

QQI White Paper Consultation – Review of Higher Education Institutions

Feedback from the Irish Universities Association

16 October 2015

General

1. The White Paper (WP) does not sufficiently acknowledge the autonomy of universities in the area of quality assurance, and needs to make explicit reference to the provisions of Section 27 of the 2012 Act regarding universities. Otherwise the WP appears to take a 'one-size-fits-all' approach which cannot be the case.
2. There are references in the WP to "comparability", eg Section 2.4. This would appear to push institutions towards a common approach to QA, rather than affording institutions scope to develop QA mechanisms that are effective and/or innovative for their own situations. The extent to which institutions may experiment and/or innovate regarding approaches to QA and to developing their own procedures is not clear.
3. Given that the universities have already completed two complete cycles of external institutional quality review over the last ten years, is it assumed that they are considered to be beyond the 'initial' review as referenced on p.9 para 2. This should therefore be made explicit.
4. Regarding the references on p.5 to institutional "*quality indicators and benchmarks*" (para 4), and given the lack of sector-wide quality indicators, the IUA suggests that each university should align its quality indicators with those already agreed between that university and the HEA. If each HEI selects its own quality indicators and benchmarks with no reference to other strategic processes already underway, there is a risk that this will lead to widespread confusion, dilution of effort and incoherence. In any case, all HEIs should use common data definitions. Some work which over time could lead to an agreed set of quality indicators might be useful.
5. The reference on p.5 (para 5) to positive review outcomes resulting in "*greater degrees of institutional autonomy*" regarding "*quality and quality assurance*" is confusing. What does this mean in practice? Given that the 2012 Act specifies review requirements, it is not clear whether QQI has any discretion here. The IUA notes in passing that although universities have been through two institutional review cycles with generally positive outcomes, there appears to be an increasing level of scrutiny by QQI, which is the opposite of what is suggested above...
6. The WP states on p.6 that "*review is complementary and proportionately related to the specific lifecycle of engagement of the institution and other engagements between the institution and QQI*". It is unclear how this proportionality will be operationalised.

7. In the 'Review of Reviews' report, QQI was urged to reflect on the 'cost-benefit' of any new review model. This is referenced on p.6 of the WP. The IUA queries whether this has taken place, and if so, whether the review model as reflected in the WP is optimal and cost effective. The IUA would like to bring to the attention of QQI that universities undergo one institutional review every five-seven years, and that a university will pay QQI a relationship fee for 'services' provided over this same period, which on average equates to approx. €400,000 per university (actual payment varies between institutions, depending on the number of student FTEs). This average does not include a possible annual charge for the IEM. It should also be noted that a full institutional review process could be commissioned from an EQAR registered agency for approximately 10% of this cost. There is a valid question regarding whether this situation represents value for money for universities.
8. P.7 para 1 of the WP states that *"Review primarily exists to provide / independent external review of the institution's own internal reviews"*. This statement is somewhat misleading as the WP also refers to significant compliance issues (e.g. ESG; IEM). Furthermore, QA in HE has a much broader application, beyond 'reviews' e.g. HR appointment process, staff development; staff-student feedback; L&T innovations, etc. It might therefore be preferable to rephrase this as *"Review primarily exists to provide / independent external review of the institution's own internal QA processes, and compliance with ESG and other requirements"*.
9. P.14 Context section. It is presumed that HEIs will have sight of the documents referred to in this section.
10. P.14, under Purpose and Objectives, some clarification would be useful regarding *"a statement about the relative emphasis to be given by the Review Team to compliance and enhancement in the review"*. Is it QQI's or the HEI's prerogative to instruct the Review Team regarding this "relative emphasis"? What criteria is used to determine the appropriate emphasis? If the review of one HEI has an emphasis on compliance while the review of another has an emphasis on enhancement, does this not frustrate the objective of comparability (p.8)?
11. The WP also sets out procedures for reviews by Designated Awarding Bodies and the NUI described as *"effectiveness review procedures"* (Section 27 of the 2012 Act). It is not clear whether these procedures are also intended to cover DAB reviews of Linked Providers. If this is the intention, the WP should be explicit regarding this.

Terminology and wording

12. The language of the WP has proved to be an obstacle to engaging university staff on the central issue of institutional review. The WP has a tendency to present the problem of 'opacity' as outlined in the Review of Reviews Report, i.e. the overuse of quality jargon and concept descriptors that are foreign to those who do not directly occupy a QA function.

13. Furthermore, the language used in many parts of the document is open to a variety of interpretations. QQI is asked to clarify some sections and terms in the WP, notwithstanding that definitions may appear elsewhere (eg. 2012 Act) eg. “*directions*” and “*for cause*”.

14. Examples where clarity is desired include:

- p.2, examples of what might prompt a ‘*for cause*’ review would be useful.
- P.2, the sentence “*Though cyclical review can lead to directions, it is not linked to directions and outcomes that may change the status of QQI’s approval of a provider’s Quality Assurance Procedures*” requires clarification
- The 2012 Act (30 (i)) states: “*before establishing (QA) procedures under section 28, a relevant provider, shall submit a draft of the proposed (QA) procedures*” to QQI “*for approval*”. This does not apply to universities, and should be clarified.
- The WP (e.g. p.2) refers to ‘*relevant providers of higher education*’; this presumably includes universities. There are instances in the 2012 Act, however, from which the WP draws, where universities are excluded from ‘*relevant provider*’ references.
- P.10 para 2. The reference to “*standards against which reviews are evaluated*” is ambiguous or possibly incorrect. Does this refer to the broad scope of QA mechanisms as contained in the ESG? Or does it refer only to the internal statutory review process? Or simply the standards which will be referenced during the review process? Or does it refer to a post-review evaluation by QQI of the overall review process? Again, clarity is required.
- P.10 para 4 refers to institutions selecting ‘*standards*’ for quality. Page 5, para 4 refers to ‘*quality indicators*’. The language used in the WP should be consistent if these are the same.
- P.13 para 2 refers to ‘*national themes for quality*’ while p.8 refers to ‘*enhancement themes*’. If these are the same, the language should be consistent.

15. A number of the steps proposed in the review procedures (section 4.1) are seriously problematic as currently presented and require clarification. These include, for example:

- *the publication of a self-evaluation report*. These should not be made publicly available, otherwise the ability of the university to undertake an honest self-evaluation and to ensure that the review focuses on enhancement, is significantly weakened;
- *the editing of the final report by QQI*. QQI should have no role whatsoever in editing a review team’s findings;
- *findings of QQI*. QQI itself has no findings, these are made by the review team;
- *approval of findings by QQI*. This implies that QQI has a power of veto over such findings, which is obviously unacceptable.

- *Terms of Reference are confirmed with the institution and the HEA.* It is not clear why the HEA should have any role here. The current reference would appear to blur the lines between QQI's function, institutional autonomy and the HEA.

It is anticipated that QQI does not really intend to put in place a review process such as these examples might suggest. If this is the case then the entire WP needs careful revision. The basic challenge as seen by IUA is that the WP has been written as a one-size-fits-all document to cover the entire HE sector, which may in reality be unrealistic.

Main focus of quality review and incorporation of other issues

16. It is important that the WP does not diminish the current focus of the university sector on quality enhancement. The criteria and key questions on p.15 would appear to suggest a drift from an enhancement-led review approach to one more aligned with compliance/audit e.g.

- Are the QA procedures compliant with the ESG?
- Are the QA procedures *"in keeping"* (consistent?) with QQI policy and guidelines?
- The WP also incorporates a reviews of compliance the Code of Practice for the International Education Mark.

17. The WP refers to the compliance review in relation to the IEM *"where reasonable and subject to timing"*. Given that the IEM does not yet exist and timelines regarding its possible introduction remain hypothetical, this may not be feasible or desirable in a first round of DAB reviews. QQI needs to consider the implications for a consistent approach throughout the review schedule, if the timing related to IEM or other such issues is variable.

18. The WP proposes the introduction of an Enhancement Theme. IUA agrees that QQI may legitimately seek to identify enhancement themes and pursue these, but suggests that folding such themes into the institutional review process may not be the optimal working method. Reasons for this include the necessary lead-in times, alignment with different HEI priorities and strategic developments, alignment with other themes already being developed by the National Forum for the Enhancement of Teaching and Learning and other bodies, the length of review cycles and the number of HEIs undergoing these, costs, etc. IUA suggests that it might be more useful to introduce such a theme in parallel, possibly based on the Scottish model.

The Scottish model involves a significant number of additional activities and initiatives around the identified enhancement themes over an extended time period. Funding is also available for these activities. This thematic enhancement work therefore runs in tandem with, rather than simply being incorporated into, the institutional review process.

19. On p.13, reference is made to enhancement themes being *'used by institutions in shaping their internal reviews'*. What is meant here? Is this in the development of the QA Framework? Or should these themes be incorporated into each HEI's internal review process? In which case, the caveats already mentioned above apply.

20. Likewise, on p.13 there is a reference to QQI taking a '*thematic approach*' to reviews across a range of HEIs. It is assumed that this would be distinct to the "enhancement themes" referred to earlier on p13, and would be in parallel to the institutional review process. It would be useful if QQI could make such distinctions clear.
21. The WP is unclear regarding how the review process will engage with 'research' quality, see p.5. Will Research Centres be included? Is the WP referring to research degree programmes? Depending on the scope intended, Review Team members will need to be carefully selected if they are to cover research quality in the wider sense. It would be useful if QQI could clarify what is meant regarding this reference to research.
22. The same paragraph on p.5 refers to the review examining institutional enhancement of quality '*at the level of the programme and/or module.*' From the perspective of the universities, module level is far too granular to be covered during an institutional review.

Timing issues

23. The issue of timing in relation to the introduction of the IEM is referred to above.
24. The WP, once finalised, will need to lead to a Procedures for Review document, which is unlikely to be finalised until well into 2016. This is likely to have significant consequences for the proposed review schedule in Annex 2, which states that these will be during the academic year 2016 – 2017. Given that effective preparation for institutional review takes approximately 12 months, and that it appears unlikely that the sector will have access to the required documentation, policies and guidelines until sometime in 2016, the review schedule may already be ambitious.
25. In either case, the timelines for the schedule of reviews as expressed in Annex 2 need to fit comfortably into existing university strategic timelines, other institutional cycles and objectives. This does not currently appear to be the case.
26. Given the workload associated with organising and administering an institutional review process, and providing the necessary supports for HEIs undergoing review, together with the range of other ongoing QQI policy initiatives and deadlines, the IUA wishes to raise the issue of QQI's capacity to conduct the number of institutional reviews per year proposed in Annex 2. This is a serious issue as without the required capacity to undertake the task properly, many of the benefits of institutional review will be reduced or lost due to sub-optimal implementation.