



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

# Review of Higher Education Institutions White Paper

## FEEDBACK REPORT

FOLLOWING CONSULTATION PROCESS

DECEMBER 2015

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# 1 INTRODUCTION

In July 2015, QQI published a White Paper on Review of Higher Education Institutions. The White Paper contained proposals for the policy and procedures for the next cyclical quality review of higher education institutions. Institutions and other stakeholders were requested to email submissions in response to QQI. In parallel, QQI set up dialogue meetings about the proposals with representative bodies and other stakeholders. At some of these meetings it was agreed that a note of the meeting would comprise the feedback of the organisation concerned.

In keeping with the QQI consultation framework, all submissions received through the formal public consultation processes are published, unless otherwise requested. The written submissions made are published on [www.qqi.ie](http://www.qqi.ie)

This report sets out a summary of the feedback received via the consultation process on the White Paper, the response of QQI to that feedback and the next steps in the finalisation of a policy for the next cycle of quality reviews in higher education. This report does not capture the full extent of every comment made by each contributor in the consultation process, but it does try to capture the most salient points, in particular those pertaining to the themes and the areas for action by QQI. The feedback on the White Paper will be used to inform the policy on reviews, other relevant QQI policies and procedures, and QQI communications and engagements with institutions and other stakeholders.

## 2 SOURCES OF FEEDBACK

Feedback on the White Paper was received from a range of institutions, representative bodies and other stakeholders.

The bodies that QQI received feedback from are listed in table below.

INSTITUTION/REPRESENTATIVE BODY
Athlone Institute of Technology
Department of Education and Skills
The Higher Education Colleges Association
Institutes of Technology Ireland
Institute of Technology Blanchardstown
Institute of Technology Sligo
Irish Universities Association
Mary Immaculate College
Maynooth University
Royal College of Surgeons in Ireland
Trinity College Dublin
Union of Students in Ireland
University College Dublin
University of Limerick

## 3 FEEDBACK BY THEME

Whilst the overall number of responses received was relatively small, given the size of the sector and the range of stakeholders, the feedback provided within the responses was extensive. Responses to the White Paper were fulsome, diverse and in some cases suggestions provided by different contributors were mutually irreconcilable. Some respondents welcomed the proposals and expressed support for them, other respondents were entirely critical of the proposals and some respondents were critical of some aspects of the proposals whilst conveying support for others. Within the higher education sub-sectors, some of the feedback was consistent, including some of the more critical responses.

QQI summarised the feedback into the key points made by each respondent and this was then condensed by thematic area. The thematic areas were:

1. Scope of external review in higher education
2. Relative degrees of autonomy and differentiation between institutions
3. The outcomes of reviews
4. Metrics, benchmarks and the role of the HEA in reviews
5. Enhancement
6. Organisation of reviews (Schedule; costs; panels)

The feedback is set out by thematic area in the subsections below.

## THEME 1

# SCOPE OF EXTERNAL REVIEW IN HIGHER EDUCATION

### SUMMARY OF FEEDBACK

A good deal of feedback about the scope of external review was received from across the spectrum of institutions and stakeholders. Comments made related to: a need for greater clarity in the policy regarding the institution-wide nature of the enquiry; the extent of the scope of research in reviews; avoiding an overly instrumentalist approach to reviews; the capacity of QQI to manage the broad scope of reviews.

### QQI RESPONSE

QQI will make adjustments to the wording in the policy, in order to emphasise the cross-institutional nature of reviews, and that it is broader than just an external review of internal reviews. As a basis for this, QQI will adopt the proposed wording: *“Review primarily exists to provide independent external review of the institution’s own internal QA processes, and compliance with ESG and other requirements”*.

QQI will add a statement to the policy which clarifies that the scope of reviews in the area of research is in relation to the evaluation of the effectiveness of the quality assurance procedures of the institution for research in general, including research programmes and research activity.

It is not the intention of QQI to generate independent comparisons between institutions or league tables. Statements in the White Paper in relation to comparability were made primarily with the intention of assisting institutions to identify with and build upon developments that have been initiated by other similar institutions, as a means of sharing best practice. Also, as part of the review process, the institutions themselves will be encouraged to identify similar institutions for the purposes of benchmarking their own activities and gauging their own effectiveness through self-evaluation.

It is a statutory responsibility of QQI to issue guidelines for quality assurance and to review effectiveness of the institution-wide procedures developed and maintained by institutions, in



keeping with the guidelines. It is neither the intention nor the role of QQI to prescribe specific quality assurance procedures for institutions. In keeping with the aims of the European Higher Education Area and the principles of the European Standards and Guidelines, QQI fully endorses the statement that *“higher education institutions have primary responsibility for the quality of their provision and its assurance”*.

Regarding resources, reviews of institutions in higher education is based on the statutory role of QQI. It is the intention of QQI to secure that sufficient resources will be deployed to support this key function.

An institution-wide review comprises a significant commitment of staff and resources for both institutions and QQI. By incorporating other statutory reviews into the cyclical review process, QQI endeavours to ensure that the investment is as worthwhile as it can be and that institutions are not over-burdened by multiple reviews. The same principle applies for thematic reviews, in particular cross-border reviews; the intention being to capture the review of a range of institutions operating transnationally to a single country review, thereby reducing the burden of travel and negotiating local arrangements.

## **THEME 2**

# **RELATIVE DEGREES OF AUTONOMY AND DIFFERENTIATION BETWEEN INSTITUTIONS**

### **SUMMARY OF FEEDBACK**

In the feedback, the universities were almost unanimous in emphasising that there was insufficient recognition in the policy statements for their autonomy relative to other institutions. In general, this sub-sector did not welcome the approach of QQI to devising a single model for review. In contrast, most other feedback either welcomed the single model or did not provide feedback in relation to this direction.

### **QQI RESPONSE**

Higher education institutions are not homogenous, though there are similarities within sub-sectors, HEA profiles indicate significant heterogeneity, even within sub-sectors, in terms of mission, size and capacity. The policy will include a clearer statement in relation to aspects of institutional differentiation. It is also the intention of QQI to ensure that the review process, without compromising independence, complements the unique context of each individual institution, as regards significant differentiators such as research, delegated authority and direct validation by QQI etc.

Taking into consideration the feedback received, QQI remains of the view that the individual characteristics of sub-sectors and individual institutions are best complemented by a single review model that allows for differentiation between institutions, without introducing artificial complexity to, what should be, a relatively homogenous approach to the external review of quality assurance in higher education institutions. The alternative is a series of sub-sector specific models, which will still require tailoring for individual institutions, and which will reduce opportunities for learning between institutions and create unnecessary bureaucratic burdens (for example a change in review model if an institution becomes a Technological University, or becomes a Designating Awarding Body in its own right).

In a broader context, QQI as a public service agency is accountable to the public. A single model is more transparent for a broader public audience, and therefore easier to understand



and navigate. This approach also mirrors the direction of travel of other agencies in higher education, for example the HEA has implemented a single model for performance-related funding and compact agreements. A unique approach to review for the one sub-sector sector is not compatible with this.

Notwithstanding, the decision to implement a single review model, the model is flexible enough to distinguish between sub-sectors and individual institutions, as appropriate. This will be manifest through different types of Terms of Reference, review team profiles and methodologies (e.g. duration of visit) for different sub-sectors. This differentiation is also reflected in the statements in the policy about the difference in approach between initial review and subsequent review cycles, as well as statements about QQI differentiating in reviews, between institutions that have their programmes directly validated by the agency and institutions that do not. QQI will review the relevant statements in the policy, to ensure that they sufficiently highlight the potential for differentiation within the single review model.

QQI review functions are set out in various sections of the 2012 Act. The [QQI Policy on Monitoring](#) states that QQI monitoring may initiate a statutory review under the 2012 Act. Monitoring may either be proactive or in response to concerns brought to QQI's attention. As set out in the 2012 Act, QQI can neither approve nor withdraw approval for the quality assurance procedures of a previously established university.

### THEME 3

## THE OUTCOMES OF REVIEWS

### SUMMARY OF FEEDBACK

There was some commentary in relation to clarity about the ‘directions’ following reviews, the impact and outcomes of reviews on the status of a provider, and the statements in the White Paper linking review outcomes to greater degrees of institutional autonomy.

### QQI RESPONSE

As set out in the 2012 Act, “*Where the Authority has carried out a review under section 34, it may, following consultation with the relevant provider concerned, issue such directions in writing to that relevant provider as it thinks appropriate in relation to the effectiveness of the quality assurance procedures established by that relevant provider under section 28 and the implementation by that relevant provider of those procedures*”. It is the role of QQI to analyse the findings of Review Teams and, where necessary, issue directions on the basis of the findings. For instance, if it is found that students are not engaged in evaluations of quality at the institution then QQI may, in consultation with the provider, issue a direction that this basic requirement ought to be implemented and indicate a timeframe for its achievement.

Some institutions raised the matter that, as reviews are periodical, a recommendation or direction to an institution may remain long after the matter has been addressed by the institution. A review report and the findings contained within it represent the findings of a Team at a particular juncture in time and these should not be interfered with. A portion of the Quality Profile for an institution will reflect these findings, but there will also be opportunities to update status through Annual Institutional Reports, Annual Dialogue Meetings and review follow-up.

We acknowledge that the following statement may have caused concern ‘*positive review outcomes result in greater degrees of institutional autonomy for matters relating to quality and quality assurance*’. The intended audience for this statement were independent providers who, arising from the 2012 Act, may now be in a position to apply for delegation of authority to make awards. Whilst delegation will be based on a separate QA procedure by QQI, a review with favourable findings in relation to the health of the QA procedures of an institution will be taken by QQI as one indicator of readiness for delegation.

## **THEME 4**

# **METRICS, BENCHMARKS AND THE ROLE OF HEA IN REVIEWS**

## **SUMMARY OF FEEDBACK**

Feedback on the use of metrics, benchmarks and the role of HEA clustered into four main points: the (unwelcome) perception by institutions that QQI will be setting benchmarks and quality indicators for institutions; the overlap between quality indications and the indicators used by HEA for compact agreements, and the system-level indicators used by the Department of Education and Skills; the need for common data definitions; clarity about the role of the HEA in reviews.

## **QQI RESPONSE**

The White Paper introduced the concept of quality metrics in reviews, primarily as an alternative supporting source of information for institutions in the review process. It also introduced the opportunity for institutions to identify their own benchmark institutions, for comparison purposes.

Using data to measure quality within higher education is a developing field and, at this point in time, there is little evidence internationally to recommend any specific approach. However, the use of data-based information sources is growing and there are significantly more sources of information available to institutions than in previous cycles. It is in these contexts that QQI is introducing these concepts, primarily as an alternative source of information, to support the institution itself in evaluating its own quality. The intention is to build a community of practice in these areas across institutions and, over time and if rational, to coalesce around the more prevalent metrics for quality, if any emerge.

QQI is aware of the potential for overlaps with other agencies and, for this reason, a Forum has been established which brings together the HEA and QQI with the Department of Education and Skills, the Institutes of Technology Ireland, the Irish Universities Association and the Union of Students in Ireland. The primary objective of the Forum is to assist and advise the HEA and QQI on the implementation of the Memorandum of Understanding (MoU) between the two organisations. The Forum has decided that it would be a useful exercise to explore the data and information which public higher education institutions are requested to provide to the HEA

and QQI. The HEA and QQI have commenced this work by capturing the amount and type of data that both organisations request from the institutions with which they interact; on this basis, the Forum will determine how best to advance in this area in the spirit of the MoU's objectives.

It cannot be assumed that indicators used for system-level performance and funding purposes are the same as indicators for institutional quality. It is likely that there are overlaps between these sets of indicators, or, at the very least, the sources of data underpinning them. It has also been emphasised by the Institute of Technology sector that the institutes are not currently equipped and resourced to fully use and analyse the data that is available to them. QQI is allowing time and space for a set of indicators for quality to emerge, bottom-up, from the institutions themselves, and will use the review reports as evidence of these. It is also for this reason that QQI will not, at this juncture, establish data definitions for the purpose of metrics. The evidence simply does not yet exist for a firm and reliable set of indicators.

As part of this development process, QQI will host a seminar in 2016 to commence the discussion around indicators of quality in higher education and their uses.

A more general set of feedback was provided about the role of the HEA in reviews. Submissions from public higher education institutions emphasised the work that they are currently engaged in through institutional profiling, compact agreements and the strategic dialogue process. As highlighted above, both agencies are aware of the potentials for overlap and burdens on institutions, and have formed the Forum and MOU to specifically engage on these concerns. The White Paper specified that the reviews process will use the institutional profiles as a source of information to Review Teams. This statement will be expanded in the policy to extend to compact agreements and notes of strategic dialogue meetings.

A legislative role for HEA in reviews is specified in Section 34 (4) of the 2012 Act, which states that *"The Authority shall consult with An tÚdarás um Ard-Oideachas in carrying out a review under subsection (1) where— (a) that review relates to a relevant provider, and (b) that relevant provider is an institution of higher education"*. QQI is currently engaged with HEA in determining how this role will be exercised in the review process. It is reasonable and likely that this will be done through a combination of consultation with the HEA on the Terms of Reference and a role for HEA in the briefing of Review Teams prior to the visit. All information shared between HEA, QQI and the Review Teams will also be shared with the institutions themselves.

## **THEME 5**

# **ENHANCEMENT**

### **SUMMARY OF FEEDBACK**

Most respondents that commented on enhancement were supportive, indeed emphatic, about the necessity for reviews to incorporate aspects of quality enhancement within them. Many submissions, however, questioned the state of readiness of QQI to implement, and HEIs to utilise, enhancement themes for quality assurance in general and reviews in particular. Finally, some respondents were concerned about the technical feasibility of Review Teams selecting the appropriate balance between compliance and enhancement in the review procedure.

### **QQI RESPONSE**

The role of QQI in enhancement is in promoting and supporting innovation and continuous improvement and enhancement in provider quality assurance, usually through encouraging and enabling providers to share effective practices. External quality assurance in its various forms can act as a catalyst for improvement and enhancement and offer the provider new perspectives along with identifying system-wide enhancement or improvement initiatives that can be addressed cohesively by those contributing to or impacting on the national quality assurance system.

The introduction of enhancement themes in the review system was intended to guide institutions in the preparation of their self-evaluation reports. Feedback indicates a lack of preparedness for the introduction of themes in reviews. Accordingly, this initiative will be removed from the policy paper. QQI will continue its work in this area with a series of parallel activities to support quality enhancement in institutions.

The policy on reviews will continue the approach, as endorsed in feedback, of reviewing both the compliance and enhancement aspects of quality assurance. This will be carried right throughout the review process, from the Terms of Reference, to the briefing and deployment of Review Teams, through to the review visits and the periodic synoptic reports based on collations of institutional review findings. Ways of balancing the relative emphasis of



enhancement and accountability in reviews will, in most instances, be informed by the number and outcomes of previous reviews undertaken by an institution and the outcomes of other engagements with the agency (e.g. validation and monitoring (if required), annual reporting). Every effort will be made to determine this balance at the point of establishing Terms of Reference, although there may be occasions where an institutional self-evaluation report will provide further information that will impact on the balance.



## THEME 6

# ORGANISATION OF REVIEWS

## SUMMARY OF FEEDBACK

Many of the contributions on consultation made reference to the more pragmatic considerations for reviews. There were seven key areas of feedback: the relationship between the cost of reviews and QQI relationship fees; the impact of the schedule of reviews on individual institutions; the feasibility of the schedule for QQI; the profiles of review teams; the interplay between variables such as institution size, scope and capacity and review teams and visit durations; the publication of self-evaluation reports; the role of QQI in relation to reviews.

## QQI RESPONSE

Public institutions pay an annual relationship fee to QQI. This fee incorporates the full costs of the review process.

The draft schedule in the White Paper was set out based on consideration of the date of the last review of the institution and ensuring a mix of different institution-types for review each year. These primary factors were offset against the reconfiguration of the landscape of higher education, including proposed mergers and clusters. Feedback has indicated that some institutions will be significantly challenged by a review early in the cycle, due to specific developments taking place within the institutions. QQI will not finalise the schedule until some additional dialogue has taken place with the institutions concerned. Comments made in relation to placement (either early or late) in the schedule are understandable, but as is the nature of any schedule, at least one institution will have to go first and another will have to go last.

As regards statements about the feasibility of the schedule for QQI, as stated above, review of institutions in higher education is based on the statutory role of QQI. It is the intention of QQI to secure that sufficient resources will be deployed to support this key function.

A number of factors were identified as key influencers on the QQI methodology for reviews. These were institution size, scope, mission, strategy and capacity. QQI will take these factors into consideration when deploying review teams and planning review visits with institutions. Whilst we recognise that planning for visits is a matter between the institutions and the Teams,

as was the practice in previous cycles, some degree of standardisation within bands will be necessary given the range and types of institutions involved and the need to plan and communicate schedules well in advance.

QQI agrees that the publication of the self-evaluation report is a sensitive matter for institutions and, accordingly, will advise in the policy that institutions may choose whether to publish self-evaluation reports or not.

Internationally, it is standard practice for QA agencies to take a role in editing final reports, to ensure consistency, readability and to increase transparency. In keeping with this standard international practice, QQI will retain a role in editing reports. However, this role does not extend to making substantive changes to the reports of the review teams, rather the emphasis will be on standardising the language and style of the reports.

The approval of review findings is a formal activity related to the governance of the review process by QQI. An Approvals and Reviews Committee of the QQI Board has been established for this purpose. The role of this committee, *inter alia*, is to make decisions on the effectiveness of providers' quality assurance procedures, following consideration of the outcomes of reviews. This is related to the statutory role of the QQI Board. As indicated above, as set out in the 2012 Act, "*Where the Authority has carried out a review under section 34, it may, following consultation with the relevant provider concerned, issue such directions in writing to that relevant provider as it thinks appropriate in relation to the effectiveness of the quality assurance procedures established by that relevant provider under section 28 and the implementation by that relevant provider of those procedures*". It is the role of QQI to analyse the findings of Review Teams and, where necessary, issue directions on foot of those findings.

## 4 A SHORT WORD ON POSITIVE COMMENTS...

The previous sections above highlight the (mostly critical) feedback received, which challenged features of the White Paper and the QQI response to this challenge including, where considered warranted, changes to the proposed policy on reviews. Some of the comments received were very supportive of the proposals in the White Paper, endorsing some of the key changes to policy.

The elements of the policy that were endorsed, almost unanimously, were:

- » Approaches to system-wide learning and improvement, through dissemination of best practice annually and the use of case studies;
- » integration of Annual Institutional Reporting and Annual Dialogue Meeting processes into review processes and the undertaking not to duplicate other processes;
- » evidence-based approaches to reviews;
- » the evolving step by step review process;
- » the key questions and lines of enquiry set-out for reviews;
- » the undertaking to provide guidelines on the content and length of self-evaluation reports; and
- » the proposed focus on both quality assurance and quality enhancement, with the aspiration to address compliance early on from the process.

## 5 NEXT STEPS

Following the publication of this feedback document, and some further pieces of consultation, QQI will move to the finalisation and the publication of the Policy on Reviews in Higher Education, incorporating the changes set out in this document.

When the Policy is in place, QQI will commence the development, in consultation, of a separate Reviews Schedule and a Handbook for Reviews. The Handbook will encompass the features of the reviews methodology. Terms of Reference and Review Team Profiles for different sub-sectors and Guidelines for Self-Assessment by institutions. QQI will also finalise and publish the new Annual Institutional Quality Report template which complements the review process for the public institutions.

## APPENDIX 1

### SPECIFIC EXAMPLES OF COMMENTS RELATING TO EACH THEME

#### SCOPE OF EXTERNAL REVIEW IN HIGHER EDUCATION

*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.*

*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”.*

*The scope of the Review as stated on p.7 “Review primarily exists to provide an independent external review of the institution’s own internal reviews” is too restrictive. The internal reviews are only one component of a complex web of procedures used by the University to assure quality – for example, external examiner reports, student engagement and module feedback surveys, HR appointment and promotion procedures, programme approval and accreditation procedures. All of these need to be considered in the SAR and shared with the PRG.*

*P.6 - To convey and reinforce the message, that responsibility for ‘QA’ is a cross – institution activity (eg. module evaluation, periodic School review, research student progression, management of assessment, HR appointment processes etc), it might be helpful if the WP reinforced this with more examples, to minimise the perception that QA and Institutional Review is only a function of each University Quality Office.*

*P.7 - Para 1 states that “Review primarily exists to provide /independent external review of the institutions own internal reviews”. This statement is potentially misleading as QA in HE has a much*



*broader application, beyond 'reviews' eg. HR appointment process, staff development; staff-student feedback; L&T innovations etc. - see scope of ESG. This point is also acknowledged in the WP on Page 5.*

*P.6 - "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?*

*Regards an over-reliance on identification of QA instruments and current methodologies, to the detriment of critical analysis and penetrating discussion of quality-related strategy and operations as counter-productive to the goal of instituting a quality culture based on the understanding and acceptance of all personnel such as to instil quality culture.*

*P.21 Second point – the drive for comparability would appear to push institutions towards a common approach to QA rather than affording institutions some scope to develop QA mechanisms that are effective and/or innovative for them. To what extent can institutions experiment and/or innovate regarding approaches to QA? How well does this WP objective sit with institutional autonomy?*

*The text comments that 'The objectives of a review may be extended to include...'. Arguably, this may lead to a single review trying to cover far too much ground; can reviews of the DABs omit compliance since this is covered by the AIQR submissions?; what implications does this have for reviews by the DABs of their LPs?*

*Thematic reviews: where the text refers to a '...common, thematic approach to reviews...', does QQI anticipate running thematic reviews across HEIs within Ireland in parallel with Institutional Reviews?; Given its current level of organisation, staffing and resources, does QQI have the capacity to run such reviews?*

## RELATIVE DEGREES OF AUTONOMY AND DIFFERENTIATION BETWEEN INSTITUTIONS

*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.*



*At the very minimum, the DABs need a different form or model of review than that which will apply to HEIs with delegated authority.*

*Disappointed at the decision to adopt a 'one size fits all' model for future reviews. While it does offer economies of effort, we regard it as being a 'blunt instrument'. The Independent Review Team which conducted the QQI 'Review of Reviews' pointed out that: (a 'one size fits all' model)...ignores sectoral differences by adopting a generic approach and assumes that the differences between the sub-sectors are of secondary importance and of less significance than the basic shared requirements of any quality assurance system.*

*WP proposes to apply a review model with a high level of uniformity applicable to all providers. This makes sense in relation to the broad approach involving preparation of a self assessment report, a peer reviewer group (PRG) site visit, followed by a report from the PRG and a written response from the institution. It is also wise that the proposed overarching standards for reviews as set out in p15 of the WP are consistent across all providers.*

*The focus on uniformity in approach must be balanced against the need to respect the diversity in the range of providers to be reviewed. The diversity relates to prior experience of institutional quality reviews, institutional missions, scale and scope of activities, and importantly, different legislative underpinnings. Section 29 of the Qualifications and Quality Assurance Act 2012 establishes clearly the distinctive position of "previously established universities" and states that such unis will consult with the Authority before establishing procedures for quality assurance under Section 28. This implies that the initiative comes from the university in the light of guidelines that may be prepared by QQI. It is important that the relationship between a previously established university and QQI in relation to institutional review will be in accordance with the Act. To that end we also note Section 27 (6) (a) of the Act which affirms that "The Authority may issue different quality assurance guidelines for different relevant or linked providers..."*

*Terms of Reference: will these be institution-specific or sector-specific (i.e. DABs vs. IoTs)?*

*Awaits further discussion and information from the QQI on "for cause" review and what this will entail and under what circumstances the QQI may undertake a "for cause" review. Could QQI provide some examples of the kind of areas that 'for cause' reviews (p.5) might cover?*

*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?’*

## THE OUTCOMES OF REVIEWS

*The White Paper makes repeated reference to ‘directions’ arising from reviews and to ‘for cause’ reviews, issues upon which the 2012 Act is largely silent. These must be enlarged upon so that HEIs can consider their implications.*

*It is noted in the document (p. 2) that ‘cyclical review can lead to directions’. While it is acknowledged that the general parameters of what such directions might entail are set out in section 35 of the 2012 Act, perhaps some concrete examples of the specific areas they might cover could be provided for clarity’s sake.*

*Outcomes states that the “findings are approved by QQI and published in the Quality Profile”. The meaning of the terms “findings” and “approved” in this context is unclear and potentially of concern to us.*

*Clarification of the following statement (page 2) would be welcome, with perhaps the inclusion of examples of issues that could trigger a ‘for cause’ review: ‘‘ 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.’’ Clarify what types of directions the cyclical reviews will lead to.*

*Impact of review on QA procedures of regulated providers*

*References to institutional autonomy causing concern*

*Welcome ‘‘ 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’’*

*Removal of any negative outcomes once resolved*

## METRICS, BENCHMARKS AND THE ROLE OF THE HEA IN REVIEWS

*Page 5 statement “each institution is provided with an opportunity to identify standards and benchmarks for quality relevant to their own mission and context. Institutions are encouraged to derive these from international sources”: Exemplars of what QQI themselves would consider key international benchmarks and, where appropriate, any associated ‘league tables’ would be useful.*

*Propose that QQI engage closely with the HEA on the issue of the need for key performance indicators and benchmarks, that provide for necessary comparisons within the system context as well as within a longitudinal one.*

*This use of existing reports etc. should be widened to include HEA Compact Agreements and Institute HEA Profile Data*

*Why does the proposed procedure accord a role to the HEA in approving the Terms of Reference for the reviews?*

*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.*

*P.5 Quality indicators are already aligned with HEA*

*Given the lack of sector-wide quality indicators, we suggest 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.*

*“The standards against which review findings are compared, are each institution’s own mission and strategy and selected quality indicators and benchmarks”. Would these include selected benchmarks and indicators from an institution’s performance compact with the HEA, or would they also include the system level indicators agreed by DES and the HEA?*

*There's reference to review criteria that will include unspecified "selected quality indicators and benchmarks" (p.15). Could more be said about this and are the indicators likely to include some of the metrics and performance indicators used in the HEA strategic dialogue process and the institutional compacts?*

*Interested in further sectoral discussion on the development of quality indicators and benchmarks and quality enhancement themes, prior to implementation of review of institutions.*

*Would like to work with QQI on metrics.*

*What is meant by '...selected quality indicators and benchmarks'? Will these be selected for individual HEIs or for groups within the sector (e.g. DABs vs. IoTs)? Will they be selected by QQI or in consultation with the HEI under review?*

*Institution-specific standards & benchmarks: how sensible is it to suggest that individual HEIs would have latitude to identify their own standards & benchmarks?; What 'international sources' are being referred to here?*

*Comparability: what is implied by the notion of 'comparability' here?; how is it relevant, if at all, to HEA Compacts (for those HEIs which have them)?; does QQI envisage developing 'league tables' based upon the review outcomes?; surely, comparability can apply only to the effectiveness of QA procedures across HEIs? If it extends beyond this, it will be a matter of great concern for the HEIs*

*What does QQI mean by 'quality' and how do they envisage it being measured? No QA indicators or metrics are specified*

*Support metrics as long as not onerous.*

*We see benchmarking and quality performance metrics as being integral to the system, but IOT sector is at a disadvantage in not having dedicated Institutional Research Officers*

*It is stated in the White Paper that one of the purposes of QQI reviews is to support systems-level improvement of the quality of higher education, through the publication of synoptic reports and institutional quality profiles, and through ensuring that similar institutions adopt consistent approaches to QA (p. 21). It is important once again that this work complements existing institutional profiling and does not create duplicate or, worse, inconsistent sources of information for interested stakeholders.*



## ENHANCEMENT

*P.5 Para 3 – re enhancement themes – support the introduction of sector-wide enhancement themes, however, a reasonable lead time would be required to enable institutions to engage with the theme(s) (eg. institutions at any given time will have different strategic priorities). Would the introduction of enhancement themes be better initiated as a ‘pilot parallel project’ rather than be integral to a new formal review process?*

*“Every review is underpinned by the same enhancement themes ....” It is not clear who will select the theme(s) and what input the University will have into the decision; or how the proposed approach to the enhancement theme dimension can be reconciled with the first overarching standard for reviews: “the institution’s own mission and strategy ...”(p15). We submit that the university should select the enhancement theme and that the themes may differ between universities depending on their strategic priorities at the time of review. It would be very unwise to contemplate a fixed set of enhancement themes for all universities over the duration of the next cycle of reviews without taking account of the different strategic trajectories that each university has or will identify over the period of the next cycle.*

*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 we recommend 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.*

*P.13 Para 2 – ‘the enhancement themes are used by institutions in shaping their internal reviews’ – again, what is meant by “reviews”? Is it the holistic QA Framework? To what extent ‘shaped’? e.g. would a more meaningful objective perhaps be stated as: “...as appropriate, inform the on-going development of institutional QA mechanisms” Greater clarity is required. What about institutional autonomy?*

*Who selects ‘specific enhancement themes’ for individual HEI reviews?*

*‘National’ themes for quality? When & how does QQI propose to develop and agree such themes?*

*Enhancement themes - does the text mean to suggest that all HEIs reviewed within a single Cycle will include the same theme(s)?; such a system undoubtedly would be unfair to HEIs reviewed earlier in the Cycle as opposed to those reviewed later; can meaningful over-arching themes be found that are relevant and/or appropriate to all HEIs that fall in scope of these reviews*

*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.*

*Outline contents of terms of reference: the level of detail provided in this key section (p14-16) makes it difficult to comment in detail. In particular a greater clarity in relation to the issue of compliance v enhancement would be welcome. In relation to “aspects of enhancement to be explored”, it is not immediately evident how the enhancement theme will be chosen and by whom it will be chosen. The default purpose of the review main visit (p18) is to “focus upon exploring quality enhancements through questioning and dialogue with the institution”. An exclusive focus upon enhancement with the exclusion of compliance seems unbalanced. Further consultation with the institutions on this issue would be desirable prior to finalization of the terms of reference. A focus upon an as yet undecided enhancement theme seems overly ambitious, given the timelines involved. Perhaps the pursuit and monitoring of an enhancement theme should be pursued outside the institutional review framework on this occasion.*

*P14 clarify “a statement about the relative emphasis to be given by the Review Team to compliance and enhancement in the review” - criteria for institutes choosing to emphasise compliance or enhancement; institute choice frustrates comparability.*

*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 they “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.*



## ORGANISATION OF REVIEWS (SCHEDULE; COSTS; PANELS)

*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, we wish to raise the issue of QQI's capacity to conduct the number of IRs 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.*

*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.*

*The content of the SAR, the size of the PRG and duration of the PRG visit are more a matter for the university following consultation with QQI than for QQI to decide unilaterally.*

*The publication of a self-evaluation report 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; 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.*

*It is recommended that the cost-effectiveness of the model be a key focus of the post-implementation review process;*

*P22 provide a comment in relation to the rationale for the institutions selected.*

*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*

*Agrees with panels including at least one international expert and staff and students from other HEI's - and providing training to all.*

*Size, scope and capacity to be taken into consideration by review teams and matched to review team expertise.*

*Like QQI to give consideration to the possibility of appointing specialists, or to limiting the evaluation role of certain panel members to their specific area of expertise.*

*“Review teams will include at least one member with international experience”. We would consider it appropriate that the review teams would contain more than a single international reviewer.*

*Review team composition: there should be an explicit statement of the requirement that a majority of Review Panel members would have relevant experience of institutional QA procedures / processes as they apply to Ireland.*

*Welcome 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.*

*P.11 Para 2 – duration of review visits may vary depending on the size of the institution – some minimum/ maximum time limits should be identified. P8. states that every review has the same purpose and that the same enhancement themes will be pursued – should the duration of a review visit not be determined on factors other than scale? (eg. innovative developments? aspects of institutional practice reflecting good practice/concern?)*

*Site-visit duration - Indicative minima & maxima should be stated; if ‘compliance’ is covered by the AIQR submissions (especially for the DABs), surely five-day Main Review site-visits will no longer be necessary?; will these be institution-specific or sector-specific (i.e. DABs vs. IoTs)?;*