



## Response to QQI White Paper Review of Higher Education Institutions

Trinity College welcomes the opportunity to respond to the QQI White Paper on Reviews of Higher Education Institutions. The following response is in addition to IUA response, which Trinity College Dublin fully endorses.

### General Feedback

- The diversity of Higher Education Institutions (HEIs) needs to be recognised in the design and implementation of the institutional review process. It is necessary to balance the need for comparability and consistency across HEIs of different scale and focus. A one-size fits all model is not appropriate.
- The language of the Policy section does not recognise the autonomy of Universities as Designated Awarding Bodies but rather speaks to the body of HEI's to whom QQI delegates authority to make awards and for whom it validates programmes.
- Feedback from internal consultation found the language of the White Paper disengaged rather than engaged the community and resulted in the very 'Opacity' outlined in the 'Review of Reviews' Paper as an undesirable characteristic of institutional reviews where terms are used interchangeably to describe quality concepts.
- The Whiter Paper obfuscates the 'cyclical review' process with the 'review of HEIs' that both QQI and HEA conduct through their statutory relationships with HEI's i.e. HEA Compact and data upload, QQI engagements e.g. Annual Institutional Quality Report, Annual Dialogue Process, Monitoring and Programme Validation (as appropriate to the sector). The White Paper would benefit from a clear mapping of the 'cyclical' and 'statutory' elements against outcomes that are variably described as Compliance - Performance - Quality Assurance - Quality Enhancement - Innovation and Quality Culture. This would help crystallise the specific objectives and the achievability of outcomes from the 'cyclical review process'.

### Section 1: Introduction and Scope

- The model for awarding bodies in figure 1 assumes the implementation of the QQI Reengagement Policy for All Providers. The Universities are currently awaiting policies from the QQI in order to align our internal procedures with:
  - i. QA Guidelines for Designated Awarding Bodies and for Linked Providers;
  - ii. an assessment method to support the Code of Practice for providers of programmes of education and training to international learners once the legislative change with respect to the International Education Mark is resolved.
  - iii. QQI policy documents such as Access, Transfer & Progression Policy; Recognition of Prior Learning Policy; Code of Practice for Research Degree Programmes and Guidelines for Flexible & Distributed Learning.
- The proposed timeframe to commence the next cycle of institutional reviews as set out in Appendix 2 is in 2016/2017 may result in:
  - i. Universities in the early part of the cycle not having sufficient lead-in time to address the potential scope of the review; or

- ii. Universities undergoing institutional reviews at different times in the schedule experiencing a different/broader scope.
- Universities, as with all HEI's, require further information, and expect on the stated intention to amend the QQI Act 2012 , Section 27 (i) (b) to include procedures 'for cause' reviews e.g.
  - i. Triggers or threshold for a 'for cause' review?
  - ii. To know if the scope includes or does not include 'publicly funded Higher Education Institutions including Previously Existing Universities/Designated Awarding Bodies?'

## Section 2: Policy

- The potential scope of the Review is of concern, especially given the level of resources required to ensure an efficient and effective process. The capacity of QQI to furnish a Review Team with the necessary professional and technical skills in quality assurance to cover the potential scope of the review as defined in the White Paper is also of concern. Specifically:
  - i. Clarity is required on the role of review with respect to research. Is it limited to research degree programmes (L9-10 NFQ) or does it include institutional research, or funded researched centres e.g. SFI?
  - ii. The focus of the review 'at the level of the programme and/or module' is more appropriate as a purpose of the internal review process; it is too granular for the institutional review process.
  - iii. Universities have a compact with the HEA and reports agreed Institutional level performance metrics. The requirement that Universities report on their 'overall performance of institutions and their success in meeting mission statements and objectives' in the cyclical review process is therefore seen as a duplication. QQI and the HEA have an MOU which aims to minimise duplication and streamline data capture and the burden of reporting on institutions, which should be executed for this purpose.
  - iv. While Trinity welcomes the focus on enhancement throughout the White Paper our concerns on the introduction of an enhancement theme as a central component of the review process in addition to an already expanded scope include:
    - a. The lead-in time to consult and agree enhancement themes at a national level given a commencement time of 2016/17
    - b. The ability to sustain an enhancement theme over a 5 -7 year cycle i.e. will it still have currency for those institutions who come late in the cycle
    - c. The ability of a single enhancement theme to carry across all sectors given the scale and heterogeneity of HEI's

Instead Trinity recommends that:

- a. QQI pursue the option of the Thematic Review outlined in section 2.8 which potentially is seen as adding more value, or;
- b. each institution select an enhancement theme as part of the agreed Terms of Reference, which would support and reflect its strategic mission and objective. The outcome can be shared across the sector
- v. It is recommended that the cost-effectiveness of the model be a key focus of the post-implementation review process.
- vi. In terms of Professionalism and Inclusivity Trinity:

- a. Trinity welcomes the inclusion of international perspectives on the Review Team and our preference is to have more than one international member of the Team to include a European and non-European perspective;
- b. would welcome the recognition of Alumni as a participant in the process;
- c. would welcome the extension of training on the new institutional review model to selected institutional staff to enable them to facilitate the process internally.

### Section 3: Outline Contents of Review Terms of Reference

- Trinity anticipates the QQI will provide sufficient time in advance of the Review to agree the Terms of Reference and share the information compiled from other sources with Trinity for factual accuracy checking or update to ensure accuracy and currency at the time of the review.
- The key questions and lines of enquiry to be addressed by review are acceptable to Trinity.

### Section 4: Review Procedures

- In 4.1
  - i. Trinity understands that the roles of the QQI and the HEA are different, and question why the QQI needs to confirm the Terms of Reference for the review with the HEA; a confluence of roles which the Review of Reviews Report Panel did not support.
  - ii. If the Self-Evaluation Report is to promote critical-analysis and opportunity for reflection it needs to remain a confidential document that is provided to the Review Panel only and is not published
  - iii. We have concerns that the QQI sees its role to 'edit' the final report of the review team, this would not be good practice.

Contact: Roisin Smith, Quality Officer, ph.: +35318964330 email: [quality.officer@tcd.ie](mailto:quality.officer@tcd.ie)

Responding on behalf of Trinity College Dublin, the University of Dublin

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