



**A submission from**

**Athlone Institute of Technology**

**In response to**

**Draft quality assurance guidelines (white papers) for public consultation**

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**As contribution to the current consultation documents from Quality and Qualifications Ireland  
White papers dealing with quality guidelines**

**Introduction**

Athlone Institute of Technology welcomes the opportunity to contribute views as part of QQI's consultation process for its draft quality assurance guidelines. This institute congratulates the Authority on the significant work that underpins the preparation of this suite of documents and looks forward to the ensuing discussion following the submission phase.

The intention here is to address these statutory quality assurance guidelines as a suite and to concentrate on those elements that most impact this institution.

It is acknowledged that the governing Act (Qualifications and Quality Assurance {Education & Training} Act 2012) states that the Authority in the performance of its functions shall consult, as it considers appropriate, with providers and that in inviting submissions on this series of white papers QQI is responding to this in an inclusive manner and one that is supportive of an open dialogue. While the various actors within the higher education landscape have distinct roles that inevitably involve a creative tension, there is clear merit within a small country in working collaboratively in the interests of learners.

**Core Statutory Quality Assurance Guidelines**

The parent document for these purposes is the **Core Statutory Quality Assurance Guidelines** white paper. As the introduction makes clear, QQI is obliged to publish such guidelines and an institution such as AIT is in turn required to have regard to such guidelines when establishing or amending its own quality assurance procedures.

An important context for these guidelines is the recently amended Standards and Guidelines for Quality Assurance in the European Higher Education Area (adopted by the ministerial conference in Yerevan, Armenia, in May 2015). Officers from QQI have contributed significantly to the detailed discussion over an extended period that resulted in the adoption of this significant publication. The foundation principles that underpin the revised ESG should thus be consistent with our national quality assurance guidelines. These state that:

- Higher education institutions have primary responsibility for the quality of their provision and its assurance;
- Quality assurance responds to the diversity of higher education systems, institutions, programmes, and students;
- Quality assurance supports the development of a quality culture;
- Quality assurance takes into account the needs and expectations of students, all other stakeholders, and society.

Within this white paper's subsection on the purpose of the guidelines, reference is made to the ESG and also to the European Quality Assurance Reference Framework. These two publications are

stated to have informed the white paper which itself is intended to guide providers in their development of quality assurance procedures for the provision of education and training, research, and related areas. This intention is not questioned here but it is interesting to note that the European Quality Assurance Reference Framework, in its core intent, is concentrated on a voluntary European quality assurance reference framework which is designed essentially to encourage labour mobility. Equally interesting in this context are the changes in the ESG from its original expression a decade earlier. The repeated specific references to learning and teaching mark a significant change and the focus of the current publication is manifestly on quality assurance related to learning and teaching in higher education. The role of research, the absence of which had been a topic of conversation from the original ESG, is mentioned but more so in passing; for example, in a statement such as *quality assurance policies are most effective when they reflect the relationship between research and learning & teaching...* The point here is that the white paper and the provider procedures that it will inform are influenced by a base that emphasises one element of the HE mission. This may be a consequence of an evolving approach to quality assurance but it is one worth bearing in mind.

Given the clear reference to the Standards and Guidelines for Quality Assurance in the European Higher Education Area, and acknowledging that Ireland has played a full role in the development of that document and its revision, and noting that a key purpose of the ESG is to contribute to the common understanding of quality assurance for learning and teaching across borders and among all stakeholders, presumably there was some debate around either adopting or mirroring these. It is appreciated that the Authority is instructed to issue guidelines as soon as practicable after the establishment day and that a reference to the ESG may not, of itself, satisfy such a requirement. Yet, given the purpose of the ESG and their inherent strength, there is significant merit in utilizing them to the fullest. Speaking from a provider perspective, they centrally inform our quality documentation.

As a general point, I refer to an opinion recorded in previous submission to this Authority. The breadth of QQI's constituency is significant. There might be merit in availing of every reasonable opportunity to streamline processes as much as possible consistent with its statutory obligations. For this reason, this institution welcomes an approach that proposes core QA guidelines that are applicable to a broad range of providers. However, the argument here is that QQI might consider moving even further in this context. Under the section on p.7 dealing with the scope of the guidelines, it is noticeable that universities must have *regard* to the guidelines while others (RCSI, DIT, and IsoT) must have *due regard* to the same guidelines. That there are distinct legislative frameworks and follow-on procedures in respect of the two groupings is acknowledged but the phrase "due regard" is not to be found in the Qualifications and Quality Assurance (Education & Training) Act 2012. This is recorded by way of a minor example. We seek to cherish all learners equally and therefore perhaps we should be seeking to put in place a quality architecture that serves all learners equitably. On that basis, it is difficult to see the merit in having additional "sector-specific" QA guidelines for institutes of technology as a supplement to the core document. Again, it is fully appreciated that the context of delegation of authority and the responsibilities of an awarding body demand dedicated attention but would it not be preferable, in the interests of public understanding if nothing else, to locate these as an addendum within the core document rather than publish a separate or additional guideline? It is also appreciated that the traditions and scope of quality review are distinct between the two groupings as set out in the scope of the white paper, but perhaps the way to bring these closer is to put in place a single, comprehensive, guideline, at least in respect of relevant providers. Much of what is contained in the proposed supplementary "sector-specific" supplementary guidelines is already covered in the core guideline. For example, the

inclusive and cross-organizational approach is addressed, as are joint awards, standards, certification and records. What is different essentially is the section on delegation and the making of awards and this could be addressed adequately in the core documentation. In addition, the advisory addendum within the draft supplementary guideline dealing with a summary of indicative areas that institutes of technology should consider when determining whether to enter into a collaborative agreement, while helpful, surely might be positioned elsewhere. It seems to this respondent to weaken the guideline and to compromise the central intent of a quality assurance guideline. The strength of the ESG is that it is focused and compact and it might provide a model.

In support of the point above, it appears to this respondent that QQI has taken a progressive approach to realizing the injunctions with the governing Act of 2012. Adopting an approach as outlined above would be consistent with this philosophy.

The breadth of the Authority's constituency is arguably a significant constraint in the framing of such a policy given that, in the white paper's phrase, the core QA guidelines are applicable to all types of providers and the programmes of education and training, research, and related services they offer. The constraint is in the differing capacities of various organizations to respond to such advice. It might reasonably be argued that some organizations would benefit more than others from more prescriptive guidelines and that this poses a challenge for the authors. The legislation leaves it open to the Authority to issue different quality assurance guidelines for different relevant or linked providers or groups of relevant or linked providers but it also states under the same Section 27 that the Authority shall publish the quality assurance guidelines and effectiveness review procedures in such form and manner as it thinks appropriate. The Authority's intended approach is clear and the invitation to reflect on the white papers does not specifically invite comment on manner in which the task is approached; however, I believe it is worth raising the question as to whether the breadth of the constituency and the range and nature of the activities covered are such that can best be addressed through a single set of core guidelines. If the answer remains yes, then the attendant danger is that the guidelines are inevitably compromised in that they have to act as formal guidance for the establishment of procedures for quality assurance while at the same time being a guideline primer which inevitably will make the document larger than it might optimally be.

Within Section 2 of the Core QA white paper, the Authority has utilized the standards for internal quality assurance as advocated within Part 1 of the ESG albeit it in a somewhat amended student lifecycle. This general approach makes sense and will be useful to providers in fashioning or refashioning their own procedures. However, some additional points in relation to the detail of those changes are recorded later in this submission.

One reasonable question that might be posed is whether the additional detail contained within the draft white paper adds significantly to what is already stated in concise form within the ESG. For example, if one compares 2.7 Supports for learners in the draft document with the corresponding section 1.6 in the ESG, one finds the Irish document takes two and half pages to set out what is set in half a page in the ESG. While some of this is down to font and layout, there is a fundamental stylistic distinction that sees the latter as more focused and less prescriptive in relation to detail. Within mature learning organizations one might expect that there is the capacity to deduce how the higher level guideline might be realized operationally. As above, the sense here is that the more concise the document, the more useful it will prove to be. The guidelines as currently presented are arguably too detailed and specific and the differing stylistic approaches to the various listings (numbered in some cases, dashed in others and in different styles) only serve to confuse further.

The use of lists in such circumstances, while inviting, is fraught; there is, for example, always the risk of omission and thus such lists tend to be balanced with the use of qualifying phrases - "such as" and

“include” – which by definition might be seen to weaken the authority of a document whose weighty purpose is to serve as core statutory quality assurance guidelines applicable to all providers. The view here is that such a core document, even when it includes guidelines, is best to be concise and focused. It is not that the explications provided are not relevant but they might best be provided elsewhere (on a website for example which could be offered as training resource). The argument might reasonably be made that these are exclusively guidelines which distinguishes them from such as the ESG; while this is accepted, the introduction makes the point that the guidelines are prescribed by law and that providers must have regard to them.

Mention was made above of the different architectural variation from the ESG Part 1 that is proposed in Section 2 of the draft Core Guidelines. This is obviously a conscious decision and the justification for same might be a feature of the ensuing discussion. The subdivision of the ESG 1.1 on Policy for Quality Assurance into separate subsections on governance and documentation may well be justified but if the ESG are to be understood and embraced there is also merit in holding to the same structure. Similarly, the ESG standard 1.3 attests the recognized interaction between student-centred learning, teaching, and assessment, whereas the Core QA Guidelines separates L&T from assessment. Again, there may a reasonable argument for such an approach but it might have attendant risks. Similarly ESG standard 1.4 espouses a learner life cycle from admission to certification whereas the Core Guidelines chooses to place, for example, admission as a subset of programmes. This partitioned approach seems at variance with the Authority’s recent emphasis on the life cycle for learners.

The preoccupation with “other parties” leads to an awkward construct at the close of Section 2 which loses the more elegant design apparent in the ESG in respect of the standards concerning the on-going monitoring and periodic review of programmes and cyclical external quality assurance. The ESG again is less prescriptive in this regard and clearly defines an inclusive approach to QA which states that

*Unless otherwise specified, in the document stakeholders are understood to cover all actors within an institution, including students and staff, as well as external stakeholders such as employers and external partners of an institution.*

Concerning appropriate recognition procedures, it is interesting to note the advice that

*These are in line with the national policies and criteria for ATP and the National Framework of Qualifications (NFQ) and any appropriate European recognition principles, conventions and guidelines including the European Qualifications Framework (EQF).*

One cannot take exception to this but surely if recognition procedures are consistent with the National Framework of Qualifications then, by extension, they are in line with the European Qualifications Framework which is in essence a translation device which joins the qualifications of different EU members together. What is the merit in one element of the sector being advised to have award parchments refer to the level of the award in the European Qualifications Framework? It is difficult to see a) why this might apply to some and not all, and b) why it should apply at all.

The Authority recently hosted a conference that highlighted the important of periods of study and prior learning, including the recognition of non-formal and informal learning. It is being progressive in supporting the creation of a practitioner network in this area and one that will presumably inform policy and bring greater coherence and consistency to an important instrument in support of widening participation in higher education. While this is referenced in the Core QA Guidelines, it is not developed in the way other matters are. It might proposed that this is at least as important a

topic, given its role in inclusion and facilitating access, transfer, and progression, than some of those other matters that do receive attention.

At a higher level and notwithstanding the observations above, the stated purpose of the Core Statutory QA Guidelines is *to assist providers in the development of quality assurance systems which are appropriate to individual provider contexts, and which will promote and support quality in the education and training programmes, research (as appropriate) and related services offered*. Given this objective, the draft guidelines will be of significant assistance to providers.

### **Sector-Specific Quality Assurance Guidelines**

As above, it is the view of this respondent that these would be better incorporated in the Core Guidelines. This can be done while fully acknowledging the differing legislative frameworks and consequences in respect of delegation and awarding powers.

### **Statutory Quality Assurance Guidelines for Flexible and Distributed Learning**

This document is both timely and welcome.

The title itself occasions some reflections. First, this is a guideline and one that, to echo the document's phrase, fills a perceived gap. It is thus more of a guideline - in the sense of offering advice as opposed to a directing principle - and an assistance than its more formal sister document, the Core Guidelines. Second, while the term Flexible and Distributed Learning might well prove to be the accepted title, there is some doubt that this would be universally understood by learners currently. Perhaps there is further discussion to be had around an inclusive term that can be embraced widely as encompassing what is intended here. The European Association of Distance Teaching Universities which provides a useful resource in this regard, and an organization cited in the draft paper, employs the term Online, Open, & Flexible (OOF) education. OOF may not be the most elegant phrase, but equally the "d" for distributed within FDL is inevitably going to lead some to talk of flexible and distance learning. The fact that the title itself is contested attests the embryonic nature of this area within Ireland.

Arising from a point made immediately above, and given that this represents an emerging area, it is always likely that any guideline will necessarily have a purpose that is more formative than might be the case with, for example, the Core QA Guidelines that deal with an area that is better explored. It again raises the matter of nomenclature as there may well be differing understandings of what is intended by the term "guideline". My sense in this regard is that the FDL space will be a dynamic one for some time to come and that the guidelines will themselves have to adapt accordingly.

We have within this institution examples of committed colleagues who are working in this space and I offer below a portion of feedback supplied by one such lecturer which adds value to this discussion.

*In relation to the document itself, the term 'flexible and distributed learning' is perhaps unnecessarily obtuse when the focus of the guidelines appears quite clearly to be online teaching and learning. However, I do appreciate that the guidelines are intended to be deliberately broad in scope.*

*It is very encouraging to read in section 3.1, the importance placed on adequate resources, infrastructure, training and expertise being made available to support flexible and distributed learning (FDL). In particular, from the viewpoint of those delivering FDL, guideline 2 'The*

*infrastructure and resources required to support good quality FDL are understood, planned and routinely monitored and evaluated' is very welcome.*

*Guideline 6 'The design and delivery of curriculum by FDL is determined by the intended learning outcomes for the programme' is also something that we felt was an important counterpoint to some of the technological evangelism that can sometimes dominate discussions of FDL. It is important that the technology is utilised as a tool in FDL and not the purpose for FDL and this guideline adequately reflects this principle.*

*Guideline 9 represents a very significant consideration in relation to the student experience of FDL 'Learners are supported to make informed choices about participating in a FDL programme; and to develop the necessary independent study skills to successfully progress towards becoming an autonomous learner'. We felt that this support is an extremely important component of every aspect of promoting student participation in an FDL programme and a very significant component of induction into an FDL module. Therefore, it is a very welcome addition to the guidelines.*

Given the current focus of the National Forum for the Enhancement of Teaching and Learning on building digital capacity (Enhancement Fund 2015), it is appropriate that the Quality Authority is providing dedicated guidance in this area. In addition, there is a requirement for greater common understanding and a shared vocabulary around such a dynamic and developing area. The guideline and its inherent checklist will be of significant assistance to providers and will inform their own documentation.

The view of this respondent is that this paper, albeit significantly different in tone from its companions, is an important and timely contribution that will inform and further a current debate.

***Dr Joseph Ryan***

***01 February 2016***

***On behalf of Athlone Institute of Technology***