QQI White Paper:
Core Statutory Quality Assurance (QA) Guidelines
and
Towards a White Paper on Sector Specific Quality Assurance (QA) Guidelines

Dublin City University Consultation response

Provided by Ms Aisling McKenna, Director of Quality Promotion and Institutional Research on behalf of DCU
Aisling.McKenna@dcu.ie

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DCU welcomes the publication of White Papers for consultation on the 17th December, 2015 including the *Core Statutory Quality Assurance (QA) Guidelines*, and the *Statutory Quality Assurance Guidelines for Flexible and Distributed Learning,* and the opportunity to contribute to the public consultation. We further welcome the circulation of a further document, *Towards a White Paper on Sector Specific Quality Assurance (QA) Guidelines*, which have been developed specifically for Designated Awarding Bodies (DABs).

The DCU response to this consultation is divided into two sections. Firstly, we have provided a number of general comments on the proposed guidelines, followed by more detailed comments on each of the eleven core areas outlined in Section two of the proposed guidelines.

1   *General Comments on the Core Guidelines.*

DCU notes that the consultation period for these documents occurred during end-of-semester examinations and associated exam boards, and as a result has provided a relatively limited window of opportunity for a thorough consideration of all aspects of the published and circulated documents within institutions. DCU believes that institutional and sectoral buy-in are crucial to the successful implementation of these guidelines and associated procedures in the future, and as such, DCU considers the timing of this consultation period to be a missed opportunity in ensuring the fullest level of engagement in terms of response.

DCU notes and welcomes the relatively close alignment of the themes with the 2015 published European Standards and Guidelines.

DCU notes that the proposed core guidelines extend to eleven core themes, within which there are over 200 individual requirements, not including stated examples of good practice offered by the authors. DCU considers this approach to be overly prescriptive in its approach, and by virtue of this, does not allow for the necessary flexibility to reflect the breadth of provision within the sector. From the perspective of the DAB providers, DCU considers this approach may undermine the capacity of universities to continue to establish and develop their own institutionally appropriate quality assurance and enhancement policies and procedures, while having due regard for necessary statutory requirements and obligations.

In contrast, the proposed sector specific guidelines for DABs has a much narrower focus, with most of the document focused on the responsibility of DABs in relation to quality assurance procedures for linked providers. DCU notes that the additional statutory obligations of DABs to develop appropriate mechanisms and obligations to conduct these reviews in line with core statutory requirements on a cyclical basis. DCU believes these responsibilities must be considered in the context of the recognition of the significant resources necessary on the part of DABs to fully implement these processes.

It is worth noting more broadly, that the evidenced compliance with the guidelines in their current format and ongoing review of policies and procedures considered within their context of the proposed guidelines requires considerably more resources that currently exist within even the largest of our higher education institutions.

DCU considers that the proposed core guidelines would therefore be strengthened from a review and rebalance of requirements between the core and sector-specific guidelines.   We believe that the guidelines would be considerably enhanced by a more broadly focused set of core core guidelines, with the sector-specific guidelines are used as the appropriate mechanism for more detailed information in relation to guidelines and requirements, particularly for institutions which require approval of their QA procedures by QQI. DCU believes this would allow for a stronger and workable set of core guidelines, with a more detailed sector appropriate requirements, which acknowledging the autonomy of universities in relation to the design and implementation of programme approval and internal QA policies and procedures.

DCU recognises the crucial role that QQI will continue to play in supporting the further and higher education sector align their quality assurance and enhancement practices with best international practice. There are a number of areas within the document, (examples cited in Section 2) where DCU believes the achievement of aspirations articulated within the guidelines could be best progressed within another fora or publication, such as the previously published IUQB Good Practice Guides. Therefore DCU recommends that while the core statutory guidelines should articulate clear and broad statements in relation to the quality assurance policies procedures within the sector. Where further requirements, based on QQI approval for processes within individual providers remain, these can be addressed at sector-specific level, or within the context of 'good practice' guidelines, rather than this core document.

Summary of Key Feedback from DCU

- DCU notes the timing and limited opportunity afforded for a thorough consideration of parallel documents. We believe this to be a missed opportunity for real engagement across the further and higher education sector
- DCU considers that the limited period of consultation also makes it difficult to anticipate or consider the likely difficulties in implementation at institutional level, given the complex interaction between core and sector-specific guidelines.
- DCU notes there are over 200 individual requirements within Section 2 of the white paper alone, not including stated examples of good practice offered by the authors. DCU considers this approach to be overly prescriptive, and by virtue of this, does not allow for the necessary flexibility to reflect the breadth of provision within the sector.
- DCU believe that the guidelines would be considerably enhanced by a more broadly focused set of core guidelines, with the sector-specific guidelines allowing for more detailed guidelines and requirements, particularly for institutions which require approval of their QA procedures by QQI.
- DCU considers the excessively prescriptive nature of the guidelines is unnecessary and unhelpful to Designated Awarding Bodies (DABs), particularly in relation to specific requirements outlined in Programme Delivery (Section 2.3) and Assessment of Learner Achievement (Section 2.6) where DABs are afforded autonomy in programme approval and frameworks for assessment.
- DCU considers that the evidenced compliance with the guidelines in their current format and ongoing review of policies and procedures considered within their context of the proposed guidelines requires considerably more resources that currently exist within even the largest of our higher education institutions.
- DCU suggests that the achievement of a number of aspirations articulated within the guidelines could be best progressed within another fora or publication, akin to the previously published IUQB Good Practice Guides.

Comments on Elements Outlined within the Core Themes

2.1 Quality Management

DCU welcomes the articulation of the role quality assurance and enhancement can plan within strategic planning, risk management, and indeed (although not specifically noted within the document) internal audit processes.

DCU recognises the important role that institutional governance structures provide in ensuring that quality assurance processes within the institution are robust, fit-for-purpose, and fulfil all statutory obligations.

As noted above, we believe the core statutory requirements should be reflective of a smaller number of broad statements regarding the robustness of quality assurance in relation to governance and the management of quality systems. DCU considers that the editing of this section with this approach in mind will enable this section to be more broadly reflective of the breadth of provision and nature of providers within the sector. Where sector-specific requirements are identified, these would be best reflected within a set of sector-specific guidelines.

As an example of the overly complex and prescriptive nature of the requirements throughout the document, within the core guidelines proposals, in Section 2.1.1 includes a requirement that, 'operational objectives are specified (at every level)…' DCU believes this level of detail into operations to be unnecessary and probably unworkable for governing bodies and reflect an emphasis on operational matters, rather than strategic or governance issues.

2.2 Documented Approach to Quality Assurance

DCU notes again the very detailed nature of this theme, and queries if this level of prescriptive detail is required for university sector DABs, where well established and internationally reviewed QA policies and procedures are already in place.

2.3 Programme Delivery

DCU notes that within section 2.3, there are over 3 pages of details requirements within the core guidelines. While the bullets in section 2.3.1 are reflective of many of the elements which form part of programme validation and approval within DABs, DCU considers it crucial that the core guidelines reflect the DABs autonomy in designing and conducting their own accreditation and approval processes. DCU therefore suggests that these detailed bullets be removed from this section, and considered instead within the relevant sector-specific guidelines.

2.4 Staff Recruitment, Management and Development

DCU agrees that the quality of the human talent employed within higher education holds the foundation to a high quality higher education system. DCU notes that the individual requirements outlined in section 2.4.1 are reflective of needs of a teaching intensive further or higher education environment. No reference is made within this section to broader research, innovation, service, or professionally-based qualification for professional administrative staff, etc. Therefore DCU considers the detailed requirements cited within the core guidelines may be more usefully applied within sector-specific guidelines or the scope of the criteria and approach broadened and generalised to reflect these additional skills and core competencies.

2.5 Teaching and Learning

DCU welcomes reference to learning environments that promote and support learning, are informed by national and international best practice, and are considered to make a key contribution to a positive learning experience for students. DCU considers some of the language, particularly in Sections 2.5.4 (a,b,c,d) refers to broad aspirational statements, rather than clearly defined guidelines. While broadly valuable in relation to

developing and maintaining an appropriate learning environment, these issues may be more effectively progressed through more specific teaching and learning enhancement initiatives.

2.6 Assessment of Learner Achievement- General Guidelines

DCU notes that while section 2.6 sets out what are described as "General Guidelines", this section alone spans 3.5 pages, and almost 40 individual specific requirements in relation to assessment. Again, DCU considers that for DABs, the prescriptive and procedural nature of the guidelines risks undermining the autonomy afforded to a DAB in relation to managing and maintaining its own policies and frameworks for assessment. DCU considers it more appropriate that, where such detailed requirements are necessary, these are reflected appropriately within the relevant sector-specific guidelines.

2.7 Supports for Learners

No additional comments

2.8 Information Provision

DCU welcomes explicit reference to the importance of evidence-informed approach to quality assurance and decision-making within the further and higher education sector.

Under section 2.8.1, DCU notes that analysis is currently widely conducted within the university sector on learners and their student experience, and this analysis is often based on data sourced from individual student records or feedback on student surveys. It is our experience that the appropriate treatment of these data is crucial, particularly with respect to individual data privacy rights and confidentiality. It is also our experience, that the most valuable insights are gleaned when data is analysed by appropriately qualified and experience staff. Therefore, statements which reference the involvement of students in analysis of this information should therefore be further considered.

In Section 2.8.4, it is unclear what is meant by this particular statement, or how explicit reference to it necessarily contributes to the guidelines.

In section 2.8.5, DCU considers that this element of the guidelines be best reflected, where appropriate, under the sector-specific guidelines. DCU notes that information relevant to the progression rates of NFQ Level 8 students within the university and Institute of Technology sector is collected by the Higher Education Authority is already published and publicly available.

2.9 Public Information and Communication

It is noted that this section also provides very detailed requirements on the publication of information by universities. DCU notes in particular, under Section 2.9.2, a requirement that information to prospective learners facilitates comparison. It is unclear what the nature of this proposed comparison is, nor what the purpose of any such comparison is. DCU queries if this provision of proposed comparable information on programmes is the responsibility of individual institutions.

2.10 Monitoring and Review

It remains unclear from the document what names of '*expert panellists, examiners and authenticators and other external experts*' being '*made available*' constitutes in relation to DABs. DCU would welcome additional clarity on how this would be implemented for DABs.

2.11 Self Evaluation, Monitoring and Review

Under Section 2.11.2, DCU considers that the core guidelines should be reflective of the institutionally appropriate procedures that may be undertaken within DABs when considering below acceptable activity. Therefore DCU considers that this element of the guidelines would be more effectively reflected within the relevant sector-specific guidelines, rather than the core document.