not yet been accredited as they need to be operational for 3 years before accreditation can take place. These programmes are:
 - Computing
 - Media
 - Business
 - Engineering

8.1 The Chairman thanked all present for attending.

8.2 The meeting was adjourned at 12:06 p.m.

I certify that the Minutes are true and correct.

Chairman

Secretary

March 09, 2020

Appendix IV

Verbatim Notes of the 35th Meeting

VERBATIM NOTES OF THE THIRTY-FIFTH MEETING OF THE JOINT SELECT COMMITTEE APPOINTED TO ENQUIRE INTO AND REPORT ON LOCAL AUTHORITIES, SERVICE COMMISSIONS AND STATUTORY AUTHORITIES (INCLUDING THE THA) HELD (IN THE A.N.R. ROBINSON (EAST), LEVEL 9 MEETING ROOM, (IN PUBLIC), TOWER D, INTERNATIONAL WATERFRONT CENTRE, #1A WRIGHTSON ROAD, PORT OF SPAIN, ON FRIDAY, NOVEMBER 22, 2019 AT 10.25 A.M.

PRESENT

Dr. Varma Deyalsingh	Chairman
Ms. Ramona Ramdial	Vice-Chairman
Mr. Nigel De Freitas	Member
Mr. Esmond Forde	Member
Mr. Julien Ogilvie	Secretary
Ms. Khisha Peterkin	Assistant Secretary
Ms. Terriann Baker	Graduate Research Assistant

ABSENT

Mrs. Jennifer Baptiste-Primus	Member
Mr. Darryl Smith	Member
Dr. Lovell Francis	Member
Ms. Khadijah Ameen	Member

MINISTRY OF EDUCATION

Mr. Kurt Meyer	Permanent Secretary
Ms. Bhagwati Manick	Director, Finance and Accounting
Ms. Carol Bickram	Director (Ag.), Research, Planning and Technical Services

Mr. Urban Huggins

Deputy Director,
Funding and Grants
Administration Division

ACCREDITATION COUNCIL OF TRINIDAD AND TOBAGO

Dr. Eduardo Ali

Executive Director

Mr. Curtis Floyd

Director, Accreditation and Quality
Enhancement

Ms. Emily Pascal

Director, Finance and Administration

Ms. Lesley-Ann Brathwaite

Director, Qualifications and Recognition
(Ag.)

Mr. Junior Nagassar

Research Officer–Legal

Ms. Sharon Delochan

Assessment Officer

Mr. Chairman: Good morning, ladies and gentlemen. Thank you all for coming here today. This is the Thirty-Fifth meeting of the Joint Select Committee on Local Authorities, Service Commissions and Statutory Authorities including the THA. And this is the Committee's first public hearing pursuant to its enquiry into the efficiency and effectiveness of the Accreditation Council of Trinidad and Tobago. Members of the listening and viewing audience are being invited to post or send their comments via Parliament's various social media platforms, Facebook, YouTube and Twitter. And on this occasion, we have the pleasure of welcoming the personnel from the Ministry of Education and the Accreditation Council of Trinidad and Tobago. And at this stage, I would like the members of the Ministry of Education to please introduce yourselves.

[Introductions made]

Mr. Chairman: Would the officials of the Accreditation Council of Trinidad and Tobago introduce themselves now?

[Introductions made]

Mr. Chairman: Okay, thank for you all being here. I am Dr. Varma Deyalsingh, the

Chair of this Committee and I would like my members, my Vice-Chair and the other members to introduce themselves please.

[Introductions made]

Mr. Chairman: So I would like to remind the members of the public, the objections of this enquiry is really to evaluate the efficiency and the effectiveness of the ACTT in executing its mandate and to evaluate the performance of the ACTT in its assuring quality in the delivery of tertiary and post-secondary education, by local schools affiliated with foreign institutions and to determine whether the resources, systems and procedures of the ACTT are sufficient, to allow it to operate efficiently. I must say when the ACTT came about initially, I think it was about 2007, it was faced with many challenges, looking at around 200 schools that were existing. And there were, you know there is a drive to see if we could get those schools standardized, to get it registered, to get some accredited. So a lot of work went on and I think Mr. Bradshaw who was there from the start of it, actually gave us a good synopsis of what went on and the challenges faced. And at least we still have some challenges, we still have some ways of trying to see if we could improve the system. So I appreciate your presence here to help us to see if there is any way we could improve this system.

At this stage, I would like to ask the—you know, the chief officials to make brief openings remarks, not exceeding two minutes because we are now, you know, looking at the timeline to see how we could finish this, you know, a little quickly. So could Mrs. Lenore Baptiste-Simmons, the Permanent Secretary—no, sorry not—Mr. Meyer, I think, Permanent Secretary, could you please give us a brief opening statement?

Mr. Meyer: Good morning to the honourable Chairman and members of the Joint Select Committee on Local Authorities Service Commissions and Statutory Authorities. The Ministry of Education is charged with the responsibility for building human capital development in Trinidad and Tobago in pursuit of sustainable development. The Ministry is responsible for ensuring that all citizens have access to quality education from early

childhood to the tertiary level. The ACTT established by Act No. 16 of 2004, is the principal body responsible for the conducting and advising on the accreditation and registration of post-secondary, tertiary and training institutions and programmes whether local or foreign. The Ministry—essentially, the Council’s role is to ensure that all institutions, public and private, offer education at the tertiary level and that all programmes offered at this level adhere to at least a minimum standard or as in the case of many of our institutions, strive for optimum standards in keeping with the international best practice. The Ministry welcomes this enquiry into the—at the Joint Select Committee into the efficiency and effectiveness of the ACTT. Thank you.

Mr. Chairman: Thank you. Would Dr. Eduardo Ali give us brief opening statements, please?

Dr. Ali: Good morning, Mr. Chairman and honourable members of this august body. I would like to thank you and members of the public for joining us today as we participate in this very important exercise. First and foremost, on behalf of the management and staff of the ACTT, I would like to thank you for arranging this important meeting to permit us to make presentations to you and to the public. I would like to put on record, the appreciation we have for the Parliament of Trinidad and Tobago, as that body that will help to strengthen the national tertiary education system. As a public body which is responsible for regulating the provision of quality assurance with locally based post-secondary and tertiary education institutions and, of course, those which would require recognition of foreign qualifications, we see our role as being—as having a God-given privilege to be a blessing to this nation. To us, integrity, accountability, equity, transparency and improvement, do not just represent our value system but they are service attitudes for working with our stakeholders. Just upon my assumption, just a mere four months ago, I have been undertaking a comprehensive review of the operations and the organization’s capacity and effectiveness. As a learning organization, we are incrementally taking corrective actions to improve our operational efficiency as we obtain

feedback from staff and our stakeholders. We have also devised a plan for the way forward, both in terms of an annual plan for the next year and we are preparing our new strategic plan for 2020—2025. While not originally conceptualized, I know in our planning methodology, today's meeting is timely, because it provides us with an opportunity to collect your esteemed feedback, and has also enabled us to use some very important questions you posed to support our continuous improvement efforts.

While we have been constrained in responding to the needs of our stakeholders by not having a Board of Directors for some time, the management and staff have been, and still committed, to resolving the concerns of the citizenry. Today, we anticipate a meaningful, constructive and productive dialogue and look forward to your sterling feedback to assist us in strengthening our governance, strategic mandate and operational delivery mechanisms in the interest of good governance in this country. While I may be personally constrained to respond to specific questions of historical nature because of my limited exposure at the ACTT, members of the team are here today to provide some support to you in answering those questions, not just for public consumption, but also to obtain your esteemed advice. Thank you very much.

Mr. Chairman: Thank you, Dr. Ali. And I realize you are just in the position, six months, I think?

Dr. Ali: Four.

Mr. Chairman: Four months, right, but I at least you have your team here to help us, you know, elaborate any concerns we may have. At this stage, I would like to remind persons that when you are addressing, activate your microphone and then you can also deactivate it once you have concluded your contribution. And we would now proceed and if anyone wants questions, please direct it through the Chair and a little housekeeping rules, please yourself once, if you can just keep it off for a while.

So starting with your submission, Dr. Ali, you mentioned you had some challenges in terms of the board, you know, you do you not have a Directors of the Board. And I

looked at the submissions before of Mr. Bradshaw and this was one of the challenges along the way. Sometimes you do not have the board being present to give you a quorum or to have the proper running. Now, I know this question now will there. But this question, I want to direct to the Ministry of Education: What has seemed to be problem in giving this institution their members to fulfill their mandate? Because it is something that we saw in the past mentioned and, again, we have seen it come about again.

Mr. Meyer: There has been some difficulties in the past and it really has been some bureaucracy between the Ministry and I believe the—it is basically a bureaucratic problems. But what we have done recently, we have put a number of things in place to streamline our board appointments, not just for ACTT, but for all our institutions. And we will soon see that that—those delays should become a thing of the past.

Mr. Chairman: So, would the Council soon be fully constituted?

Dr. Ali : Yes, we are working assiduously to make sure that all the board positions are filled.

Mr. Chairman: Could you give us an idea—sorry— how many members are needed again to fulfill this mandate?

Dr. Ali: We appointed—right. We recently appointed the board and I think everybody is in place except—no, we have everybody. Yes. The board is in place now.

Mr. Chairman: It is just a matter a parliamentary—

Dr. Ali: No. The board is in place.

Mr. Chairman: In place, okay. All right. So that challenge that we had soon would be stopped?

Dr. Ali: That has been dealt with.

Mrs. Ramdial: Thank you, Chair. To the Ministry of Education: Now, I am seeing that the yearly allocation for the ACTT declined from 16.5 million in 2016/2017 to 10 million in 2018/2019. Can you give reasons as to this decline in funding to the ACTT?

Dr. Ali: It did decline, but in 2020, if you check this allocation, it has increased to \$12

million this year. The decline was—well, we had some budgetary constraints, we had some tax placed on us. The tax was raised slightly this year so we were to increase their allocation slightly, to 12 million.

Mr. Forde: Mr. Chairman. Thank you, Mr. Chairman. Welcome, I would really like to start at the top, right. We understand that an institution can be registered, an institution can be recognized and one can be accredited. I would like you all to distinctly as possible explain those three options not only for me, for the committee and for the listening public.

Dr. Ali: Thank you very much, honourable member. The issue is that institutions that wants to operate within our domestic shores, that the level of post-secondary or tertiary education provisions are required to be registered. Registration is really an operational mechanism where institutions get the legal authority to operate. There are minimum standards for registering an institution. Those standards ensure that the institutions have the capacity to deliver quality programmes.

Where recognition is concerned, such institutions that are foreign, that come onto our shores and are having collaborative arrangements with institutions locally, those institutions are required to be recognized by the ACTT. The process involves an assurance that the provisions available at the foreign location are evaluated and that the institution, locally, has the capacity to deliver the programme locally.

Where accreditation is concerned, this is a—if you wish, a higher level of delivery where the institutions are required to demonstrate. Not only do they have the capacity to deliver quality education, but they also have the ability to continue in delivering that quality education. So what usually pertains is the institution undergoes a very rigorous, sometimes two to three-year period of evaluation, preparation and evaluation to ensure that the institution has been and can continue to deliver quality education to citizens.

Mr. Forde: Follow-up. Are there any institutions, at present, in Trinidad and Tobago operating and may not be, as you said, accredited or recognized in terms of the foreign affiliation with the local institutions?

Dr. Ali: Accreditation is a voluntary process. So it is not mandatory for institutions to go through that process. Currently, we have approximately 14 institutions that have undergone that process. Some of them, or at least in one instance, one of those institutions has opted out of accreditation and has chosen to be re-registered. Be that as it may, the institutions that are foreign, all of the institutions that are foreign that have come to us have actually gone through the process of recognition and we also look at what we call transnational recognition, which is where the institution that is delivering the programmes here, they are required to be registered with ACTT and they are also required to be evaluated in terms of the quality of the programmes that are delivered here. So, generally speaking, institutions that operate in Trinidad and Tobago are required to do so.

However, there are those institutions that may have a period of lapse in terms of going through a process with us because of the application and the period by which they are evaluated to actually have a result. There are those that may have, for one reason or the other, opted out of the process and may have opted to deliver lower level programmes that are not within the purview of ACTT and there are those as well that has chosen to close their operations and so, they are no longer offering such programmes.

So those are the categories that usually we encounter, where institutions that are operating or that chose to continue to operate may be not in a position to undergo the process with us.

Mr. Forde: Okay. Again, on page 5, you mentioned about 14, those are the 14 you are referring to, based on your submission?

Dr. Ali: Yes.

Mr. Forde: But there is an institution that operations out in the east. I am not too sure I want to mention the name but it is well populated in terms of students attendance and so on, but I am not seeing them listed here as being accredited.

Dr. Ali: If the institution is not listed as being accredited, they may be registered and offering programmes as a registered institution and if they offering foreign programmes,

those programmes would probably have been evaluated for transnational recognition.

Mr. Forde: And when the process is completed, will the accreditation be retroactive? How it operates? So like an institution is operating three years now, right, they may not be listed here as being accredited, but when they do become accredited, will the process be considered retroactive? How is it done?

Dr. Ali: If you may, honourable member, I would like to pass this question onto the response from the Director of Accreditation and Quality Enhancement.

Mr. Floyd: Good morning. Good morning all and with respect to your question with retroactive accreditation, the institution after undergoing the evaluation, once the decision is made to have the institution accredited, the accreditation would take effect from the date of the board's decision. Yes? And one of the things that I would need to mention as well is that institutions pursuing institutional accreditation must have at least had registered status, must have had that registered status for a minimum of three years and must be offering their locally-developed programmes which was approved by ACTT and have graduated one cohort from that programme. So while registration is mandatory, accreditation, as was mentioned previously, is voluntary.

Mr. Forde: So in terms of the validity of the particular certification that the individual may possess prior to the board decision, is that certification affected in any way?

10.45 a.m.

Mr. Floyd: Once the institution would have been registered, the programmes that the institution is approved to offer would also be considered under the accreditation.

Mr. Chairman: Before you—let me just ask one thing. So if someone opens a school and that person has not applied for registration and is just teaching students and advertising, is there anything in the law that you can penalize that institution?

Mr. Floyd: I would probably want to defer some of the responses to the legal person but in my response to that, the institution, once you are operating and offering post-secondary/tertiary qualifications, according to the law, Chap. 39:06, you will be operating

illegally and you will be subject to a fine of \$5,000 for every day you continue to operate upon summary conviction, and \$25,000 initially.

Mr. De Freitas: Thank you, Mr. Chairman. This question might have come out in some of the answers before but I am just trying to drill down into something. Forgive me if it is a repeat. What is the real, and I focus on the word “real”, benefit of being accredited because to me in what you have said before it seems that this is something for locals and foreign institutions that want to work by way of educational material in Trinidad and Tobago? So what is the real benefit to accreditation given that it is voluntarily?

Mr. Floyd: Accreditation is the international language that is known as far as quality assurance in tertiary education. With registration, as was mentioned previously, the institutions demonstrate that they have minimum standards in order to offer the tertiary qualifications to the public. With accreditation you are looking to see how well all these systems are working. Accreditation would facilitate mutual recognition of the qualifications internationally and it would also facilitate transfer of, not only staff but students to other institutions internationally to pursue further education and it is testament to the quality that the institution is offering to members of the public.

Mr. De Freitas: You see, that is why I asked that question so it drilled down just a little bit further. So this accreditation that an institution would receive in Trinidad and Tobago it is internationally recognized? Great. So if an institution has an accreditation, let us say from the US, do they have to go through this process in Trinidad and Tobago or do you sort of accept the fact that their respective or corresponding body in their country has accredited them and therefore if they are entering Trinidad and Tobago, either in collaboration with another entity then you sort of recognize that as opposed to them having to go through the process? Does that happen?

Dr. Ali: Member, thank you very much for your question and I will respond to that. Generally speaking, the Accreditation Council of Trinidad and Tobago is a member of the International Network for Quality Assurance Agencies in Higher Education. That agency

has over 200 members worldwide. These are accrediting agencies and by virtue of being a member the recognition of our qualifications here are mutually accepted. So an institution that has been accredited in the United States by any of the seven regional accrediting bodies or that has been accredited in the UK or in any other part of the world, those would be automatically recognized by us.

However, we do have a database that we subscribe to offered by the United Kingdom's National Recognition Information Centre and the database provides us with a comprehensive list of all of the qualifications worldwide that have been recognized and accredited in their domestic provisions. So we use that information on a regular basis primarily for the purpose of issuing statements on recognition for persons who are interested in obtaining those statements for employment primarily or, as was indicated previously, for further education. So there are other benefits to accreditation and the issue has to do with employment and the employability. Of course, we have a number of graduates who are seeking opportunities in the employment market, both here and abroad, and the stamp of approval that ACTT provides on the qualifications that these holders would have gotten from an accredited institution versus a registered institution guarantees that the person will be obviously recognized in a foreign jurisdiction.

Mr. De Freitas: So there are very good benefits to being accredited, so then I want to ask, what percentage of registered entities are accredited?

Dr. Ali: If I may, we have, just as I said, about 14. Initially in 2008 there were 81 institutions, currently we have just about 55 to 60 institutions that are registered and accredited. So you are looking at a ratio of about 1:5 almost in terms of those that are accredited versus those that are registered and accredited. And therein lies the issue because when ACTT was established initially, it was conceptualized, while it is voluntary and not mandatory for institutions to go through accreditation, that you would have seen an increased interest by registered institutions nationally to move to the higher levels of quality which would have been to become accredited. That is a huge investment and quite

often institutions may not have the resources and/or the capacity to undergo that activity, notwithstanding, many would have been satisfied with having the minimum requirements and not moving to a higher level of quality.

Mr. De Freitas: And that is why you notice the reason I was asking the questions in terms of what is the benefit because I want the public to hear exactly what the benefits are of becoming accredited, because I am quite aware in other industries, certifications and the different levels you have, and professionals in a particular industry, be it engineering or sciences would understand what I am talking about, and when you get to the higher levels it comes with the kind of benefits, higher pay, and that kind of stuff. So is there an intent to do an educational drive to sort of, you know, balance that ratio a little bit better, try to get it to 1:1 which I guess is the best case scenario for the Accreditation Council? You all intend to do an educational drive?

Dr. Ali: Member, thank you for that question. In short our response is, yes, however, to do an educational drive nationally to get institutions to become more aware of what is required and to get the public at large to become more aware would require some investment of capital to support that educational drive. ACTT has been constrained in that area for some time so we have resorted to very simple means of getting the message out. For example, I have already, upon my assumption, I started to visit all accredited institutions with a view to sharing with them our strategic mandate, the proposed strategic mandate and to get their buy-in because we are looking at a number of other areas outside of what we traditionally offer. For example, one of the areas that has not been traditionally provided at the ACTT is the issue of looking at accreditation of online programmes and courses.

There is also the issue of professional development and continuing education courses offered for varying professions and we are about to look at the issue of the standards, for approving standards for accrediting those courses that are offered, both in a fully online environment, as well as those that are offered for professionals. So that is part

of our public education drive, however, as I said before, the issue is primarily a capital issue to be able to invest in moving forward with that. The registered institutions understand the benefits of accreditation, they are fully aware, however, as I indicated, there are some issues with respect to the investment on their side to move in that direction.

Ms. Ramdial: Thank you very much, Dr. Ali, but let us just go back a little bit. So from your submissions I am seeing in front of me we have 146 non-registered institutions, you have 14 registered institutions; now, I understand that there is a penalty attached to not being registered as Mr. Floyd earlier on said. Are these 146 non-registered institutions currently paying these fines? Are they paying these fines as we speak?

Dr. Ali: Member, thank you. Vice Chairman, thank you very much for your question. Just to indicate that 115 of those institutions are not within the purview of the ACTT. By matter of policy there has been a distinction made between what we call Level 1 and Level 2 programmes and Level 3 and above. Essentially Level 3 programmes are those that are at the certificate and diploma levels and thereabout, and above. Those that are below are primarily regulated by the National Training Agency. So that list that you have includes the list, 115 institutions or providers that are regulated by the National Training Agency who would approve centres and those may be approved centres by the NTA.

Ms. Ramdial: So the unapproved centres by the NTA are they currently being fined?

Dr. Ali: I will not be able to respond to that because I have not come across that information but I will pass the question on to, if possible, to our legal person.

Ms. Ramdial: Thank you.

Mr. Nagassar: Thank you, member. To date, my department has not received any information with respect to any institution operating in contravention of section 26. As Dr. Ali indicated, before any action can be taken the first thing is to determine whether the institution does in fact fall within the purview of the ACTT. That information has not been forwarded to the legal department. If the information does come to legal department, in keeping with section 26(4), the necessary action would be taken.

Ms. Ramdial: Who needs to forward that information to the ACTT?

Mr. Nagassar: Well, information relative to those issues can come from a number of fora. It can come from official complaints, it can be unearthed through our monitoring of institutions; it can come through newspapers, and so on. As I indicated, none of that information has been brought to my department.

Ms. Ramdial: So am I to understand that the onus is on the institutions themselves to come forward to be registered in order to not be fined?

Mr. Nagassar: Yes, of course. In order to fall within the provisions of the Act it is incumbent on all of those institutions to come forward.

Ms. Ramdial: And what is the ACTT doing to encourage these institutions to come forward to register? Dr. Ali.

Dr. Ali: Yes. Well, what I can say from my limited knowledge is that in the past ACTT has been, as was indicated, monitoring those institutions that have been providing education to citizens that are not registered, and that information which has come to the attention of ACTT has followed up with correspondence to them indicating that they need to be registered. In terms of the legal aspect, as was indicated, that is another matter altogether. But, generally speaking, once information comes to the attention of the ACTT, as least historically, ACTT then contacts the institution to let them know that they need to be registered, this is the procedure for registration, this is the policy for registration, and thereafter they are required to do so.

For the most part institutions initiate the process with us but from the information we receive, quite often that process is not followed through. There are delays on their part and the delays continue to a certain extent where they may eventually shift from offering the level of programmes that are under our purview to the level of programmes offered under another purview where they may go through an alternative process.

Ms. Ramdial: So can the Ministry of Education act on your behalf to approach these institutions to get them registered?

Mr. Meyer: We could do that through the NTA, and I believe what we will have to do is take a look very carefully at if there is a gap to make sure that if they are not covered by ACTT, NTA is picking them up, and if they are not covered by either institutions then fines can be levied.

Ms. Ramdial: Okay.

Mr. Chairman: Well, I knew before the advent of the ACTT there were about 200 institutions existing and after, you know, those institutions were approached and some of them, as you quite rightly say, could not afford to put mechanisms in place to have their internal quality surveying, and whatnot, and I think it dwindled down to 94. So definitely you had that level of decline but now we are still in a situation where after all this time, 2007, we still have those institutions. As I say, we need to get something to get them back into the forefront where, you know, they could be encouraged or somehow help, because, again, if you could educate more persons in the proper manner I think this will help us. Mr. De Freitas.

Mr. De Freitas: Thanks again, Mr. Chairman. I just want to take it from the standpoint of the end-user because these are educational institutions. Just for my knowledge and the knowledge of the public, how would someone who, looking at these non-registered entities, because some of them are like draperies and what are called technical educational stuff that is going on, and you see them all over the place sometimes, sewing, that kind of stuff, how would someone know when looking for these entities whether it is accredited or even registered? How would they know? Is there something that goes up or is there a thing that goes on their website if they have one? Is there a published list?

Dr. Ali: Yes. We take every effort to provide a comprehensive listing of all registered and accredited institutions on our website. It is public information, notwithstanding there is what is called the compendium of institutions. It is a comprehensive list of all the registered and accredited institutions that are under the ACTT, as well as the programmes and qualifications that are duly recognised by us. So that information is available and

since it was first introduced the traffic, public traffic towards utilizing or using the service is quite high. So we have a situation where persons can avail themselves through that mechanism.

The other mechanism is, of course, quite often persons come to us for statements on recognition and at that level they discover when they approach us whether the particular qualification is a qualification that is under our jurisdiction as an agency or, as I said before, they may be under the jurisdiction of the National Training Agency, and at that point they would refer the matter to the National Training Agency for further information. However, where we are concerned we provide them with the information that they need at either one point through the website, as I indicated, or when they can come to us for a statement on recognition, or sometimes they may just call and make enquiries publicly and we provide the information to them.

Mr. De Freitas: All right. So I am coming to a particular question, so I just want to ask this bridge question. So there is no compelling of institutions, or I should say accredited institutions to put up a sticker or any kind of mark to say, “Well, listen, this is an accredited institution”, so that somebody who engages at that level, which is the institution, sees that and knows, well, okay, this is an accredited institution?

Dr. Ali: All registered and accredited institutions, they have a trademark from ACTT that allows them to be able to advertise that affiliation with ACTT. So if they are registered there is a registered institution trademark; if they are accredited there is an accredited institution trademark, and that information is also used in public advertisements and from the institution. Notwithstanding when an institution is registered by us or accredited by us, public advertisements do go out primarily throughout the newspapers for persons from the public to know that the institution has been registered and/or accredited and the duration for that registered status or accredited status.

Mr. De Freitas: All right. And this is the question that I was getting to and the Ministry may or may not be able to answer this. So barring all of that, what recourse is there to a

student who has gone through the entire process, for whatever reason they may not have done the necessary checks; they have come out with the certification and then realized it is no good, what recourse does that student then have? Because they would have spent money to get this, you know, certification or diploma, or whatever it is, only to realize after that it is not accredited; it is not recognized. The institution itself is not even registered and you have just wasted time and money. So what recourse is there to students who may find themselves in that situation?

Dr. Ali: Generally speaking, as was indicated, our public education drive primarily has targeted students in schools, persons at tertiary institutions and those who attend certain events, career fairs and others over the years, and at that level information is provided to students so that they are aware of which institutions are accredited and which ones are registered. They are also given an opportunity to come to us in terms of obtaining further information or clarification if they so desire, and those are the channels that we have uses. As far as where the institution is concerned or the individual is concerned, quite often we suggest to them to do what is called an “intent to” Statement on Recognition and we try to compel them as far as possible to do that.

What that means is if you, a student or a member of the public is desirous of pursuing a degree or any qualification at any institution in Trinidad and Tobago, we do provide a service where they get a Statement on Recognition prior to embarking upon the degree that says, the programme is duly recognized and/or accredited in Trinidad and Tobago, and that provides them with the opportunity of being able to know for sure that the qualification is one that is acceptable. Quite often there are those who will not know about the service and those are the ones we try to reach through various public channels but we are not the only ones who send that message out, because what we do is we work closely, as I said, with the school system and we work closely with the institutions and we advise them as much as possible to advise their students as well. So those are usually the channels that we take to get the information out.

Mr. De Freitas: Thank you very much. And, again, that is great, but what I really wanted to get to was, there will always be that one person who, for whatever reason, is captured in that and I was trying to find out if there is any recourse for that person because somebody may be listening right now and, you know, wanting that information.

Dr. Ali: Just two possible courses, one is students do write us registering their complaints and there is a due process that we have which is primarily lobbied through the office of the Executive Director and through our legal department. The other opportunity they have is to go to the Ministry to get that recourse addressed.

Mr. Forde: I just want to make a follow-up question of my Senator colleague there. Accredited institution certifications are recognized internationally but if you are just registered it is locally only; clarify.

Dr. Ali: That is correct. So registered institutions, it demonstrates that the institution is legally operating domestically in Trinidad and Tobago. We cannot qualify the programme quality at those institutions unless they have gone through programme approval, which we offer as a service, or they have gone through transnational recognition if it is a foreign qualification being offered in Trinidad. Accredited institutions, however, enjoy the full benefits because those institutions, the programmes that are offered at those institutions undergo a comprehensive evaluation by ACTT, which would mean at the end of our evaluation we guarantee that the quality of programming that is offered at these institutions and the qualifications that are offered are surpassed or meet the standards that we have for quality education.

Mr. Meyer:—question—

Mr. Forde: You want to add to what your colleague is saying?

Mr. Meyer: Yes. I just want to clarify one thing, we have not yet received any complaints of that nature about your specific question. We do have a register and the public is free to write us if a particular situation like that occurs, but we have not, up to this date, we have not received any complaints like that.

Ms. Ramdial: Okay.

Mr. Forde: Just one—

Mr. De Freitas: Just to add to that—one second—but I am wondering if that is a function of, you go to the programme, you finish, you get your certification and it may take a little while, you know, to apply for a job or to even properly use it and by that time you are not even thinking that there is some sort of a recourse, that is why I asked that question because somebody may be listening. They would be quite angry, obviously, but to find out that this thing no good may actually be a number of months to years after you have actually got it. So I am glad you said that because, you know, that might be a reason.

Mr. Forde: Mr. Chairman, again, we were provided with the list of institutions that are not registered in Trinidad and Tobago, we were also provided with a list of institutions who have attained accreditation in Trinidad and Tobago, what about the list of registered institutions in Trinidad and Tobago? Because, you see, what is happening, Mr. Chairman, I am zeroing in on a name, a particular name that I am not seeing. It is an institution in the east, Mr. Chairman—*[Interruption]* No, again, I want you all to bear with me because, again, as a Member of Parliament, individuals come to us with everything and individuals come with regard to scenarios like those. So again, how are we to deal with situations like those and, you know, you see thousands of people patronizing this particular institution, you know? And again, as the Accreditation Council, the legal department and the different various quality control and the compliance, how are we to identify those institutions to make it clearly to the public that, “Listen, you all need to be careful with regard to the various institutions when you are looking at your educational thing? Could you shed some light? Because again, you know, probably it might be a discussion to have after, but I am really curious.

Dr. Ali: Sure, hon. Member, I will make an initial response and then allow the Director for Accreditation and Quality Enhancement to elaborate. Generally speaking, in terms of the lists that you will have, they would primarily respond to the questions that were

provided. So there is a list of registered institutions that is on our website and the public can go on our website and they can look at the list of registered institutions. If an institution is not named therefore it is not registered and so in that regard that institution really would be operating illegally and, as we have indicated, there are certain provisions made for treating with such institutions. I am not sure if the Director of Accreditation and Quality Enhancement will like to elaborate on that issue.

Ms. Ramdial: So, again, we go back to this illegal operations and the fee for the unregistered bodies. First of all just to clarify, what is the fee to register?

Mr. Floyd: Good morning again, hon. members, the fee for registration, there are different fees at different stages of the registration process. There is the application processing fee when you submit the application and that is \$1,000 with the submission of the application. There is also the evaluation fee which is used for payment of the evaluators who will be conducting the evaluation of the institution, and then there is the certification fee which is used for publishing in the daily newspapers as well as the news, the certificates.

Ms. Ramdial: Yeah, so how much is—

Mr. Floyd: So it varies.

Ms. Ramdial: Okay.

Mr. Floyd: The evaluation itself can vary between \$10,000 to \$15,000 because it is dependent on the number of sites that will have to be visited and the number of evaluators who will be contracted to conduct the exercise. The advertising or certification fee that too sometimes could have some fluctuations because it would depend on the rates at the time to publish.

Ms. Ramdial: So what is the average? Like an average—

Mr. Floyd: So average, it could work out to about, again, maybe about \$3,000/ \$4,000.

Ms. Ramdial: Let us just say, we are looking at an average fee of about \$20,000 in general per institution, just averaging from what you have just said; I know that there are different

levels. So is it that we can deduce that the cost is a deterrent for these unregistered institutions? Is it that you will need to have a cheaper fee structure implemented to have these 146 unregistered institutions come and pay to operate legally?

Mr. Floyd: There have been instances where the fee for some of these institutions would have been prohibitive and they decided to withdraw; that would have been in minimal instances. In a few other instances the institutions determined that they could not uphold the standards to undergo the process. They felt it was too rigorous, they did not have the necessary systems and resources in place, and so they decided, they opted out of pursuing the registration with the Council.

Mr. Chairman: Dr. Ali, you wanted to—

Dr. Ali: Yes. I would also like to elaborate on a point. We have done our comparative benchmarking with fees or charged by other bodies internationally and the fees that we charge our institutions in Trinidad and Tobago for public information are between 5 and 25 per cent of what international accreditation bodies charge, so we already are disadvantaged.

Ms. Ramdial: Below, yeah.

Dr. Ali: We are below the benchmark, way below the benchmark but we do know that some institutions have a concern about the fees that we charge. Well, I think it is important for the public to understand that we are already setting fees at a very low level and we are offering the accreditation primarily. The stamp of approval that we have is just as good as the recognition given to any accreditation provided in any major developed country in the world.

Ms. Ramdial: A quick follow-up, so again, would it be safe to say that it is not really the fee that is the deterrent to register but really the standards that need to be upheld? But this can have serious impact on students attending these institutions and I think that something needs to be done ASAP.

Mr. Chairman: So what I am gathering here is that the quality assurance, looking at the

functioning of these institutions, you have persons going in and checking on those individuals, the schools, inspecting the schools, is it done to the institutions? After you have given them the accreditation, you know, registration, do you go and check and see if it is maintained?

Dr. Ali: The response to that is generally, yes. We have what we call pre, mid and post evaluation and monitoring activities and those include annual visits to the institutions and annual reports that are provided to the ACTT on those institutions, and the data we require is fairly comprehensive. In fact, when you look at what we ask and you compare with what other accrediting agencies ask in other parts of the world we request a lot more information from them than what is asked by those other bodies in other parts of the world. But I think maybe the Director would like to elaborate on that point.

Mr. Floyd: Certainly. Thank you, Dr. Ali. We have a multifaceted approach to the monitoring of the institutions. The monitoring would take place prior to engagement with the Council, during as well as after a status is awarded by the Council. We would have mentioned some of them previously, where we get feedback from members of the public through various forms of media. We also monitor the newspapers on a daily basis for advertisements, and if there are any errant institutions, these are things that we would follow up on. Also, when students come in to apply for these statements on recognition, this is where we might be able to pick up on an institution that we are not aware of, or on institutions offering programmes that have not been approved by us. So some of these things take place prior.

When an institution is applying for institutional registration they would submit to us information that we would review to determine whether or not the programmes that they are offering are really within our purview. There are several instances where persons would want to become registered because of the status associated with it and to be able to attract students, but upon review of the level of the programmes, it would be determined that they are not within our purview, so we are not in a position to engage them in the

registration process.

Institutions are also required to submit reports to us, annual reports, progress reports coming out of the evaluation exercise and these reports are monitored. They are reviewed by the officers, and any gaps that have been identified would be communicated to the institutions for them to be able to close off on those gaps. Institutions can be registered for a maximum period of three years. Accreditation is for a maximum period of seven years, as it stands currently. And during that period, apart from the annual reports, if there are any issues or complaints that would come up, any issues that come out of the annual reports that they submit, it would warrant, in some instances, a site visit to the institution. Particularly with the accredited institutions, we have what is called a “midterm review” and this is, for example, if the institution is awarded credited status for a period of five years, two and a half years into the status, we go back in on a midterm review to ensure that the institution is progressing towards the continuing institutional accreditation process, and closing off on any gaps that would have been, or the recommendations that would have been made by the evaluation team.

The status that would be awarded, whether it be registered or accredited, of course, is for a stipulated period of time. So in order to maintain that status the institution would have to apply for re-registration or continuing registration, as it is called, or continuing institutional accreditation where we would go back in and look at the institution again, complete a comprehensive evaluation of the institution to ensure that it is at least maintaining the standards, and to see what progress it is making in the respective areas.

Mr. Chairman: So is there a difference between approval for the programme and approval for the institution? So could you just elaborate more on that?

Mr. Floyd: The registered institutions registration looks at the capacity of the institution to be able to offer the particular programmes. These programmes must also undergo what is referred to as “programme approval”. We want to ensure that the programmes are up to standard for delivery to the public.

Likewise, when the institution undergoes the accreditation exercise, one of the main mechanisms that it must have in place is an internal programme, approval monitoring and approval process for its programmes. This too would be taken into consideration in evaluating the institution, so the programmes being offered at that time would be subsumed under the institution.

Mr. Chairman: So Dr. Ali, if someone gets a programme approval, an ACTT approved degree, and you mentioned that there is also the link with the international organization, I think it is a AQAA, the American and the other organization, would that person automatically be able to go and work in these other jurisdictions, or will your approval you have given, would they still have to go and apply to the AQAA for another sort of stamp of approval?

Mr. Ali: Generally speaking, Mr. Chairman, the ACTT when it approves the programme as was indicated is primarily approving it for delivery. It does not mean that after the programme has been approved necessarily that the provisions are made. Those provisions are tracked after we go through for another site visit to the institution.

Where accreditation is concerned, the answer to your questions is generally yes. However, there are domestic legal provisions in each territory that must be required. There are professional regulatory mechanisms in each country. So every standard that is established for the profession in that country must be met before the individual can of course obtain employment, and of course there are immigration and other factors that need to be taken into account. But notwithstanding that, the individual qualification that the person has and the credits that have been awarded for that qualification, will be recognized by the other country provided that it is part of our international agreement.

Mr. De Freitas: Mr. Chairman, if I could just ask here. So everything we have discussed today to me seems to apply to physical entities. You just spoke about site visits and whatnots. Where does online entities fall into this? Does it fall under your purview? You spoke about programme approvals, an online entity is strictly the programme and the

information; you do not need to be physically anywhere except in front of a computer. So where do online entities fall in terms of your jurisdiction and whatnot?

Mr. Ali: Generally speaking, hon. member, the standards we have for registration and accreditation can ideally applied to face-to-face environment or to an online environment. However, we do recognize that in an online environment primarily if you are talking about an institution, there are different types of scenarios that would present themselves that would be different contextually to what happens in a face-to-face institution or brick and mortar institution.

So what we have been doing is we have established a team that is looking at the issue, and we are looking at developing benchmarking with standards for online programmes initially. In our new strategic plan we are hoping to look at two sets of factors or two sets of scenarios. Scenario A, where you have courses and programmes that are offered in the online environment by institutions locally who wish to have those programmes offered. We will have the standards in place for evaluating those institutions, and for those that are fully online institutions, we will register and where possible accredit those online institutions in Trinidad and Tobago. If they are accredited—not if they are registered—by virtue of our international treaties, we would be satisfied to be able to ensure that those institutions would be able to provide their education in other jurisdictions outside of Trinidad and Tobago, the Caribbean and, of course, internationally.

Mr. De Freitas: Do the online entities need to be registered right now or is that something that we need to look at?

Mr. Ali: Generally, as I said, they could apply to be registered and/or accredited with our standards as they are. However, as I indicated, the standards need to be relooked to make provisions for those that are fully online, particularly those that would have provisions in other jurisdictions. There are institutions that have been established in other countries. Some of them are operating at minimal or zero quality. We call them “diploma mills”, and we have obviously been educating the public as to what diploma mills are, and the

need for students in particular to not attend diploma mill institutions or providers. Notwithstanding that, there are fully well-established online institutions, universities and colleges around the world, and so our standards that we put in place here would allow us to also recognize those that are coming onshore to students who want to pursue those programmes.

Mr. De Freitas: Understandably so, but what I was trying to get at is, for example, somebody locally may have a degree in a particular field and decide that they want to offer online courses. Does that individual need to register like a school, brick and mortar would, or is that something that we have not captured in any legislation?

Mr. Ali: Generally speaking, we do have what we call our “foreign awarding bodies” and foreign university institutions, as well as our transnational providers, and they are covered under that. I could ask, if possible, the Assessment Officer who handles transnational qualifications to speak to that.

Ms. Delochan: Thank you, hon. member. All institutions that are foreign institutions that are bringing programmes to Trinidad and Tobago, whether they are of an online nature or face-to-face, because some of the local institutions do provide local tutorials for transnational programmes, they need to come through the Accreditation Council of Trinidad and Tobago for recognition of those programmes. We would specifically look at the resources that students would be afforded, to provide them with the support they need to continue the programme.

Mr. De Freitas: My apologies, I understand that because that is what is happening now. People here would do an online course and they would get their certificate from a university. I am talking about the reverse. A Trinidad and Tobago citizen sets up a website, offers courses, does that person need to register that institution in the same way that all of the ones that are not registered here are illegal?

Mr. Ali: If I may speak to that, the answer to your question is yes, they must.

Mr. Forde: I have one question for the ACTT and then I want to bring in the Ministry of

Education, Mr. Chairman. We noted that several organizations, especially belonging to the State as not being registered. For example, we have Atlantic LNG Company of Trinidad and Tobago, Export Centres Company, the GAPP, Geriatric Adolescent Partnership Programme, and then T&TEC, especially with regard to T&TEC. What is happening with regard to these companies?

Mr. Ali: If I may, hon. member, generally speaking that list that I spoke about that has 115 providers, are from the National Training Agency. So those entities would have gone to the National Training Agencies because the qualifications they offer are at a level that are not within the jurisdiction of the ACTT.

Mr. Forde: But for educational institutions, you would definitely govern them?

Mr. Ali: Yes, primarily those that are offering degrees, certificates and all the way to doctoral degrees, they come to us.

Mr. Forde: Okay, fine. I would just like to go to the Education Ministry. In your submission you provided us with various organizations that are GATE funded and those that are not GATE funded. Again, sitting as a Member of Parliament, a lot of parents would visit our offices in order to verify and certify. Have you all ever listed, just as how you have clearly listed to us in this document, whether via the media, in the newspapers? I know probably you may say it is on the website, but again for some individuals they may not be able to go to the website. Have you all listed, from a marketing point of view, in terms of listing these institutions that are not GATE funded, versus those that are GATE funded for the public to have a total understanding?

Mr. Meyer: I will let Mr. Huggins answer this one.

Mr. Huggins: Good morning, thank you. Institutions that are GATE funded are usually advertised, because it is an asset to the institution and for the students who know that the students are eligible for GATE funding. So when institutions do advertise for their programmes, they usually add or they usually include in their submissions that the programme is GATE funded.

Mr. Forde: What about those that are not being GATE funded, do they clearly specify at the time that they are not GATE funded for the individual?

Mr. Huggins: They may not, but what would happen is that if it is that a student applies for a programme that is not GATE funded, the student will then know that this programme is not GATE funded. So even if the institution is delinquent in not informing the student that the programme is not GATE funded, when the student does apply for GATE funding they are then informed that this particular programme or institution is not tied to GATE.

Mr. Forde: So the process: I take my daughter to the particular institution, we apply. We get the necessary breakdown, invoices and what is the cost. You will then go to Ministry of Education office now to ascertain whether you would be applicable for the funding of GATE? How does the process go from when you do the application? Clarify for the public.

Mr. Chairman: I got the impression that once you are applying for GATE, the programme has to be ACTT approved. Once you are applying to get GATE funding, it has to be approved.

Mr. Meyer: That is right. It must be approved.

Mr. Forde: No but, Mr. Chairman, remember the student does not know that. Remember the student who is going to apply may not know that information. They want to be educated so they are now going to the particular institution in order to apply, then they will be informed. As you say, the institution wants to get the business so they may not say up front that, “Listen, this programme is not GATE approved.” So, the child goes home with the parent and then to realize when they go to the Ministry of Education now, that particular institution is not— so I just want to know for the listening public or the viewing public, clarify for us how the process operates for the particular individual, because again, we will have a lot of students now who would have now received their results now looking to seek some sort of entry.

Mr. Meyer: For the listening public, it is strongly recommended that when they are

interested in pursuing tertiary education they should look to see what institutions are approved for GATE funding. That is done through the Ministry's website. The Ministry does have a website included, and you will get that information. Those students who have applied for funding or go to an institution—and it is on the student also to ask the institution at the time, “Are you eligible for GATE funding?” It is a legitimate question, any student can ask an institution.

Ms. Ramdial: Just indulge me, because you are saying that GATE funding is only applicable to the ACTT stamp of approval. Are there any unregistered institutions that are getting GATE funding?

Mr. Meyer: No.

Ms. Ramdial: You are certain about that?

Mr. Meyer: Certain. One of the criteria for accessing GATE is that you must be registered and accredited.

Ms. Ramdial: Okay, good, good.

Mr. Chairman: And this is why initially I think when GATE came about, there was a move to try to get that ACTT stamp of approval. But you see what I am getting, members, is I am getting a sort of a discomfort. Member Forde mentioned some school, then we are getting some ideas that there may be some individuals putting out there schools that may not be up to mark or lacking in certain things. A former Executive Director of the ACTT suggested that a public affirmation should be introduced into the registration process.

So let us say somebody is coming to be re-registered or when you are going to look at their—after your inspection, so where members of the public can express concerns and have the institution, any sort of problems they have, put it into that. So what do you think about this idea of public affirmation? I think it is a good idea. Could you comment the feasibility of this suggestion, ACTT, and you aware of any similar approach adopted in any other countries? So at least we could get like a stamp of disapproval or any sort of red flags being raised on certain institutions.

Mr. Ali: Well there are different procedures and processes used by different international accrediting agencies. For example, in the UK there are at least two agencies that I am aware of. Their process is if an individual has a concern, and they do not call them complaints, they have a concern with an institution and the qualifications that they are offering, or the support services provided to the students, they would normally through the public means, their website primarily, register their concerns. We have been looking at that issue. While we have a specific procedure that we follow, we realize that the procedure needs to be benchmarked and to be upgraded, and so we have already started looking at those models with a view to upgrading what we offer.

Be that as it may, any person from the public who has a concern can write to us, and have written to us, indicating their concerns. What happens usually is having written, we will then investigate those concerns. We will look at the technicality of the concern and then we look at the legality of the concern. If there are issues, those issues would be addressed at the level of the institution. We raise the matters with the institution and the institution then is responsible for addressing those matters, and reporting to us in terms of how they have gone about redressing the issue.

In terms of a public affirmation, I think it is a good approach and it is certainly something that we will look at in terms of how we could integrate that within our present system.

Ms. Ramdial: Chair, thank you. Moving on to another topic of discussion to the ACTT. You indicated that your staff complement is not adequate, and I understand you have at least 20 vacancies. Could you tell me or could you give an update as of now, what is the situation?

Mr. Ali: Hon. member, the situation has not changed. Previously as you see from the org chart that was provided, there was a shortage based on the previous chart that was proffered. Because of resource constraints, we have not been able to fill any of those vacancies. Notwithstanding, given that it is based on a particular context, and now that we

are in a different financial context or situation, we have been looking at streamlining our workflows. So we have already undertaken to do an analysis of the workflows in the organization, and we are looking at how we can streamline the workflows in keeping with the resources that we have available.

So, generally speaking, it has posed some constraints, because as I indicated, the ratio usually of technical staff to admin staff in most of these organizations is primarily high. Four to one in accrediting agencies, in most large accrediting agencies, and we recognize that we need to do more in terms of improving or enhancing our technical staff complement.

Ms. Ramdial: Okay. I also understand that according to section 16 of the ACTT Act you can receive special grants. Have you made any application for any special project or activities to accommodate for these grants?

Mr. Ali: Yes we have. In fact, most recently we submitted a proposal to the Ministry of Education for funding under the European Development Fund and we are awaiting an approval of that.

Mr. Forde: I just want to go back to get some clarity here, because I am now double checking the information provided by both the ACTT and the Ministry of Education. On the Ministry of Education document provided, on page 5: “Tertiary level institutions which are currently in receipt of GATE funding”, you have No. 5 and No. 6: Metal Industries Company (MIC), Tobago Hospitality and Tourism Industry. And if we go to your amended document on page 5, there is a footnote which says:

MIC Institution of Technology, St. Andrews Theological College and Tobago Hospitality and Tourism Institute are currently awaiting board decisions.

If we go back and to tie it in with the Ministry of Education document, should they be on the GATE listing, Mr. PS?

Mr. Ali: I would like to respond to that to indicate that those specific institutions you have called have undergone an evaluation process. They have been and are accredited or

were accredited, up until the point where the evaluation was complete. There was a deadline for submission of their evaluation reports. We have received it, we have processed it, they are just awaiting board approval. So any programmes that would have been approved within the context of their recent accreditation status, would automatically mean that the students would have received GATE. We just have a period of about three months, over which these institutions have been awaiting approval, and the board would approve it soon, once the matter is addressed at the level of the board.

Mr. Forde: Additionally to that, are all programmes of GATE receipt institutions, would receive GATE for all the particular programmes? For example, the University of the West Indies, are all the programmes accredited in order to receive GATE funding?

Mr. Ali: The Ministry of Education will have to answer to that question, because all we do is evaluate, and we provide a list and thereafter it is taken to the Ministry for further discussion and approval.

Mr. Forde: Mr. PS, you could—

Mr. Chairman: Would someone from the Ministry respond?

Mr. Forde: All the programmes at the University of the West Indies are GATE funded?

Mr. Meyer: No, not all. Since with the introduction of the Standing Committee with respect to recent—the university is a very dynamic place, and they usually have programmes that are coming on stream all the time. They develop programmes based on needs analysis and what identify to be of value. Those programmes would need to come before a Standing Committee. First of all, it has to go through the ACTT process of approval. They would go through that rigorous process of determining—the process for approval. Once approval is given for the programme, ACTT would write the Ministry and say, we have done our evaluation on this particular programme, and the university would then apply to the Ministry for funding for the programme.

At that point in time, the Ministry would do their evaluation as well, based on our directive through the Standing Committee to determine the relevance of the programme,

the impact of the programme, and if the programme is within the developmental needs of the country, and of course, the costing to approve the programme for GATE funding. That is the process they would go through thereafter.

Mr. Forde: And again, all that information is drilled down to the individual who operates at the customer service desk at the university, I presume? That information you just explained, in that, the person knowing from day one that, listen, this programme is not accredited to receive GATE. We hope that the CSR at the particular desk at the University of the West Indies would have that information.

Mr. Meyer: It is a conversation that usually comes in very early in funding.

Mr. Forde: Because you see there is a timeline, you know, Mr. Huggins. There is a timeline between your making the application, the application being processed and then only to know after when you are anticipating that you are going and get entry to your programme—

Mr. Meyer: If you are getting funding.

Mr. Forde: You get declined. It is a real live situation especially now in 2019. Thank you, Chairman.

Ms. Ramdial: Thank you, Chair. To Dr. Ali. So you have accredited institutions and you have accredited programmes, no?

Dr. Ali: We have accredited institutions only and we have approved programmes. Most of the accredited programmes that are offered in Trinidad and Tobago are with international and regional accrediting bodies in specialized areas, like for example medicine and law, et cetera. But we do not accredit programmes currently.

Mr. Chairman: You see, I am wondering if this would puzzle persons, where you go to an institution and it is accredited by you, and then they join it and some programmes are not approved. So a young person seeking some sort of educational pursuit may go into an institution, hey, it is accredited, but the programme at the end of the day may not be approved.

One thing, Dr. Ali, I would want to come about, or even the personnel from the Ministry of Education, I was looking at the ACTT submissions where at page 14, you listed the institutions that have applied for accreditation but are still being assessed or evaluated. I was a bit alarmed to see the Council for Legal Education, the Hugh Wooding Law School. So is it that attorneys, after they get their LLB, which may be ACTT approved, but that segment of their continued training is not approved. Are we putting attorneys out there who may not have ACTT approval?

Dr. Ali: Hon. member, Chairman, I would just say that every institution has the authority and the right to be able to pursue accreditation voluntarily. Some institutions have chosen, for various reasons, governance and funding and other reasons, not to go in that direction. Obviously it would mean that, as I said, there are certain benefits provided to institutions that have gone through the institutional accreditation process. But where an institution is registered they do not normally enjoy those benefits.

In terms of attorneys having graduated from the Council of Legal Education, the Council by way of its treaty also has provisions made for recognition of those attorneys within the jurisdiction of the Caribbean region. So that treaty makes provision for that and I think that is what they have looked at over the years in terms of their opportunity to get due recognition for their attorneys.

11.45 a.m.

Mr. Chairman: I have noticed you had mentioned that your standard of, you know, payments that you get, it is less than the other institutions aboard in terms of the moneys that you could collect or you have been collecting. Right? But looking at your past—a report from Mr. Michael Bradshaw, he actually noted that, you know, when he had a deficiency of funds coming in, your institution actually had, you know, updates, they had actually ways of raising funds within the institution to help offset certain costs. Do you still follow that procedure?

Dr. Ali: I could only speak for the months in which I have been positioned in the agency

to say that there are plans for revenue-generating activities. Our corporate communications unit has now been focused on stakeholder engagement and fundraising activities, so I have been shifting their priorities to address the deficits that we have in our budget, notwithstanding, we have in our recurrent, because the decline we have experienced, we also have some cost-cutting measures that we have entertained in the last few months to address that deficit.

But what I can say is that, as I indicated, there are plans in place for looking at that. There are new products and services that we have already started to develop; we are re-engineering some of our products and services primarily the standards for some of the areas that we have specified, and we are hoping that when that is done, that activity has been completed within the next year or two, that we will have more services that would be offered to institutions in the public to meet the growing demands of a growing workforce, and a growing society. So generally speaking the answer is, yes, we do have plans. In terms of what transpired in the past, I think the submission you have received from the past executive director would have to speak to that because he would have been there to look at those issues at that time.

Mr. Forde: In terms of student complaints, you keep a track of the number of student complaints that you all would have received whether yearly, quarterly? How do you all track those stuff?

Dr. Ali: All of the complaints that come to us eventually are processed by the legal department, so I will ask the legal research officer, the attorney-at-law to speak to that matter, please.

Mr. Forde: And if you can give us a little breakdown? Like, for instance, the last five years, you know, what sort of complaints you all have been receiving—

Mr. Nagassar: Sure.

Mr. Forde:—briefly, and the totals, like yearly as the case may be.

Mr. Nagassar: Sure. For the past three years we are in receipt of some 30 complaints;

in the last year, 13.

Mr. Forde: Thirteen. And the breakdown, what is the major complaint as such?

Mr. Nagassar: It varies. It can be internal; it can be issues ranging from institutions offering programmes that are not approved by the ACTT. It can also concern issues of discrimination, issues of unfair treatment, issues related to transcript, issues of a certain lecturers not having the requisite qualifications to teach.

Mr. Forde: And in terms of the investigative response from the ACTT, how do you all go about the whole process?

Mr. Nagassar: Thank you for that. The process is a very detailed and thorough one. Upon receipt of a complaint from a complainant, the process entails firstly, the complaint being reviewed by the legal department. That complaint is reviewed to identify the issues, it is also reviewed to determine very importantly whether the ACTT has the jurisdiction to determine the complaint. The ACTT being a creature of statute cannot process a complaint that does not fall under its purview.

Following review of that complaint, it should also be noted as well that the review that normally takes place is done in keeping with a number of instruments that are in place to really monitor and regulate institutions. Those instruments include, firstly, the provisions of our governing Act, it also includes our approved policies, the standards and criteria by which institutions are required to operate, and very importantly, the general conditions. All institutions under the purview of the ACTT whether you are registered, accredited or recognized are required to enter into general conditions, those conditions specify the terms by which institutions are expected to operate. Following review of the complaint, advice is then provided in determining whether or not the ACTT can, in fact, pursue further.

Mr. Forde: And you all give the necessary feedback to the complainants?

Mr. Nagassar: Yes, we do.

Mr. Forde: Again, according to section 16 of the Act, the council is able to receive special

grants whether national, regional or internationally for financing of special projects and activities. I know you have only been there for four months, but with regard to your team, have you ever captained to any of these grants whether locally, internationally, regionally?

Dr. Ali: What I would like to do is defer the question to the director of finance and administration. As I indicated, we applied for a grant recently, and we are awaiting approval of that grant, that is specifically to look at the implementation of what is called a national qualifications framework in Trinidad and Tobago and, of course, the review of our standards, but I will ask the director of finance and administration to speak to that issue.

Ms. Pascal: Thank you, member. The ACTT has accessed an EDF funding in the past. We have applied recently for a grant to do a work study, it is called an “employability study” to see what areas the education system should be geared at in order to have persons qualified for the areas that we need personnel in.

So, for instance, if our development needs a certain type of skill, this work study is to guide students to that area of study in the universities, and we have applied to the EDF and we have gotten some 500,000 to do that study.

Mr. Forde: That is TT/US?

Ms. Pascal: No, TT.

Mr. Forde: Thank you very much, Chairman.

Mr. Chairman: We are now faced with an influx of persons coming in from South America, some persons come in with certain degrees and whatnot, and you know. Do you have any ways of linking up with any institutions in Venezuela or wherever to see if, you know, somehow you could look at their level of education there, how does it link with ACTT? Do you have any links with that?

Dr. Ali: Generally, hon. Chairman, the response is, yes. What I would say is that we just launched our new website which is in five languages including Spanish. The objective is to have persons within the Caricom community, and those persons who are in Latin

America be able to navigate our website and to access information.

We also have partners with various embassies where we have that close collaboration to be able to track what is happening in terms of migration, and the extent to which that has an impact. What I would like to do is ask the acting director of qualifications and recognition to speak to some of those specific arrangements.

Ms. Brathwaite: Thank you, member. As part of the qualifications and recognition department, we have seen an influx in applications for statements on recognition because of the influx of Venezuelan migrants coming to our shores. And what we do at the department is, we conduct the necessary research into the institution, also to verify whether the programme was approved or recognized by the Ministry of Education in Venezuela, and based on whether or not the programme is recognized or the institution is recognized, we issue a statement on recognition.

Also too, what we have seen as well is that, a lot of information on the institutions are currently not available because some of the websites are down. So what we have done in the past through our embassy in Venezuela, we have contacted the Ministry of Foreign Affairs officials there and they have assisted us in the past. And as Dr. Ali mentioned previously, we have links with the UK NARIC which is an international database, so we have access to professionals in that agency who assist us as well, so that we able to issue the statements of recognition, as well as even equivalent assessment which is another service that we offer.

Mr. Chairman: Well, I thank you for that, because I was concerned about the migrant population who would have been disadvantaged.

I would like to pose a question here now. To the Accreditation Council, your submission indicated that preliminary research and analysis was conducted on the shortcomings of the current legislation however, this has not been referred to or endorsed by any corporate governance body, namely the board of directors nor line Ministry, and I am referring to, I think, page 73 of your submissions. So I want to ask a question: What

is the proposed time frame for submitting the proposed changes to the ACTT Act to the board of directors and the Ministry of Education?

Dr. Ali: If I may, hon. Chairman, to indicate that we have an agenda set for the new board of directors, for the least, next four, five months and it includes some of those issues that you mentioned in terms of areas of legislation that require their review. You would have to understand that there are more pressing issues, namely institutions that have no status that would need to be approved quickly by the board of directors. Once that has been done, this matter will be raised with the board and thereafter, it would be channelled to the Ministry. From the board, the chairman of the board, to ensure that the Ministry can act upon on the advice that we render.

Mr. Forde: Chairman, litigations; you all have ever been subject to any litigation?—ACTT.

Dr. Ali: My response to that is, no, but I will allow the attorney-at-law to elaborate.

Mr. Nagassar: Member, since ACTT's inception to the current period, there has been no litigation proceedings initiated against the ACTT as it relates to any of our decisions. Decisions as it relates to registration, accreditation, recognition, programme approval, there has been no litigation proceedings initiated against the ACTT to date.

Mr. Forde: So as a result of that, well, we can say, there is no need for an appeals process as a result of—because I know the Ministry of Education had mentioned in their submission, you know, that there is the provision for an appeals committee with regard to the ACTT structure and so on.

Mr. Nagassar: An appeals committee is very important. Despite no litigation proceedings being initiated against the ACTT, we are still confronted from time to time to deal with complaints. Institutions may challenge certain decisions, and so moving forward it is very important that such a committee is appointed. The current circumstances are, in the absence of such a committee, those aggrieved institutions, stakeholders, students would have no choice but to petition the courts.

Mr. Forde: PS, you want to shed any light there?

Ms. Bickram: Thank you, hon. member. We recognize the need for the appeal committee, and we have in discussion with the ACTT we had a meeting in September and we noted to them the need to have it established because they had requested the Ministry to establish the appeals committee. We did ask them for a legal brief that will guide us which was submitted about a week or two ago. We sent it to our legal counsel, she is examining it, and we will continue the discussions to so establish, because it is in the Act.

Mr. Chairman: Now, we have heard the constraints that I think you are faced with, Dr. Ali, the financial staffing and we also realize you have a lot of work set out for your new board of directors.

And just in closing, just one question to the Ministry of Education. In your submission you stated that the ACTT fosters improved or higher standards among providers. That was page 4, paragraph C of your submissions. Right? Since it falls under purview and it seems you have been have pleased with them, and what we are hearing so far, we realize the constraints. I want to ask: What benchmarks has the Ministry of Education utilized to justify its analysis of the ACTT? Have you conducted any research on the best practices of accrediting institutions?

Mr. Meyer: The short answer to that would be, no, but we have looked at the ACTT's performance in terms of the time frame for delivery, and we have noted the fact have been complaints, nothing has really come to us. We have seen an improvement, we know there have been constraints, but even in spite of constraints, the ACTT has complied with most of our deliverables. So, generally we have 11 agencies that we provide oversight for. ACTT performs, so we are not displeased.

Mr. Chairman: Well, since 2007 it was a lot of work to be done, and I think you are on the right path. And at this stage, I think, we have done a lot this morning, I do not know if any other member would like to make any other question.

Mr. Forde: One other comment.

Mr. Chairman: Mr. Forde. Okay. Sure.

Mr. Forde: You know, the Secretariat just identified to me as a follow-up here, regarding a complaint against the ACTT related to its advice provided to an institution on the requirement of statutory approvals for registration of institutions, can the Ministry now clarify for us, it is stated on page 4 of our provisions, whether all tertiary institutions must have statutory approvals in order to operate in Trinidad and Tobago? That is one.

And secondly, whether statutory approvals are a prerequisite for registration with the ACTT? Right? And, again, the Ministry of Education would have submitted in their proposal on page 4, question vi.

Mr. Meyer: With respect to the statutory approvals, I am also responsible for the infrastructure portfolio of the Ministry, and that is all the schools, all the ECC centres. We require statutory approvals for these centres because it is a health and safety issue. You cannot have students, teachers, members of the public going to an institution that does not have basic statutory approvals. And, in fact, it should not even be a prerequisite. It should be, this is the thing that you require before even the ACTT comes to have a conversation with you. This is not a negotiating factor. If you cannot fire, you cannot get Town and Country Planning approval, you cannot get the regional corporations to sign off on the institution, then you have no right having an institution operated, and you cannot be wasting the ACTT's time if you do not put those basic things in place. That is from our side.

Mr. Forde: You wish to share any comment.

Dr. Ali: From the ACTT's side, our standards provide examples of evidence to meet the requirements for operating a learning establishment, and those standards have traditionally required statutory approvals.

We also require institutions to demonstrate that they have various health and safety provisions made. So that, for example, where occupational health and safety is concerned, and where evacuations are mandatory, that the necessary checklists, we have a checklist

of criteria, and we evaluate those when we have a site visit. So when our evaluators go in, they check to see whether those are in place.

So generally speaking, our response to that is, it is helpful if institutions have statutory approvals because it would, of course, give the ACTT an opportunity to ensure that they have been meeting those requirements, but we do have alternatives where institutions can, in fact, provide us with a wide range of evidence requirements to meet the standards.

Mr. Forde: And, Mr. Chairman, my final question, again. The ACTT provided us with a list of institutions that are not registered. They would have also provided us with a list of institutions that are accredited. Right? So in writing I would like you all to provide through you, Mr. Chair, the list of registered institutions in Trinidad and Tobago. I know you mentioned that it is on the website, but just to ensure that this particular institution in the east, you know, I mean, I would like to get it officially, Mr. Chairman. Thank you.

Mr. Chairman: Any other questions from members? Okay. So I gather it was a full morning. I find, you know, a lot of knowledge, but member Forde has not been forthcoming in this institution in the east or [*Laughter*] you have some investigation do to.

Mr. Forde: My constituency in the east, Mr. Chair.

Mr. Chairman: Okay. So you would have the complaints, so you see. Okay. At this state I would like to invite Dr. Ali to give any sort of brief closing remarks.

Dr. Ali: Thank you very much, Mr. Chairman, and members of this Committee. On behalf of the Accreditation Council of Trinidad and Tobago, and I can safely say the board, because we have a board now, the management and staff of the ACTT, we are indeed grateful for this opportunity where we have had the opportunity to provide some level of accountability to the public, and more specifically to the Parliament. We believe that this dialogue has really been insightful, has allowed us to do some introspection and has provided us with the opportunity to craft a strategic plan that we believe will be helpful to the public of Trinidad and Tobago. Thank you very much.

Mr. Chairman: Thank you. Mr. Kurt Meyer, Permanent Secretary, give some brief closing remarks, please.

Mr. Meyer: Thank you, Mr. Chairman. We have listened very intently to the questions and we have noted what could be considered some gaps in how we operate, and we will continue to work closely with the ACTT to close these gaps to ensure that the quality of education offered to all the students and the people of Trinidad and Tobago is of an ever increasing standard. Thank you.

Mr. Chairman: Thank you. So you have heard the concerns and you have given us the reassurance that things will improve soon, and we are grateful for that. And I would like to thank you for attendance and your participation. I would like to thank the members of the media who are here, and also thank members of my Committee and staff for the participation and support. And if there is no further business I would like for consideration, I would like to declare this meeting adjourned. Thank you.

12.06 p.m.: *Meeting adjourned.*

Appendix V

Verbatim Notes of the 36th Meeting

VERBATIM NOTES OF THE THIRTY-SIXTH MEETING OF THE JOINT SELECT COMMITTEE APPOINTED TO ENQUIRE INTO AND REPORT ON LOCAL AUTHORITIES, SERVICE COMMISSIONS AND STATUTORY AUTHORITIES (INCLUDING THE THA) HELD IN THE ARNOLD THOMASOS MEETING ROOM (EAST), LEVEL 2, (IN PUBLIC), OFFICE OF THE PARLIAMENT, PARLIAMENTARY COMPLEX, CABILDO BUILDING, ST. VINCENT STREET, PORT OF SPAIN, ON FRIDAY, FEBRUARY 28, 2020 AT 10.20 A.M.

PRESENT

Dr. Varma Deyalsingh	Chairman
Ms. Ramona Ramdial	Vice-Chairman
Mr. Nigel De Freitas	Member
Mr. Esmond Forde	Member
Mr. Julien Ogilvie	Secretary
Ms. Khisha Peterkin	Assistant Secretary
Ms. Terriann Baker	Graduate Research Assistant

ABSENT

Mrs. Jennifer Baptiste-Primus	Member
Dr. Lovell Francis	Member
Mr. Darryl Smith	Member
Ms. Khadijah Ameen	Member

ACCREDITATION COUNCIL OF TRINIDAD AND TOBAGO

Dr. Eduardo Ali	Executive Director
Ms. Emily Pascal	Director, Finance and Administration
Mr. Junior Nagassar	Research Officer - Legal

Mr. Curtis Floyd

Director, Accreditation and Quality
Enhancement

Mr. Chairman: Welcome again. This part of the hearing is really in camera. We wanted to meet to discuss a letter we got from you with three concerns before we go to the public hearing. The letter I think we have that you addressed to us had three concerns. So the letter was dated February the 13th, 2020, where you sent to the Secretary of the Committee, and the three concerns were, one, that we had made a call for public submissions which was made on Parliament's social media pages, and the allegation made was that the Secretariat was discourteous in not informing you.

So we wanted to discuss that because our normal procedure is if we needed any sort of a public input we would send it on the social media pages, and if members now would—of the public—state certain facts that we think needed further explanation then we would have informed you. So this was always our policy. So it was not meant to be discourteous. It is just that if any issues had come about, obviously we would write to you to now answer those things. So this is one.

Mr. Forde: Mr. Chairman, just before you move on as we are discussing that particular one, I think also to the ACTT in terms of the purview of, not only this Committee, but all parliamentary Committees in terms of having the responsibility to gather information however, press, individuals, public coming off the street, phone calls, because we even have a segment during the live meetings where people can call in—well really text in—information which is conveyed to the Chairman and questions can be put forward. So it is a normal purview of the Committee to request information and I think your concern is that you all were not informed prior.

Mr. Ali: Well there is another concern if I could speak.

Mr. Forde: Which is—you are going on to the next one?

Mr. Ali: No related to that.

Mr. Forde: Sure.

Mr. Ali: Chair, thank you very much and good morning to all. The concern really is while that was done, the logo of the Accreditation Council of Trinidad and Tobago was used in correspondence that was sent to the public, and the impression that persons had was that we were aware. Noting that the correspondence that was posted online was on the website of the Parliament used a logo from ACTT which gives the impression that there was communication and approval to use our logo. And so, that was why this particular comment was raised.

Mr. Chairman: So the logo that was actually used, usually will be sent out with a Parliament letterhead? So you actually had that. Anybody has a copy of the—

Ms. Peterkin: You are saying that the call for submission had ACTT letterhead on it?

Mr. Ali: Yes, it did. It had the logo and we were concerned about— It traditionally— well as practised, institutions are not allowed to use our logo without express permission and there is a trademark that we have with institutions. And so, we do not really sanction the use of our logo unless we have given the consent for it to be used, and the correspondence that was posed online by the Parliament had the logo. So institutions who were responding assumed that we were notified and then we were informed subsequently that there was a public call, and that is why we raised that comment.

Mr. Chairman: I do not know if the logo was there, but we would have to check why that occurred. That should not have been there.

Concern two, you had claims that the derogatory and possible libellous remarks were made against the Council via a live chat forum from the parliamentary YouTube Channel *ParlView*. You could just elaborate on it?

Mr. Ali: Yes, Sir. I think we gave the link that as far as last week that information was still available and it made reference to the previous executive director, and certain statements that implied that he was making rules as he went along and there were a number of other bits of information. Now the issue is the name of the body that claimed to have provided that information does not exist in Trinidad and Tobago as far as we are aware.

Our search revealed that there is a name of such an institution in St. Vincent and the Grenades. When contacted it did exist but it no longer exists. So we assumed that it is someone locally who was pretending to be that institution and had put these comments online, and the comments are very—

I got a phone call from the previous executive director who was very disturbed by the information that was contained on that site and, of course, I am also concerned because there were a number of statements made that suggest the ACTT—and to use the last set of words—“is a laughing stock of international education”. We take that very seriously because we try our very best to do our work as we have been mandated to do, and we feel to have that statement on a channel that is available to the public, especially on a site as important as a Parliament YouTube channel site, suggests that the statement is true. So we just raised that as a concern.

Mr. Forde: Mr. Chairman, again, as we would go about the business of the Parliament, or any institution, again comments are asked, the public is free to make a comment. I think in terms of between your letter, February 13th, and in communication with the Secretariat who I presumed you all would have some sort of communication whether through you as the executive director, or your secretariat, or administration officer, in terms I am saying, listen, we went up on the site, we saw this comment, and we need to give a feedback in terms of what was said because we are talking about now February 13th, today now being February 28th, and then we would have met some time in November. So I am just looking at the timeline in terms of some sort of communication again, WhatsApp, telephone, to say well listen, some information is on the site; I think that we should be given the opportunity to make a statement. So you send a statement to them so that we could then put up on the same site to rebut what could have been said, but we understand the—

Ms. Peterkin: We have the response from our corporate manager with the statement.

Mr. Chairman: What they said, they:

...have no way of verifying whether someone is who they say they are. We do review these comments and remove anything that seems lifeless or— This comment does not meet that requirement and was interpreted as fair commentary reliance. Please let us know for it to be removed.

This is something that they sent us. So we looked at it. I mean, today's hearing if any of these issues come about you would probably have a chance to air it and probably to defend it.

Mr. Ali: Chair, if I may say also—thank you—the issue for us is that this matter—we were not aware that this information was on the website. It was a member of our board who brought it to our attention at a board meeting and she asked us to look into it, and we looked into it immediately and then I had asked for it to be looked at. So we saw it as an opportunity while we were corresponding with you in terms of our submission to inform you that this was a concern. And so, that was really our intention just to let you know it is a concern because we did not want—that was available for two months on the website and so, anyone going on to the website, or to that particular video, would have seen the comment and would have formed certain types of conclusions which would have been not necessarily accurate.

Mr. Chairman: Agreed. Well we may have an opportunity to correct it if it comes up.

Ms. Peterkin: It is not there anymore. They took it down. It has been removed.

Mr. Chairman: But again these questions may come up with the two parties we will be seeing first, because at this hearing we will be meeting two parties first, and then afterwards we will be meeting three parties. So it is two sessions we are having due to this spacing availability.

There was again another concern with items 32 and 37 of the public hearing summary which I think you mentioned was inaccurately reflected. We had checked actually for the verbatim notes and we did not actually realize that there was a problem, because actually this was in our notes where 32 had that:

“The ACTT submitted an application for funding under the European Development Fund via the Ministry of Education. Funding of TT \$500,000 will be used to conduct an employability study.”

Mr. Ali: Thank you, Chair. Just to clarify, there are two sets of funding under the EDF. There was one that we submitted late last year to the Ministry of Education in the amount of close to \$1 million. That one is still awaiting feedback from the Ministry. The other one which the Director of Finance and Administration would have spoken to at the last hearing would have been one that was already approved and that we already have access to funding. So it says the institute submitted an application for funding under the EDF, and funding will be used to conduct employability study. There are two sets of funding mechanisms through the EDF, one that we are still awaiting feedback on, and the other one which was approved already and provided to us to do the employability study. So it is just a matter of how it is worded. It might give the wrong impression that there is only one set of funding that we have applied for, but there were really two. One was approved and is provided, the other one we are awaiting feedback from the Ministry on.

Mr. Chairman: And I think you had concerns with 37 which is:

“Statutory approvals and health and safety provisions are generally required for registration. However, an ‘alternative’ option allows institutions to provide ‘evidence requirements to meet the standards’.”

Yes, sure.

Mr. Ali: The statutory approvals were initially required, but there was a change made and then subsequently it was no longer required. We have used other forms of evidence for addressing health and safety concerns and we have used that ever since. Again, it is a matter of how it is worded because it gives the impression that currently they are required, but they are not currently required. It is something that if an institution wants to submit to us as a form of evidence, we have a checklist of evidence that we will look for. This is not one of them. But if the institution wants to go above and beyond to provide additional

forms of evidence and statutory approvals as one of them, we will not say no because the onus is on the institution to provide us with information that they think will meet a requirement.

While we may not have asked for it, if they choose to provide us with supplemental information it is not something that we will say no to because it is they want to demonstrate that they have surpassed the measures for quality that we have put in place. So in this instance, statutory approvals were initially—when ACTT was set up it was a requirement because the Ministry at the time made it a requirement. So there was a transitional period during which the Ministry's requirements had to continue until institutions were registered. When institutions were finally registered we had new requirements up to today, and that is what institutions have been complying with. And statutory approvals are not an official requirement, but as I said if the institution wants to provide that we will accept. I mean, the onus is on them to demonstrate at all levels whether they think they meet certain quality requirements or not. So that is where that speaks to.

Mr. Forde: Mr. Chairman, again it is a very important aspect and point. I think to further discuss it here would be an injustice to the live that we are going on shortly. So I think I will not bring up my questions, follow-up questions, rather than to have it said now and we repeat it later.

Mr. Chairman: So your concerns we will try to air with while the meeting is there to get some sort of—

Mr. Forde: Because I think it is an important aspect for the people.

Mr. Chairman: Yes, it is. It is definitely.

[Chairman confers with the Secretary]

It has been brought to my attention it was really the Ministry of Education had made such statements, but again it would be clarified. So thank you for your clarification and we will bring it up during the public meeting.

Mr. Ali: If I can say, yes, that is correct. The Ministry did make that statement, but that

has nothing to do with ACTT's requirements because ours are different from the Ministry's.

Mr. Chairman: Good. So we will now bring the other two parties, which is the Omardeen School of Accounting and also the Professional Institute of Management and Business Studies, and then we will start the public hearing.

10.37 a.m.: *Meeting suspended.*

10.42 a.m.: *Meeting resumed.*

**PROFESSIONAL INSTITUTE OF MARKETING AND
BUSINESS STUDIES LIMITED**

Mr. Graham Newling	Director
Mr. Frank Cowie	Chairman
Mr. Nestor Dinnoo-Alloy	Deputy Corporate Secretary

OMARDEEN SCHOOL OF ACCONTANCY LIMITED

Mrs. Sohaila Omardeen	Director
Mr. Idrees Omardeen	Managing Director

Mr. Chairman: Good morning all. I am Dr. Varma Deyalsingh, Independent Senator and Chair of this Joint Select Committee on Local Authorities, Service Commissions and Statutory Authorities (include the THA). I would like to welcome you all to this second public hearing pursuant of our enquiry into the efficiency and effectiveness of the Accreditation Council of Trinidad and Tobago. The first hearing was held on November the 22nd, 2019, and at this enquiry we had some persons and schools who actually wanted a continuation of our first meeting. So we actually got some concerns that we thought it would be best to have a second hearing to raise these issues. So it is welcome to have you back members of ACTT. We did not expect this hearing but it is here. There are concerns and I think we can actually satisfy all parties.

Members of the listening and viewing audience, you are invited to post or send your comments via Parliament's various social media platforms, Facebook, YouTube and

Twitter. On this occasion, I have the pleasure of meeting the representatives of the Accreditation Council of Trinidad and Tobago. Again, I say welcome again. It is a pleasure having you the first time. And we are now—first time we are seeing the members of the Omardeen School of Accountancy Limited and the Professional Institute of Marketing and Business Studies Limited.

I must say that we are having this hearing in two parts due to the limitations of space. We are now having two bodies here, and after this meeting we will be having another public hearing with members of the School of Business and Computer Science, the University of the West Indies, and School of Accounting and Management Caribbean Limited. At this stage, I would like to invite members to introduce yourselves and starting with the Accreditation Council of Trinidad and Tobago.

[Introductions made]

Mr. Chairman: Welcome. At this stage would officials of the Professional Institute of Marketing and Business Studies Limited introduce yourselves?

[Introductions made]

Mr. Chairman: Welcome. And now would officials of the Omardeen School of the Accountancy Limited please introduce yourselves?

[Introductions made]

Mr. Chairman: Welcome all. I would just like to remind members that the objectives of the enquiry, but before I do so I would like to ask my members to please introduce yourselves.

[Introductions made]

Mr. Chairman: So I would like to remind members of the public and those present that the objectives of this enquiry is to evaluate the efficiency and effectiveness of the ACTT in executing its mandate; also to evaluate the performance of the ACTT in ensuring quality in the delivery of tertiary and post-secondary education by local schools affiliated with foreign institutions; and lastly to determine whether the resources, systems, and

procedures of the ACTT are sufficient to allow it to operate efficiently.

At this stage, I would like to ask some opening remarks/statements to be made, and I am starting with Dr. Eduardo Ali, please, to give us some opening remarks not to exceed two minutes because we are running on a timeline.

Mr. Ali: Thank you very much, Mr. Chairman, hon. members. It is indeed a pleasure for us to again be here with you today to discuss an issue that is of critical importance to our nation. I would like to ask though that if you can give me a little indulgence so that I can provide my own perspective which I hope it provides some context for today's discussion.

Despite two decades of attempts and while Trinidad and Tobago has an Education Policy Paper that mentioned some strategic measures for higher education and for technical and vocational education and training, the country still lacks a comprehensive data sensitive tertiary education system with clearly articulated targets and financial measures for institutions and agencies. While we are fortunate to have what we call an external quality assurance system, which is governed by ACTT, this represents only one out of four components of what we call an interconnected national tertiary education system.

The ACTT, and by virtue its sister agency, the National Training Agency, thus have limitations which can be a reflection of the absence of this comprehensive tertiary education system established by legislation and policy which our country so desperately needs. In many developing nations there are growing tensions and increasing competition for resources among governmental actors, employers, educational institutions, students and graduates alike. Research shows that curriculum is at the centre of this controversy because programmes offered by institutions impact the knowledge, skills and attitudes of the citizenry.

All of our institutions compete for the same slice of the economic pie to offer the programmes that serve a limited national employment demand without a fully diversified economy. This is a huge part of the problem we experience which only public policy and

not ACTT can resolve. Accreditation agencies are the hub of this dilemma because they inculcate quality standards which some educational institutions are very determined on deciding for themselves. For over a century US accredited institutions have valued the accreditation as a developmental journey, but there are still a few who regard it as an impediment.

UNESCO, the World Bank, and the OECD have pointed to increasing numbers of national accreditation systems globally. To effectively regulate our sector in Trinidad and Tobago, ACTT seeks the patience from and understanding of its stakeholders, whilst encouraging collaboration, cooperation, mutual respect and constructive criticism by all, and that is why we are here today.

10.50 a.m.

But, hon. members, ACTT does not appreciate divisive rumours, destructive allegations or unethical tactics by the limited few who seek personal or private gain, disregard quality standards, hide behind the cloak of social media or use their positions to escape external regulation.

In spite of all of these challenges faced by ACTT over the years, while we are working on addressing our own improvements that are needed, the truth is we have several obvious constraints. For instance, our resource limitations have placed us in an unfortunate position of not being able to adequately respond to stakeholders' needs. The breadth and depth of stakeholders' needs have grown beyond ACTT's current capacity and sometimes there are very forcible and intimidating demands of some stakeholders.

Additionally, bureaucratic processes have slowed down our decision-making and our actions causing some inertia. We lack the financial resources to deliver our services. We are located within building conditions which sometimes impair our ability to work effectively. We live in a society where some institutions and citizens primarily focus on the quick and easy acquisition of certification. This being antithetical to the culture of quality tertiary education as defined by ACTT, we have to be cautious of and protect

unsuspecting citizens of international diploma mills and accreditation mills coming into our country but at the same time safeguard them from these mills developing here as well.

Despite having capable staff, ACTT's organizational structures and systems have been benchmarked with the local public service by the authorities but not with those of higher education systems in developing countries and for that reason we have had several issues. I hope that this broader context would explain why we are here today. We are here because we love our nation and our country needs a more comprehensive tertiary education policy, legislation, and system, with adequate resources for our institutions and agencies alike to aid them in better serving our population.

We are here today to discuss the challenges faced by our various stakeholders who have differing, sometimes problematic, perspectives and views of educational quality that come from varied opinions, experiences and interests. Making reference to my own professional background in research, I am here today to signal that ACTT's governance in administrative structures and systems require some critical thought by legislators and by policymakers. That conversation should entail careful benchmarking with similar international bodies and trends and less reliance on external bureaucratic processes that could render an agency as important as ACTT in becoming less efficient in its decision-making, its operations and productivity.

So, hon. members, having said this, we see this dialogue here today as a necessary one to facilitate learning from each other and to enable us to construct a more meaningful tertiary education developmental pathway for our beloved nation. So we thank you for having us here today.

Mr. Chairman: Thank you, Dr. Ali, for those comments. Would Mr. Graham Newling, Director of PIMBS Limited please give us some remarks or opening statements?

Mr. Newling: I would like to pass over to our Chairman, Mr. Frank Cowie because I am too emotionally involved in this to speak too much, so Mr. Cowie will make the opening remarks. Thank you.

Mr. Cowie: Good morning, everyone. The opening remarks of Dr. Ali are welcomed and I would like to keep it very simple and focus on how key stakeholders can have a conversation that embraces the national watchwords of “Discipline, Production and Tolerance” on how the effectiveness and efficiency of ACTT impact on the positive development of the Trinidad and Tobago society.

This situation is a very ticklish situation and it must be noted that there are several stakeholders that form part of this discussion. All right. That would include the ACTT of course, the Joint Select Committee who has a very important function, the Ministry of Education; you have, I can see the PNM, the UNC, citizens of Trinidad and Tobago, the Parliament, and of course, the media and we are just a grain of sand on the shoreline, a small institution like PIMBS. I would like to draw the analogy to a child having concerns and things to discuss with parents. At the end of the day, we have to go back to the house of the ACTT where they would have to deal with us and our problems. It was in the wisdom of the persons who created the ACTT Act that there must be something in place to protect the citizens of Trinidad and Tobago.

So I would like to remind the public that before the ACTT Act was put in place, there were hundreds of institutions who were trying to produce and add to the GDP of Trinidad and Tobago. Of course, the ACTT came into being which is very important and with that being said, life continues after where the job of the ACTT is to ensure that we become a First World country and provide the right sort of products and so on to help our citizens of Trinidad and Tobago. I would like to point out at this point in time that there are many persons in ACTT with the best of intentions and that would include Dr. Eduardo Ali who has been doing quite well in putting forward what it is he needs for his institution.

But as I recall, when the Act was set up in 2008, the regulations that accompanied the Act were very important and these regulations were to be put in place to guide the operations of the ACTT. In the absence of such regulations, Dr. Ali and other members have been placed in very difficult situations where they have had to ad-lib or to “extempo”,

as we would say in our local parlance, as they go along and an institution as big and as heavy as the ACTT, sometimes when they lean their weight on small institutions and the statistics would show that some institutions would have disappeared unfortunately. So I feel that it would be important for Dr. Ali to have that sort of support in terms of putting those regulations in place. They have been trying and you know, our institution has had concerns yes and they are being dealt with very efficiently and I hope that this conversation would be a very fruitful one.

Mr. Chairman: Thank you. And even a grain of sand in someone's eye could cause a great deal of irritation and cause of concern and we need to realize what is happening to the grain of sand. Anyhow, I am glad you gave glowing praise to Dr. Ali who is relatively new in the position, so hopefully things will improve for all parties.

I would like now Mr. Idrees Omardeen from the Omardeen School of Accountancy to please give us some remarks.

Mr. Omardeen: Hon. Chairman and hon. members of this Joint Select Committee, I would like to say good morning and we would like to thank you for the opportunity to address, you know, to bring our points here for you to see if we could get some sort of redress on it.

We want to highlight, and I want to stress here, what we consider to be maybe illegal practices being performed by the Accreditation Council of Trinidad and Tobago and I stress "we" because that opinion may be different from your sides. So I am diving straight into the issue of what we are here for.

In 2005, so we are going back a few years, Dr. Eduardo Ali as a Chief Evaluator at the Ministry of Science, Technology and Tertiary Education informed all tertiary level schools that full compliance of all statutory approvals for buildings and premises would be required if we are to get registered because we were moving from the Ministry of Science and Technology to the Accreditation Council and so we needed to have all of our approvals in place for us to be registered with the Accreditation Council of Trinidad and

Tobago. And he continued and he stressed that this was imperative of us so that we could continue to get GATE funding and without GATE funding or without GATE registered students, you know, schools like ours, we might as well have closed down. All right. So it must be noted though that quite a number of private schools operate or operated in rental premises which made it difficult for us to comply as not all landlords were willing to get or furnish statutory approval for tenants. Right? Times may have changed by now but in 2004, 2005, things were different and then the onus of the moneys to be spent would have been on the schools.

Dr. Ali provided a list of requirements. I made a submission and I provided that list to members of this Joint Select Committee. I have another copy here in case you would need it. And the list that he provided was in reference to the ACTT Act, No. 16 of 2004. We complied. We got all necessary approvals for all of our three locations: Port of Spain, San Fernando and Chaguanas. In 2007 and 2008, evidence of our compliance was required when the ACTT team evaluated our schools. Dr. Ruby Alleyne and Mr. Curtis Floyd even pointed out those approvals that would be expiring soon and that was in 2008. This Committee will no doubt understand our dismay when in 2010, at another evaluation by the Accreditation Council, we were told by Mr. Bradshaw that we wasted our money as ACTT no longer required statutory approvals. Yet even up to 2016, statutory approvals were inspected and listed in our evaluation report.

Now, it is important to note here that from 2010 to 2016, we tried getting this in writing from the Accreditation Council that statutory approvals—your Fire approval, your WASA approval, your Town and Country approval, your public health approval. We are not operating a lotto booth or a cambio exchange, we are operating a school and we have to protect 300 students or 500 students as the case might be per centre. So these things are a requirement and it is required by law, you know, and to tell us now that we got these in vain and it is no longer a requirement, it was a tough pill to swallow.

Yet even up to 2016, right, and we sought information from ACTT as to when the

policy regarding these approvals was changed. It was only because of our request under the Freedom of Information Act in 2019 that we learnt that the policy was changed on September 21, 2006. So let me say that over again. It is only because we made a freedom of information request in 2019 that we found out that the accreditation council changed the rule for schools to have the statutory approvals which are requirements by the laws of Trinidad and Tobago on the 21st of September, 2006. If we had known that, we did not even have to move from two locations at least. In Port of Spain, we moved from Queen Street to Independence Square; San Fernando, we moved from two blocks up the road lower down, just so that we could satisfy every single requirement that we were supposed to require. And it did not cost one and two dollars but we complied and we had every single approval that was required by the ACTT, we had all.

Mr. Chairman: Mr. Omardeen, we are pressed for time, right, but I understand your concerns. You have two questions—I mean, three things stuck out to me in the fact that you are saying there was an illegal—

Mr. Omardeen: But I said “we”, we considered it. I am not too sure if the Joint Select Committee—

Mr. Chairman: So at least, we probably will get some clarification on that and your concern about the statutory requirements no longer being necessary would have put you at a disadvantage so that is another point. So very quickly, we just want to get—

Mr. Omardeen: I only have a little bit more to—

Mr. Chairman: Yeah.

Mr. Omardeen: So I want to expand on this September 21st, 2006 where it was passed by the board of directors of the ACTT where they instructed Dr. Ruby Alleyne, or they advised Dr. Ruby Alleyne that upon making this change, that all stakeholders should be informed within the next couple of weeks. That was since 2006. And if you ask a student at any tertiary level school now if a school has an ACTT registration or accreditation, if they would think that that school complies and would have things like a fire approval at

least and meet the health and safety standard that is required for the student's health and safety, they would say yes. So the ACTT needs to come out in the public domain now and inform parents, inform students, and inform schools like ourselves who—we ended up closing our school because we abided by the law and spent too much money complying and they need to come out and tell the population that these statutory requirements for the—I mean if OSHA goes into some of the competitor schools, they would close them down. Thank you very much.

Mr. Chairman: Thank you all for your comments and I guess it is part of our proceeding today to hear you come to vent to see if you could improve the system. Dr. Ali is new here so I am thinking, you know, we could probably come to some terms of how best we approach this. I would like to remind members to activate your microphone when you are speaking and please deactivate it when you are finished.

So I would like to mention that the functioning of the ACTT is very important. We see the relevance in a global economy. I mean presently now we have medical doctors who are not getting jobs locally and with your accreditation and an accreditation society, it is a vent where they can get jobs abroad. So it is a very important role. We have seen too that the fact that with this pandemic coronavirus going around, people are even scared to go into open classrooms, so long-distance learning, all these are things we have to look, you know, with this. Persons may be saying, “I do not want to go into an open classroom, I rather long-distance learning” and it is important to see how you are going to structure your parameters to engage the public who may now be very scared to be out in a crowded place.

So some concerns I said that came about here this morning which we will address soon— But I would like to pose some questions to the Accreditation Council of Trinidad and Tobago. Could you advise when there was a change in the statutory requirement of the registration process for tertiary level institutions and also what were the reasons for this change?

Dr. Ali: Hon. Chairman and members, before I answer that question or I pass the question onto my counsel who will answer the question as best as he can, I would just like to make a very important statement because I heard reference to different names being called different times and I think it is very important for us to set the records straight.

The Ministry of Science, Technology and Tertiary Education as a Ministry, as an independent Ministry back in 2004—2005, had the opportunity to evaluate institutions to determine whether or not—the private institutions primarily—to determine whether or not they fulfilled requirements for the provision of funding for institutions under the GATE Programme. During that time, the legislation for ACTT was in Parliament, it was going through its natural course. Subsequently, the ACTT was established in 2005 and it really did not become fully functional until a year after because you had to hire staff and others and put the systems in place. So the point being that at that time the Ministry had set its own requirements. The ACTT, being established a creature of statute, has had to establish its own requirements and therefore the two should not be equated in any form or fashion because they are two different matters altogether. That is the first point I would like to make.

Secondly, in response to your question, the changes that were made—and I will have the acting corporate secretary speak to that in a moment—were made because of a number of factors which were outlined by the previous speaker. You had several institutions at the time that were operating that had tremendous difficulties in meeting statutory approvals. They could not get the approvals from the Water and Sewerage Authority, they could not get the approvals from T&TEC and other statutory organizations, and because of those huge delays, ACTT, benchmarking with international best practice, had introduced standards in accordance with those best practices and I would like to just mention three of them.

Our criteria, regulatory requirements, which is criterion one for registration, Standard 1.2 says:

The institution demonstrates the ownership of and responsibility for assuring access to the learning facilities that support and facilitate the learning expected of its students.

The objective here is to ensure that whatever learning environment you have in place is conducive to the learning of students, that is: Are the facilities adequate for classrooms for students to engage in learning? Are the library facilities adequate for students to engage in learning for example? And so our evidence requirements were a master plan for facilities, a provision of adequate ventilation and lighting, an adequate space allocation for learners, staff and stakeholders, plans for the acquisition of furnishings and equipment and evacuation procedures and maps. And routinely, when our evaluators go in, they check to see whether those things are in place because they want to ensure that if you have a classroom configured for learning, it is structured in a way to allow the kinds of learning that will take place there and the facilities for laboratories, et cetera, are in place that are conducive for the learner and specialists who are in that area will visit the institution to evaluate that. So if it is a medical school, medical practitioners would go in who have the expertise to assess it to determine if it is conducive or not.

There are three bodies that we benchmark with: Quality Assurance Agency for Higher Education in the UK, the Higher Learning Commission in the United States and we have also looked at the SACSCOC, which is the Southern accrediting agency in the United States. And this is what their corresponding standards are. For its QAA, their indicator is:

“Higher education providers maintain physical, virtual and social learning environments that are safe, accessible and reliable for every student...”

The Higher Learning Commission:

“The institution’s resource base supports its current educational programmes and its plans for maintaining and strengthening their quality in the future.”

And for SACSCOC:

“The institution takes reasonable steps to provide a healthy, safe, and secure

environment for all...campus..."

—constituents.

What all three of them have in common are similar types of evidence requirements that we have: qualifications of the health and safety staff; safety, emergency, and disaster plans; emergency procedures and evacuation plans; inspection reports that demonstrate that there have been inspections of the facilities; corrective actions; policies and training regarding health and safety and the environment and safety committee meetings that may take place where Minutes of records and records are kept.

So for us, those are the kinds of benchmarks that ACTT uses when it is going into an institution to evaluate the institution. So I just wanted to make that reference and perhaps, at this point, pass the comment onto the acting corporate secretary who could speak more specifically about the date, when it was changed and why.

Mr. Chairman: One question though. It was mentioned that a rental property would not be entertained. Is that a fact? When you say ownership of a property, could you rent a property to run a school?

Dr. Ali: Ownership meaning that you actually access the property by legitimate means so that you can conduct your business at the institution.

Mr. Nagassar: Thank you, Chairman. The ACTT refutes any allegation that its operations are illegal. ACTT remains committed to its statutory mandate ensuring that our operations are in keeping with our governing Act, Chap. 39:06, and by extension all laws of the Republic of Trinidad and Tobago.

Chairman, in direct response to your question, it should be noted that the initial requirements for licensure—meaning for institutions to operate—were initially defined by Cabinet, approved by Cabinet in 2005 which had determined that all institutions falling under the purview of the ACTT must have met all legal and regulatory requirements according to the laws of Trinidad and Tobago. These requirements were defined by the ACTT and the Ministry at the time to include statutory approvals for buildings. The

criteria for registration was subsequently reviewed and amended on the 21st of September, 2006. By Cabinet Minute No. 2280 of 2006 Cabinet was asked to note that and I quote: The criteria for licensure and registration established rigorous standards with which all post-secondary and tertiary institutions, public and private, were required to comply in order to operate legitimately in Trinidad and Tobago.

Mr. Chairman, at that time, data collected by the ACTT during the period of 2005 and 2006 indicated that approximately 80 per cent of those institutions at the time would not have met the standards, legal and regulatory requirements and also the acquisition of the necessary statutory approvals.

Therefore, in order to sustain the levels of student enrolment in tertiary education consistent with Government policy at the time, it was imperative that institutions not be forced to close their doors but be given more time and support for quality improvement. Consequently, the decision was taken by the board of ACTT on the 21st of September, 2006 to simplify the process for applicants and to facilitate the registration of institutions to operate within time. Consequently, those statutory requirements were no longer a requirement for the purposes of registration.

Ms. Ramdial: I have a question that I want to ask Mr. Omardeen. Apart from the statutory approvals that you spoke about earlier, what other factors led to the closure of your school?

Mr. Omardeen: Well, I would say it is unfair competition because of the fact that we were the only accounting school to fully comply with all the statutory approvals and we were not informed until Mr. Bradshaw came to us in 2010 and gave us a hint about it and we finally got something in writing in 2016 where the then corporate secretary said that we got our statutory approvals on our own volition. Then we got the formal letter in 2019 where it stated that the requirement for statutory approvals was changed on the 21st of September, 2006.

So for all these years, we have been competing and when we got the—we have the

evaluation reports for all of our competitor schools now and when we looked at it, you know, none of them fully complied with having statutory approvals like how we did for all of our three schools. So if we were told about this in 2006, we did not have to even move locations in San Fernando, we did not have to do as much as—you know. Some of the things that we did, we could have followed what our competitors were doing if we had known, but we were not informed.

Ms. Ramdial: So am I to understand that that entire process of getting statutory approvals were the main issue that forced your school to close down?

Mr. Omardeen: Well, we were operating at a higher level because of moving location, purchasing buildings, and setting up shop and we had to compete now against people who—one of my competitors does not even have a fire exit and they are upstairs of a building with seats for 300 students.

I know Dr. Ali said that, you know, there were certain criteria that they would now use, but when you look at the evaluation reports for all of our competitor schools, you wonder how some of these schools are even being allowed to operate at this current point in time.

11.20a.m.

Ms. Ramdial: So what is next for the Omardeen School of Accounting? Do you have any intentions of coming back into the market?

Mr. Omardeen: Well, if we have a level playing field, where all schools have to abide by the laws of Trinidad and Tobago, because I have not—I mean, I heard the corporate secretary speak about a Cabinet Minute where it was changed that statutory approvals would not be required for schools. But the Ministry of Education still asks all primary and secondary private schools for statutory approvals. So I find, you know, that is a little bit questionable.

Ms. Ramdial: Okay.

Mr. Forde: Again, just for the record, Mr. Omardeen, I know you sent a very verbatim

report to us. Your school started when? What year was it established?

Mr. Omardeen: 1978.

Mr. Forde: And when was it closed?

Mr. Omardeen: At the end of 2018, and our—well it is not. We are still in operations within—

Mr. Forde: Just give us a year.

Mr. Omardeen: The last set of classes, formal classes, was at the end of 2018.

Mr. Forde: Fine. Dr. Ali, again, we would have gotten this information from Mr. Omardeen's report where you were once employed with the Ministry of Science and Tertiary Education. Just give us a little synopsis of what your job would have entailed then in relation to the regularization of these institutions, and the job title.

Dr. Ali: Sure, at the time my position was Education Advisor. I was responsible—working on the issue of policy. There was a registrar who was responsible for dealing with institutions. That was not my responsibility. So, at the time, I primarily worked on establishing a national tertiary education policy and other policies of the Government at the time.

I was nowhere involved initially. I was not supposed to be involved initially in this matter related to institutions, but I was asked to, in the absence of the registrar. So, in terms of this whole discussion, the issue is the Minister had decided that there were to be certain requirements that needed to be put in place. At that time statutory approvals was one of those requirements at that time.

You have to understand that during that period ACTT was not in existence. The Ministry was not about setting standards for institutions to operate. The Ministry had started to provide funding to institutions or to students attending certain institutions. The private institutions had indicated they wanted to have a level playing field. The Government took a policy decision to create a level playing field. And so we had to put a system in place quickly to ensure that they were being somehow regulated to provide

funding to students in that institution. So there was a registrar who was appointed, and that was her responsibility, to ensure that those standards were in place and those institutions were being reviewed.

At that point in time, I was just merely communicating the Ministry's policy position on those matters to institutions. I was not really the person responsible for evaluating.

Mr. Forde: Right. So, again when the ACTT became enacted you would have been the first—what role you played at ACTT? You were not there then?

Dr. Ali: No, I was a member of the board for a few years before I left.

Mr. Forde: All right. I just want to, you know, sort of tie in some of the information that we would have received from Omardeen, right, and the various comments he would have made in his opening remarks.

And in terms of from '77 to 2018, we have also been informed in November by the Ministry of Education, that the statutory regulations were still enforced. That was in November 2019 when they sat here with us. For the record, as the Executive Director of the ACTT, what stands today with regard to the exact and proper regulations in order for an institution to be registered via your institution? Are statutory regulations required, yes or no?

Dr. Ali: Okay, first to respond to the issue in relation to these institutions that have been operating. You mentioned that there are some. For example, this institution has been operating for a period of time and it has been providing evidence of statutory approvals. I would just like to say for the record that we have had, up until July 11, 2008, when Omardeen School of Accounting was first registered, we have had 14 other institutions that have gone through the process prior to them. They were the 15th and all of them were required to provide for us a checklist. There was a checklist, which all institutions, including Omardeen signed, and we have evidence of that, to demonstrate that they were accepting the requirements that we had set. Statutory approvals were never mentioned in those requirements. That is the evidence that we have. So all 15 institutions that we have

never had statutory approvals as one of the elements that they were required to sign as a condition of registration when they were operating.

With regard to my position, my position is, currently the standards of ACTT are what they are until subject to change. I cannot indicate otherwise. So the board previously had taken a position that the Standard 1.2, which I referred to before, stands and the evidence requirements stand. Until such a change is made by the board then I will be able to communicate otherwise. But I am not in a position to say otherwise at this point in time.

Ms. Ramdial: Just one little question. So ACTT has its standards with respect to statutory approvals, as you mentioned earlier, evidence of that would be accepted. What about the Ministry of Education? Are you on the same level with respect to statutory approvals?

Dr. Ali: As for my understanding of what the Permanent Secretary would have indicated before, the statutory approvals he was referring to were with respect to schools including early childhood centres.

Mr. Chairman: Is there relaxation of the statutory approvals that once existed? Because I am getting the impression that it was onerous and then there was a relaxation. And if there was a relaxation, I mean are there now institutions operating substandard infrastructure, as mentioned no fire escape and all these things. Could you comment on this?

Dr. Ali: Mr. Chairman, I would not say that there is a relaxation. I would say that the evaluators are trained and they go in to evaluate the institutions. There are times when institutions may drop the ball after an evaluation. So let me explain. We are aware that institutions prep themselves for an evaluation. And so in preparation, they would put all the necessary markers in place, including fire extinguishers, for the evaluator's visits. After leaving the institution, quite often, these things may change, unless we go through another step where we monitor subsequently. And so it is a possibility that that can happen where institutions are concerned.

As far as the previous question that was raised by member Forde, in terms of the issue of statutory approvals, while we have indicated our position as it stands, there have been some changes in the laws within the last few years, namely with respect to occupational safety and health. We are in the process of preparing to revise our standards. We have been communicating with institutions to that effect. We are preparing in our new strategic plan funding being provided by our funding agency to move towards reviewing our standards and our criteria and our evidence requirements. We have been benchmarking with other international accrediting agencies, looking at what they do. And so the objective is to look at both what they do as well as what pertains to the law as it stands today.

So where occupational safety and health is concerned, back in 2008, when such institutions were not registered, there was no such legislation in place, nor such systems in place. Now that there are, they will need to be looked at within the context of revised standards that we will be embarking upon between this year and next year.

Mr. Forde: In terms of, again I know we may be identifying Omardeen, but I think it is a vivid example in order to reference the discussion that we are having in terms of the whole accreditation in Trinidad and Tobago. Again, Mr. Omardeen, you did not provide Dr. Ali with a copy of your document?

Mr. Omardeen: No.

Mr. Forde: No.

Mr. Omardeen: No, I did not.

Mr. Forde: But it would be interesting if that could be possible, in order to identify some of the things. For example, he said that he would have gotten information from the Freedom of Information Act as a result. And again, with all the communication he was not able to get that information from your organization. He identified that 46 per cent of the institution campuses, which is a staggering six of the 13 institution campuses, met none of the five critical criteria set out by ACTT, and then he identified the five: town and

country, public health, WASA and so on. He identified 75 per cent, which is nine of the 13. TLIS mentioned above were not even two or more of the five statutory regulations met, and these institutions have been registered and accredited. Right? We are not identifying the institutions, but we are identifying the numbers.

Omardeen also mentioned again, that is information that he provided, that 40 per cent of the accountants in Trinidad and Tobago would have passed through his institution from '77 to 2008. You know, what did your organization do to ensure that, listen, can we ensure and see well look, how can we assist Omardeen? What was the communication process like? We are getting information here. I do not know what communication transpired between the two organizations.

Dr. Ali: Thank you very much, member. Let me just say that I have been in this position for six months and upon assumption, I made a call to Mr. Omardeen to try to broker a meeting. The intention was to meet to discuss all of these issues. However, after calling and speaking to the gentleman, we subsequently received some allegations in writing, in addition to many FOI requests. Legal counsel advised that we should respond to those before we met. Then having gotten those to them, we got a subsequent FOI request. So we were not in a position to meet to discuss any of these issues, despite my attempts to do so upon first assumption. My plan was any institution that had any previous issue with ACTT, upon assumption, I would have contacted them and try to resolve through meeting. But it was very difficult because institutions continue to write and write and write and copy attorneys and have those attorneys engaged. So if attorneys are involved, then our attorneys need to be involved. And I could not have met with them unless that process came to a closure.

But I cannot speak for what transpired before my coming. That would have to be something that others would have to account for. However, what I can say is that I have made every attempt to meet with the institutions concerned. I mean, there are other institutions here. One also in this room. And I have made every attempt to communicate

with them by phone, by email and where possible in person, to ensure that we resolve any longstanding issues. So I am just saying that we have made attempts to, but we could not communicate face-to-face because of the way that matters were approached, which would not have been the best way.

Mr. Forde: Last question, Mr. Chairman. Again, you would have mentioned, when we met in November, with regard to your institution setting is up an appeals tribunal, especially in a case like, you know, what we are discussing now. Any headway has taken place since? Well I know it is only three months away, but any headway in terms of that?

Dr. Ali: My understanding is that matter is before the Ministry and we have not heard from the Ministry on the issue.

Mr. Forde: Thanks, Mr. Chairman.

Ms. Ramdial: Mr. Newling, you have anything you want to add to this discussion, especially with respect to statutory approvals?

Mr. Newling: Well, not really. I agree with everything that Idrees has said here and I can back him up on a lot of it. That was not really a major issue for us. We have many other, many other things that we wanted to address.

Ms. Ramdial: You want to expand on the other issues?

Mr. Newling: Can I pass that to my Chairman, please?

Ms. Ramdial: Sure.

Mr. Newling: Okay.

Mr. Cowie: Thank you, Mr. Newling. What it is I have gathered so far is the problems that may arise because of the lack of regulations. So I think we can all improve in that way. I see here the vision of ACTT, and it is a principal authority for quality assurance and continuous improvement, all right, and best practice. So that part, I think, is very important.

I want to refer—building on what Mr. Nagassar said, I want to look at the ACTT Act, just briefly, on page 17, Chap. 39:06. They said:

“The Council may, with the approval of the Minister, make Regulations for better carrying out the provisions of this Act.”

And also:

“Regulations made under this section shall be laid as soon as practicable before both Houses of Parliament and shall be subject to affirmative resolution.”

So, yes, ACTT is going through teething problems, but these regulations that are clearly stated in the law and are absent put individuals in ACTT in tough situations where they make up things as they go along. Right? And that has created the problems that our institution, and maybe other institutions, face.

Mr. Forde: Mr. Chairman, is it possible that you could just highlight one or two as you make the statement? Is it possible?

Mr. Cowie: For one, we would be looking at, okay when it is we have questions, okay. You know, we have problems as we go along and, you know, we seek clarification. ACTT, as a big brother, this is our problem. Could you help us to resolve that so that we can better serve the nation, and so on? Because ACTT, as well as yourself, are to protect the stakeholders. But at times some of these questions may be challenging. I do not know what may be the issues. But getting that information in a timely fashion has been a problem. So much so, that it affects our bottom line in terms of being able to provide service to the public. Because we cannot move forward unless ACTT says: "Well okay you can go ahead". And that information is sometimes late in coming. That is one example.

So like things like our registration certificate, when it is we get it, it comes after the period has ended, in which case, we would have missed the opportunity to work with students during that period. Some of these things, I feel concerned, as I said, to talk about these things in this forum. And the media who sees themselves as the guardian of democracy can chat with me to get things off the record. Right?

But what it is I would like to focus on is the fact that if it is ACTT gets the assistance

to put these regulations in place, then we would be aware of what is required and things would be very clear as to how we go forward.

We feel, and notice the words that I choose as an institution, we feel that in the absence of these regulations, we are operating with a moving goalpost. So, at one point in time in 2018, the goalpost would be here. We would have to fit things between here. But at some other point in time, because there are no formal regulations, these things can change.

Mr. Chairman: I hear you, Sir, but I also heard you said that you all are on level playing field and now shifting goalpost. You had mentioned that, I think. So definitely regulations would help the situation.

Dr. Ali who would help in formulating these regulations? Would you look at those bodies to bring that into account to solve some of the issues that we have at hand?

Dr. Ali: Thank you very much, Mr. Chairman. I would pass some of that over to counsel but before I do, I would just like to indicate that generally we have had consultants in the past who have assisted us with developing regulations. For whatever reasons, those regulations never went beyond the Ministry. So some of these are challenges that we face, in terms of how things are reported and how things are dealt with, with expediency. Of course, to have regulations in place that come back to an agency like ours, if it has to go through that course, you need to get the board of directors to approve and there were periods when we were challenged in that regard. We had not board of directors for more than two and half years in the last five or so years. So that presents a challenge for ACTT as well.

And we are very much aware of some of the issues. But I must say that we have policies that are in place. There are some gaps in the policies, I must confess, and there are some procedural changes that are required. But we attempt to stick to our policy as best we can to ensure that we treat with the institutional matters as they should, and there is a level of equity in terms of how institutions are treated with.

Those gaps sometimes are the areas where you could find some issues. I do believe that regulations, if it goes through the channels, would help. Of course, there is a role for the Chief Parliamentary Counsel. Of course there is a role for the Parliament. But it will never get there unless it is laid by the relevant line Ministry to the Parliament or the line Ministry takes the responsibility for ensuring that those matters are laid. And that has been one of the challenges we have had over the years, for successive years, to get to this point. I am not sure of Mr. Nagassar would like to add to that.

Mr. Nagassar: Chairman, in relation to the concern raised with regulations, the ACTT recognizes the importance of regulations. As the institution indicated, those regulations are to be laid before Parliament and subject to affirmative resolution. I can confirm that that matter is currently engaging the attention of the board and once the board has considered that matter, the necessary representation would be made to our line Ministry, and so on.

Now, in relation to the statement that there is shifting of goalposts, I am not sure what was said, I just want to indicate for the record, Mr. Chairman, that as much as there are no regulations, there are systems and mechanisms in place to monitor and regulate our institutions.

The executive director indicated the institute. The policies, we do not have approved policies in place. All our institutions are subject to our policies. All institutions operating in Trinidad and Tobago, they are also required to enter into general conditions. Those are legally binding agreements. So it is not a situation where there are no regulations, there is nothing in place to monitor and regulate our institutions. Systems and mechanisms do exist by virtue of our approved policies and also by virtue of the general conditions, which are legally binding.

In response to the issue of the issuance of certificates to institutions after the period of status being granted, it should be noted, Mr. Chairman, that the issuance of a certificate of registration or accreditation is not contingent on an institution operating. By virtue of

our approved policies, registration accreditation, status is only conferred subject to an institution entering into those agreements. And so, if an institution fails to enter those agreements, for whatever reason, then by all means, in keeping with our approved policies, the institutions would not enjoy the benefit of a registered institution. Those general conditions are very important for the ACTT. They are the main tool, a mechanism by which we use to regulate and monitor our institution.

Upon entering into those general conditions is when the ACTT would then issue those certificates. As I said before, and as the executive director indicated, there have been certain periods in ACTT's history that we have been operating without a board. And so, the issuance of certificates would have been an issue, because by virtue of section 7 of our Act, every certificate issued, which is akin to a licence, must meet certain ingredients as stipulated under section 7, the signature of a chairman, deputy chairman. So you would expect, Mr. Chairman, if there is no board, no chairman to sign onto those certificates, then those certificates would not be issued.

Ms. Ramdial: Just one little question. How long have you been without a board?

Mr. Nagassar: We do have a board at this time, but we have been without a board for a number of various periods. For example, the period '15 to '17, almost two years, there was no board. The last board, the board term—there was a new board appointed in 2017. Their term expired May 04, 2019 and a board was recently appointed October of 2019. So there have been various intervals in the history of the ACTT without a board. And so the issuance of certificates would have been affected in that regard.

Mr. Forde: So, again Mr. Chairman, through Dr. Ali or it is through the legal officer, so a statement of recognition is requested. That must be signed off by the board?

Dr. Ali: A statement of recognition is what is requested for an individual who has pursued a programme of study, either in Trinidad and Tobago or abroad and the statement indicates whether the programme has met the standards of ACTT or not. That is for an individual who may be interested in pursuing further education or employment. Those are signed off

by the director responsible for that department or the executive director.

Mr. Forde: Right. Again, we live in a fast-paced industry. An individual would have sent in a request to us stating that it is over a year now that they have been waiting for a statement of recognition. Right? Again, what could have caused that delay, subject to what you would have now mentioned to us? Again, that is just information provided by us. Again, you have the authority to say no.

Dr. Ali: Okay, I am not too sure what the particular circumstances would have been. It may have been an incomplete application. For example, someone may not have provided all the information required for the application to be processed, and that might have been communicated to the individual and it would not have been provided. I am not too sure what the particular circumstance is. But there are varying factors which may have led to that not being processed.

Sometimes we do get applications from individuals who do not give us a correct mailing address, or perhaps their email address, and so we cannot communicate with those individuals as well. That has happened in some instances. So again, it depends on the particular circumstance. There may have been instances where that would have happened.

Mr. Forde: So we can then notify the person to contact you all further?

Dr. Ali: Yes, definitely.

Mr. Forde: Additionally, Mr. Chairman, right, you all would have various policies, regulations, guidelines, as the case may be. Based on a breach of a regulation or policy, what sort of consequences are there? Give an example, breaching of something may lead to what penalty as the case maybe?

Dr. Ali: Okay, I can pass this question on to either Mr. Nagassar or Mr. Floyd, whichever one prefers to answer the question.

Mr. Nagassar: Member, if any conditions are breached by virtue of the general conditions, which are legally binding, there are a number of consequences that can be faced by an institution, in terms of the institution having the right to suspend the

institution's operations, even to revoke status as well.

In relation to any breach of conditions as well, if, for example, there is information that an institution is operating illegally or is misleading the public, as it relates to the recognition gain of programmes and so on, of course, any actions like that would attract section 26 of our Act, where in the first instance we would be required to issue official notice to the institution advising on the breach.

11.50a.m.

The institution is given a stipulated time frame to comply. And if there is failure to comply with the directives of the ACTT then in keeping with section 26(4) the ACTT would have no choice but to initiate summary proceedings against those institutions.

Mr. Chairman: Have you given any guidelines for new continuing registrants regarding the minimum infrastructural standards and OSH requirements to which you must adhere?

Dr. Ali: Mr. Chairman, if I could pass that question on to the Director of Accreditation and Quality Enhancement, Mr. Floyd.

Mr. Floyd: Mr. Chairman, as would have been communicated by our executive director earlier on, we have the Standard 1.2 which speaks to:

The institution—demonstrating—ownership of and responsibility for assuring access to the learning facilities that support and facilitate the learning expected of its students.

And the examples of evidence there that the institution would be required to provide include: the master plan for the building; the provision for adequate ventilation and lighting; to ensure comfort, health and safety; adequate space allocation for learners; the plan for acquisition of furnishings and equipment that are appropriate, as well as evacuation maps and procedures. When the external evaluators go in to conduct their evaluation these are some of the things that they would be taking into consideration.

Mr. Chairman: Thank you. So I heard that there are penalties from the attorney, and I heard there was a breach about a fire escape. So hopefully if any complaints are made we may see the execution of some sort of progress being made according to the Act.

One thing, Mr. Cowie, I disturbed your—I think you were on a point, but we are moving very quickly with time because we have another session after. So if you can quickly—no but before I go to you, I think Mr. Newling wanted to mention something.

Mr. Newling: Yes, I did want to mention this. In the process of registration of post-secondary and tertiary level institutions provided this is a document which we call “the 12 steps”, because there are 12 steps in it, and this is what we use to base our application on. In .7 here it says:

If the institution provides and meets these requirements for registration it is required to pay a certification fee. A certificate of registration will then be issued by ACTT. A certification fee also covers the cost of publishing the institutions’ or providers’ registered status in the *Gazette* and in at least two daily newspapers circulating in Trinidad and Tobago.

So the implication is, you pay after you have had the site visits, evaluation, whatever you want to call it, you then pay the certification fee and you are given a certificate. There is nothing in here that says that you must sign the conditions of registration. We only found out about this in a meeting in 2016 at ACTT headquarters in July. We had a long discussion about this whole thing with ACTT and they eventually produced a document which is called “Chapter Two”. Now we do not know what happen with chapter one or chapter three. They produced Chapter Two out of the blue which was a whole policy on registration and so on. It was signed off in January 2014, if my memory serves me correctly, but it was never made privy to us or to any of the institutions.

Mr. Chairman: If that is on the website, do you have a website where you actually put things like this?

Mr. Newling: But that was only put on the afternoon of the meeting. That was only put on the same afternoon as the meeting and we can show evidence of that if necessary.

Mr. Forde: Mr. Chairman, can I?

Mr. Chairman: Sure.

Mr. Forde: Mr. Cowie, well either or, Mr. Cowie seems to be the man. Is your institution registered or accredited with ACTT?

Mr. Newling: We do not know.

Mr. Forde: Good thing I asked the question.

Mr. Newling: Yes.

Mr. Cowie: What has happened is that PIMBS has been operating for quite a while and as we have mentioned at times we have been continuously registered. But sometimes some of these certificates come after the period—they come very late. And in light of the opening conversation about discipline, production, where we want to increase the GDP of Trinidad and Tobago within a framework, we have been affected by the timely collection of these certificates.

Mr. Forde: So are you all in operation in 2020?

Mr. Newling: We have zero tertiary students.

Mr. Floyd: What has happened is that we were evaluated and we have to see them soon, because in terms of the time allocated it is a costly procedure. Bigger institutions, of course, are at an advantage because they pay the same amount of money after three years and some smaller institutions have to pay that every year.

Mr. Forde: Right. So again, just for the record, once registered not always registered then? Is it a yearly, two years? Dr. Ali.

Dr. Ali: Yes. Okay, so once an institution has been registered it is registered for a period of three years and then it has to go through a continuing registration process.

The point that was made previously by PIMBS that they are not sure whether they are registered or not. They are aware having communicated to them that the board had extended their registration period up until a period where they were going through a continuing registration exercise. So that has been communicated to them. The institution underwent a recent site visit for continuing registration and that report is in process and it will be with them soon for them to fact check, and we had a discussion about that issue.

So it is not fair for them to say today that they do not know if they are registered or not registered. They have been communicated to by us and I have kept in constant contact with them through the director to indicate where we are with things, because I take an interest in institutions particularly that have had longstanding issues to resolve those issues.

So as far as we are concerned they have been communicated to, there was an extension to their registered status and they are awaiting the final report for the board to make a decision on their continuing registration status which would be effective of the date of the board's approval.

Mr. Newling: Mr. Chair, please. I would just like to point out this is a good example of the lack of communication or very slow communication on ACTT's part because the very e-mail that Dr. Ali was referring to there is dated Friday, January the 31st, and it says in it:

Further details on the conditions to be fulfilled in relation to the award of this status will be communicated to you in subsequent correspondence within seven working days.

And we have heard nothing more from them.

Mr. Chairman: Well, you know, I am looking at—probably the publication of the registered schools on your website would assist persons to know. You are new in the job so at least you have put things into place that could assist. And I am hearing the fact that regulations also need to be implemented. So again hopefully you can push that forward as quickly as possible to the line Ministry and see if we can—it will come to Parliament eventually but this is something, I think, would satisfy certain members. So those are the two points I am looking at and the fact that the whole idea of the statutory approvals seems to be a disconnect between the Ministry of Education and the ACTT at certain levels.

At this stage we have to meet other parties soon. So I would like to close this hearing, but before we do, do you have any other questions? Mr. Forde, any other questions?

I would like to invite—

Mr. Chairman: Yes, sure.

Mr. Cowie: Mr. Chairman, as a final point of closing, I want to remind the Joint Select Committee that ACTT is responsible for providing audited financial statements on a yearly basis and since inception that has not been done. So maybe added to the regulations they can provide audited financial statements that the public can look at over time. Thank you.

Mr. Chairman: Thank you. I would like the ACTT, someone, to respond to this allegation.

Dr. Ali: Thank you very much, Mr. Chairman, and I will just pass the matter on to the Director of Finance and Administration to explain our circumstance.

Ms. Pascal: Mr. Chairman, under our Act we are required to be audited by the Auditor General. In 2017 the Auditor General told us they did not have the personnel to handle audits, so they hired PricewaterhouseCoopers to do our audits and they are currently looking at 2010 to 2016 and that is where we are at right now.

Mr. Chairman: So who usually pays for these auditors? Would it be something your department would? And was funding decreased this year or anytime?

Dr. Ali: We have gotten an increase by 2million, but bear in mind that that is still not covering our salaries and our rental. We have other expenses that we do not have funds for. We have been utilizing our reserves and if we continue at the rate we are we will not be able to sustain our operations in a month or two from now. It is that serious.

The issue for us though, as was mentioned, is that we have engaged the Auditor General's Department and the Ministry of Education on our issue related to financial audits—our audits. That is a very long standing issue where the Auditor General Department is concerned. We understand that they are the ones that give the authority to do the audit and to contract whatever parties. It is outside of our hands, because we are third party in this arrangement. We are not directly involved with the first that does the audit.

Mr. Chairman: As you are already on the mike could you give us brief closing remarks, probably one minute because we are pressed for time.

Dr. Ali: Thank you very much again, hon. members and members who have joined us here today both from the ACTT and from the institutions. We again appreciate the opportunity to be able to address you and the members of the public. We hear the concerns of our stakeholders. I have heard them for a while and I have trying my best in my own capacity and to alert the members of our new board on the issues. So we have been trying our best to address these concerns.

We do know that there are a lot of changes that need to be made and we have taken note of those and we have a process for moving forward with those changes. And agreed that the regulations are critical for the operations of ACTT and we hope that the authorities will take that seriously into account in moving forward. Thank you very much.

Mr. Chairman: Thank you. Would a representative from PIMBS Limited give closing remarks?

Mr. Cowie: We are grateful for the opportunity to have some of our concerns heard, and we want to compliment the ACTT for sticking to their core values of accountability, which they are doing now, integrity, teamwork and trust. We know that there is a need for ACTT and the Joint Select Committee to protect all stakeholders and we are thankful for that process and to be nurtured by these two great institutions, the JSC and the ACTT. Thank you.

Mr. Chairman: Would a representative of Omardeen School of Accountancy Limited give closing remarks?

Mr. Omardeen: Yes, thank you very much. My point is that we need to take a little more interest in the safety and welfare of students and we live in a society where we cannot take an institution's or people's word for it. We must get proof whether it is depositing money, cash in a bank account, you have to have a source of funds, whether it is a fire approval, you need to substantiate these things with approvals, with the necessary evidence. And in

Trinidad it is a must. So I hope going forward that the ACTT could look at improving the system generally for all stakeholders. Thank you very much.

Mr. Chairman: I guess we have had a productive morning. We have heard some concerns, there are certain improvements. As you said, we may have to level the playing field as you put it that way. But at least we can work together and mediation is something you can look at instead of legal options, all parties involved. So thank you all for coming here, and I hope if you have any further questions you can always write to our Committee and we would take it into account and do have productive day.

And we would like to suspend for five minutes and we will take the other three parties after.

[Chairman confers with the Secretary]

So, thank you, Omardeen School of Accountancy, thank you PIMBS for coming and representatives, have a good day.

12.05 p.m.: *Committee suspended.*

12.11 p.m.: *Committee resumed.*

THE UNIVERSITY OF THE WEST INDIES (UWI)

Dr. Dawn-Marie De Four-Gill

Campus Registrar

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Mr. Chairman: Good afternoon, ladies and gentlemen. I am Dr. Varma Deyalsingh, the Chair of the Joint Select Committee on Local Authorities, Service Commissions and Statutory Authorities (including the THA). I welcome you, representatives of your various

organizations. This I may say is our second meeting that we had concerning the issue with the ACTT, its function, its efficiency, its effectiveness and our focus today really is to look at the Accreditation Council of Trinidad and Tobago, its function, if it is meeting that mandate, the efficiency, the effectiveness in evaluating its mandate and also to evaluate the performance of the ACTT in assuring quality in the delivery of tertiary and post-secondary education by local schools affiliated with foreign institutions. Also, to determine whether the resources, systems and procedures of the ACTT are sufficient to allow it to operate efficiently.

I would like the members of the various committees here to please introduce yourselves starting with Dr. Dawn-Marie De Four-Gill, the Campus Registrar. If you can give a brief opening statement please.

Mrs. De Four-Gill: Thank you and good afternoon. I am Dawn-Marie De Four-Gill. I am the Campus Registrar at the University of the West Indies, St. Augustine Campus. As you indicated, I will just give an opening statement with respect to the ACTT and our relationship with them. The University of the West Indies has been a client of the ACTT since 2008 when the UWI St. Augustine Campus was registered with the ACTT. On February 05, 2011, the campus was accredited with the ACTT for seven years and was reaccredited on February 05, 2018, for another seven-year period, the maximum period of institutional accreditation conferred by the ACTT on tertiary level institutions.

Throughout these registration and institutional accreditation exercises the relevant officials of the St. Augustine Campus communicated regularly with the ACTT officials assigned to guide the Campus. These ACTT officials prove themselves to be knowledgeable about current trends in quality in higher education, having been exposed to the required training in North America, Europe and other parts of the world. Directors and professional staff of the ACTT have, for example, participated in several fora of the International Network for Quality Assurance Agencies in Higher Education alongside quality assurance staff of The UWI. They have also been playing a leadership role in the

Caribbean Area Network for Quality Assurance of Tertiary Education (CANQATE).

The ACTT's commitment to continuous quality improvement of the national tertiary education sector is evident not only in the quality principles informing its registration and accreditation criteria and standards which are reviewed periodically, but also in the quality of the support provided by its professionals assigned to guide the campus in the various self-study and site visit exercises.

The campus's relationship with the ACTT has been beneficial to the campus and indeed the university as a whole and it has exposed the university community to the internationally benchmarked higher education standards which serve to both validate and reinforce The UWI's long stands focus on quality.

While valuing the campus's important relationship with ACTT we do have a few recommendations. The first, is that for accredited higher education institutions with mature quality management systems demonstrated ability to fulfill requirements within a reasonable period, build facilities meeting health and safety standards and providing access to services and amenities. Serious consideration should be given to granting provisional site registration as obtained in other jurisdictions in a competitive environment. This can facilitate business continuity pending full compliance with all requirements within a defined period of time.

The second is that there should be a review of the adequacy of the ACTT's human resources as while they do their best with what they have they appear to be stretched.

Our third recommendation concerns the need to ensure the communication of clear policy directives to institutions. This relates to the indication in 2017 that reaccredited institutions would be accredited for ten years. However, the campus subsequently learned that seven years remained the allowed period of accredited status.

We wish the ACTT well in its continuing development and ongoing promotion of quality tertiary education. We trust that our contributions to this Parliamentary Committee hearing would help to facilitate the assessment of the council's efficiency and

effectiveness in executing its mandate.

Mr. Chairman: Thank you. And would your other member, please introduce herself?

Dr. Gift: So my name is Sandra Gift, and I am the Senior Programme Officer in the Quality Assurance Unit of the University of the West Indies which is a regional unit, and I am located at St. Augustine and therefore serving the St. Augustine campus.

Mr. Chairman: Thank you. And would officials of the School of Accounting and Management Caribbean Limited please introduce yourselves.

Dr. Fulchan: You can call us SAM for short.

Mr. Chairman: SAM, okay, it is easier.

Dr. Fulchan: Mr. Chairman, as we are affectionately known now. My opening statement. In response to the emerging needs for business degrees and professional development other than what was offered at the University of the West Indies, SAM's founder had a vision for private tertiary education which gave birth to the School of Accounting and Management back then in 1984. SAM was regarded as a premier private tertiary institution and we are the first to bring a university from England into Trinidad and Tobago. We are the first institution, both private or public, to bring an MBA into the Caribbean as well. So there are many firsts when it comes to SAMs.

We are approved by the ACTT, not accredited, but transnational recognition which is what we have subscribed for for the maximum period of three years. We have had that relationship since the inception of ACTT as well. Thank you.

12.20 p.m.

Mr. Chairman: Thank you, and would officials from the School of Business and Computer Science please introduce themselves.

Mr. Bobby-Sookram: My name is Kumar Bobby-Sookram. I am the Senior Manager, Quality Assurance at SBCS. Similar to SAMs, we provide transnational programmes and have been affiliated with ACTT since its inception. We are one of the early members to be registered with ACTT. Like SAMs, we have always maintained the full period of three

years, and we are here to facilitate any questions that you may have.

Mr. Chairman: Thank you. I want to remind members that please, you can activate your microphone when recognized and then deactivate it after. Dr. Dawn-Marie De Four-Gill, you mentioned three concerns you had with the ACTT. One was the fact that the provisional site registration that you are thinking that, you know, if you have a site that you wanted, instead of closing it down, and I think the ACTT had mentioned this morning in our deliberations that I think they do have that policy in place that they look at and give that assurance. So have you noted in the past that they have been too harsh in any sort of their dealing in terms of requirements?

Dr. De Four-Gill: No, that has not been our experience. I think the suggestion is more along the lines of provisional registration status versus waiting for full site registration. And it really relates to when we are trying to operationalize a new site, as opposed to something that is happening on the current campus. So, it would facilitate, you know, continuation of business especially in a competitive environment within which we operate. And really, it was linked to institutions that have the rigid standards inbuilt in its operational policies, and that would obviously be transferred to any new site that they are trying to operationalize. So, it was really provisional versus—

Ms. Ramdial: Thank you. Good morning again, everyone. To SAMs and SBCS, you identified that you are one of the premiere—both premiere institutions, you have been around for quite some time, but I also note that you speak about being registered and approved but not accredited. What prevents you from being accredited?

Dr. Fulchan: Now, accreditation was not—I mean it is two-fold, the ACTT registers transnational providers, people who provide or institutions like SAM that provide international programmes. If we do only provide international programmes we are not expected to get accredited. Only if we are offering homegrown programmes. Let us call them home-grown developed by SAM, all right, so it was never really offered to us because it is not the business that we are in.

Ms. Ramdial: Okay, so you do not have any local home-grown programmes that would require you to be accredited with ACTT?

Dr. Fulchan: Not at this time.

Ms. Ramdial: Not at this time, okay. SBCS?

Mr. Bobby-Sookram: We have some local programmes, some diplomas, but other than that, like SAMs, we deal mostly with transnational programmes and our understanding is that a programme is accredited in its country of origin. So our programmes are accredited in the UK, but ACTT recognizes them and so that is why at this stage at least, accreditation is not an immediate concern. Perhaps down the line as our local capacity matures, that may be something that we would look at in future, but at this stage registration seems to be sufficient for our needs.

Ms. Ramdial: Just one more question. What programmes do you have at your institution that are local that have not been accredited?

Mr. Bobby-Sookram: We have some diplomas in about four areas: computing, media, business and engineering.

Ms. Ramdial: And are you in the process of trying to get these diplomas accredited?

Mr. Bobby-Sookram: Well, these diplomas have only been run for about a year so we are still in the very early stages.

Mr. Chairman: I think you have to run it for three years and have the first batch of students qualifying before you can ask.

Mr. Bobby-Sookram: That is correct.

Mr. Chairman: So, that is in the pipeline right?

Mr. Bobby-Sookram: Yeah.

Mr. Chairman: Okay.

Mr. Forde: Mr. Chairman, for the both institutions has it always been like that? Only transnational programmes versus local programmes from since inception, with both? I would like to get a feedback from both individuals please.

Dr. Fulchan: Yeah, it has always been and it is not again in the ACTT's purview to accredit institutions like us that offer transnational programmes. We would register at the ACTT, go through pretty much the same process of accreditation, right, but it is to register us. Like my—from SBCS said, once programmes are accredited in the countries of origin, there is no need to accredit an accredited programme. So, it has always been like that at SAM.

Mr. Forde: Similar?

Mr. Bobby-Sookram: Yeah, very similar I mean, our understanding is that accreditation is a far deeper process, the registration is a standard that all institutions legally must comply with, but if you are providing an indigenous programme you know, obviously there would be more expected you know, so—

Mr. Forde: Again, Mr. Bobby-Sookram, at your institution you mentioned that you have a couple of local programmes. It is clearly identified to the registrants that it is not accredited, it is fully a local diploma programme as the case may be?

Mr. Bobby-Sookram: That is correct.

Mr. Forde: Is that clearly identified to them?

Mr. Bobby-Sookram: Yeah, as an institution we do not claim to be accredited by ACTT.

Mr. Forde: One other question, Mr. Chairman. Again, to all three participants, again, the registrar mentioned that they have a rollover programme where you all have been accredited seven years on two occasions, right? You would have started in 2008, 2001, and then you have another seven-year programme. In terms of communication with ACTT, right, how will you all rate yourselves in terms of communicating with ACTT, the feedback you will get from them, right? Again, it is to all three participants. Again, the University of the West Indies for, you know what I mean, the whole gestation period, your growth, your development and so on. You have identified for seven years while we were told earlier that there is a three-year accreditation programme that is basically in place. So, could you just shed some light on your seven-year and then you also mentioned about a

ten-year? Communication was made but that never materialized.

Dr. De Four-Gill: Okay, so just to clarify, we went through registration when—in 2008. Pretty much at the start of the life of ACTT. Then we opted to go for institutional accreditation which was a very deep, rigorous exercise. We got accreditation for the maximum period of seven years. Dr. Gift actually led the team that took us to accreditation. And then, we went back again when the period was up and we got reaccredited for another seven years in 2018.

The type of communication and the feedback that we got from ACTT was very instructive, they held our hand throughout the way as is the norm with accreditation institutions worldwide. They acted as other institutions, as would be expected from an accreditation institution. I would ask Dr. Gift to expand a little bit on that experience.

Dr. Gift: Well, I have to say it was challenging in the sense that we—and it was eventually I think in the interest of the campus, because we were required to not only simply just provide statements but to provide rigorous evidence of the statements made. And that had implications therefore for ensuring that you had a very well-managed quality management system.

One of the challenging aspects of the accreditation process is the generation of a self-study report, where you basically assess yourselves first using ACTT's accreditation criteria and standards and providing the evidence. And even though we have a rigorous internal quality assurance system where we do similar reports periodically, routinely, I found that the professional staff with whom we worked for the self-study exercises were actually quite helpful, they demonstrated a good knowledge of what was required. They were very professional, communication was effective in the sense that we would reach out to them for information, seeking guidance, seeking clarification and without too much delay we would get feedback that would be instructive in terms of how we could enhance what we were already doing in terms of a self-study report.

I have to say that I myself had a great sense of admiration for the staff of whom we

worked, because I found that they stretched us. They made requests of us that allowed us to demonstrate that we did have the evidence to substantiate what was being said in terms of our approach to quality at the university, and that we benefited from it.

Mr. Forde: SAMs?

Dr. Fulchan: I want to take it pre-2008, the accreditation council involved all institutions into training and development. We were exposed to former chairs of the Quality Assurance Association in England. They brought these guys in and prepared us for this process of registration. So even before it was required for us to register the ACTT has played a critical role in ensuring that we were up to the standard that they were going to set. Fortunately enough for SAM, I mean, we are doing this almost 40 years now, and the accreditation bodies in England require us to follow their rules and regulations. So we were prepared really when the ACTT came in, finally in 2008, you know, to go through this process. We ourselves would have to go through that accreditation process with the British universities.

We have found that the—to answer your question directly—the relationship with the ACTT from 2008 and prior to now, really has been cordial. I mean, there is not a time that we cannot call on them that they do not respond to us, both in writing and verbally, right? They have met at our institution prior to registration, we have met at their institution and they have really worked with us to make sure that we comply.

Mr. Forde: SBCS.

Mr. Bobby-Sookram: Yes, so similarly, yeah, we have transnational programmes and we have been audited. Our transnational programmes our collaborations have been audited by the QAA of the UK on three different occasions. So again, when ACTT came into being they did have a lot of training sessions and so that we attended, and there was consistent communication. It was a new process for us and ACTT was new, so initially, you know, we required a lot of that communication to understand what the standards meant because transnational programmes are different from local programmes and how they are managed, how they are administered, how they are delivered is different. And so, you have

a set of standards that are for registration of all institutions, local or transnational. So, where there were those variances we had to communicate with ACTT on that and ensure that the interpretations of the standards were, you know, everybody was on the same page then, and where we differed, that accommodation was made for that and it was seen as such. And that has improved greatly to the point now where for registration there are no issues really, you know.

So, in the initial days perhaps sometimes even with the external evaluators that may come from a different background, a non-transnational background. There may be need for clarification, but because we were able to speak to the ACTT and make our case known, those things were dealt with. So, I think from the inception the communication has been good, and it has reached a stage of maturity now where you know, a lot of the issues have been ironed out, and if there are new issues and new challenges, there is that relationship that you could rely on to see you through.

Mr. Forde: Two more quick questions, Mr. Chairman. Again, to SAMs, you mentioned in your brief to us that you had a problem in exposing some confidential information to some of the external evaluators. Care to just shed a little light on, you know, what exactly—you said they are competitors and you had a problem, you know, so could you just shed a little light as to your concern there?

Dr. Fulchan: You see, one of the issues with developing an accreditation body in this country, and even using what is best practice in other jurisdictions to develop the accreditation council here, I think it was really—they did not take into consideration some of the issues that they faced where they were—I do not want to use the words “copy and pasting”, but using best practice from other countries.

One of which is peer review, where in the British universities they are reviewed by their peers and in England, universities up to only recently had a cap on the amount of students that they were allowed to take into an institution. So really, it was not a competitive-type environment because you had a cap, you cannot take more than you

can—you know, that capacity.

But seven years ago England removed the cap. So they are now operating in an environment similar to Trinidad, where universities are now competing for students. Now, so previous to seven years ago peer review was not an issue because you could have come into my institution, look at my institution because we would get our numbers anyway. Now we are taking that system and implementing it in Trinidad. We now have competitors coming in and looking at our—what we consider competitive information. That could be our syllabus, our structure, what we consider our competitive advantage.

We have expressed this to the ACTT, and they are working with us and assuring us of confidentiality. But the reality is, a member cannot when assessing documentation, cannot divorce itself from what they have learnt and not take it into their institution, right? Yes, not documents, but the learnings that they would have gotten from the approval process. So, really it is a concern. We still fulfill the need of the ACTT by supplying this documentation, but it is really a concern for us.

Mr. Forde: And my second question to UWI. With regard to your accreditation, what would you say are the benefits to the University of the West Indies? Have you been able to assess that yes as a result of it you are seeing some benefits percentage-wise or student population?

Dr. Gift: Thank you, Chair. Through you, Chair, I would say that the most significant benefit has been in terms of enhancing the quality culture within the institution. Because prior to accreditation, the University of the West Indies has had an internal quality assurance review system, where we were reviewing periodically every five to seven years, every discipline within the university undergoes a peer review exercise. So we had that system in place. But even so, we had accreditation for our specialized programmes in medicine, and engineering, and to some extent in law as well through the Council of Legal Education.

But when the institution as a whole had to be accredited, it really ramped up this

question of a quality culture because then it was not just specialized programmes or every five to seven years you had a review, the brand of the entire institution came under scrutiny and we had to sensitize all members of the campus community and across the University as well. Because the other campuses have also been accredited institutionally. In Barbados and in Jamaica, Open Campus, and so forth.

So, it generated within the university community as a whole, a stronger and heightened awareness of the importance of quality, not just in terms of academic quality but in terms of our administrative systems, but also in terms of service quality, because the criteria and standards which are used for institutional accreditation are institution-wide. And whereas the focus was on academic quality through our internal reviews, accreditation placed the focus on institutional quality as a whole.

So, I would say that now every member of staff is aware that every five to seven years we are coming up for accreditation, and that that has implications for the nature of the quality systems which are maintained at unit level within departments, administrative departments, but also within academic units. And it also, I think, has contributed to the university's ranking internationally because you may have heard that the university is now ranked within the top 3 to 4 per cent universities worldwide, based on the Times Higher Education rankings.

Without an internal quality assurance system I doubt that we would be able to achieve that. Certainly there are other factors that come into play, research, publications, and so forth. But the fact that we have—that we are an accredited institution, I think, is definitely related to our success in the realm of rankings.

So, in terms of the quality to quality culture the external recognition of quality through the ranking system, enhancing therefore competitiveness, we have our students at graduation now the valedictorians commenting on the fact that UWI is ranked internationally. And the fact that they are accredited gives our graduates a heightened sense of confidence when they therefore leave and they have to approach the labour market

to seek jobs and so forth.

Mr. Chairman: Does the accreditation status in the university provide adequate assurance that minimum international standards are being met by the accredited institution? Because I mean, you have great rankings now with the Times Higher Education. What I am looking at is—if—being in the field of medicine, if a doctor is qualified here, are the schools here accredited? And could a doctor have the freedom of movement from leaving here to go to different countries in terms of that accreditation?

Dr. De Four-Gill: With respect to medicine the accreditation is very specific. It is done in the Caribbean by CAAM-HP. And if you have to move to another jurisdiction, you would have to comply with the requirements of that jurisdiction. Certainly, we have had many of our students go abroad to do postgraduate work and they are easily accepted and they do well. In fact, they thrive in other jurisdictions. There is not an automatic flow but there is some reciprocal arrangements, and the fact that we have CAAM-HP accreditation status for the medical programmes is recognized by other territories.

Mr. Chairman: But they may still have to do certain examinations?

Dr. De Four-Gill: They will still have to do other examinations.

Mr. Chairman: What about the law school? Because I think our first meeting we were told that they are not accredited. That programme in the law school, could you elaborate? Not registered, accredited? Somebody had mentioned Hugh Wooding you know, is Hugh Wooding—

Dr. De Four-Gill: Hugh Wooding is not part of UWI. We have a relationship with them but is not part of UWI. So our graduates are seamlessly taken into their programme, but it is not officially under the ambit of the University of the West Indies.

Mr. Chairman: So up to the LLB level you all are accredited? Are there any programmes not accredited offered by the University of the West Indies?

Dr. De Four-Gill: Well, no, because—by virtue of the accreditation process that we went through twice, the programmes that we had listed on our register, they were all—they all

came under the whole ambit of being accredited. Any new programme that we develop, we send first, once it is developed and it is passed, it goes through all our quality control mechanisms, it is passed through our academic boards, F&GPC, and it goes through all these quality control mechanisms, we would then send it to ACTT for programme approval, and then the process is once that is received, it goes to GATE to get, you know, funding.

So, we do not offer—we do not have programmes that are not accredited.

Mr. Chairman: I think you had mentioned another concern about the clear policy directive, you were talking about clear policy directives from the ACTT, but I think this morning, I think we had gone through that already where we were suggesting that their website needs to be upgraded and policies need to be out there so different stakeholders can actually see what is happening in a timely manner. So I think that is being addressed. In terms of the stretching of their staff I think they are very well aware of that and with funding and what not, I think they are going to be working at that. So I think your concerns are being met. And I feel proud to be a graduate of the University of the West Indies since we are so high on the ranking. I must commend you.

Dr. De Four-Gill: We are proud to be UWI.

Ms. Ramdial: Just one more question to SAM and SBCS, you spoke about your transnational programmes and the courses that you offer that are accredited in the country of origin. For example, if it is an English degree or diploma, or certificate, are these programmes accredited in other jurisdictions rather than just the country of origin?

Dr. Fulchan: Good question, I mean it is twofold, it is recognition and accreditation, and countries recognizing that, say for example, the University of the West Indies is accredited, right, and giving some level of recognition to the accreditation body that does the accreditation. British degrees, you know, for as long as I know, have been accepted worldwide as recognized as accredited in the country of origin. So I think it is a matter of recognizing the accreditation body in England.

Just to take a stab at UWI a little bit, the universities that we operate are ranked in the top 1 per cent of universities in the world, right, sorry about that, Chair, but I am happy to hear that you all are in the global ranking.

Ms. Ramdial: Just a follow-up to that question. The master's programmes that are being offered, sometimes you would see in the advertisements, "Master's programmes from Australia, New Zealand and other jurisdictions". Are they accredited for example, in England? Would they be accredited in England? Would they be accredited in America? So that, students or persons who have done these master's programmes can jump across and be recognized?

Dr. Fulchan: Okay, now, I can answer for the UK programmes because we do not offer any programmes from Australia or any other jurisdiction. Canada for sure is not yet a republic, they are independent, so on the twenty-dollar bill in Canada there is still the Queen's face there, right? So you can seamlessly take any of our qualifications anywhere in the world. We have had students graduated and working in different parts of the world, from Dubai, Egypt, US, Canada, Amazon, Facebook or they work everywhere, and it is qualifications that they get here.

The business model that we run at SAM is slightly different to the transnational franchise-type model. A student who is attending SAM is actually attending university at SAM. So, at the end of three years of a bachelor's degree a student could go up to England and graduate. Their name is on the registrar to graduate. Same for our master's and doctorate. So it is not like offering a franchise-type programme, we are literally offering the university's programme within here. The university would visit us seven, eight times a year to make sure that we—our quality standards meet theirs and surpass theirs. Not just in delivery but our infrastructure as well, so we do not have a problem with any of our students seamlessly getting in to further education, further training, anywhere in the world really.

Ms. Ramdial: SBSCS.

Mr. Bobby-Sookram: Very much the same thing holds. Our students can go to the university and graduate in the UK if they so desire. Most opt not to because, you know, it is an expensive thing, and our partnerships are all UK based. So we cannot speak for anywhere else in the commonwealth, but once there is some sort of a recognition, understanding between the universities in Australia, wherever and the UK, I am sure that would answer that.

Mr. Chairman: To get GATE approved, you have to be accredited.

Mr. Bobby-Sookram: Registered.

Mr. Chairman: Registered, and you can—

Dr. Fulchan: To get GATE approval you need to be accredited and I am happy you brought that up, Chair, because institutions like ours are not GATE approved anymore, because we were never designed to be. Our business model was never designed to get accreditation, right, although we go through the same process for registration and accreditation with the UK bodies. That same self-study and everything else we do with the UK bodies. So we go through the same accreditation process with the UK Quality Assurance Association and the university and their externals, and we do not attract GATE funding, and I mean, I could go ahead to say that the cost per student in the private sector is much less than the public sector, and we no longer get GATE. And GATE really just pays tuition, not everything else.

So we think it is really unfortunate that we would have gone through that rigorous process of registration, accreditation by foreign bodies that are ranked really higher than the public sector universities, and we cannot attract GATE funding.

12.50 p.m.

Mr. Forde: Mr. Chairman, well that, again, that is being subjective. Right? You are in the field of education, you make a decision to go the transnational way versus the local—well this is the way of the University of the West Indies then, let us use that term and, again, you cannot afford to have your cake and eat it also.

Dr. Fulchan: Through you, Chair, I mean, I guess everything could be subjective, but the reality is, we were not designed to be subjective. We were not designed by— We did not go into the ACTT to say to them, “look, only approve us transnationally”. I would love if all of us could get accredited, but it is not in their purview to accredit institutions like us although we provide, I mean, universities that are ranked in the top 1 per cent of universities in the world, and our students do not have a problem with recognition anywhere in the world. We have seamlessly—you understand? So I am not understanding clearly where the subjectivity comes in, Chair.

Mr. Chairman: So could a partial GATE funding might be applicable to your institutions so as not to disenfranchise persons who may rather come to your institution than a public. so this is something that may need to be developed further or recommended.

Mr. Forde: And, again, Mr. Chair, through you, it is left up to the individual institution on the road or the path that they want to take. Again, we do not need to go into the thing, it is just that, you know, I mean it is just that I look at it from that point of view, you will see it differently, and that is the path that you choose versus what The University of the West Indies has chosen.

Dr. Fulchan: No. We did not have a choice, Chair. Chair, unfortunately, we did not have a choice, eh. We were never given the recommendation to become accredited because it was not part of what was expected of us. So, I mean, if you say to us—now I want to be clear as well, eh, because I think with the way how world global economies are going, I do not think education should be funded first. I think you know housing, health care, things like that really should be a priority. Right? But what I would like to see is that, at least, an even playing field, right?—where students really have a choice, not choose based on price, but based on quality. Right? And if it is that students in this country have a choice based on quality and not price, then we should have an equal playing. It is either we all get GATE or we do not get GATE, and the student has the opportunity now to choose, right?—and, again, based on quality which is what we are here to discuss.

Mr. Forde: I will just end on this particular note in order to ensure, and I think this is why the both doctors mentioned to us that one of the benefits of being accredited is as a result of what they offer and then, again, what they are entitled to at the end of the day.

Dr. Fulchan: Mr. Chairman, I am not sure—

Mr. Forde: In terms of that they benefit from GATE.

Dr. Fulchan: Sorry?

Mr. Forde: They benefit from GATE.

Dr. Fulchan: Okay.

Ms. Ramdial: Let me just add that GATE and schools that benefit from GATE, it is a policy decision not made by ACTT or anyone of your bodies here, but really government policy at the end of the day. So recommendations can be made for partial funding of institutions like yours to give, as you rightly say, students a level playing field in terms of choice at the end of the day. We just want to highlight that.

Mr. Chairman: So at this stage we are pressed for time. I think there is a meeting further down the line, a parliamentary meeting, a sitting, a parliamentary sitting so my members here are anxiously awaiting to leave. So at this stage I would like to ask the chief officials if you can give brief closing remarks starting with any representative from the University of the West Indies.

Dr. De Four-Gill: As I emphasized before we are satisfied with the relationship we have with the ACTT so far. We recognize they are overstretched in terms of human resources, however acknowledge their professional approach to taking us to the various exercises, registration, both accreditation, the processes, as well as the new accreditation. And so we remain committed to working with ACTT in terms of, you know, enhancing quality, as well as, you know, the growth of the tertiary level sector in Trinidad and Tobago. Dr. Gift, I do not know if you want to add anything too?

Dr. Gift: No, Chair, thank you, I am okay.

Mr. Chairman: I saw your comments made Dr. Ali smile in the back, so I think you

made him a little happy with those comments. Right? Would Dr. Nigel Fulchan give us any closing remarks, please.

Dr. Fulchan: Chair, I would like to thank the panel for the opportunity. The ACTT has been really a beacon of best practice, I believe, because we have been dealing with universities over the past 40 years and we are able to compare the services we get from accreditation bodies across the world, well really mainly from the UK, to the accreditation council. The council really goes beyond, I think, the call and to ensure that we keep to the standards that they expect. Yes, they are stretched. We were stretched recently without ACTT having a board in place, so although the ACTT did their job, because of the length of time to get that board in place, we were affected. Well our reputation took a little hit and financially as well, where employers would normally pay for their staff to attend SAM could not because we were not yet registered because we awaiting for a board to sign a document. Yeah? So, look, the ACTT, I think, needs to be commended for their high level of efficiency, their practice, their evaluation team, they all do a good job. Thank you.

Mr. Chairman: Thank you very much. Would Mr. Kumar Bobby-Sookram give us closing remarks.

Mr. Sookram: Well, being the last speaker I will mostly have to echo a lot of what was said previously, but with respect to the resources, yes, sometimes we have been adversely affected by ACTT not having the resources in terms of timeliness, you know, and for a private business time is money sometimes so it does affect us, but we do realize that this is something outside of ACTT's control a lot of times, and so we work with it, you know, and adjust our expectations accordingly and, you know, do the best we can.

Mr. Chairman: Thank you very much. And we heard the comments this morning and I think the members of the ACTT actually realize if there are any shortcomings we would have to work on that together with our recommendations and the Ministry of Education.

And at this stage in the game, I got some glowing praises for the ACTT so you

know, they are in the discussions. So I want to thank all of you, officials, for your attendance and participation, members of the media, and also to thank my Committee members and their staff for participation and support. And if there is no further business for consideration, I declare this meeting adjourned.

12.57 p.m.: *Meeting adjourned.*

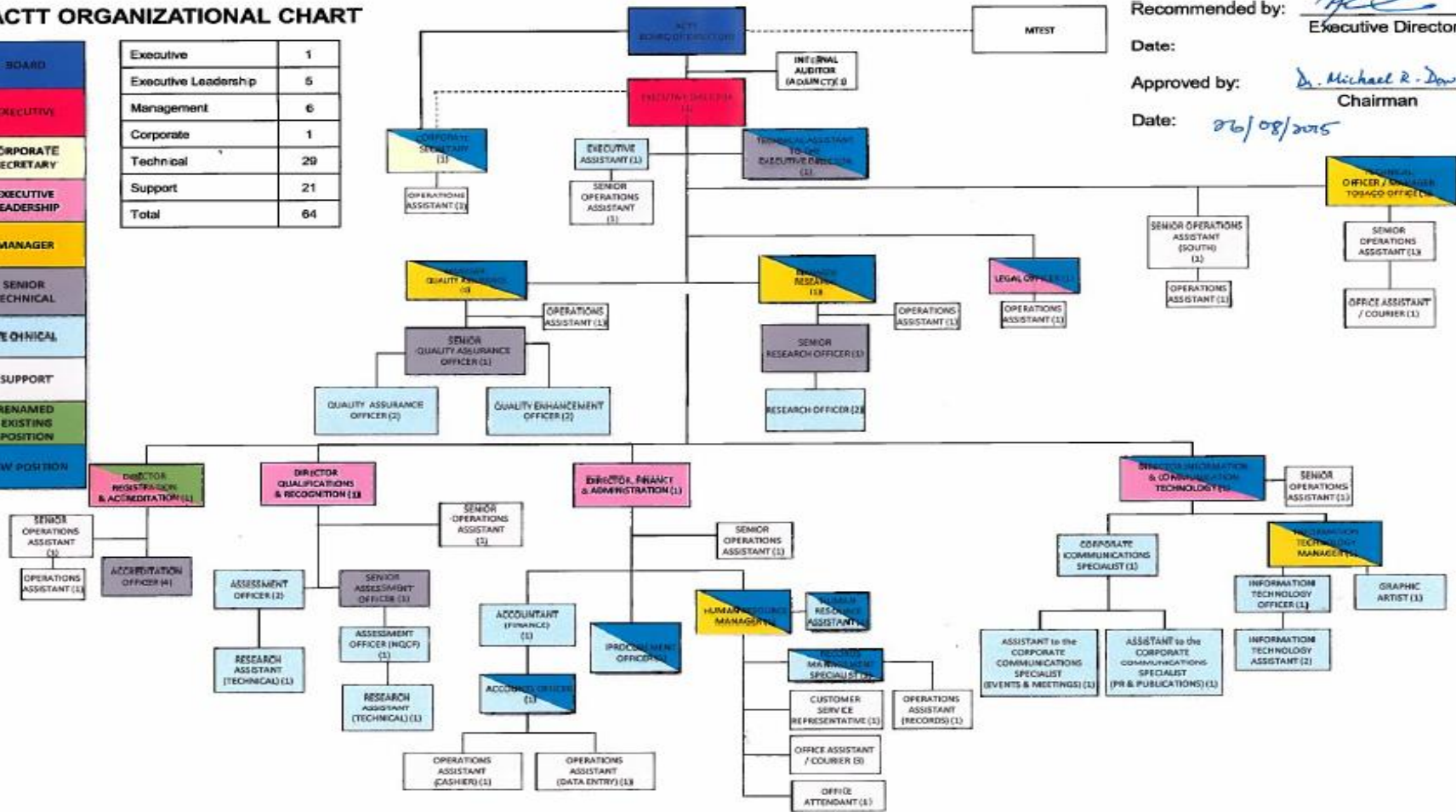
Appendix VI

ACTT's Organisational Chart

ACTT ORGANIZATIONAL CHART



Executive	1
Executive Leadership	5
Management	6
Corporate	1
Technical	29
Support	21
Total	64



Recommended by: RE
Executive Director

Date: _____

Approved by: D. Michael R. Dowlett
Chairman

Date: 26/08/2015

Appendix VII

Auditor's Report Summary: Findings and Recommendations

Key findings and recommendations from Deloitte and Touche's (D&T) review of financial processes are summarised as follows:

FINDING	RECOMMENDATION
Organisation structure reflects clear reporting lines however, with regard to the job description of the Senior Operations Assistant, there were poor segregation of duties.	D&T recommends limiting deposits to direct bank deposits only.
Non-participative management style in Finance Department.	D&T recommends a more participatory approach to be adopted within the department, including team building activities.
Finance sub-committee does not include someone with a finance background, sub-committee not positioned to critically ensure that the mandates of the Board as relate to finance function are being carried out.	Recommendation to consider someone with finance background to head this sub-committee
Policies and procedures not reviewed for continued relevance and applicability.	Recommendation that policies and procedures revised to reflect processes actually being performed. Procedures to be developed for each process or job function and adequately documented.
Policies and procedures not properly organised, policies and procedures not differentiated.	Recommendation to codify policies and procedures and review of same conducted on a regular basis. Development of procedures and policies manual needed.
Online purchases (particularly airline travel) made with personal credit cards, danger of comingling of funds and fraud, could circumvent procurement policy	Recommendation to discontinue use of personal credit cards for online purchases, procurement policy to include provisions for online purchases such as use of corporate credit card.
No set procedures for data entry, paper trail difficult to establish, difficult to detect unauthorised data entry activity.	Recommendation to develop data entry procedures including approval system for transactions.
Limitations in Tenders Policy and Procedure for the purchase of goods and services include lack of electronic purchasing system, limited checks and balances for procurement, delays in purchase approvals.	Recommendation to acquire procurement software, receipt of goods to be checked by officer other than the one initiating the procurement, authorisation powers given to other senior managers and increasing approval limits for Executive Director and Director of Finance and Administration.

FINDING	RECOMMENDATION
Petty cash vouchers are issued and approved by the same officer.	Recommendation to have separate officers issue and approve petty cash vouchers.
Quickbooks accounting software used is out of date and no enterprise version of software used. Staff members share usernames and passwords as software has a 5 user licence	Recommendation to acquire enterprise version of the Quickbooks software.

Appendix VIII

Letter from ACTT to Omardeen
School of Accountancy Limited



The Accreditation Council of Trinidad and Tobago

Appendix Eleven

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Pan American Life Plaza,
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Port of Spain, Trinidad, W.I.
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July 26, 2019

Mr Idress Omardeen
Managing Director
Omardeen School of Accountancy Limited
59-61 Gooding Village (Lower Cipero Street)
SAN FERNANDO

by hand and email

Dear Mr Omardeen

RE: CHANGE IN EVIDENTIARY REQUIREMENTS FOR REGISTRATION

I write with reference to the subject at caption and to your letter dated July 15, 2019. Your said letter to the ACTT had requested clarification on the exact date when the evidentiary requirements were changed with regard to statutory approvals. ACTT advises that the change in the evidentiary requirements for Criterion One in the standards for registration took effect on September 21, 2006 and not 2007 as previously stated. The ACTT apologises for the discrepancy in the dates.

Do note that at a Board meeting held on September 21, 2006, the Board of Directors of the ACTT had taken a decision for a modification of the process for registration (referred to as 'licensure' by the Ministry at that time) with a view that same would simplify the process and result in institutions obtaining their status at a faster pace.

I hope that the above meets with your request and advise further that the ACTT is open to further dialogue with you on this matter.

Sincerely

Dr. Eduardo Ali
Executive Director

EA/jn