

## **QQI consultation on Statutory Quality Assurance Guidelines, including ‘Core’, ‘Sector Specific’ and Flexible and Distributed Learning Guidelines – IOTI submission**

IOTI welcomes the publication by QQI of the recent White Papers on the Core Statutory QA Guidelines, and on Flexible and Distributed Learning. It also notes the publication of a preliminary document, which is intended to be the first step in framing a White Paper on Statutory ‘sector-specific’ QA guidelines for the institute of technology sector; and of a White Paper on Core Policy and Criteria for the validation of education and training programmes by QQI.

This document will address all four QQI publications from the perspective of the institute of technology sector as a whole. It is not intended to provide a detailed critique of the publications. Instead, it will focus on some high level issues that are particularly germane to the institutes. Individual institutions may also submit their individual responses to the publications.

### **1. White Paper on Core Statutory QA Guidelines, and ‘Towards a White Paper on Sector Specific Quality Assurance .... For Institutes of Technology’**

As intimated in previous submissions to QQI on its policy documents, the speedy completion of QQI’s core policy development work is an essential undertaking, so that providers will obtain a comprehensive and clear overview of their responsibilities under the new quality assurance system, as set out in the Qualifications and Quality Assurance (Education and Training) Act 2012, and so that the system will begin to operate in a clear and coherent fashion. In this regard, IOTI acknowledges and welcomes the publication of the White Paper on the Core Statutory QA Guidelines. The White Paper on the core guidelines, together with the White Paper on institutional reviews, and the finalised policies that will result from them, set out the basic QA framework under which higher education providers HET will operate from henceforth.

This submission will consider the Core Statutory Quality Assurance Guidelines (which are applicable to all providers) in conjunction with the preliminary document on the sector-specific guidelines, which ‘set out additional, statutory quality assurance guidelines specific to institutes of technology’, and which are intended to ‘address the responsibilities of institutes of technology as awarding bodies’.

The first matter that IOTI wishes to raise is the question of whether QQI’s approach of establishing ‘core’ and ‘sector-specific’ guidelines is appropriate, particularly in a context where higher education is now treated as a ‘system’ in policy and funding terms, and where institutes are expected to collaborate closely with other HE institutions, particularly the universities, in such fora as regional clusters and research networks. Indeed, the point about the QA guidelines underpinning the quality of a system – in this case a broader, national education and training system – is emphasised at the outset of the Core Statutory QA guidelines (p. 8). At its most recent

meeting, the chief academic officers of the institutes discussed this matter and were of the strong opinion that there should be one set of QA guidelines for all providers, and that particular statutory obligations that apply to particular sets of institutions should be set out in annexes to the main document. It should be noted, however, that this issue was discussed solely in relation to higher education providers, and largely in relation to a notion of a system, ‘the higher education system’, that has emanated from the *National Strategy For Higher Education to 2030* and related developments. Whether it is appropriate to apply the same core set of guidelines to providers outside higher education, particularly when the essential principles which underpin these guidelines have been drawn from the quality assurance tradition of the higher education sector, is a moot point.

There is also an argument that, in the interests of transparency and, again, in the context of the State’s avowed approach of treating public higher education as a system, that the sector-specific guidelines should be more visible to the system as a whole, and consulted on more widely, that is, with a group of stakeholders that extend beyond the specific set of institutions to which each set of sector-specific guidelines applies. IOTI would value a discussion with QQI to understand more clearly why the agency has adopted this approach. It is much less of a concern in relation to topic-specific guidelines as the need for more detailed processes for particular types of provision, and their inclusion in the main QA guidelines, would necessarily make the latter unwieldy. Moreover, it is also unlikely that topic-specific guidelines will be confined to particular sectors. Instead, as in the case of the Flexible and Distributed Learning guidelines (see section 2 below), they will invariably be developed in discussion across sectors and so the issue of transparency is unlikely to arise.

The issue of transparency in relation to QA guidelines is critical as there are some policy matters that remain ambiguous and require a broader, public discussion. For example, in the preliminary IoT sector-specific guidelines (section 2), it is set out that:

In addition to (or by encompassing) regular periodic review of study programmes, institutes of technology with delegated authority should undertake quality reviews of academic, administrative and service departments and, as appropriate, in units such as schools, faculties, departments and colleges.

It is not clear from the 2012 Act that there is a statutory basis for this requirement, though, admittedly, it is arguable that it may arise from QQI’s statutory roles in setting policies and criteria for delegated authority, or in establishing quality assurance guidelines for providers. Or it may simply arise from the impulse to have a system-wide approach to QA that mirrors the system-wide approach that is now evident in relation to policy and funding. Thus, in this instance, the traditional approach to QA that has operated in the universities (arising from the 1997 Universities Act), which focusses on departmental rather than programme review, is being extended formally, through the sector-specific guidelines, to the IoTs. There may be merit in this. However, it is a matter that requires more upfront discussion, as the issue of merging the different approaches to internal quality review that have

developed separately in the IoTs (programme) and the universities (department), has not surfaced to any great degree to date, whether one looks in the 2012 Act or in QQI's publications since then. It is unlikely that a continuing ambiguity on this topic would serve the institutions, QQI and the HE system well in the future. One particular area that needs to be explored further in this regard concerns the extension of quality review to non-academic units, and whether that approach is appropriate in all instances, particularly when the great disparity in the resources attached to such units – especially marked in relation to the universities and IoTs – is taken into account.

In relation to the sector-specific awards, IOTI would also query the section on 'procedures for certification' (5.1), which seem to establish obligations for institutes of technology with delegated authority that do not apply to other awarding bodies, especially the requirement that 'award parchments refer to the level of the award in the European Qualifications Framework'. Will this be a requirement for the universities, DIT and the RCSI? And, if not, it is not readily apparent what point there would be in binding one set of public higher education institutions to such a requirement, when the rest of the 'system' does not have such an obligation. As QQI well knows, many European universities would disagree with the requirement to reference awards to the EQF, and would view themselves as aligning more closely to the first, second and third cycles of the QF-EHEA, than to Levels 5-8 of the EQF, a point that is clearly implied in *Standards and Guidelines for Quality Assurance in the European Higher Education Area 2015* (Standard 1.2). This is likely to be the position of Irish universities too. It also seems to mark a policy departure by QQI from the NQAI position where EQF was regarded as a reference tool, against which national framework or qualifications' levels were to be mapped. It was not envisaged that awards would be 'in' EQF. These are all matters that need to be discussed openly amongst all stakeholders, and it does not seem appropriate to introduce such shifts in policy through sector-specific guidelines that are not being widely consulted upon, and which only apply to some institutions.

In general, there seems to be some confusion in the sector-specific guidelines, especially in sections 4 and 5, as to whether they are genuine quality 'guidelines' or, simply, a set of statutory obligations arising from the 2012 Act (as carried over from the 1999 Qualifications Act) regarding the IoTs' awarding powers. If they are the latter, it would make more sense to isolate these particular issues, and produce a succinct document of no more than 1 to 2 pages, that could be added as an appendix to the core quality guidelines. Alternatively, they could be taken out of the QA guidelines altogether and put in a separate document pertaining to general qualifications/awarding policy. Hopefully, the anticipated legislation on IoT self-awarding will reduce or eliminate the need to have separate 'guidelines' for the sector in due course. In addition, the sectoral protocols on joint awarding and the validation of Level 9 Research programmes agreed between IOTI, on behalf of the sector, and QQI in November 2014, cover much of the content of the sector-specific guidelines; and perhaps more use could be made of those documents as a means of covering the

respective legal obligations of the IoTs and QQI in the area of awarding and delegated authority, ahead of the anticipated legislation on self-awarding.

More positively, IOTI is of the view that the core quality guidelines – which are the essential guidelines with regard to establishing QA processes to underpin the quality of the learning environment, both at undergraduate and postgraduate levels – are comprehensive, balanced and well written. These guidelines build on a long tradition of quality assurance in higher education – as reflected in the resources referenced in Annex 3, though IOTI was disappointed that the recent TUQF publication on research provision was overlooked in the section on Research Degree Programmes – and upon international practice, particularly the European tradition embedded in *ESG 2015*. Key principles such as the principle that quality assurance is the primary responsibility of the provider, or that quality should be less to do with bureaucracy and more about creating a quality learning environment in institutions, are generally well-embedded in the draft guidelines. Rightly, the guidelines expect that institutions themselves will proactively endeavour to improve the quality of the learning environment at all times (p. 10).

One issue that might be teased out more, though, is the issue of institutions maintaining, as a function of managing their quality assurance, ‘a resource base which is sufficient to ensure sustainability’ (p. 15). This is a particularly vexed question for publicly-funded higher education institutions in the current climate, because that responsibility is not one hundred per cent in the hands of the institutions. This is not to say that institutions have no responsibility, or do not possess the major responsibility in this regard, but it is disingenuous to ignore the role of other stakeholders in the matter of funding and the impact that this has on quality. ‘Continuing planning procedures’ will not in themselves protect against all contingencies related to state funding of education and its impact on the quality of provision. Some allusion to this reality should be reflected in the quality guidelines.

Other matters that require more clarification include the statement that there should be cooperation with QQI, in its role as the ENIC/NARIC (p. 21). Ostensibly, this seems unproblematic. However, the issue mentioned above on the referencing of EQF levels on parchments would suggest that a more open discussion on qualifications policy, and its relationship with QA, is required, before the implied integration of the two, and the engagement of institutions with ENIC-NARIC in a meaningful way, can proceed.

There is also the matter of consulting national and international fora on quality matters. The National Forum for the Enhancement of Teaching and Learning is mentioned under section 2.5.3. This immediately poses a question: should other relevant national documentation also be referenced e.g., the national framework for doctoral education, or the emerging principles for student engagement (which highlight learner responsibility as well as learner rights)? Perhaps a more generic statement about consulting national fora or embedding agreed national policy documents that are relevant to quality in quality processes should be inserted in the guidelines, rather than singling out particular fora or documents for mention. The

actual material could then be referenced in the annex on resources, which could be updated as new documentation appears.

In summary, IOTI is broadly supportive of the Core Statutory Guidelines set out in the White Paper, but considers that there is need for further discussion on the nature of sector-specific guidelines, and whether they should exist within or apart from the Core guidelines. For the purposes of transparency, and to enable all stakeholders to see whether the national education and training system, or the national public higher education system, are in reality systems, sector-specific guidelines should go out to a broader consultation than that currently envisaged.

## **2. White Paper on Statutory Quality Assurance Guidelines for Flexible and Distributed Learning**

The White Paper setting out proposed statutory quality guidelines to address the quality issues surrounding Flexible and Distributed Learning is welcomed by IOTI. It is evident from the document that it benefitted greatly from the inputs of expert stakeholders, from across publicly-funded further and higher education and private institutions, especially in relation to its comprehensiveness and detail.

The framing of the document around 10 Guidelines that relate to three distinct contexts (organisation context, programme context and learner experience context) is a useful device and will enable institutions to identify clearly what kind of FDL provider they are, and what level of specialised QA process is needed to adequately cover their particular level of FDL provision. That said, it is stated on page 4 that these guidelines are to be ‘regarded as the core Quality Assurance Guidelines for Flexible and Distributed Learning’. Elsewhere, in the Core Statutory Quality Guidelines (p. 8), it is implied that such core guidelines are intended to ‘ensure that the learning environment ... reaches an acceptable threshold of quality’. It would seem to IOTI, certainly on an initial reading, that the guidelines on Flexible and Distributed Learning go beyond this threshold and hold institutions to a higher threshold of quality than that set out in the core guidelines. This may be a good thing, particularly in an area that is constantly shifting in terms of its development. On the other hand, it might also be overly burdensome, and discourage innovation. Again this is something that needs to be considered carefully, and it also suggests that there is a need to keep the topic-specific guidelines under review so that they clearly harmonise with the core guidelines.

IOTI notes that there is considerable activity underway in the National Forum for the Enhancement of Teaching and Learning in areas, particularly digital learning, that touch upon these guidelines. IOTI would recommend that QQI and the Forum engage in a meaningful dialogue to ensure that there is broad agreement between the guidelines that are likely to emerge from the Forum on different aspects of digital learning, and these QA guidelines.

### **3. White Paper on Core Policy and Criteria for the Validation of Education and Training Programmes by QQI**

IOTI notes the publication by QQI of the draft policy and criteria that it will use for validating programmes, both FET and HET, that will lead to QQI awards. While this policy does not directly apply to the institutes of technology, it is recognised that it represents current thinking by the national QA agency on the validation of programmes that lead to awards in the National Framework of Qualifications; and that, as such, it is one of a number of national and international reference points that IoTs might examine when framing or reframing their own validation processes from time to time, especially parts 1-3, which encompass the validation of higher education programmes by QQI. IOTI will also give further consideration to this document in submitting its response to the recently issued Statutory Quality Assurance Guidelines for Apprenticeship.