



Review of Reviews

Terms of Reference

A Review of QQI Legacy Review Procedures

July 2013

1 Terms of Reference

The purpose of this document is to specify the Terms of Reference for a review, to be carried out by QQI, of the models used by the legacy agencies (IUQB, HETAC, NQAI) for reviewing the effectiveness of quality assurance procedures for higher education institutions and their impacts. These Terms of Reference were developed in consultation with higher education institutions and their representative organisations. This review will commence in August 2013. The scope of the review is determined by the legacy review models and the higher education institutions associated with these reviews.

Up to 2012, a number of external agencies operated their own independent systems for the review of the effectiveness of quality assurance procedures of higher education institutions (institutional review). These were:

- The HETAC Institutional Review Process for higher education and training providers
- The IUQB Institutional Review of Irish Universities (IRIU) process
- NQAI procedures for the review of DIT and the RCSI

The Qualifications and Quality Assurance (Education and Training) Act 2012 (the Act) provided for a new integrated agency, Quality and Qualifications Ireland Ireland (QQI), replacing IUQB, FETAC, HETAC and NQAI. When QQI was established on the 6 November 2012 FETAC, HETAC and NQAI were legally dissolved and Section 35 of the Universities Act (1997) was repealed. With the conclusion of IUQB, QQI assumed responsibility for the independent external quality assurance reviews of all higher education institutions associated with the legacy agencies including those of the universities; the function previously performed by the IUQB through its Institutional Review of Irish Universities (IRIU) process.

1.1 The Terms of Reference will be set by QQI following consultation with the higher education institutions and other stakeholders.

Higher education institutions are primarily responsible for their own quality assurance. They develop, implement, monitor and continuously improve their own systems for the quality assurance of provision. The review of the effectiveness of quality assurance procedures by external agencies aims to ensure that higher education institutional quality assurance systems are accountable to stakeholders, that these continue to be trustworthy at European and international levels and that there is independent external input to the review of these systems. The effectiveness of the review model established by the external agency can contribute significantly to the future enhancement of institutional and national systems of quality. This Review will also be mindful of the new Irish legislative context in which quality assurance and review systems will now operate.

2 Purpose of this Review

2.1 Evaluating the effectiveness of legacy review models

The key purpose of this review is to evaluate the effectiveness of the legacy quality and institutional review models that have transferred to QQI and to consider the findings resulting from the outcomes of those reviews. Building on the feedback that has already been provided by institutions and review teams during the review processes, this review will provide institutions that underwent review with a further opportunity, both individually and collectively, to provide feedback to QQI on the experience and the effectiveness of the processes. The outcomes of this review will support QQI in the development of a fit-for-purpose model of review for higher education institutions. The review will also provide institutions with an opportunity to contribute actively to the development of this future QQI review model.

2.2 Informing QQI policies

This review will inform QQI policy development on Review by gathering key recommendations and feedback in relation to options and approaches to review for higher education institutions. While this review is concerned with institutional review in the context of higher education, the QQI policy on review is broader in scope, not only in terms of the range of providers to be considered (higher, further and English language) but also in the potential range of review types (institutional, thematic, sectoral). Accordingly, while the findings of this review are important and will set out the experience of reviews in a higher education context, other factors will also inform the development of a QQI policy and a broader range of stakeholders will be consulted in policy development.

This review will also assist in informing the development of the Quality Assurance Guidelines in the changing and evolving context for higher education institutions (the 2012 Act, the emerging landscape for HE, the national strategy for HE, and the current economic environment). The outcomes of this review may also inform additional QQI policies, guidelines and engagements with higher education institutions required in the current transitional context.

2.3 Evaluating the practice of reviews

The review will provide QQI with an opportunity to examine the general practice of review models as tools of public policy in the context of: the efficient use of resources for state agencies; the relationship between QQI and other state agencies; the respective quality assurance responsibilities; consideration of the totality of demands placed on institutions by review versus the benefits of review.

2.4 Preparing for QQI review

Quality assurance agencies are required to conduct system-wide analyses from time to time that provide for the analysis of general findings of reviews that they have conducted (see Appendix 3 for Standards and Guidelines for Quality Assurance in the European Higher Education Area Part 2). This review will build on the system-wide analyses of legacy agencies, providing analysis that crosses all higher education institutions and providing important feedback for QQI to inform the preparation of its own review by the European Association for Quality Assurance in Higher Education (ENQA) in 2014, whilst also providing for more cross reaching system-wide analyses in the future.

2.5 Consulting with stakeholders

The review will be carried out in consultation with all higher education institutions that underwent review with any of the legacy institutional review models as set out above. (See Appendix 2 for a list of relevant Institutions). Other stakeholders such as students, employers and professional bodies will also be consulted. QQI will also consult with the Higher Education Authority in establishing and carrying out the review. For QQI, as a new agency, this consultation with stakeholders serves a purpose in its own right, as QQI seeks to be better acquainted with its key stakeholders.

The review will be carried out in the context of the legislative changes set out in the Act.

3 Background Considerations for this Review

Factors need to be considered in the context of performing this review are:

- The structured approach to consultation
- The legislative context and new requirements
- The public sector efficiency and effectiveness the reform agenda
- The provision of contemporary information

3.1 The Structured Approach towards Consultation

QQI is working towards the enhancement of effective and efficient consultation with all providers. Open and transparent consultation is an organisational imperative for QQI in addition to developing good relationships with individual providers and representative bodies. The Act also specifies that consultation must be a key feature of the development of key QQI policies and procedures and in doing so defines a number of specific categories of providers for direct consultation, such as relevant and linked providers.

3.2 The New Legislative Context

The Act sets out a range of functions for QQI with respect to, *inter alia*, the publication of quality assurance guidelines by QQI, the agreement of quality assurance arrangements with providers. Sections 34 and 35 of the 2012 Act are the key sections that define the regulatory position with respect to review of effectiveness of quality assurance procedures. In summary, these include:

- Consulting on the development of Quality Assurance Guidelines and Quality Assurance
 Effectiveness Review Procedures
- Publishing Quality Assurance Guidelines and Quality Assurance Effectiveness Review Procedures
- Reviewing the effectiveness of provider quality assurance procedures based on a 7-year cycle
- Publishing review reports
- Following-up on the outcomes of review

The Quality Assurance Guidelines to be published by QQI, following consultation, will determine to a great extent the nature and form of the QQI quality culture and the relationship between QQI and the different categories of higher education institutions. Some additional requirements are specified in the Act. For example, QQI guidelines and

consequent procedures established by designated awarding bodies (DAB) for review of the effectiveness of the quality assurance arrangements of linked providers will likely be informed by the quality assurance effectiveness review procedures established by QQI.

3.3 Public Sector Efficiency and Effectiveness – the reform agenda

A further consideration for the development of any QQI approach is the effective use of organisation resources to ensure that agency engagements are appropriate and constructive. The Irish Government has devised approaches to better regulation. Relevant guidance is also available from the Organisation for Economic Cooperation and Development (OECD). The main thrust of the guidance available is to deliver better quality services, reduce costs (of compliance, of regulatory bodies etc.), innovate, manage risk, better meet user needs and adapt to changing needs (with sunset clauses and measures to revoke regulation)¹. This includes a strong focus on delivering quality outcomes to the public through responsive regulation; smart regulation; shifting away from prescription by the regulator; and emphasising learning by the regulatory body. QQI will be cognisant of these dimensions when determining its approach to achieving quality outcomes through its regulatory work.

3.4 The provision of contemporary and reliable information

The final key consideration for the development of a QQI approach to this review is the provision of information by QQI to the public and to stakeholders that is founded on reliable and robust data, and presented in a timely and transparent fashion.

4 Objectives of the Review

The objectives of the review may be divided into two substantial categories:

- Category 1 focuses on the effectiveness of each institutional review model
- Category 2 is concerned with evaluating the impact of the institutional review models and higher education system findings from the review outcomes.

Category 1 An evaluation of the effectiveness of each legacy review model:

4.1 An evaluation of each review model

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¹ These include the OECD's Guiding Principles for Regulatory Quality and Performance (2006); OECD Ireland: towards an integrated public service (2008) and the set of reports by the National Economic and Social Research Council (NESC) on achieving quality in Ireland's human services (2011-2012).

To evaluate the effectiveness of each *review model* as a tool for providing *externality and accountability* for quality assurance in higher education institutions, in the context of the role and responsibilities of each legacy agency. This will include an evaluation of each stage of each model and all associated engagements and consideration of:

- the appropriateness of each model for all categories of higher education institutions;
- the scope of the reviews undertaken;
- the level of engagement of each review model with higher education institutions;
- perceptions of the demand placed on institutions by the totality of the review process versus the benefits of the outcomes of the review;
- the links between external review and the internal quality assurance systems of higher education institutions:
- the benefits of the review model in delivering quality outcomes and supporting quality improvement.

4.2 Objectives and criteria associated with review models

To consider the effectiveness of the application of the *objectives and criteria applied* to each review model. The criteria common to each review model are the Standards and Guidelines for Quality Assurance in the European Higher Education Area Part 1 (*ESG*). A core objective for each review model was to evaluate the effectiveness of institutional quality assurance policies, procedures and arrangements against the seven elements of the ESG Part 1.

This objective of the review will focus on the way in which institutions, expert panels and all other stakeholders applied and interpreted the objectives and criteria; the adequacy of the range and scope of the objectives and criteria for each review; and the extent to which additional and/or different criteria could be used in a future model.

4.3 Supporting policies, frameworks and documentation

This objective is designed to consider the value and use of documentation supporting the review process as considered by institutions undergoing review and the wider stakeholders involved in the review process. For example, policies, guidelines and wider support structures and engagements. This includes national guidelines, quality assurance frameworks, agency policies, procedures and guidelines provided to institutions to supplement the ESG and to support the implementation of the legacy review processes (a list of documentation/references is set out in Appendix 1 under each review model as appropriate).

4.4 Recommendations and feedback

This objective is designed to gather key recommendations and feedback arising for QQI in relation to options and approaches to review for consideration in the development of a QQI policy on the review of the effectiveness of quality assurance procedures in higher education institutions.

Category 2 The combined impact of legacy institutional review processes in the higher education sector:

4.5 Impact analysis

This objective is designed to establish an understanding of the medium to long-term impacts for the institution following completion of a review process. This will be based upon an analysis of institutional follow-up to reviews and an attempt to determine the tangible changes experienced/implemented by institutions following review. An important consideration will be an examination of the unit of engagement at institutional review level and the effects of this on internal (to the institution) models of quality assurance. Different units of engagement for internal quality assurance (programme; department) were prescribed for different higher education institutions by preceding legislation (Universities Act, 1997; Qualifications (Education and Training) Act, 1999). The roles and responsibilities of the legacy agencies were also different. This also needs to be considered in an evaluation of impacts.

4.6 System findings

To provide a higher education system-wide analysis of the outcomes and findings of the institutional/quality assurance reviews. This objective will focus on a system-wide analysis of the outcomes and actual findings of the reviews i.e. conditions, commendations, recommendations. This will include consideration of any trends and themes across higher education institutions, for example the effectiveness of the external examiner system. Key trends or themes arising may subsequently be used by QQI to inform engagement with the higher education sector on an enhancement agenda.

5 Criteria for the Review

To meet the review objectives, review models will be evaluated and assessed against criteria and procedures that are informed by the review objectives, the background considerations for the review and by the standards and guidelines for quality assurance

agreed by the Ministers of the Bologna signatory states. Specifically, the criteria and procedures are informed by the following constructs:

- 5.1 The key criteria against which the review models will be evaluated are set out in Part 2 of the Standards and Guidelines for Quality Assurance in the European Higher Education Area 3rd edition (2009) (see Appendix 3). Elements of Part 3 of the ESG are also appropriate as criteria for this review. These elements have been extracted and presented in Appendix 4.
- 5.2 The evaluation of the effectiveness of the review models will focus primarily on the elements of each model and the associated inputs and outputs for each model. Each objective is stated in a way that signals the criteria upon which the objective will be reviewed. In addition to the criteria in 5.1, consultation with institutions and other stakeholders together with the judgement of the review team will provide an essential basis for determining the overall effectiveness of these models.

6 Outcomes of the Review

The key outcome of the review will be the findings of the Review Team in relation to each objective set out in Section 4, which will be published in report format. The Review Team will determine whether the objectives will be addressed in a single report or two reports (one for each category of objectives). Following approval by the QQI Board, reports of the review will be published by QQI.

The Executive will prepare an Implementation Plan in response to the findings and the recommendations of the review which will also be published.

QQI will also publish a separate Report on the Consultation Process that is encompassed by the review. Information and feedback on QQI reviews accrued through the review will be published in this Report and be used by QQI to inform the QQI review policy development process.

7 Approach to the Review

7.1 The Review Team

The Executive will appoint a team of 2-3 external experts to carry out the review. The experts will be selected based on their ability to demonstrate current or recent senior level experience in most of the categories outlined below:

- engagement with good practice in quality assurance and/or enhancement at a senior level in a national and/or international setting
- extensive direct knowledge and experience of quality assurance processes in more than one country
- extensive experience of assimilating a large amount of disparate information as the basis for making judgments

7.2 Indicative Schedule

It is important for QQI that the outcomes of the review become available in a timely way to influence and shape policy development. Nonetheless, the quality of the outcomes cannot be compromised by haste. An indicative schedule for the review is outlined in the table below. It is important that the timelines remain indicative as the Review Team will require flexibility to determine their own schedule of meetings and interviews as well as an opportunity to adapt the timelines to emerging findings.

Table 1 Indicative Schedule for Review

Stage	Indicative dates
Draft Terms of Reference devised Consultation Plan devised	April 2013
Consultation on Terms of Reference with higher education institutions and other stakeholders	May/June 2013
Adoption of Terms of Reference by QQI Collation of existing reports and data by QQI Appointment of Review Team by QQI	July 2013
Review Team: Research (blended methodology) Consultation	August/November 2013
Report writing	November/December 2013
Report adopted by QQI Board Report published	January 2014

Appendices

Appendix 1	Summary Details of Legacy Review Processes
Appendix 2	List of Higher Education Institutions
Appendix 3	European Standards and Guidelines Part 2
Appendix 4	European Standards and Guidelines Part 3

Appendix 1 Summary Details of Legacy Review Processes

Table 2 Legacy Review Implementation

Review Model	Legislative Basis	Period	Number of Institutions Reviewed
IUQB	Universities Act, 1997	2009-2013	7
HETAC	Qualifications (Education and Training) Act, 1999	2009-2013	31
NQAI	Qualifications (Education and Training) Act, 1999; Ministerial request	2005-2010	2
Total			41

Table 3 Summary of Legacy Review Model Elements

Element	HETAC	IUQB (IRIU)	NQAI
Terms of Reference	✓		✓
(bespoke)			
Objectives	✓	✓	✓
Planning	✓	✓	✓
Expert panel	✓	✓	✓
Self-evaluation by	✓	✓	✓
institution			
Planning visit	✓	✓	✓
Site visit	✓	✓	✓
Summary report		✓	
Review Report	✓	✓	✓
Institutional Response	✓	✓	✓
Recommendations	✓	✓	✓
Commendations	✓	✓	✓
Conditions	✓	✓	
Follow-up procedures	✓	✓	✓

Table 4 Legacy Review Model Guidelines, Criteria and Supporting Documentation

Common	Standards and Guidelines for Quality Assurance in the European Higher
	Education Area, European Association for Quality Assurance in Higher
	Education, 2009, Helsinki, 3rd edition
	NQAI Policies, actions and procedures for access, transfer and progression for
	learners
	Irish Higher Education Quality Network:
	Common Principles for Follow-through on Quality Improvements identified
	through Quality Reviews
	Common Principles for Student Involvement in Quality Assurance/Quality
	Enhancement
	Principles of Good Practice in Quality Assurance/Quality Improvement for
	Higher Education and Training
	Provision of education to international students: code of practice
	The National Strategy For Higher Education In Ireland
Additional	Policy on Institutional Review of Providers of Higher Education and Training,
HETAC	2007
	Supplementary Guidelines for Institutional Review, July 2009
	Supplementary Guidelines for the Review of the Effectiveness of Quality
	Assurance Procedures, revised 2011
	HETAC's Guidelines and Criteria for Quality Assurance Procedures, 2011
	Effective Practice Guideline for External Examining, 2010
	Assessment and Standards, 2009
	Participating in an evaluation panel as an expert assessor: Guidelines, 2009
Additional IUQB	IUA/IUQB 'framework for Quality in Irish Universities' Institutional Review of Irish Universities Handbook, 2009
	Higher Education Authority/Irish University Association: Governance of Irish
	Universities- a Governance Code of Legislation, Principles, Best Practice and
	Guidelines
	A Framework for Quality in Irish Universities: concerted action for institutional
	improvement (IUQB and IUA, October 2007)
	National Guidelines of Good Practice for the Approval, Monitoring and Periodic
	Review of Programmes (IUQB, March 2012)
	Good Practice in the Organisation of PhD Programmes in Irish Higher Education
	(IUQB, June 2009)
	National Guidelines of Good Practice in Strategic Planning for Academic Units in
	Irish Universities (IUQB, June 2008)
	National Guidelines of Good Practice for Institutional Research in Irish Higher
	Education (IUQB, June 2008)
	National Guidelines of Good Practice in the Organisation of Student Support
	Services (IUQB, April 2006)

Appendix 2 List of Higher Education Institutions

Institutions reviewed by HETAC under the Institutional Review Process

Institute of Technology Sligo Letterkenny Institute of Technology Institute of Technology Tallaght Open Training College Hibernia College Dundalk Institute of Technology St Patrick's College, Thurles HSI Limerick Business School

Tipperary Institute

Griffith College Dublin

Institute of Technology Tralee

American College Dublin

Kimmage Development Studies Centre

National College of Ireland

Waterford Institute of Technology

Limerick Institute of Technology

Galway-Mayo Institute of Technology

Dublin Business School

Institute of Technology Carlow

Cork Institute of Technology

St Nicholas Montessori College

Dun Laoghaire Institute of Art, Design and Technology

Institute of Technology Blanchardstown

Athlone Institute of Technology

Institute of Physical Therapy and Applied Science (IPTAS)

The Irish College of Humanities and Applied Sciences (ICHAS)

Newpark Music Centre

Carlow College

IBAT College Dublin

SQT Training Ltd.

Setanta College

Clanwilliam Institute

Universities reviewed by IUQB under the IRIU process

Dublin City University NUI Galway NUI Maynooth Trinity College Dublin University College Cork University College Dublin University of Limerick

Quality Reviews of Institutions undertaken by NQAI

Dublin Institute of Technology Royal College of Surgeons in Ireland²

² Review by the Higher Education Authority and National Qualifications Authority of Ireland of the Royal College of Surgeons in Ireland in relation to the commencement of its degree-awarding powers

Appendix 3 Standards and Guidelines for Quality Assurance in the European Higher Education Area Part 2

2.1 Use of internal quality assurance procedures STANDARD:

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines

GUIDELINES:

The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met.

If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

2.2 Development of external quality assurance processes STANDARD:

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

GUIDELINES:

In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions.

2.3 Criteria for decisions

STANDARD:

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

GUIDELINES:

Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner.

Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

2.4 Processes fit for purpose STANDARD:

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

GUIDELINES:

Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes.

Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

Amongst these elements the following are particularly noteworthy:

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task;
- the exercise of care in the selection of experts;
- the provision of appropriate briefing or training for experts;
- the use of international experts;
- participation of students;
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached;
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review:
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality.

2.5 Reporting STANDARD:

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

GUIDELINES:

In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.

Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

2.6 Follow-up procedures STANDARD:

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

GUIDELINES:

Quality assurance is not principally about individual external scrutiny events: It should be about continuously trying to do a better job. External quality assurance does not end with the

publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

2.7 Periodic reviews

STANDARD:

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

GUIDELINES:

Quality assurance is not a static but a dynamic process. It should be continuous and not "once in a lifetime". It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event.

The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

2.8 System-wide analyses STANDARD:

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

GUIDELINES:

All external quality assurance agencies collect a wealth of information about individual programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work.

Appendix 4 Standards and Guidelines for Quality Assurance in the European Higher Education Area Part 3 (relevant extracts)

3.3 Activities STANDARD:

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

GUIDELINES:

These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

3.4 Resources

STANDARD:

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes and procedures.

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3.6 Independence

STANDARD:

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

GUIDELINES:

An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instruments of governance or legislative acts);
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence;
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

3.7 External quality assurance criteria and processes used by the agencies STANDARD:

The processes, criteria and procedures used by agencies should be pre-defined and publicly available. These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

GUIDELINES:

Agencies may develop and use other processes and procedures for particular purposes. Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their

conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

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