February 5th 2016

Policy Document: Policy on Quality Assurance Guidelines

The College welcomes this brief overarching document outlining the context and principles governing QQI's Quality Assurance policies. It welcomes the accommodation of the provider's particular context in determining the scope and scale of its policies and procedures to ensure their fitness-for-purpose.   It also welcomes the specific consideration of an improvement and enhancement perspective in the ongoing development of policies and practices in the light of emerging best practice, both nationally and internationally.

It offers the following specific comments for consideration.

Extract 1 (from 4.1):   The term "quality assurance" is used to describe the processes that seek to ensure that the learning environment (including teaching and research) reaches an acceptable threshold of quality.

> The definition might be extended beyond 'learning environment' (which can emphasise location and resources) to include the totality of the learner preparation and experience – from programme design, learning outcomes, and related learning environment

> The term 'acceptable' suggests a minimum tolerable threshold. Is there scope to present quality assurance more positively as reaching agreed / approved / recognised standards? Alternatively, closer association of 'assurance' with 'enhancement' might assist in the presentation of quality assurance and enhancement being a continuous improvement process.

Extract 2 (from 4.1):   QQI also has a responsibility as an international agency to ensure that European policies and international effective practice are implemented nationally, as appropriate to the Irish context.

> This presentation suggests a relatively passive role for QQI in implementing imposed EU policies as they emerge. The presentation might be balanced by the reality of QQI and Ireland's HE engagement in these international developments.

Extract 3 (from 4.3):   As part of the collaborative process, QQI will:

> *In addition to the items listed, consideration might be given to including:*

> - *Facilitate the promotion and adoption of quality assurance enhancements emerging from best practice nationally and internationally*

Extract 4 (from 4.5a):   QQI's guidelines will reflect Ireland's commitment and contribution to international effective practice, EU directives and policy.

> This might be extended to also include:

> *… and the accommodation and integration of international best practice.*

Policy Document: Core Statutory Quality Assurance Guidelines

The College welcomes this comprehensive re-presentation of core statutory guidelines. It welcomes the recognition and accommodation of the various providers involved and the variability in the range and scope of their teaching, learning and research activities.   The document is well presented, transparent, fair and most helpful as a guide to best practice. The College is delighted to have due regard to the entirety of its content as presented.

While not serving as a definitive checklist against which the College's QA can be comprehensively evaluated, it provides a useful basis by which the College can continue to evaluate and inform the operation and ongoing development of its quality assurance procedures.

It offers the following specific additional comments for consideration.

Extract 1 (from 2.2.1 (d)):   Risk in this context can also extend to the mode of provision, for example online delivery not embraced by the QA system.

> The instancing of the online example suggests particular problems with respect to QA. A more general consideration of risks might anticipate risks arising from any change in programme delivery – location, mode, pedagogy, staffing, etc.

Extract 2 (from 2.5.4 and 2.6)

> In certain situations a common programme, leading to an identical award may be designed for delivery to different cohorts of learners, for example full-time, part-time, in-company or blended learners.   In these instances it might be worth making specific references to meeting the needs of the different programme cohorts involved as opposed to programme learners more generally.

Extract 2 (from 2.7.1)   (i) Learner perspectives about the sufficiency and quality of learning resources and learning supports are listened to … and … (iv) There are mechanisms for learners to make representations to the provider about matters of general concern to the learner body.

> Perhaps these could be strengthened to include:
>
> *… are considered and addressed where appropriate, providing confidence in the feedback and overall educational processes for learners and institutions alike. … and …*
>
> *… general concerns to the learner body and to have these concerns considered and appropriately addressed.*

Extract 3 (from 2.8.2)

> Further recommendations or clarification regarding the appropriate duration of retention of student work (assignments, examination scripts) as opposed to summative results would be welcome.

Typo: Page 43 What QQI MUST DO

> "quality assurance guidelines" (space omitted)

Policy Document: Sector-Specific Quality Assurance Guidelines for Private and Independent Providers

The College welcomes QQI's particular consideration of the quality assurance policies and procedures of independent private providers.

It offers the following specific comments for consideration.

Extract 1: (from 1.1):   These statutory sector-specific QA guidelines address the responsibilities of independent, private providers of higher, further and English language education and training (hereafter referred to as voluntary providers) in the context of accessing the statutory, regulatory functions of QQI. …

The approval of quality assurance procedures has no standing in its own right. It does not confer any status on a provider.

> The College has greatly valued the external recognition afforded to it, both nationally and internationally, through its approved status as a '*registered*' HETAC provider and previously as a '*designated institution*' of the NCEA. Similar institutional wide recognition has been afforded to other institutions through the use of 'recognised' institutions in the case of Institutes of Technology.

> The College considers the availability of an institution based measure of recognition to be valuable and that it should be retained. While recognition applies to programmes, in the case of institutions with multiple programmes, the requirement exists for an overarching testament of the institution's standing with QQI.

> The absence of an agreed institutionally based status will inevitably result in a range of presentational forms being used by providers when referring to their suite of programmes (e.g. 'provider of QQI registered / approved / validated programmes'). Clarification on institutional status would retain consistency and facilitate greater national and international communication and recognition.

Extract 2: (from 2):   Additional QA procedures will be required if a voluntary provider wishes to change the scope of its quality assurance.

> The College has benefitted from its QA procedures being considered by NCEA / HETAC / QQI on an institutional rather than programme specific basis. In this way, programmes involving different scope and modalities have been anticipated allowing freedom of development and accommodation within institutionally agreed QA procedures.

> It recognises that changes in scope beyond institutionally agreed QA procedures would require separate consideration by QQI.

Extract 3: (from 5): The provider's quality assurance procedures for the recruitment, management and development of staff will be developed in the context of all the education and training activities and related services of the provider. This will also include those education and training activities leading to awards of awarding bodies other than QQI, such as professional bodies and local provider provision.

> In addition to its design, development and delivery of programmes leading to academic awards of NCEA/ HETAC / QQI, the College has a long history of programme development and provision leading to the examination of professional bodies such as ACCA, CPA, IILEX, etc.

> The College would welcome clarification as to the nature and extent of QQI's requirements in respect of the College's non-QQI awarded programmes. For example, QQI may wish to be appraised on the availability of an institution's staff to commit to the requirements of the QQI specific programmes, as opposed to other institutional responsibilities.

Policy Document: **Topic-Specific Quality Assurance Guidelines for Flexible and Distributed Learning**

Griffith College welcomes the document and the detailed guidelines provided which are informed by national and international best practice. It welcomes QQI's readiness to accommodate FDL subject to capacity and preparedness at organisational and programme level in the learners' educational interests.

It offers the following specific comments for consideration.

> Regarding adoption of the descriptor "Flexible and Distributed Learning" (FDL), the College suggests the continued use of the term "Blended Learning". The latter encapsulates the breadth and variety of emergent technology and pedagogical approaches, with implications of potential, multiple gradations between face-to-face and online delivery. The phrase Blended Learning is understood and widely used within HE and the wider education sector, the four syllables neatly communicating its flexible, multi-media message more concisely than the ten required for FDL.

Extract 1: (from 3)

> Apart from the title, is the content on Page 9 required or could it be readily omitted?

Extract 2 (from 3.1.1d):

> Clarification on the interplay between FDL learning in the case of one of more learners in a programme cohort being located outside Ireland and transnational provision would be welcome.

Extract 3 (from 3.1.1f): For example it may be possible (and more appropriate) to make changes and enhancements to aspects of FDL delivery during presentation rather than waiting for end-of-module or end-of-year review.

Changes and enhancements to aspects of programme delivery are not exclusive to FDL contexts and might be addressed more generally.

Extract 4 (from 3.1.4c)

General requirements ensuring the legality and equivalence of provision for learners might be more appropriate. Specific details such as those listed in the first two requirements relating to the location of servers and licences are likely to become restrictive, dated and inappropriate in cloud based solutions as technology advances.

Similar caution might be used throughout the document (e.g. 3.2.3a) with the omission of specific references to pcs and smartphones and broadband. More general descriptions such as computing and related learning support devices might be considered or by means of more general requirements that learners can access learning resources appropriately.

Extract 5 (from 3.1.4d)

Additional clarification would be welcome outlining what is intended regarding the local recognition of providers, programmes and/or qualifications. For example, FDL applications could be envisaged which would enable overseas students to participate fully without the engagement of local providers.

Extract 6 (from 3.2.2a) All materials and media (for example audio-visual, printed or digitised assets) that will be used to deliver FDL are subject to informed peer comment at one or more draft stages and allow for the incorporation of feedback into subsequent and final versions of the learning materials.

This guideline seems prescriptive in the light of evolving forms of FDL. For example, many lecturers commonly present webinars using digital resources using platforms such as Adobe Connect. These synchronous sessions (and recorded for review) approximate to the in-class delivery by a lecturer using his/her lecture material. Typically such resources and presentations would not distributed in draft format for prior peer review, but rather the responsibility of the individual lecturer, and subject to within module or end of module review.

Extract 7 (from 3.2.3d) Sufficient, accurately maintained and up-to-date learner records are available for monitoring progression and achievement and in facilitating timely intervention for FDL learners who may be struggling.

These requirements might be relocated in the Core Statutory QA guidelines as they apply equally to learners on all programmes who may be struggling. They are not exclusive to FDL.

General Comment on FDL Policy

The document tends to overstate the particular requirements arising from FDL. For example in the case of learners, 3.3.1a states that *they are required to receive sufficient and appropriate information from the provider to understand FDL elements and assess the suitability of a programme.*

Could this not be re-presented more generally in the Core Statutory QA guidelines along the lines of all learners receiving sufficient and appropriate information as to how their programme is constituted, delivered, scheduled, assessed and supported along with the resources available to them and the expectations made of them in respect to their participation, etc.

General Comment on QQI Policies

Given the central role envisaged for the Core Statutory QA Guidelines and the supplemental role intended for the complementary documents, consideration might be given to providing an index or reference within the supplementary documents to the aspects to which they relate within the Core Statutory QA guidelines.