



QFI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Quality and Qualifications Ireland (QFI)

Self-Evaluation Report for the External
Review for Reconfirmation of Full
Membership of ENQA

March 2014

www.QFI.ie



QQI

Quality and Qualifications Ireland
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Contents

Page

Foreword.....	4
Executive Summary.....	5
Glossary of Terms.....	6
1. Introduction.....	7
2. Development of the Self-Evaluation Report.....	7
3. Higher Education in Ireland.....	8
4. About QQI.....	12
5. QQI: Relationships with Providers of Higher Education.....	20
6. QQI: Higher Education Quality Assurance Activities.....	22
7. QQI: Compliance Statements.....	30
8. QQI: Compliance with European Standards and Guidelines (Part 2).....	30
8.1 ESG Standard 2.1 Use of internal quality assurance procedures.....	30
8.2 ESG Standard 2.2 Development of external quality assurance processes.....	33
8.3 ESG Standard 2.3 Criteria for decisions.....	36
8.4 ESG Standard 2.4 Processes fit for purpose.....	38
8.5 ESG Standard 2.5 Reporting.....	40
8.6 ESG Standard 2.6 Follow-up procedures.....	42
8.7 ESG Standard 2.7 Periodic review.....	44
8.8 ESG Standard 2.8 System-wide analyses.....	46
9. QQI: Compliance with European Standards and Guidelines (Part 3).....	47
9.1 ESG Standard 3.1 Use of external quality assurance procedures for higher education (ENQA membership criterion 1).....	47
9.2 ESG Standard 3.2 Official status (ENQA membership criterion 2).....	48
9.3 ESG Standard 3.3 Activities (ENQA membership criterion 1).....	48
9.4 ESG Standard 3.4 Resources (ENQA membership criterion 3).....	49
9.5 ESG Standard 3.5 Mission statement (ENQA membership criterion 4).....	51
9.6 ESG Standard 3.6 Independence (ENQA membership criterion 5).....	53
9.7 ESG Standard 3.7 External quality assurance criteria and processes used by the agencies (ENQA membership criterion 6).....	54
9.8 ESG Standard 3.8 Accountability procedures (ENQA membership criterion 7).....	57
9.9 ENQA membership criteria (in addition to ESG).....	59
10. QQI: Current Challenges and Areas for Future Development.....	60

Foreword

Quality and Qualifications Ireland (QQI) was established in November 2012, with the commencement of the Qualifications and Quality Assurance (Education and Training) Act (2012) as the legal successor to the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the Irish Universities Quality Board (IUQB) and the National Qualifications Authority of Ireland (NQAI). QQI has responsibility for the external quality assurance of further and higher education and training and is also responsible for the National Framework of Qualifications (NFQ). QQI also validates programmes and makes awards within the NFQ for further and higher education and training providers without their own awarding powers.

In line with its remit in the higher education area, QQI has, since its establishment completed a number of external quality assurance activities begun by its predecessor agencies, including the completion of institutional reviews commenced by HETAC, IUQB and NQAI and a number of programme validations (accreditations) commenced by HETAC.

In May 2013, QQI unveiled its Comprehensive Policy Development Programme, designed to build on the policy legacy of its predecessors but updated and adapted to the new requirements of its establishment legislation. Under the policies created through this programme, it has been possible since October 2013 for providers of higher education to apply for initial validation of programmes leading to QQI awards. QQI published its first Strategic Statement 2014-16 in December 2013, outlining its mission, vision, values and goals.

Prior to the establishment of QQI, three of its predecessor bodies: HETAC, IUQB and NQAI had been full members of ENQA. All three agencies underwent successful external quality reviews for compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and against the ENQA membership criteria: HETAC and NQAI in 2007 and IUQB in 2009.

In 2010, ENQA adopted a policy that, following an amalgamation of member agencies where the newly established body is a legal successor to the legacy bodies, the new entity is required to undertake a review against the ENQA membership criteria within two years of establishment. This self-evaluation report has been prepared by QQI in that context.

QQI aims through this evaluation to demonstrate the agency's compliance with the ESG in order to obtain a renewal of its ENQA membership and may also use the ensuing report to apply for inclusion in the European Quality Assurance Register (EQAR).

QQI hopes that this self-evaluation report and associated appendices will assist the external panel appointed by ENQA to determine our compliance with the ESG. QQI would like to thank all the stakeholders who provided feedback on quality assurance services as part of the compilation of the report.

QQI also looks forward to the ENQA panel's advice and recommendations for its continued work to improve the quality assurance services that it provides to a range of Irish higher education providers.

Dr. Pdraig Walsh
Chief Executive, Quality and Qualifications Ireland (QQI)
Dublin, March 2014.

Executive Summary

The aim of this report is to demonstrate that Quality and Qualifications Ireland (QQI) complies with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, as published by the European Association for Quality Assurance in Higher Education (ENQA).

QQI was established in November 2012 as an amalgamated agency formed from four bodies with responsibility for qualifications and quality assurance of Irish higher and further education and training. The mission of QQI is to promote the enhancement of quality in Ireland's further and higher education and training system, and to support and promote a qualifications system that benefits learners and other stakeholders.

This self-evaluation report sets out the structure of the system of higher education in Ireland; describes the functions of QQI; sets out QQI's relationship with providers of Irish higher education; and outlines QQI's quality assurance activities at institutional and programme level. It also details the resources through which its services are delivered and the governance structures that seek to ensure that transparency, accountability and quality are at the heart of our business.

This report presents an analysis of QQI's compliance with Parts 2 and 3 of the ESG. In this regard, it provides an overview of both the policies and processes that have been inherited from the legacy agencies and those that have been developed *de novo* by QQI since its establishment.

The report concludes by setting out the challenges QQI faces and outlines areas identified for future development as it matures as an organisation.

Glossary of Terms

ACELS	Accreditation and Coordination of English Language Services
DA	Delegated Authority
DAB	Designated Awarding Body
DIT	Dublin Institute of Technology
EGFSN	Expert Group on Future Skills Needs
ELTO	English Language Teaching Organisation
FETAC	Further Education and Training Awards Council
HEA	Higher Education Authority
HECA	Higher Education Colleges Association
HETAC	Higher Education and Training Awards Council
IAG	Interim Advisory Group
IEM	International Education Mark
IHEQN	Irish Higher Education Quality Network
IOT	Institute of Technology
IOTI	Institutes of Technology Ireland
IUA	Irish Universities Association
IUQB	Irish Universities Quality Board
NFQ	National Framework of Qualifications
NQAI	National Qualifications Authority of Ireland
RCSI	Royal College of Surgeons in Ireland
USI	Union of Students in Ireland

1. Introduction

Quality and Qualifications Ireland (QQI) was established on 6 November 2012 under the Qualifications and Quality Assurance (Education and Training) Act 2012¹. QQI emerged from an amalgamation of four bodies that collectively had a range of awarding and quality assurance responsibilities: the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the National Qualifications Authority of Ireland (NQAI) and the Irish Universities Quality Board (IUQB). HETAC was re-confirmed in 2007 as an ENQA member agency following a review, NQAI was confirmed as an ENQA member agency in 2007 following a review and IUQB was confirmed as an ENQA member agency following a review in 2009. Details of the external panel reports and progress updates can be viewed in Appendix 1.

QQI has assumed all the functions of the four legacy bodies. These functions include the maintenance and development of the National Framework of Qualifications (NFQ), the validation and awarding of qualifications, and the monitoring and review of quality assurance of providers of education and training.

In addition, QQI has been assigned some new functions. It is responsible for the development and implementation of a register of programmes leading to awards in the NFQ. It will also establish a Code of Practice and International Education Mark for the provision of education to international learners.

In respect of its statutory functions for higher education, QQI is responsible for the review of the effectiveness of the quality assurance procedures of all public higher education institutions that have

awarding powers and also validates programmes of higher education for independent providers who choose QQI as their awarding body.

2. Development of the Self-Evaluation Report

In commencing this project, QQI formed a project team and steering committee charged with the development and production of the report. The team consisted of the following members:

Project Team

Dr Anna Murphy (Project Manager), Ms Laura Carrigan, Ms Kathy Lantry, Ms Orla Lynch and Ms Roisin Sweeney.

Steering Committee

Dr Anna Murphy, Dr Padraig Walsh, Ms Karena Maguire and Ms Laura Carrigan.

QQI recognises the importance of seeking the views of and feedback from staff, providers, Board Members and other system stakeholders in order to ensure the statements included in this report are a fair and accurate reflection of how QQI perceives itself and how it is perceived by all those parties that engage with QQI. By evaluating the feedback from stakeholders, QQI was able to consider its responses to the compliance statements in an informed capacity, combining internal and external perspectives on the processes employed.

A series of internal and external consultations and workshops² were held with stakeholders in order to gather feedback as part of the QQI preparation for the self-evaluation report.

Internally, QQI staff in the Quality Assurance Services section participated in a focussed workshop on the extent to which they consider the organisation is currently meeting the relevant ENQA criteria. The ENQA report and its progress was also

1 Qualifications and Quality Assurance (Education and Training) Act 2012:
<http://www.oireachtas.ie/documents/bills28/acts/2012/a2812.pdf>

2 See Appendix 2 for table of Consultations

a standing item in the senior management team meetings of QQI. The Board of QQI provided feedback through a workshop hosted on the 17th of December 2013 and considered a draft version of the self-evaluation report (SER) at a Board meeting on the 14th of February 2014.

External input included the involvement of a representative selection of staff from national higher education institutions in a system review of the institutional review models implemented to date in Ireland. This included Quality Assurance Officers, Presidents of higher education institutions and many other senior staff, and representative organisations that have had active roles in our quality assurance activities. We also conducted an online survey and invited providers to submit their feedback on the full range of QQI external QA services. Responses were subsequently published on the QQI website. Further feedback was provided through the QQI system review (Review of Reviews) which was commissioned with the aid of an independent review team to analyse the strengths, weaknesses, impacts and other features of the higher education institutional review processes used by the three legacy bodies with responsibility for quality assurance of higher education. The feedback from this review was collated and used to inform the relevant section of this report.

3. Higher Education in Ireland

The higher education system in Ireland comprises a number of sectors. Some of these providers have self-awarding powers, some have been delegated awarding powers by QQI, and others are independent providers who come to QQI seeking accreditation for their programmes. It is important to note that in Ireland, an awarding body is a national body that has the legal power to grant a qualification in recognition of learning attained. A visual

representation of the higher education system in Ireland is set out in Diagram 1 on page 9³.

Universities

There are eight universities recognised under the Universities Act, 1997 – University College Cork (UCC), University College Dublin (UCD), National University of Ireland Galway (NUIG), National University of Ireland Maynooth (NUIM), Trinity College Dublin (TCD), the University of Limerick (UL), Dublin City University (DCU) and the National University of Ireland (NUI). As a federal umbrella structure, the NUI is the formal awarding body for a number of recognised colleges⁴. In this context it has responsibilities for QA but is not in itself a provider. The universities validate and award their own qualifications, as well as those in linked providers⁵, recognised by them including, for example, the Colleges of Education. The awards of these colleges are recognised in the NFQ.

Dublin Institute of Technology

The Dublin Institute of Technology (DIT) awards its own qualifications under the Dublin Institute of Technology Act, 1992. The DIT is identified as a designated awarding body under the 2012 Act.

Royal College of Surgeons in Ireland (RCSI)

RCSI is a not-for profit, independent academic institution with charitable status. It is both an independent degree-awarding institution and a surgical Royal College. The RCSI is identified as a designated awarding body under the 2012 Act.

3 See Appendix 3 for the higher education award types available in Ireland

4 See Appendix 4 for a list of NUI constituent Universities and colleges

5 Qualifications Act 2012 (p11): "A linked provider is a provider that is not a designated awarding body but enters into an arrangement with a designated awarding body under which arrangement the provider provides a programme of education and training that satisfies all or part of the prerequisites for an award of the designated awarding body" <http://www.oireachtas.ie/documents/bills28/acts/2012/a2812.pdf>

Institutes of Technology

There are 14 public Institutes of Technology. The Dublin Institute of Technology awards its own qualifications as indicated above. The other 13 Institutes of Technology⁶ have delegated authority to make their own awards (initially from HETAC and now from QQI) up to various levels in the NFQ, including seven institutions making awards at Doctoral level.

Independent Private Providers

There are 41 independent private higher education and training providers that provide programmes that lead to awards that are recognised on the NFQ and are validated by QQI.

6 See Appendix 5 for list of 13 Institutes of Technology

Professional and UK awards

There are a number of other awarding bodies such as professional bodies and UK awarding bodies that have had their awards included in the Framework⁷. The UK bodies are regulated and quality assured by UK authorities.

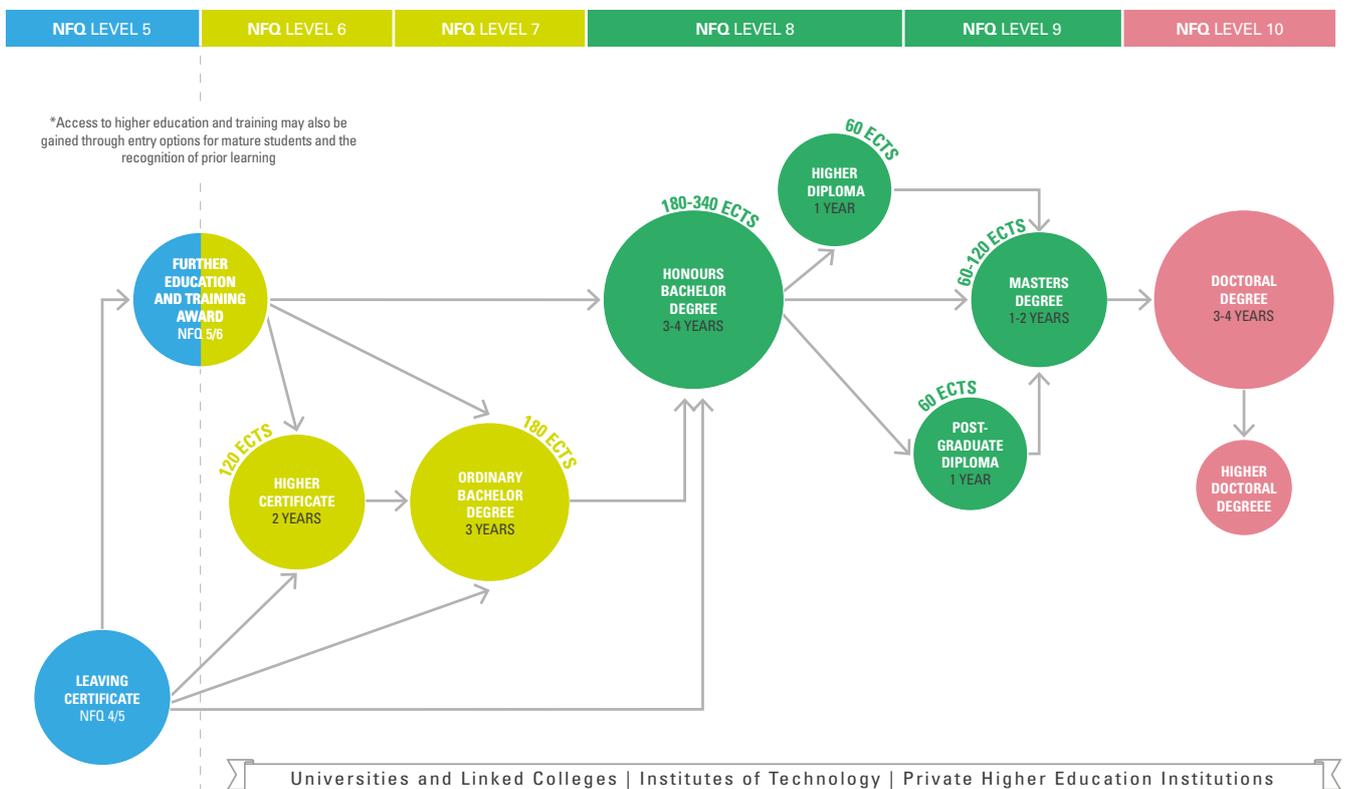
The National Framework of Qualifications

The Irish National Framework of Qualifications (NFQ)⁸ was introduced in 2003. It is a single reference point for the awards of all Irish national awarding bodies (i.e., of the designated awarding bodies, the Institutes of Technology and QQI) and recognises a number of professional and international awards. The Framework includes a number of higher education award-types.

7 Professional Alignment: <http://www.nqai.ie/AlignmentReports.html>

8 See Appendix 11

Diagram 1: Higher Education System in Ireland



Funding and Governance of Irish Higher Education Institutions

The Higher Education Authority (HEA) is the statutory planning and development body for higher education and research in Ireland. The HEA has wide advisory powers throughout the whole of the higher education sector. In addition, it is the funding authority for the universities, institutes of technology and other designated higher education institutions. Its funds can occasionally also be applied for by private independent providers under particular targeted funding streams.

National Legislation Pertaining to Higher Education

The Universities Act, 1997⁹ sets out the objects and functions of a university and the structure and role of governing authorities. The governing authorities are required to see that strategic development plans are in place. The HEA has an oversight role on such plans. The legislative framework preserves the

academic freedom of the universities and respects the diverse traditions and institutional autonomy of each university.

The Institutes of Technology Act, 2006¹⁰, creates a similar relationship between the institutes and the HEA as that between the HEA and the universities.

Students and Staffing Numbers in Higher Education

At present there are approximately 175,000 students in full-time and part-time higher education in Ireland (see Table 1 below). Staff numbers in public higher education institutions are noted in Table 2.

As private education institutions are largely not in receipt of public funding an accurate picture of learner and staff numbers is more difficult to attain. However the number of students in receipt of major awards made by HETAC in 2012 was 4,187.

Table 1: Male and Female student numbers in public higher education institutions¹¹

Institution type	Male	Female	Total
University	37,404	44,174	81,578
Colleges	3,058	6,796	9,854
Institutes of Technology	45,735	33,995	79,756
Total	86,197	84,965	171,188

Table 2: Staff numbers in public higher education institutions (2011)¹²

Institution type	Academic Staff	Non-academic Staff	Total
University (7)	7,168	6,532	13,700
Colleges of Education ¹² (5)	416	355	771
Institutes of Technology (14)	4,697	3,413	8,110
Total	12,281	10,300	22, 581

91011

12

9 The Universities Act (2012): <http://www.irishstatutebook.ie/1997/en/act/pub/0024/index.html>

10 The Institutes of Technology Act (2006): <http://www.irishstatutebook.ie/2006/en/act/pub/0025/index.html>

11 HEA; Staffing Trends Universities, HE Key fact and Figures 2011/2012 p.113 – figure for 2012/2013 not released at time of publishing

12 Colleges of Education: St Patricks College, Mater Dei, Mary Immaculate College, NCAD and St Angela's College

Changing Landscape of Irish Higher Education

The *National Strategy for Higher Education to 2030*¹³, (the ‘National Strategy’) which was launched in January 2011 aims to oversee the transformation of Ireland’s higher education sector over the next two decades. Endorsed by the newly-elected Government in March 2011 as the future blueprint for the sector, the Strategy sets out changes for the sector and is aimed at providing for:

- “A more flexible system, with a greater choice of provision and modes of learning for an increasingly diverse cohort of students;
- Improvements in the quality of the student experience, the quality of teaching and learning and the relevance of learning outcomes;
- Ensuring that higher education connects more effectively with wider social, economic and enterprise needs through its staff, the quality of its graduates, the relevance of its programmes, the quality of its research and its ability to translate that into high value jobs and real benefits for society.”

The implementation of the recommendations of the National Strategy is overseen by an Implementation Oversight Group¹⁴ of which the QQI CEO is a member.

Following subsequent recommendations made by the HEA, the Minister for Education and Skills announced a major re-organisation of the country’s higher education sector in May 2013. This related to system reconfiguration, inter-institutional collaboration (including mergers and the development of regional clusters) and system

governance in Irish higher education¹⁵. A new system performance framework has also been put in place by the HEA based on key system objectives and indicators noted by Government. The HEA is entering into a set of individual institutional performance compacts with higher education institutions which will reflect each institution’s contribution as part of a new higher education system designed to respond to the needs of Ireland’s economy and wider society in the coming years. A key element in the overall approach will be the implementation of performance funding in the sector¹⁶.

As a further step in implementing the National Strategy, in January 2014, the Minister for Education and Skills announced the publication of the Heads of a Bill¹⁷ which will allow for the future establishment of Technological Universities through the merger of some of the Institutes of Technology.

Based on the recommendations in the National Strategy and the HEA’s Landscape Report¹⁸ Technological Universities will be established as higher education institutions with a mission to provide high quality enterprise-focussed education and research. Three groups of Institutes of Technology have expressed interest in merging and applying to become a Technological University:

13 National Strategy for Higher Education also known as the Hunt Report (Report of the Strategy Group, 2011): <http://www.education.ie/en/Publications/Policy-Reports/National-Strategy-for-Higher-Education-2030.pdf>

14 National Strategy for Higher Education to 2030 Implementation Oversight Group <http://www.education.ie/en/The-Department/Bodies-and-Committees/National-Strategy-for-Higher-Education-to-2030-Implementation-Oversight-Group.html>

15 HEA (2013) Report to the Minister for Education and Skills on Irish Higher Education: <http://www.education.ie/en/Publications/Policy-Reports/HEA-Report-to-the-Minister-for-Education-and-Skills-on-Irish-higher-education.pdf>

16 HEA (2013): <http://www.education.ie/en/The-Education-System/Higher-Education/HEA-Higher-Education-System-performance-Framework-2014-2016.pdf>

17 General Scheme Technological Universities Bill (2014) <http://www.education.ie/en/The-Education-System/Legislation/General-Scheme-Technological-Universities-Bill-2014.pdf>

18 Completing the Landscape Process for Irish Higher Education (2013): http://www.heai.ie/sites/default/files/completing_the_landscape_process_finalx.pdf

- Dublin Institute of Technology, Institute of Technology Tallaght and Institute of Technology Blanchardstown
- Cork Institute of Technology and Institute of Technology Tralee
- Waterford Institute of Technology and Carlow Institute of Technology.

A fourth group, the Connacht-Ulster Alliance (Galway-Mayo Institute of Technology; Institute of Technology Sligo and Letterkenny Institute of Technology) have indicated that they are deepening their existing alliance with a view to merging and becoming a Technological University in the medium term. It is anticipated that the Technological Universities will be self-awarding bodies and that QQI will act as an external quality assurance body to these institutions.

4. About QQI

QQI's roles derive from the statutory functions set out in the Qualifications and Quality Assurance (Education and Training) Act 2012.

These roles are to:

- Quality assure providers of further and higher education and training and their research and related services
- Promote, develop and maintain the National Framework of Qualifications
- Validate programmes and make awards (for providers without their own awarding powers)
- Inform the public about the quality of education and training programmes and qualifications
- Advise the Minister for Education and Skills in relation to national policy on quality assurance and enhancement in education and training.

Our Mission, Vision and Goals

Mission: QQI's mission is to promote the enhancement of quality in Ireland's further and higher education and training and quality assure providers. QQI supports and promotes a qualifications system that benefits learners and other stakeholders.

Vision: QQI's vision is to seek extensive high-quality education and training opportunities with qualifications that are widely valued nationally and internationally.

QQI has developed six goals to assist the organisation in fulfilling its mission:

1. To establish a comprehensive, coherent set of QQI policies and procedures with the National Framework of Qualifications as a central organising feature
2. To prioritise learners in its policies and actions and in its relations with stakeholders
3. To quality assure providers and support the enhancement of the quality of education and training provision
4. To collaborate with stakeholders to create greater coherence within and between Ireland's education and training systems and with its qualifications system
5. To provide relevant, timely and comprehensive information to the public on the quality of education and training provision and qualifications
6. To build an organisational culture to enable QQI to perform successfully

Our areas of work

Higher and Further Education and Training

QQI is responsible for the external quality assurance of higher education and training and validates programmes and makes awards for certain providers in these sectors. As indicated above, higher education and training awards are made at Levels 6 - 10 on the NFQ. QQI is also responsible for the external quality assurance of further education and training (Including the teaching of English as a foreign language) and validates programmes and makes awards for certain providers in these sectors. Further education and training awards are made at Levels 1 - 6 on the NFQ.

Qualifications Recognition

QQI is the custodian of the NFQ. It also acts as an information centre, comparing international qualifications with Irish qualifications using the Irish NFQ as a reference point. QQI also acts as the Irish representative on the ENIC / NARIC network¹⁹.

International Education Mark

Under the 2012 Act, QQI is required to establish a code of practice for the provision of programmes of education and training to international learners, and to authorise the use of an International Education Mark (IEM), by a provider that complies with the Code. This is a new function under the 2012 Act. The objective of the IEM is that it will contribute, as part of a quality framework, to the promotion of Ireland as a destination for international students. Providers seeking authorisation to use the IEM will need to meet statutory quality assurance requirements and demonstrate compliance with the Code. The Code itself will set out a range of student supports and services intended to enhance the international student experience in Ireland, before,

19 <http://enic-naric.net/>

during and after their participation in a programme of education or training in the State. The Code of Practice and the International Education Mark will be developed in 2014.

English Language Training

The Accreditation and Coordination of English Language Services (ACELS) is a non-statutory function of QQI, inherited from NQAI and administered on behalf of the Department of Education and Skills (DES). The ACELS function includes the management of an inspection/ recognition scheme for English Language Teaching Organisations (ELTOs) nationally. In 2014, the ACELS function will be superseded by the International Education Mark (for English Language Training) described above.

International and National Activity

QQI is currently active on approximately 40 different networks, steering committees, groups and forums in a national and international context²⁰. Staff representation across these networks and agencies relates to further and higher education and training arenas. It is important for QQI to engage with and be represented on such qualifications and quality assurance platforms in order to share and explore critical areas of research and work in an international context.

The Organisation and How it is Structured

QQI employs approximately 78 whole time equivalent staff and its business is divided across seven sections; Quality Assurance Services, Qualifications Services, Provider Relations, Industry and External Partnerships, Corporate Affairs and Communications, Audit and Procurement and Strategic Analysis²¹. Each section is led by a senior manager who reports directly to the Chief

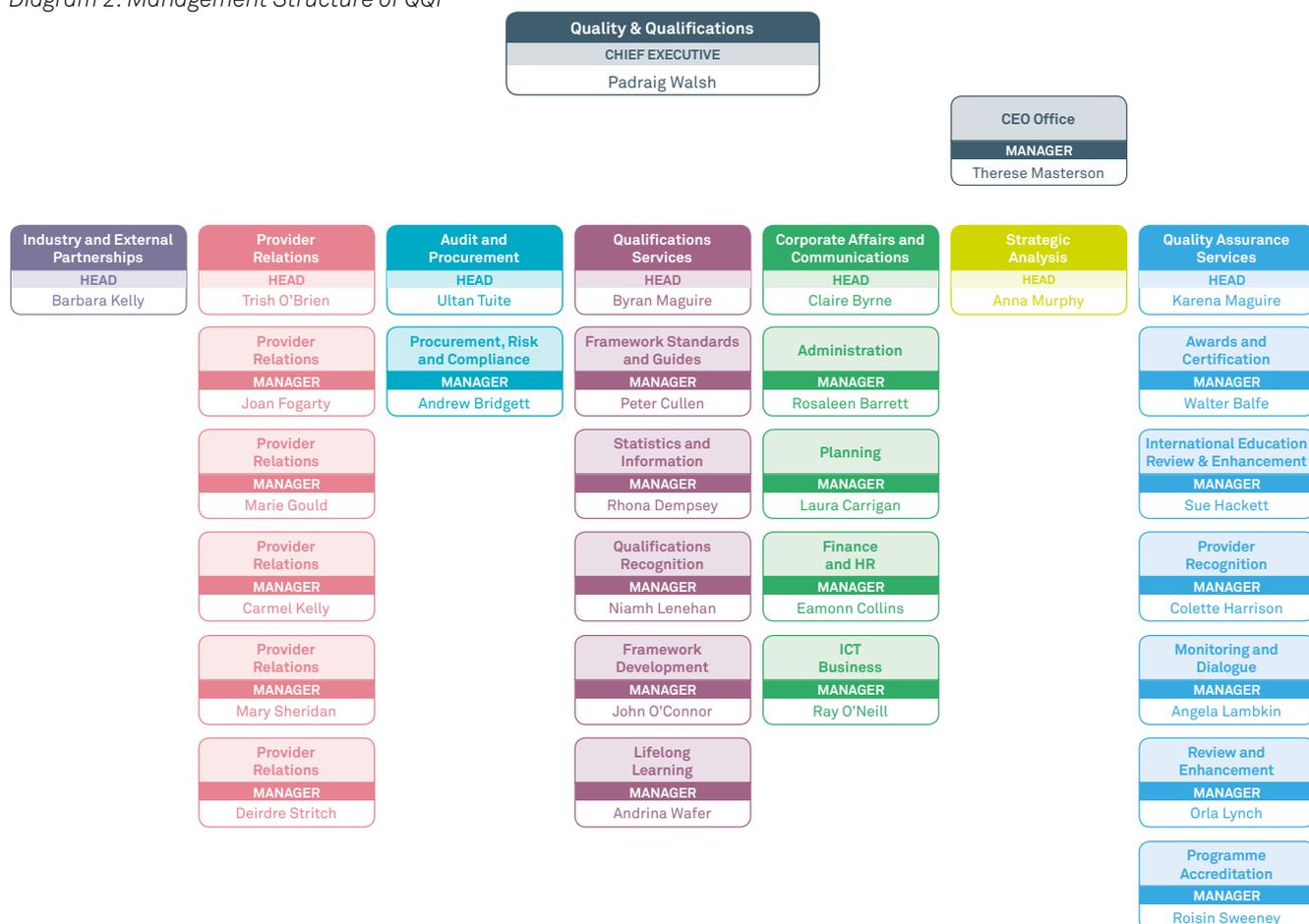
20 A list of these activities is presented in Appendix 7

21 See Appendix 8 for 'All staff' organogram

Executive Officer²² (The diagram below outlines the management structure in QQI).

22 QQI's Business Sections:
http://www.qqi.ie/About/Pages/Business_Sections.aspx

Diagram 2: Management Structure of QQI



QQI Funding

QQI receives state funding from the Department of Education and Skills in the form of grant-in-aid. QQI is also funded through a range of fees and charges for various activities including the validation and certification of awards and institutional review. QQI's income for 2013 was €11.7million, with €7.4m allocated from the state grant. The state grant for 2014 has been provisionally advised as €7.2m. In 2014, QQI will also receive €1.1 in relationships fees for services to the Institutes of Technology and the

designated awarding bodies (i.e. the universities, the DIT and the RCSI).

How QQI is governed

QQI Board

QQI is governed by a Board which consists of ten members including the Chief Executive. The members of the Board²³, other than the Chief Executive, are appointed by the Minister for Education and Skills. QQI's independence is set out in and guaranteed by its establishment legislation. The board is not designed to be representative, except for the inclusion of one representative nominated by the Union of Students in Ireland which represents higher education students.

The Code of Practice for the Governance of State Bodies²⁴ sets out a corporate governance best practice framework which the Irish government has put in place for State Bodies such as QQI. The QQI Board adopted the Code as part of its corporate governance system in March 2013. The governance of QQI operates under two strands; corporate governance and academic governance.

QQI Sub-Board Committee Structures

Upon the appointment of the QQI Board in December 2012, an Interim Advisory Group (IAG) was established to deal with matters requiring governance in the transitioning to QQI. For continuity, the IAG members were drawn from committees of the predecessor organisations to QQI, and made recommendations to the QQI Chief Executive or Board, as appropriate, on a number of areas including programme validation, institutional review, programmatic review and provider registration. The IAG was in place from December 2012 until June 2013. A sub-Board committee structure for QQI was developed by an internal Governance Working Group. The Board agreed the

sub-Board committee structures proposed and they are being implemented on a phased basis since October 2013. With the consent of the Minister for Education and Skills, the board has delegated some of its statutory decision making functions to the committees.

The following sub-board committee structures for academic governance have been agreed and are being introduced:

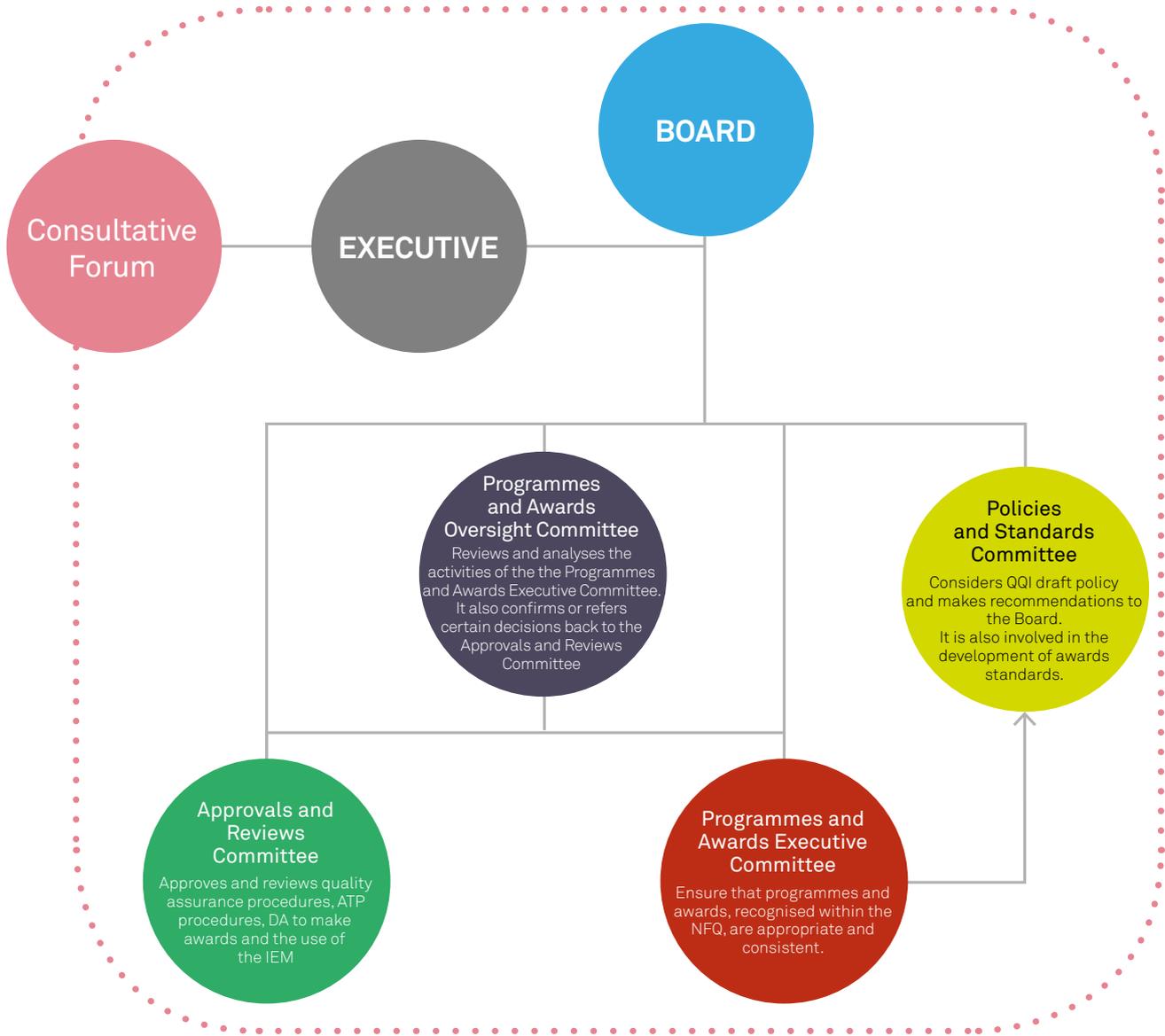
- Programmes and Awards Executive Committee PAEC (October 2013)
- Programmes and Awards Oversight Committee PAOC (introduced April 2014)
- Policies and Standards Committee (introduced March 2014)
- Approvals and Reviews Committee (planned end 2014)

A brief description of the role and functions of each Committee is set out on the following page. See also Diagram 3.

²³ See Appendix 9 for Board Members

²⁴ Department of Finance (2001): http://www.governance.ie/reference/code_of_practice_for_the_governance_of_state_bodies/

Diagram 3: QQI's Governance Structure



Programmes and Awards Executive Committee

The role of the Programmes and Awards Executive Committee (PAEC)²⁵ is to perform those functions of the Board that ensures the programmes and the awards which are recognised within the National Framework of Qualifications (NFQ) are appropriate and consistent.

The Programmes and Awards Oversight Committee

The role of the Programmes and Awards Oversight Committee (PAOC)²⁶ is to review and analyse the activities of the PAEC, and on that basis to provide advice and make recommendations to the PAEC on the fulfilment of its mission. It will also confirm or refer back decisions of the PAEC, as required.

²⁵ PAEC Terms of Reference: <http://www.qqi.ie/About/Pages/Authority.aspx>

²⁶ PAOC Terms of Reference: <http://www.qqi.ie/About/Pages/Authority.aspx>

Policies and Standards Committee

The role of the Policies and Standards Committee²⁷ is to apply its expertise to considering QQI draft policy and to make recommendations to the Board regarding the approval of these policies in line with the organisation's strategy. It will also consider and may act on recommendations from the QQI Executive to determine standards for education and training awards or to endorse subject guidelines concerning knowledge, skill and competence which are expected to be developed for further and higher education awards.

Approval and Reviews Committee

The role of the Approvals and Reviews Committee²⁸ is to perform such of the Board's functions as to ensure that providers, to which it grants access to external quality assurance services, the International Education Mark or delegated authority to make awards, have met and continue to meet, the associated criteria.

Consultative Forum

In addition to the Committees outlined above, QQI is in the process of establishing a Consultative Forum, which will comprise of representatives from the further and higher education and training qualifications system and from the wider community of QQI stakeholders²⁹. The Consultative Forum will provide a comprehensive consultation and dialogue environment between QQI and stakeholders and is advisory in nature. The forum will meet first in April 2014.

27 Policies and Standards Committee:
<http://www.qqi.ie/About/Pages/Authority.aspx>

28 Approval and Reviews Committee Terms of Reference:
<http://www.qqi.ie/About/Pages/Authority.aspx>

29 See Appendix 10 for a list of the types of bodies from whom nominations are being sought

How QQI is Developing its Quality Assurance and Qualifications Policies

Internal Quality Assurance

QQI is committed to delivering a quality service and this is evidenced by our approach to internal quality assurance (iQA) which focuses on continual improvement by reviewing our processes and services provision. QQI is building upon the internal QA procedures and quality cultures of its predecessor bodies. The development and establishment of performance standards and service delivery standards are expressed and reflected in the QQI Customer Charter³⁰. QQI is developing an internal Quality Assurance (iQA) manual which outlines the steps involved in documenting key processes. The Quality Assurance Services Section is implementing iQA across many of its key processes in respect of higher education activities. The implementation of iQA will ensure that monitoring, metrics analysis and improvement processes are carried out on a regular basis. It is a means of ensuring consistency in our approach, clear documentation of process, agreed targets and metrics as well as an agreed set of performance standards. The iQA system is evolving as QQI policy continues to develop.

QQI's Consultative Framework

Taking into account all of the functions that QQI has inherited from its predecessor bodies, QQI has embarked on an extensive consultation process with its providers and stakeholders in relation to all of its functions in the areas of quality assurance and qualifications.

The Qualifications and Quality Assurance (Education and Training) Act 2012 places a legislative responsibility on QQI to consult with stakeholders

30 QQI Customer Charter (2013):
<http://www.qqi.ie/Downloads/Customer%20Charter/Customer%20Charter%20QQI.pdf>

in the development of new policies and processes. In order to ensure that the organisation meets its organisational objectives in the most effective manner, QQI intends for much of its work to be developed and conducted through consultation with a wide range of stakeholders.

QQI has developed a framework³¹ for consultation that applies to initiatives on which formal input and feedback from stakeholders is sought. In the development of this framework, national and international practice and guidelines on establishing effective consultation have been evaluated. QQI has committed itself to public consultation on its policies; publishing the submissions of stakeholders; the timely analysis of submissions; and to the publication of the synthesis of such analysis.

Comprehensive Policy Development Programme

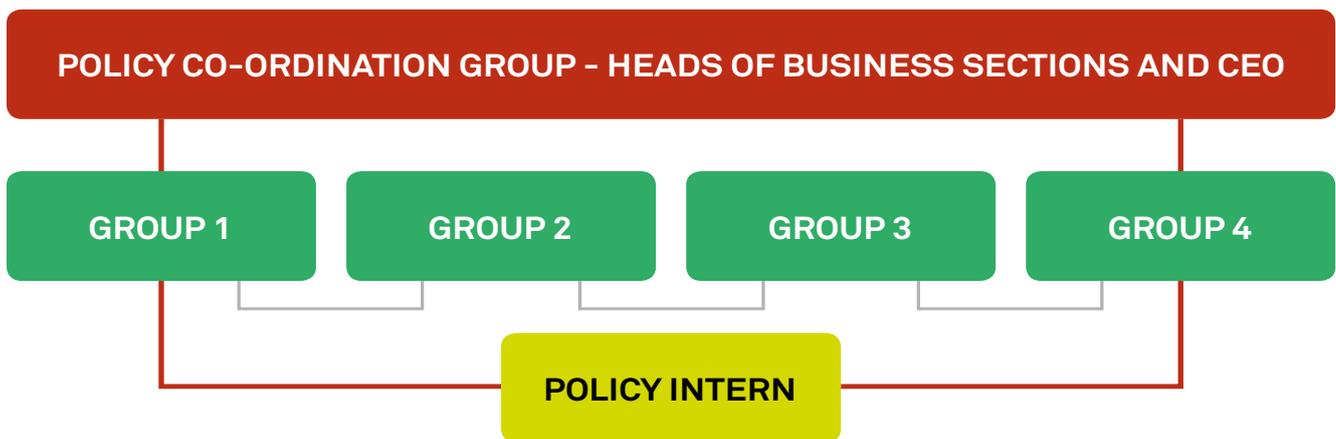
QQI has been operating a Comprehensive Policy Development Programme (CPDP) since March 2013. A snapshot of the state of development of the CPDP is available on the QQI website³². The policy development programme ensures cross-organisational coherence and common approaches

31 [QQI Consultation Framework \(2013\): http://www.qqi.ie/Downloads/Consultation/QQI_Consultation_Framework.pdf](http://www.qqi.ie/Downloads/Consultation/QQI_Consultation_Framework.pdf)
 32 [Snapshot of the QQI Comprehensive Policy Development Programme: http://www.qqi.ie/Downloads/Consultation/Snapshot%20of%20QQI%27s%20Comprehensive%20Policy%20Development%20Programme%202013-2014.pdf](http://www.qqi.ie/Downloads/Consultation/Snapshot%20of%20QQI%27s%20Comprehensive%20Policy%20Development%20Programme%202013-2014.pdf)

to addressing policy development issues. This is particularly important for QQI as a quality assurance agency and qualifications body (NFQ custodianship). A coordinated approach to policy development in the areas of quality assurance and qualifications highlights the overlap, complexity and impact that one policy area will have on another, together with the impact of policy on provider groups that have multiple engagements with QQI. The added complexity of inheriting existing legacy policy from the predecessor agencies was another benefit in a coordinated approach towards policy development. It addressed the need to provide the QQI Board with an understanding of the issues relating to policy development and implementation across a range of areas at the same time.

Diagram 4 sets out the structure and internal governance for policy development. Policy leaders are assigned reference groups which enable policy leaders to avail of experience and expertise from across the units and sections and to work towards common positions/understandings of policy direction through constructive debate which are coordinated by the dedicated policy development intern/facilitator. The Policy Coordination Group provides guidance and support for the policy leader and a perspective which stretches across the entire suite of policies; this ensures connectivity across and within policies.

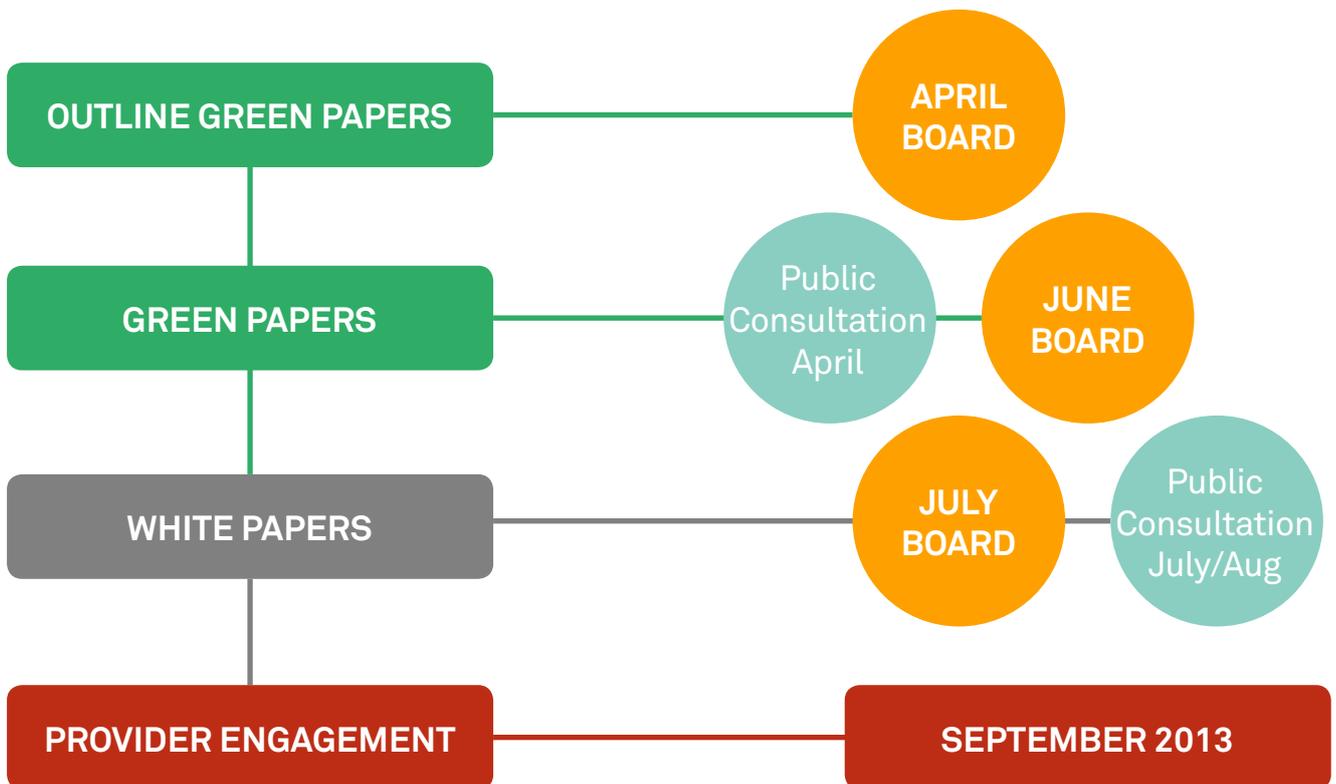
Diagram 4: The Policy Development Structure



The Diagram below sets out the stages of initial policy development together with the consultation process (with providers and other stakeholders) and final Board approval. This was the process implemented when QQI launched the first installment of its Comprehensive Policy Development Programme in May 2013, which consisted of 18 Green Papers; issues and options papers.

The consultation processes associated with the Comprehensive Policy Development Programme are undertaken in a manner that is set out in QQI's public Consultation Framework³³. Respondents to QQI's consultation processes are informed that QQI publishes all submissions received (unless the respondent indicates that they do not wish their submission to be published). QQI published a progress report³⁴ on the Comprehensive Policy Development Programme in November 2013.

Diagram 5: The Policy Development Process and Consultation Stages (Phase I: Green Papers, May 2013)



3334

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 33 Consultation Framework (QQI, 2013)
http://www.qqi.ie/Downloads/Consultation/QQI_Consultation_Framework.pdf
 34 Progress Report on Comprehensive Policy Development Programme (QQI, 2013)
http://www.qqi.ie/Downloads/Progress_Report-November_2013.pdf

5. QQI: Relationships with Providers of Higher Education

Table 3: QQI's relationships with providers

	Designated Awarding Bodies (Universities, DIT & RCSI; 9)	Institutes of Technology (IOTs; 13)	Independent Providers (Private & not for profit; 41)
Quality Assurance Guidelines	✓	✓	✓
Statutory Review	✓	✓	✓
Annual Dialogue Meetings	✓	To be established	
QQI Awards			✓

QQI currently has relationships with: ten Designated Awarding Bodies (DABs); DIT, the National University of Ireland, the RCSI and the seven Universities; thirteen Institutes of Technology with delegated authority to make awards and 41 non-statutory (independent) higher education and training (HET) providers. Under the 2012 Act, and in practice, there is not a homogenous quality assurance relationship between QQI and the HET providers it interacts with. The most fundamental distinction to be made is where QQI acts as an external quality assurance body only and when it is quality assuring providers that offer programmes leading to QQI awards. On a technical level, the 2012 Act includes sections that guarantee the continuity of the functions of the legacy bodies in the transition to establishing QQI; this means that learners can be assured of the continuing recognition of their qualifications and providers can continue to rely on the processes of external QA that had been in place. Section 27 (6) (a) of the 2012 Act enables and perhaps foresees different types of quality assurance relationship in facilitating QQI to vary quality assurance guidelines for different types of providers.

Providers with Awarding Powers

Between 2002 and 2012, the seven public universities were subject to external review by IUQB. They currently engage with QQI under the

Framework for Quality in Irish Universities (IUQB/ IUA, 2007). RCSI and DIT were subject to review by NQAI. Collectively, these institutions with the addition of the National University of Ireland are known as DABs under the 2012 Act. They are responsible for all their own awards, including those made for 'linked providers'; a term introduced under the 2012 Act to describe providers offering programmes that lead to the awards of DABs. All of the DABs have been subject to institutional review.

Following its establishment under the 1999 Act, HETAC was responsible for making the awards in the Institute of Technology sector. Over time, the Institutes of Technology were all granted delegated authority for the vast majority of their higher education and training awards so that prior to the establishment of QQI in 2012, most of the interaction with the Institutes of Technology had moved decisively from programme to institutional level. DA was saved under the 2012 Act. Moreover all the IOTs have been subject to a statutory review within the last four years both for the performance of their functions under DA and the effectiveness of their QA procedures.

The common connecting points between QQI, the DABs and the Institutes of Technology will be around the policy areas of quality assurance guidelines, review, the International Education Mark, and

quality enhancement. In addition, as DA policy evolves and extends, this will impact upon the Institutes of Technology.

QQI's relationship with the DABs and the Institutes of Technology will increasingly focus on quality improvement activities that can benefit the sector as a whole. In this regard, we will be seeking to ensure that the quality assurance guidelines on which the institutions will base their QA policies and procedures and the review policy which will determine the effectiveness of these procedures will maximise the opportunity to advance quality within individual institutions and in the sector as a whole. This approach also acknowledges evolving public policy where these institutions are being asked increasingly to collaborate and where the opportunity has been created for Institutes of Technology to become self-awarding Technological Universities.

Other Higher Education and Training Providers

A number of additional providers (41) have transferred to QQI from its predecessor body, HETAC. These providers offer programmes leading to QQI awards. QQI is also responsible for the quality assurance of these providers, the majority of which have been subject to institutional review by HETAC. While the external quality assurance function of QQI with these providers fundamentally has the same objectives as when this function is exercised in providers with awarding powers, the fact that QQI is the awarding body leads it to having a much closer interaction with programme level design and with the quality assurance of the associated teaching, learning and assessment. This is set out in a series of related QQI policies and procedures which these providers are required to follow.

Unifying Themes – that link all provider groups

The following themes are relevant to all providers as a backdrop to external quality assurance engagements:

- The National Framework of Qualifications
- The Lifecycle of Engagements
- Quality Enhancement

The National Framework of Qualifications

While our relationship with higher education and training providers differs, the NFQ provides a unifying construct.

QQI has taken over custodianship of the NFQ which was launched in 2003. Since the NFQ was introduced all of the qualifications made by the national awarding bodies in Ireland have been recognised within it. The NFQ is playing an increasingly important role in various aspects of quality assurance. These include helping to link the provision of education and training and the learning outcomes achieved with the purposes for which qualifications are used, notably in relation to employment. The link between framework qualifications and the quality assurance behind these qualifications is paramount and requires QQI to deliver a coherent and holistic approach to qualifications and quality assurance as it develops its suite of policies and associated procedures for all of its provider relationships. The Irish NFQ was self-certified as compatible with the QF EHEA in 2006 and referenced to the EQF.LLL³⁵ in 2009. In both case it was the first national framework to complete the process. In 2009 the NFQ was the subject of an independent implementation and impact report³⁶. The national statutory position of the NFQ was reinforced in the 2012 Act.

35 European Qualifications Framework, Lifelong Learning: http://www.eqf-lll.eu/en/eqf_en

36 Framework Implementation and Impact Study (NQAI, 2009): http://www.nqai.ie/framework_study.html

The Lifecycle of Engagements

The concept of a Provider Lifecycle of Engagements model has been developed by QQI and is equally applicable to all providers. It identifies, organises and communicates the range of engagements between QQI and a given provider and by extension to provider types. As described above there is a diverse range of providers that have relationships with QQI. There are also many kinds of interactions between QQI and providers based on the functions set out in the 2012 Act. Each type of provider will have a particular set of obligations and entitlements based on their particular status and services sought from QQI. Despite these differences, the Provider Lifecycle of Engagements model is intended to highlight providers' wider responsibilities in the national education and training community – the common thread that binds all of them together.

Quality Enhancement

As QQI matures as an organisation, and as the QA systems and procedures of providers mature, QQI intends placing a significant emphasis on quality enhancement activities. In this regard it will be collaborating with providers to agree quality enhancement themes to pursue over a given period. While QQI can direct certain quality enhancement activities, its objective is primarily to facilitate and support peers within higher education and training to share expertise and practices. QQI continues its membership of the Irish Higher Education Quality Network (IHEQN), a network with which the predecessor bodies to QQI were all involved and which seeks to identify and advance areas of common interest across public and private higher education and training.

QQI will be collaboratively developing a strategy for quality enhancement in 2014.

6. QQI: Higher Education Quality Assurance Activities

This section describes QQI's range of quality assurance activities with its providers and how they have been mapped from the processes of its predecessor bodies. The activities are described for quality assurance at the institutional level (to which all of QQI's providers, public and private, are subject) and at the programme level where QQI makes the award.

This section also describes how the relationship with providers such as the Institutes of Technology has developed over time from a position where HETAC made all their awards in 1999 to the current point where the IOTs make the majority of their own awards. The quality assurance processes that were developed for this maturing process are described in the following pages. These have transitioned to QQI.

The institutional and programme processes that QQI operates are described below. In the case of each process, we report on the feedback that was obtained from higher education providers as part of this self-evaluation exercise in terms of areas of strength and areas of weakness.

QQI has adopted policies, criteria and guidelines established by its predecessor bodies and saved under section 84 of the 2012 Act. These are adopted and adapted as necessary, to support new policies issued by QQI and the establishment of QQI services in accordance with the 2012 Act. Over time these policies will be replaced with new QQI policies under the QQI Comprehensive Policy Development Programme.

Table 4: Core functions of legacy bodies and QQI in relation to QA activities*

Function	IUQB	NQAI	HETAC	QQI
Maintain NFQ		✓		✓
Institutional Review	✓ (6)	✓(2)	✓ (37)	✓ (11)
Programme Validation			✓ (307)	✓ (29)
Re-Validation (Programmatic reviews)			✓ (135)	✓ (21)
Research Accreditation			✓ (12)	✓ (5)
Provider Access to Programme Validation i.e. Initial Validation			✓ (23)	✓ (2 legacy completed)

*The numbers in brackets refer to the frequency of activity in total for the predecessor agencies prior to amalgamation. The figures for QQI refer to 2012-14

Institutional Reviews

In line with the principles of the European Standards and Guidelines for Quality Assurance, providers of higher education in Ireland have primary responsibility for quality assurance. This responsibility is set out in law and widely understood by all stakeholders. Institutional review is the primary method of engagement between QQI and its providers. All public self-awarding providers and all providers offering QQI awards are subject to institutional review. As an external quality assurance mechanism it has dominated the external quality assurance landscape for higher education institutions in recent years.

In order to minimise the burden on institutions, these reviews incorporated prescribed statutory review functions such as a review of the effectiveness of agreed quality assurance procedures and a review of delegation of authority to make awards (as prescribed in the Qualifications Acts (1999 & 2012)). They also confirm the extent that the institution has implemented the NFQ and procedures for access, transfer and progression; and provide recommendations for the enhancement of the education and training provided by the institution; to contribute to coherent strategic planning and governance in the institution. The

institutional review enhances public confidence in the quality of education and training provided by the institution and the standards of the awards made. Reviews are usually organised on a 5-6 year cycle.

Review of Reviews

In 2013, QQI commissioned an independent review team to analyse the strengths, weaknesses, impacts and other features of the higher education institutional review processes used by the three higher education legacy agencies i.e. IUQB, HETAC and NQAI. The team was also asked for its views on possible future approaches to institutional review. The Report arising from the Review of Reviews will be published in April 2014.

The general view among the various stakeholders was that the legacy agencies had performed a very valuable role in emphasising the importance of external and internal quality assurance in Irish higher education. Nevertheless, they also pointed out the need for improvement and that QQI could benefit from learning from the achievements and shortcomings of those experiences. A major question underlining many of the concerns expressed in the consultation process referred to the need to place more emphasis on the effectiveness of the quality assurance processes

and structures in place, rather than simply asserting their existence. Furthermore, the definition of the model for the forthcoming reviews should balance carefully the amount of effort required from QQI and from the HEIs and the benefits for both parties.

Feedback from Stakeholders

The feedback set out below under each activity is collated from stakeholders and providers involved in the QA processes externally facilitated by all legacy agencies. Some feedback on external legacy QA processes may be overtaken by recent events in QQI policy development activities.

Institutional Review: Analysis of Feedback from Stakeholders

Identified strengths

The general opinion that the review team consistently heard from the various stakeholders it met or who submitted written responses was that, irrespective of the body undertaking them, the reviews were challenging but rewarding. This was a learning experience, helping many institutions to develop a much greater knowledge of themselves through the gathering and analysis of significant and integrated amounts of data. It was also a good opportunity for institutions to reflect on themselves, notably during the preparatory and self-evaluation stages of the reviews, which were universally regarded as very valuable. In addition, it offered an important occasion for the institution to come together and reflect not only on quality issues, but also about important strategic and mission-related concerns. Other important aspects mentioned in the consultation process referred to the quality and usefulness of the

feedback and recommendations provided. The terms of reference and the associated documentation were in general regarded as adequate and useful in assisting and framing the reviews.

Identified weaknesses

Among the more negative aspects of the past reviews often mentioned was the problem of ‘review fatigue’ due to the fact that some institutions, particularly in the HETAC sector, had undergone multiple review processes within a short timespan. This created some doubts about the actual value added by each review, especially when the number of reviews started to accumulate. Some of the criticisms referred also to procedural aspects of the reviews. It was suggested that on occasion they had a tendency to adopt a predictable and formulaic approach, with too much emphasis on compliance and conformity and only a limited contribution to the enhancement of the institutions. Some questioned the effectiveness of the reviews in being an instrument of change that could help institutions to improve their quality practices. Stakeholders suggested that there was an emphasis on quality assurance processes rather than an assessment of their effectiveness in contributing to learning and institutional development.

Delegation of Authority

Delegation of Authority (DA) to make awards was one of the policies saved under section 84 of the 2012 Act and adopted by QQI³⁷. Under the 2012 Act, QQI continues to operate the system of

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37 Delegated authority for all taught programmes (up to Masters Degree level 9) and many have received delegated authority for research programmes including Doctoral degrees at level 10 on the NFQ.

delegated authority³⁸ to make awards to recognised institutions originally under the Qualifications (Education and Training) Act, 1999³⁹. DA refers to the delegation of authority to providers to develop and validate their own programmes and to make awards relating to those programmes. Under the 1999 Act delegated authority was granted to all Institutes of Technology (IoTs) by HETAC. This arrangement dominated the HETAC relationship with IOTs. Recent activity on delegation of authority carried out by QQI relates to applications for an extension or renewal of delegated authority for research provision and the renewal of a small number of joint awards (previously established by HETAC) and supported by quality assurance procedures on collaborative transnational and joint awards.

The 2012 Act confirms that institutions with delegated authority are awarding bodies in their own right. It provides for joint awarding by bodies to which QQI has delegated authority (under the Act of 2012) to make awards (Institutes of Technology are the current group). It also enables other non-public institutions to seek delegated authority to make awards. QQI has commenced the development of a policy which will extend the existing policy on delegation of authority to Institutes of Technology to allow them to make joint awards without prior approval from QQI. This policy amendment will also facilitate complete delegated authority for all Level 9 Master degree programmes by research.

Delegated Authority:

Analysis of Feedback from Stakeholders

Identified strengths

The majority of those consulted with considered the process for DA to be fair, rigorous and supportive of organisational development.

It was considered useful in facilitating institutions to undertake a self-critical review.

Identified weaknesses

From the feedback, QQI is aware that there are some concerns with uniformity of monitoring for DA. QQI intends to address this by taking a new sectoral approach towards delegation of authority with additional emphasis on annual dialogue with the institutions and mutual exchange of information. Other recommendations have been superseded by new policy development in the area of delegated authority as indicated above.

Provider Registration and Initial Validation

The first policy suite launched by QQI was the Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards⁴⁰. This sets out policy and criteria for providers that wish to seek QQI programme validation for the first time. It only applies to providers who do not currently have any programmes validated by QQI. Under the 2012 Act, independent higher education providers who wish to access QQI awards for the first time must undergo a single procedure, with two stages, to ensure a programme is recognised by QQI and leads to an award of QQI. This also involves approval of quality assurance capacity and procedures and validation of its first programme.

This new QQI policy has superseded the legacy Provider Registration Policy established by HETAC. Under the 1999 Act, an independent

38 **Criteria and Procedures for Delegation of Authority (HETAC 2004):**
<http://www.hetac.ie/docs/DA%20Criteria%20and%20Procedures%202004.pdf> accessed 20/1/2014

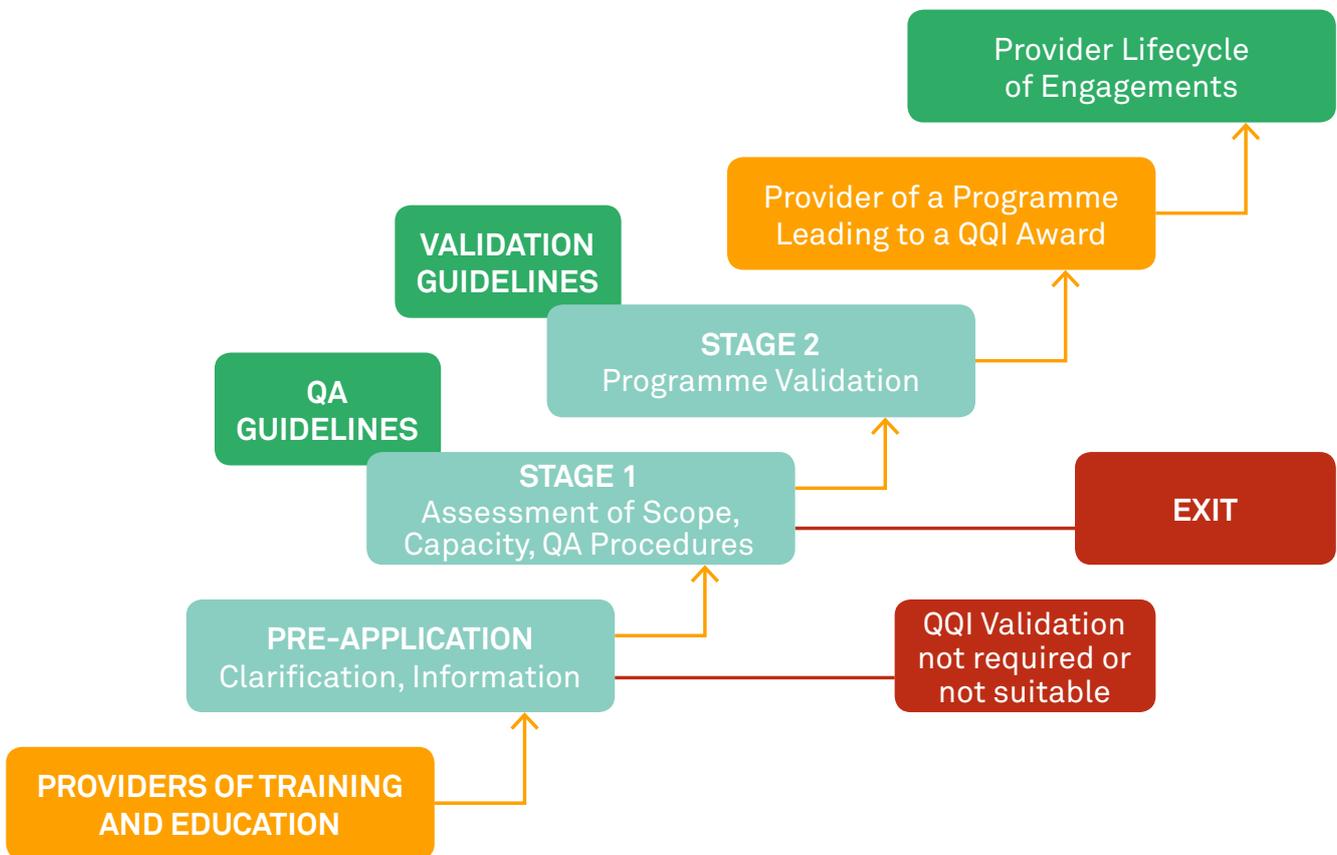
39 **Qualifications and Training Act, 1999:**
[http://www.hetac.ie/docs/Qualifications%20\(Education%20and%20Training\)%20Act.%201999.pdf](http://www.hetac.ie/docs/Qualifications%20(Education%20and%20Training)%20Act.%201999.pdf)

40 **Policy and Criteria for Provider Access to Initial Validation (QQI, 2013):**
http://www.qqi.ie/Downloads/White%20paper%20policies/QQI_initial_validation_%207_10_13.pdf

higher education provider who wished to access HETAC awards for the first time underwent a two-stage process: (i) agreement of quality assurance procedures and (ii) validation of its first programme. Once a provider passed these two steps, they were deemed to be a HETAC ‘registered provider’. The term QQI ‘registered provider’ is not used by QQI as the recognition is bestowed on the programme not

the provider. The QQI Initial Validation process has been operational since October 2013. QQI has also completed evaluation of a small number of new providers under the legacy process inherited upon establishment of the organisation. The diagram below sets out the operational process for the new QQI policy on initial access to programme validation leading to QQI awards.

Diagram 6: Process for Access to Initial Validation



Provider Registration:
Analysis of Feedback from Stakeholders

Identified strengths

Those who took part in the process felt this process was demanding, however the rigour and thoroughness of the processes are key strengths. It was considered that they were fair and thorough as there were clear standards to be met. In respect of the panel members, overall it was considered that there was a satisfactory balance

of members in terms of backgrounds. It was noted that there was very good support from the agency and a user-friendly approach with providers which facilitated the development of a positive working relationship without compromising the robust nature of the process.

Identified weaknesses

Concern was expressed in relation to the use of technical language in policy documents and guidelines. Overly technical language is

unnecessary and the use of plain language would be more beneficial to providers. There was a perception among providers of being left alone to do their own learning. There was also concern that given the expanded brief for QQI and the significant numbers and diversity of providers that there may be difficulty for QQI in ensuring that policy standards are met. While the processes were demanding, one area that perhaps could be considered is that of greater support for the provider's registration process. Processes for validation and time delays around getting a date for panels has improved but is still problematic.

Programme Validation

Validation⁴¹ is the quality assurance process by which an awarding body satisfies itself that a learner may attain knowledge, skill or competence for the purpose of an award made by the awarding body. It corresponds to the process of external programme accreditation used in some other European countries. Validation is a core function of quality assurance mandated by the Qualifications and Quality Assurance (Education and Training) Act 2012. Validation is granted for a specified period not exceeding five years. QQI is responsible for validating the programmes of higher education institutions that do not have their own awarding powers. Designated Awarding Bodies (DABs) and Institutes of Technology (IOTs) have awarding powers and carry out programme validation as a function of their own internal quality assurance. Universities also carry out programme validation for their linked providers, including the teacher education colleges, where they also make awards. Awarding bodies are responsible for monitoring the quality of programmes which they validate. QQI's programme validation remit can extend to other national jurisdictions through

41 Core Validation Policy and Criteria (HETAC, 2010): http://www.hetac.ie/docs/E.1.8_1.1Core%20Validation%20Policy%20and%20Criteria%202010.pdf

international validations by Irish providers providing programmes (that lead to QQI awards) abroad. The policy on Collaborative Transnational and Joint awards⁴² relies on the UNESCO/OECD TNE guidelines⁴³ and IHEQN Guidelines for the Approval, Monitoring and Review of Collaborative and Transnational Provision⁴⁴ where QQI validates programmes overseas.

The validation process used by QQI and other awarding bodies is consistent with the generic quality assurance model promoted by the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the Irish Higher Education Quality Network's (IHEQN) 'Principles of Good Practice in Quality Assurance/ Quality Improvement for Higher Education and Training'. The processes of external quality assurance agencies will normally be expected to include; Self-assessment: External assessment by a group of experts; a site visit; Report publication and Follow-up procedures.

QQI will be developing a new policy on Programme Validation in late 2014. The Green paper on Validation was published as part of the comprehensive policy development programme in May 2013.

42 Collaborative, Transnational and Joint Awards (HETAC, 2008): <http://www.hetac.ie/docs/Policy%20for%20collaborative%20programmes,%20transnational%20programmes%20and%20joint%20awards.pdf>

43 UNESCO TNE Guidelines: <http://www.oecd.org/edu/skills-beyond-school/unescooecdguidelinesonqualityprovisionincross-borderhighereducation.htm>

44 Guidelines for the Approval, Monitoring and Review of Collaborative and Transnational Provision (IHEQN, 2013): http://www.iheqn.ie/fileupload/File/IHEQN_Guidelines_Collaborative_Provision_FINAL_21May13_55218605.pdf

Programme Validation: Analysis of Feedback from Stakeholders in relation to HETAC processes

Identified strengths

It was noted that support documentation for this process was very clear and accessible and the process itself was considered fair with a tendency to have the same panel members. It was noted that a professional and firm structure is in place. The process is demanding and thorough, moving education providers towards a real adoption of a learning outcomes approach. It was felt by some of the respondents to be a worthwhile process bringing external expertise to add value to programme thinking. Some considered that engagement with other colleagues from different institutions was, for the most part, a positive one. It was also noted that robust QA applies and that panel members were suitably selected for their qualifications and experience.

Identified weaknesses

Some of those consulted felt that having a designated person who could liaise with the college in relation to programme validation would allow the provider greater insight into the requirements. For the provider, it might also be a valuable tool in the process as requirements would be more likely to be met in the first instance. It was noted in the feedback that there is difficulty in sourcing appropriately qualified individuals and some argued that it is difficult to avoid direct competitors. It was felt there is at times a lack of expertise by many panel members on assessment and standards. It was noted that timing, particularly in relation to panel visits, was problematic. Those who engaged in the consultation from a panel member's perspective noted that there were some issues with panel composition and some concern in relation to consistency with some panels perceived as being more in-depth in reviewing than others.

Devolved Responsibility

Devolved Responsibility⁴⁵ (DR) is a mechanism established by HETAC (and continued by QQI) to facilitate mature providers in taking on responsibility for additional parts of the programme or research validation process that the agency would normally carry out. This policy approach was encouraged by the earlier external review of HETAC in 2007. Under the DR process QQI may devolve specific responsibilities to a public or independent private provider to manage sub-processes of the validation process (under Section 5 of its HET Core Validation Policy and Criteria (revised 2013⁴⁶). The provider agrees to undertake those responsibilities in accordance with a Memorandum of Agreement. DR agreement is currently applicable to two independent private providers for taught programmes at Levels 6-9 on the NFQ in specific fields of learning as agreed with QQI. Four Institutes of Technology have carried out research validation (accreditation and/or approval) under devolved responsibility. While the sub-process is managed by the provider, QQI is responsible for the overall process and the final validation/accreditation decision. This facility can be extended in future to other providers. The following exclusions apply to devolved responsibility: Transnational programmes; Programmes leading to joint awards; and new discipline areas for taught programme validation.

45 Devolution of Responsibility for Validation Sub-Processes (HETAC, 2011): http://www.hetac.ie/docs/E.3.5-1.1_Devolution_of_Responsibility_for_Validation_Sub-processes_2011.pdf

46 Core Validation Policy Revised (QQI, 2013): http://www.qqi.ie/Downloads/initial%20Validation/HET_Core_Validation_Policy_and_Criteria_Revised%202013.pdf

Devolved Responsibility: Feedback from Stakeholders

Identified strengths

From the feedback received many felt this process provided a positive experience to the provider and the end results enables more control over sub processes. This in turn means that providers have more control over the timings of panels and nominations to panels which was considered to be an advantageous aspect to the process.

Identified weaknesses

For many providers the process appeared to result in more work and cost for the college with little by way of benefit. The issue of panel members and fees was raised and it was pointed out that it was difficult to get industry people without a suitable fee. Some indicated that the strict policy whereby panel members must operate *pro-bono* was difficult to work with. Some felt it would be better if the panel members were paid in order to ensure an appropriate level of expertise was appointed within each panel.

Research Degree Programme Approval

The research degree programme validation policy and criteria⁴⁷ supplement the *HET Core Validation Policy and Criteria*. The policy includes three processes: *Research approval* in a specified discipline-area at a specified NFQ level (which will be referred to as research approval); *Research accreditation* in a specified discipline-area at a specified NFQ level (which will be referred to as research accreditation); and *Validation* of a professional doctorate programme.

Providers (and consortia of providers) may apply for research approval or research accreditation.

47 *Research Degree Programme Validation Policy and Criteria* (HETAC, 2010):
http://www.hetac.ie/docs/E.1.7-1.0_Research_Degree_Programme_Policy_And_Criteria_2010.pdf

Providers should have quality assurance arrangements for the provision of research degree programmes which are consistent with the relevant guidelines (Section 5.4) and standards (Section 5.1-5.3) especially IUQB's *Good Practice in the Organisation of PhD Programmes in Irish Higher Education* and with the generic criteria in Section 3 of HETAC's *Core Validation Policy and Criteria*.

Research Degree: Programme Approval Feedback from Stakeholders

Identified Strengths

Overall the feedback indicated there was a good level of support from QQI to providers undergoing this process. It was considered by many to be a very detailed process which was rigorous and generally it was considered that the process worked well.

Identified weaknesses

Some providers felt the fields of study are too restrictive and should be widened. There was also a sense that the process moved rather slowly and was considered by one respondent to be a 'cumbersome exercise'. Some of the feedback indicated there were concerns in relation to the submissions from providers, with the material provided considered to be poor.

Monitoring and Dialogue

QQI inherited a range of monitoring and dialogue activities from its legacy organisations, each of which served different purposes. These activities span a range of models from auditing and inspection to annual dialogue meetings. QQI is currently developing a policy approach to both monitoring and to dialogue which is due to be presented to the Board later in 2014.

Dialogue with the universities was undertaken by the IUQB and for the DIT and the RCSI with NQAI. Annual meetings were held with these institutions based on a report prepared by the institution on

certain activities undertaken in the previous year; these included progress against recommendations identified in the most recent institutional review. Follow-up with the IOTs and independent providers was carried out by HETAC following institutional review. Follow-up with new providers was a more specific dedicated process as set out in the *Provider Monitoring Policy 2009*⁴⁸. In the case of IUQB, a digest of the analysis of the quality assurance activity described in these reports was published in the agency's Annual Report⁴⁹. QQI published the digest⁵⁰ separately in 2013 based on the 2012 annual engagements with the universities.

7. QQI: Compliance Statements

Sections 8 and 9 contain statements of QQI's assessment as to how it complies with Parts 2 and 3 of the European Standards and Guidelines (and with the ENQA membership criteria). The statements cover the activities for the 5-year review period 2008-13. Some statements within these sections relate to the newly-established QQI (mission statement etc.). Where a statement relates to quality assurance policies, procedures and activities that have been inherited by QQI from one of the three predecessor bodies HETAC, IUQB and NQAI, the statements also include details of the activities and outputs for the period 2008-12.

48 *Provider Monitoring Policy* (HETAC, 2009): <http://www.hetac.ie/docs/Provider%20Monitoring%20Policy%20And%20Procedures%202010.pdf>

49 *IUQB Annual Report 2011* (pp. 11-14): <http://www.iuqb.ie/GetAttachment477f.pdf?id=a387fe32-9cd5-4b47-be07-8b9b8264f562>

50 *Annual Institutional Reports (AIRs) of Universities - Analysis 2012* (QQI, 2013) <http://www.qqi.ie/Downloads/News%20Items/10630%20QQI%20AIRs%20of%20Universities%20Analysis.pdf>

8. QQI: Compliance with European Standards and Guidelines (Part 2)

8.1 ESG Standard 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.

8.1.1 Institutional Level Quality Assurance Processes – Use of Internal Quality Assurance Procedures

8.1.1.1 Institutional Review

Under Section 84 of the Quality Assurance and Qualifications (Education and Training) Act (2012), institutional quality assurance reviews already commenced by IUQB, HETAC and NQAI were completed by QQI using the relevant saved methodology, which in all cases, was based on taking into account the effectiveness of the internal quality assurance processes described in Part 1 of the ESG. This involved one university review commenced by IUQB and three institutional reviews commenced by HETAC. QQI also completed the

institutional review of the RCSI which previously fell under the jurisdiction of NQAI. The review was completed by QQI using the IUQB IRIU methodology.

Prior to beginning a new cycle of institutional reviews, QQI is legislatively required to issue quality assurance (QA) guidelines to relevant providers (universities, institutes of technology and independent higher education institutions) following consultation with such providers. This process will commence in 2014. Once the QA guidelines have been issued, QQI is required to develop, in consultation with providers, processes for the review of the effectiveness of providers' internal quality assurance procedures developed using these guidelines. These institutional review procedures developed by QQI will be based on lessons learned from the legacy review systems (which will be informed by the findings of the QQI-commissioned Reviews of Reviews report (to be published in April 2014). The institutional review methodology will, as in the case of the processes operated by the legacy agencies, take into account the effectiveness of the internal quality assurance processes described in Part 1 of the ESG. It is expected that the institutional review policy will be approved in 2015 with the first reviews under the new methodologies commencing in 2016.

Legacy practice in relation to institutional reviews

Universities (by IUQB): The statutory provision for quality assurance institutional reviews of the university sector is set out in the Universities Act, 1997. The process developed by IUQB was termed *Institutional Review of Irish Universities (IRIU)* (the IRIU is described in the IRIU Handbook⁵¹). The Irish Universities Association (IUA) and IUQB jointly published a document entitled *A Framework for*

51 IRIU Handbook (IUQB, 2009): <http://www.iuqb.ie/GetAttachment34c.pdf?id=ec40280c-1d8d-46ab-9921-3c64a588ec4f>

*Quality in Irish Universities*⁵², which described the agreed quality assurance procedures that would operate within the universities.

Non-university self-awarding institutions (by NQAI): The statutory provision for quality assurance reviews of the DIT and (from 2011) in the RCSI is described in the Qualifications (Education and Training) Act (1999).

Institutes of Technology (by HETAC): The statutory provision for quality assurance reviews of the public Institutes of Technology is described in the Qualifications (Education and Training) Act (1999). The evaluations conducted under Section 28 of the 1999 Act included the operation and management of delegated authority to make awards as delegated by HETAC to the IOTs.

Independent Private Institutions (by HETAC): Under the same section 28 of the 1999 Act these institutions (mainly independent higher education providers, for profit and not-for-profit), in receipt of HETAC awards also underwent the *Institutional Review* process. This included a review of the re-validation process for programmes previously validated by HETAC. The review methodology used by HETAC was termed *Institutional Review* (see *Handbook for Institutional Review of Providers of Higher Education and Training*⁵³ and *Policy on Institutional Review for Providers of Higher Education and Training*⁵⁴). The terms of reference for the review were adapted to meet the needs of an institution or of HETAC. All self-evaluation reports

52 *A Framework for Quality in Irish Universities* (IUA/IUQB, 2007): <http://www.iuqb.ie/GetAttachment9fc0.pdf?id=9fd43f6e-8514-4f25-a069-87e822ad3e0a>

53 *Handbook for Institutional Review of Providers of Higher Education and Training* (HETAC, 2007) <http://www.hetac.ie/docs/Institutional%20review%20Handbook-%2007.08.2009.pdf>

54 *Policy on Institutional review for Providers of Higher Education and Training* (2007): <http://www.hetac.ie/docs/Policy%20on%20Inst%20Reviews%20December%2007.pdf>

and terms of reference are published⁵⁵. The Terms of Reference reflected any particular circumstances such as significant organisational change; merger; a joint review with other statutory or non-statutory bodies from Ireland or overseas. A full suite of HETAC policies were relevant to the objectives in the review process.

Common features of all institutional review models were:

- The review was embedded in legislation
- The evaluations required review and reporting on the effectiveness of the internal quality assurance procedures developed and applied by all providers
- The IR process was developed so as to be compliant with the quality assurance requirements of Part 1 of the ESG.

8.1.1.2 New Provider institutional Level Quality Assurance Evaluation

The 2012 Act sets out the conditions that must be met **before** an independent private higher (or further) education and training provider may apply for QQI validation of a programme that leads to an award made by QQI for the first time. In October 2013, QQI launched a new **Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards**⁵⁶. This policy document sets out policy and criteria for providers who want to seek QQI programme validation for the first time. It only applies to providers who do not currently have any programmes validated by QQI, FETAC or HETAC. The policy and criteria for initial access focus on the evaluation and agreement of the providers' internal quality assurance procedures. The QA

55 Self-evaluation reports and terms of reference for HETAC institutional reviews - http://www.hetac.ie/publications_instit.htm

56 QQI Policy suite on Policy and criteria for Provider Access to Initial Validation(QQI, 2013): http://www.qqi.ie/Downloads/White%20paper%20policies/QQI_initial_Validation_%207_10_13.pdf

guidelines established as part of this policy suite are based on Part 1 of the ESG guidelines - provider internal quality assurance procedures. Part two of this process is programme validation. The Core Validation Policy criteria and guidelines (referred to in the section below) is also based upon Part 1 of the ESG – internal quality assurance procedures of the provider.

This new QQI policy facilitates a provider who is involved in the provision of both further and higher education and training programmes. It recognises potential synergies in the agreement of one set of institutional quality assurance procedures for both HE and FE provision leading to QQI awards.

In 2013 QQI completed the evaluation process for two new providers who commenced the process under HETAC process - New Provider Registration Process. A total of 23 new providers completed this process between 2008 and 2012. The legacy **Procedures for assessment of applications for Registration as a HETAC Registered Provider** were revised in 2011 to provide explicit reference⁵⁷ to the seven elements of the internal quality assurance system as set out in Part 1 of the ESG.

8.1.2 Programme Level Quality Assurance Processes – Use of Internal Quality Assurance Procedures

8.1.2.1 Programme Validation

Under Section 84 of the Qualifications and Quality Assurance (Education and Training) Act (2012), programme level quality assurance processes (programme validation) already commenced by HETAC were completed by QQI using the saved HETAC policy and methodology, which in all cases, was based on taking into account the

57 Procedures for assessment of applications for Registration as a HETAC Registered Provider (see section 4.3.2, HETAC, 2011): <http://www.hetac.ie/docs/Procedure%20for%20addressing%20app%20registration%20as%20HETAC%20provider.pdf>

effectiveness of the internal quality assurance processes described in Part 1 of the ESG (see **Core Validation Policy and Criteria**⁵⁸). QQI has validated 29 programmes since 2012. Prior to this HETAC validated 307 new programmes between 2008 and 2012.

The *Core Validation Policy and Criteria* together with the associated suite of complementary policies were re-developed between 2009 and 2010 to ensure that they were aligned with a reference to the seven elements of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines. Appendix 11 indicates samples of some of the references to the seven elements of the ESG in the HETAC policy suite supporting the external quality assurance mechanism of Programme Validation.

8.1.2.2 Research Validation

QQI also inherited research validation for Institutes of Technology. In 2012/2013 QQI completed a number of research re-validations commenced by HETAC but carried out by the Institutes of Technology under Devolved Responsibility (described on page 28). Research approval is a process for the validation of research degree programmes at NFQ levels and/or in discipline-areas where there has been little or no prior provision by the provider concerned. Research approval provides a platform for a provider to build-up its track record and progress towards meeting the criteria for research accreditation.

Both processes followed the HETAC process for research validation. The *Research Programme Policy and Criteria 2010* is linked to the *Core Validation Policy 2010*. Both of these documents were revised with explicit references to the internal quality

58 *Core Validation Policy and Criteria* (HETAC, 2010)
http://www.hetac.ie/docs/E.1.8_1.1Core%20Validation%20Policy%20and%20Criteria%202010.pdf

assurance procedures of providers – Part 1 of the European Standards and Guidelines.

8.2 ESG Standard 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.

8.2.1 Institutional-Level Quality Assurance Processes - Development

8.2.1.1 Institutional Review

Under Section 84 of the 2012 Act, all reviews that commenced under IUQB, NQAI or HETAC were carried through to QQI. This included one review commenced under IUQB, and a number commenced under HETAC. The institutional review of the RSCI initiated by NQAI will be completed in April 2014 utilising the IUQB IRIU methodology in general and

some aspects of the HETAC methodology. In relation to new policy on quality assurance processes to be developed by QQI, this will follow the QQI consultation framework⁵⁹ which was approved by the Board. This framework commits QQI to a process of consultation with all stakeholders in the development and implementation of policy. This is particularly true of higher education institutions.

All legacy institutional review processes were developed using key stakeholders, including the providers' representative organisations; other national agencies such as the HEA (national funding agency); networks such as the Irish Higher Education Quality Network (IHEQN); and the Union of Students in Ireland (USI). Draft policies and methodology were produced, to ensure compliance with the quality assurance provisions of the relevant legislation (Universities Act 1997 and Qualifications Act 1999) and to ensure compliance with the European Standards and Guidelines (ESG). Drafts were published and comments were invited by stakeholders. Following the consultation, changes were made to the policies and handbooks as appropriate. Timetables for the cycle of reviews (2008-2012) were agreed with all providers and briefings took place with the persons responsible for quality assurance. As different higher education institutions had different levels of quality assurance arrangements with HETAC, some additions and changes to the general terms of reference were required for each institution.

8.2.1.2 New Provider Institutional Level Quality Assurance Evaluation – QQI development of New Policy

Under the 2012 Act, all new provider registration evaluations that commenced under HETAC were carried through to QQI and completed using

59 QQI Consultation Framework (QQI, 2013)
http://www.qqi.ie/Downloads/Consultation/QQI_Consultation_Framework.pdf

legacy processes – a total of 23 evaluations were completed by HETAC during the period 2008 – 2012. QQI continued with a number of evaluations with 2 completed since 2012.

In October 2013, QQI launched a new *Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards*⁶⁰. This policy document sets out policy and criteria for new providers who want to seek QQI programme validation for the first time. Initial access to programme validation is a two-stage process. Although the policy itself is not applicable for public providers associated with QQI, the criteria and policy approach will be considered as part of the re-engagement policy with all legacy providers, public and private. The development of this policy followed the QQI consultation framework⁶¹ and included consultation with a wide range of stakeholders and providers; a draft position paper; feedback received contributed towards the development and publication of the draft policy (white paper) with a second round of public consultation. All responses and submissions to QQI's consultation processes were published. Final policy and procedures are published on the QQI website and contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used.

The HETAC Policy on *New Provider Registration, 2008* was also developed in consultation with all higher education and training institutions, government agencies, learners and many other stakeholders including public HEIs. The *Procedures for assessment of applications for Registration as*

60 QQI Policy suite on *Policy and criteria for provider access to initial validation* (QQI, 2013):
http://www.qqi.ie/Downloads/White%20paper%20policies/QQI_initial_Validation_%207_10_13.pdf

61 QQI consultation framework (2013):
http://www.qqi.ie/Downloads/Consultation/QQI_Consultation_Framework.pdf

a HETAC Registered Provider were developed and revised in 2011 to ensure further clarity of purpose and transparency of procedures, and clarity on the external quality assurance methods developed to implement the policy and procedures.

8.2.2 Programme-Level Quality Assurance Processes - Development

8.2.2.1 Validation of Taught Programmes

Under the 2012 Act, all programme validations that commenced under HETAC were carried through to QQI. QQI has adopted the *Core Validation Policy* and guidelines to carry out programme validation. A new policy on programme-level quality assurance processes will be developed by QQI in 2014/2015. A green paper on programme validation was published for consultation in May 2013. Further policy development will follow the QQI consultation framework⁶² as previously referenced. This framework commits QQI to a process of consultation with all stakeholders in the development and implementation of all policy. This is particularly true of higher education institutions.

This approach towards consultation was also adopted (by HETAC) in the development of the revised programme validation (*Core Validation Policy*⁶³) and research accreditation procedures in 2010 (*Research Policy and Criteria 2010*⁶⁴). The new policies provided Institutes of Technology with more guidance on the policy for programme validation carried out under Delegated Authority. The new policy suite was also revised to provide HEIs with an opportunity to take responsibility for some aspects

of the taught programme validation process (for private HEIs) and for research accreditation process (for IOTs). This is referred to as the *Devolution of Responsibility for Validation Sub Processes*⁶⁵ as described in section 6.

8.2.2.2 Validation of Research Programmes

Under the 2012 Act, all programme and research validations that commenced under HETAC were carried through to QQI. QQI continued to facilitate research accreditation carried out by a small number of Institutes of Technology under the new devolved responsibility processes. QQI is currently considering new policy approaches toward research accreditation for the Institutes of Technology under delegation of authority to make awards.

The research policy and criteria developed by HETAC previously formed part of the overall approach to validation. Following consultation with providers and other stakeholders in 2009 two separate policies were developed: one for research and one for undergraduate validation. The revised *Research Degree Programme Policy and Criteria 2010*⁶⁶ continued to link the overall processes for validation. The devolved responsibility for the validation of research approval and accreditation was a significant step for Institutes of Technology.

62 QQI Consultation Framework (QQI, 2013):
http://www.qqi.ie/Downloads/Consultation/QQI_Consultation_Framework.pdf

63 Core Validation Policy (HETAC, 2010):
http://www.hetac.ie/docs/E.1.8_1.1Core%20Validation%20Policy%20and%20Criteria%202010.pdf

64 Research Policy and Criteria (HETAC, 2010):
http://www.hetac.ie/docs/E.1.7-1.0_Research_Degree_Programme_Policy_And_Criteria_2010.pdf

65 Devolution of Responsibility for Validation Sub processes (HETAC, 2011):
http://www.hetac.ie/docs/E.3.5-1.1_Devolution_of_Responsibility_for_Validation_Sub-processes_2011.pdf

66 HETAC Research Policy and Criteria (2010):
http://www.hetac.ie/docs/E.1.7-1.0_Research_Degree_Programme_Policy_And_Criteria_2010.pdf

8.3 ESG Standard 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.

8.3.1 Institutional-Level Quality Assurance Processes – Criteria For Decisions

8.3.1.1 Institutional Review

QQI continued to manage institutional review that was commenced under IUQB (one university) and HETAC (3 independent providers) and the NQAI (RCSI). The terms of reference and handbook for the RCSI review set out the main objectives for the review, the criteria and rationale for review and the review process⁶⁷. The review largely followed the IUQB practice with some additional objectives for reviewing the follow on recommendations from the previous review carried out by NQAI.

In all review models the reviewers were required to confirm that the provider was compliant with the specified objectives and quality assurance provisions set out in the terms of reference; and/or in accordance with the legislative requirements; and the seven elements of the ESG Part 1. Review consistency was achieved through panel training.

67 Terms of Reference for the RCSI review (QQI, 2013): <http://www.qqi.ie/Downloads/Reviews/130356-QQI%20RCSI%20Terms%20of%20Ref.pdf>

Each panel undertook a full training day in the agency offices in advance of the review visit to the provider. The criteria for decisions and approach towards consistency is set out in the handbooks and guidelines developed by the agencies to guide the providers; the reviewers and other stakeholders. The panels were provided with the national reference point and policy context for each of the quality reviews as appropriate. For example in the case of the universities this referred to the *Guidelines of Good Practice*⁶⁸ series.

8.3.1.2 New Provider Institutional Level Quality Assurance Evaluation

The QQI policy on Provider Initial Access to QQI Awards introduced policy and criteria for the evaluation and agreement of institutional level quality assurance procedures. The policy sets out the criteria for decision making. The suite of supporting documents includes an Application Guide⁶⁹ on the criteria for evaluation and decision by panel members. QQI will endeavour to ensure consistency in the decision making for this evaluation process.

In 2013, QQI completed three provider evaluations commenced using the HETAC Provider Registration process. The three reviews were completed in accordance with the criteria and decision making as set out in the policy and process developed by HETAC. Formal decisions made as a result of the Provider Registration Process were based upon the

68 National Guidelines of Good Practice Series (IUQB, 2005-2012) http://www.iuqb.ie/info/good_practice_guides.html

69 Application Guide for Providers - http://www.qqi.ie/Downloads/%E2%80%8CInitial%20Validation/Initial_Validation_Application_Guidev4.pdf

explicit published criteria from a number of policies and procedures⁷⁰.

Each expert Panel is provided with training prior to the evaluation process and site visit. Panels are required to confirm that each Institution is compliant with the published policy and criteria. A member of the agency executive is present during the process to facilitate a consistent interpretation of the policy and procedures by panel members. Providers are provided with the same policy, criteria, procedures and guidelines as panel members. Provider briefings on the policy, criteria and guidelines for new applicant providers are held periodically. The expert panel reports are based upon a series of standard questions under each criterion formulated for panel members to form the basis for the report. This ensures that the evaluation judgements are set out clearly in the Panel Reports and linked to the evaluation criteria. The policy and process has in place ways of moderating conclusions if required. All final reports of the process are published. Lessons learned from the HETAC policy on new providers informed the development of the new QQI policy on *Provider Access to Initial Validation of Programmes Leading to QQI Awards, 2013*.

8.3.2 Programme-Level Quality Assurance Processes – Criteria For Decisions

8.3.2.1 Validation of Taught Programmes

Under the 2012 Act, programme validations and re-validations (programmatic reviews) commenced by HETAC were completed by QQI. In addition, QQI reopened the programme validation

process in January 2013 using the relevant saved policy, criteria and methodology. The policy on the Protection for Enrolled Learners (PFEL) supplemented the HEI programme validation process as a requirement of the 2012 Act which was extended to a broader range of providers under this new legislation. PFEL is a pre-requisite for programme validation.

Programme validation was carried out in accordance with the criteria and decision making as set out in the *Core Validation Policy, and criteria, 2010*. This refers to the range of decisions/outcomes and judgements against the published criteria. The criteria underpinning decisions for the programme evaluation are set out as 'Elaborated Programme Validation Criteria' in Section 3.2 of the policy. This includes guidelines on the 'Expert Panel Report' (Step 4) including possible judgements against the validation criteria. Additional guidance is provided to higher education institutions in the *General Programme Validation Manual 2010*. The Policy provides a submission template to enable providers to submit consistent and coherent programme detail for evaluation. The same criteria are used by the expert panel and the HEI provider. QQI appoints expert programme validation teams based upon experience of the discipline expertise; knowledge of the programme validation criteria and experience of quality assurance. Panel training and briefing is embedded as part of the validation process prior to the site visit. The programme validation reports are consistent with the elaborated validation criteria. Positive report outcomes are published on the Agency website as are the proceedings of the formal QQI standing committee which makes the final decision on the validation outcome. The Core

70 Provider Registration Policy, 2008; The Procedures for assessment of applications for Registration as a HETAC Registered Provider were developed and revised in 2011; Guidelines & Criteria for Quality Assurance Procedures in Higher Education & Training, 2011 (for the agreement of QA procedures) ; Programme validation Policy Criteria and Guidelines (Core Validation Criteria 2010), General Programme Validation Manual 2010. (for the validation of the first programme submitted by a new provider).

Validation Policy and Criteria has mechanisms in place for QQI to moderate conclusions⁷¹.

QQI has recently established a project (with the aid of an external expert) to develop further infrastructure to enhance the consistency of decision making for programme and research validation and re-validation. Prior to managing a programme validation/research accreditation or programme re-validation QQI managers are required to observe and shadow an experienced QQI programme validation Manager. Panel members also undergo briefing and clarification with the QQI executive prior to a site visit.

8.3.2.2 Validation of Research Programmes

Accreditation of research programmes was operated primarily for Institutes of Technology under delegated authority to make awards. Research accreditation evaluations that had already commenced under HETAC were finished out by QQI using the *Research Degree Programme Policy and Criteria, 2011*. The process for decisions and the panel of experts in the validation of taught programmes as set out in section 8.3.2.1 is also similar for research accreditation carried out by the Agency and by Institutes of Technology under devolved responsibility. The criteria for decision making is set out in the *Research Degree Programme Policy and Criteria, 2010*. The research degree policy sets out criteria at institutional level (provided in Section 3.1 of the policy) and discipline level (Section 3.2). Section 3.4 provides a guide for presenting information about the research degree programmes in a consistent format.

71 Core Validation Criteria p.12 (HETAC,2010) http://www.hetac.ie/docs/E.1.8-1.1_Core_Validation_Policy_and_Criteria_2010.pdf

8.4 ESG Standard 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.

8.4.1 Institutional-Level Quality Assurance Processes – Processes Fit For Purpose

8.4.1.1 Institutional Review

In managing the reviews carried over from the legacy agencies QQI ensures that experts undertaking the institutional review have the appropriate skills and competence to perform the roles as specified in the criteria and objectives for each review. This includes a careful selection of experts by the agency; adequate briefing and training of experts; the use of international experts and students as members of the review team. In all cases the review procedures are sufficient to provide adequate evidence to support the findings and conclusions reached and these findings were subsequently adopted by the QQI governance structures. Each review process involved the use of the self-evaluation report; a site visit to the provider; a draft report and a final report published on the website. Clearly defined follow-up procedures were part of the review process. All processes are described in more detail in policies, procedures, terms of reference and handbooks developed for each individual process, most of which were similar to each other.

8.4.1.2 New Provider Institutional Level Quality Assurance Evaluation

The QQI policy on *Provider Access to Initial Validation of Programmes Leading to QQI Awards* was launched in October 2013. QQI has provided a number of briefing sessions for applicant providers. No applications have been received to date. The policy, procedures and guidelines developed to support this process are deemed to be fit-for-purpose and involve learning from the legacy processes carried out by HETAC and FETAC.

The internal and external *Procedures for assessment of applications for Registration as a HETAC Registered Provider*, 2011, made explicit reference

to the composition and appointment of the expert panel which consisted of at least one international panel member. The process provided for appropriate briefing/training for panel members. The policy and criteria were sufficient to provide adequate evidence to support the findings and conclusions reached by the panel members. The main components of the evaluation process included an institutional self-evaluation report; a site visit by the expert panel; a panel report and subsequent publication of the final report on the outcome. The follow-up model for this process is set out in the *Provider Monitoring Policy, 2010*⁷². Separate follow-up is also provided for in the programme validation policy and process. The feedback from providers that successfully completed the HETAC provider registration process indicates that institutional policies, procedures and overall structures are generally enhanced and providers benefit significantly from undertaking the process.

8.4.2 Programme-Level Quality Assurance Processes – Processes Fit For Purpose

8.4.2.1 Programme Validation

QQI's validation process (as adopted from the HETAC validation process) is an external quality assurance procedure by which QQI, as an awarding body, approves new programmes of education and training. Specifically, it is the process by which QQI satisfies itself that a learner may attain the required standard (of knowledge, skill or competence) for the purpose of achieving a qualification made by QQI as an awarding body or the Institutes of Technology as awarding bodies under Delegated Authority.

QQI, in managing the programme validation process under section (84) of the 2012 Act, has implemented the process in accordance with the fitness for

72 *Provider Monitoring Policy* (HETAC, 2010): <http://www.hetac.ie/docs/Provider%20Monitoring%20Policy%20And%20Procedures%202010.pdf>

purpose approach set out in the *Core Validation and Criteria, 2010; Programme Validation Manual; Participating in an Evaluation Panel as an Expert Assessor: Guidelines*⁷³ and other supporting policy documents: *Assessment and Standards, 2009*⁷⁴ is a core supporting document.

In addition, the QQI Board adopted and published additional policies and protocols to ensure the fitness for purpose of the programme validation policy, an example of which is the *Protocols for the Protection of the Enrolment of Learners, 2013*⁷⁵. Similar protocols existed under the 1999 Act. However these were extended to not-for-profit organisations under the 2012 Act. QQI also published interim guidelines for providers transitioning to the new QQI PFEL proposals.

Fit-for-purpose practice is determined through the appointment of the panel for programme validation. This is established on a case-by-case basis in accordance with the HETAC document *Participating in an Evaluation Panel as an Expert Assessor: Guidelines*⁷⁶. The validation policy makes explicit reference to the expertise required for the expert panel including competence to make national and international comparisons. The executive selects and appoints competent and experienced expert panel members from a combination of national and international Higher Education Institutions. All panel members are briefed by the executive prior to each programme validation process. Initial impressions of each panel member are captured as part of and prior to the briefing process. Conflict of

73 Documents for Panel Members Participating in HETAC evaluations: http://www.hetac.ie/publications_pol10.htm

74 Assessment and Standards (HETAC, 2009): <http://www.hetac.ie/docs/Fina%20English%20Assessment%20and%20Standards%202009.pdf>

75 QQI Protocols for the protection of Enrolled learners: http://www.qqi.ie/Downloads/QQI%20Resources/Guidelines_for_Protection_for_Enrolled_Learners_09_October_2013.pdf

76 Documents for Panel Members Participating in HETAC evaluations: http://www.hetac.ie/publications_pol10.htm

Interest and commercial sensitivity are significant considerations as part of the selection of expert panel members and all panels are checked with the institutions in advance of appointment. QQI is currently in the process of establishing an online resource for training peer review panel members and other third party experts used by QQI in quality assurance services.

The validation process includes self-assessment by the HEI; an external assessment by an expert panel; report publication and follow-up procedure to review actions. Validation reports may include conditions which must be met prior to the formal completion of validation. Any such prerequisites must be followed-up by QQI before a formal validation decision is made.

The programme validation policy, criteria and process recognises the importance of institutional improvement and enhancement as a fundamental element in the process. Reports have a section dedicated to more detailed quality enhancement recommendations in addition to the mandatory prerequisites and conditions for actual programme validation.

8.5 ESG Standard 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.

8.5.1 Institutional-Level Quality Assurance Processes - Reporting

8.5.1.1 Institutional Review

The institutional review processes carried over to QQI and previously managed by the legacy agencies included guidelines; methodology and briefing to emphasise the importance of producing reports that were readable, with clear decisions, commendations and recommendations that were easy to find. In the case of the review of universities two reports were produced and published. The first of these was a two page summary report giving concise details about each university with highlights about the findings. The main report was used for all providers under all models. This covered description, analysis, conclusions, commendations and recommendations. Each report contained: an introduction and context; an analysis of the institutional self-assessment report; a section on quality assurance and accountability; a section on quality enhancement; a judgement of compliance with relevant legislation and consistency with

ESG Part 1 and a conclusions section. Additional statements were included for the Institutes of Technology to determine the status of Delegated Authority (DA) - this included a recommendation on continuing approval for DA or otherwise and/or additional conditions.

8.5.1.2 New Provider Institutional Level Quality Assurance Evaluation

QQI adopted and implemented the same procedures and guidelines for reporting on the new provider Registration process to that of the legacy body HETAC. The provider registration process for institutional level evaluation of quality assurance procedures produced two reports; a pro forma initial eligibility report prepared in the early stages of engagement by the HETAC executive and the panel institutional approval report, with recommendations on whether the institution's quality assurance should be agreed and the institution approved to proceed to a programme validation stage. All reports were published in full in a readily accessible format on the agency website. In general the reports were briefly descriptive, providing analysis, comment and observations; recommendations and commendations linked to the appropriate criteria.

8.5.2 Programme-Level Quality Assurance Processes - Reporting

8.5.2.1 Programme Validation

The processes and procedures in this policy set out the explicit nature of the expert panel report; the guidelines on panel judgements and the clarity and accessibility of the report in published mode (as set out in step 4 (page 12) of the *Core Validation Policy and Criteria, 2010*). This was adopted and applied by QQI. The validation policy emphasises the importance for an expert panel report to be explicit and unambiguous in terms of whether or not the programme as described should

be validated; if there are any prerequisites for validation (i.e. conditions which must be met before the programme is validated and commences) which are required to be fulfilled by the provider; whether there are any special conditions for validation. The policy states that conclusions must be based on judgements made against the validation criteria and findings and recommendations should relate to the validation criteria. The report is expected to address multiple audiences including any enhancement recommendations presented by the expert panel. All reports are published in a readily accessible form on the QQI (formerly HETAC) website.

The QQI Programmes and Awards Executive Committee (PAEC) at its first meeting in October 2013 adopted an amendment to the implementation of the Core Validation Policy and Criteria with regard to reports for unsuccessful validations. The adopted amendment required that a full report is produced for unsuccessful programme validations. The practice to date was to communicate unsuccessful validations in the form of a letter indicating the criteria that the process and provider had failed to meet.

8.5.2.2 Research Accreditation Validation

The Institutes of Technology involved in the research accreditations managed the process of accreditation under devolved responsibility and submitted expert panel reports to QQI for consideration by the appropriate governance structure. The *Research Degree Programme Policy and Criteria, 2010* was developed as a supplement to the *HETAC Core Validation Policy and Criteria 2010*. This in practice means that the process of research accreditation is carried out in the same way as the programme validation process. The requirements for the expert panel report are also identical to the programme validation requirements as per step 4

(page 12) of the *Core Validation Policy and Criteria, 2011*.

8.6 ESG Standard 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.

8.6.1 Institutional-Level Quality Assurance Processes – Follow-Up Procedures

8.6.1.1 Institutional Review

As the institutional review models were transitioned from the legacy agencies to QQI, all follow-up reports on the last cycle of reviews will be submitted to QQI in accordance with the schedule established for each provider. A one-year follow-up report will also be required in respect of the review of the RCSI where the review report will be published in April 2014.

QQI has progressed 11 follow-up reports from institutions that previously completed their review under the legacy agencies. A number of institutions

were in the process of Institutional Review when QQI was established. In these cases, the reports were published by QQI along with the institutional response and implementation plan. One-year progress reports will be submitted to QQI as per the requirements of review processes. In some instances the recommendations and the responses of the expert panel required more immediate follow-up under the HETAC review process.

8.6.1.2 Provider Access to Initial Validation of Programmes leading to QQI Awards - New Provider Registration Process (HETAC)

The Policy and Criteria for Provider Access to Initial Validation of Programmes leading to QQI awards has set out a number of procedures for follow-up. The successful validation of a programme by the applicant provider completes the initial access process. Detailed follow-up procedures will rely on the procedures set out in the *Core Validation Policy and Criteria, 2010* and supplemented by the *Provider Monitoring Policy and Procedures, 2010*⁷⁷. External examining is also deemed as another follow-up post validation follow-up/monitoring quality assurance mechanism employed by Irish higher education institutions that supports public confidence in academic qualifications. External Examiners are recommended by HETAC for new providers. All providers are responsible for the payment and management of their External Examiners.

QQI has also introduced a new mechanism to track and communicate all follow-up engagements at the level of the provider referred to as the QQI Provider Lifecycle of Engagements⁷⁸. It is introduced to identify, organise and communicate the range of actual and follow-up engagements between QQI

77 *Provider Monitoring (HETAC, 2010):*
<http://www.hetac.ie/docs/Provider%20Monitoring%20Policy%20And%20Procedures%202010.pdf>

78 *Application Guide – Provider Lifecycle (QQI, 2013):*
http://www.qqi.ie/Downloads/%E2%80%8CInitial%20Validation/Initial_Validation_Application_Guidev4.pdf

and individual providers. It is a concept which is articulated in the QQI Green Paper Section 1 on the Comprehensive Implementation of the Functions of QQI⁷⁹. There is a diverse range of providers that have relationships with QQI. There are also many kinds of interactions between QQI and providers based on the functions set out in the 2012 Act. Each kind of provider will have a particular set of obligations and entitlements based on their particular status and services sought from QQI. The Provider Lifecycle of Engagements model is intended to highlight the provider's wider responsibilities as a member of the national education and training community.

QQI has published Green Papers on new QQI policies for Provider Monitoring and Programme Validation.

8.6.2 Programme-Level Quality Assurance Processes – Follow-Up Procedures

8.6.2.1 Programme Validation

As the HETAC policy and methodology was continued by QQI under section (84) of the 2012 Act, post validation follow-up has also transitioned to QQI and is currently being implemented by the QQI executive. Follow-up on programme validation is set out in section 4.5 of the Core Validation Criteria document. Successful programme validation together with research accreditation is typically granted for a specific period of 5 years (intakes of 5 cohorts of learners). General conditions of approval specify follow-up processes and information (section 6 of the Core validation Policy and Criteria). Revalidation is compulsory or validation will lapse. Some periods of recognition granted by expert panels may be less than 5 years for higher perceived risk or unknown variables associated with the nature and content of the programme at the time of validation.

79 *Green Paper on the Comprehensive Implementation of the Functions of QQI - Provider Lifecycle of Engagements (QQI, 2013)*
<http://www.qqi.ie/Downloads/Consultation/Green%20Papers/Green%20Paper-Section%201%20version%202.pdf>

Providers are responsible for the re-validation of programmes (termed programmatic review). QQI has managed 6 re-validation processes that commenced with HETAC. External examiners are appointed to moderate standards on an annual basis.

8.6.2.2 Research Accreditation

The QQI practice during this period was limited to the establishment of two Memorandums of Understanding to facilitate Institutes of Technology in carrying out research accreditation under the devolution of responsibility policy. Follow-up on the accreditation activities is set out in the HETAC Special Conditions attached to Discipline-area Research Approval and Research Accreditation both of which are set out in the Research Degree Programme Policy and Criteria in sections 2.2.2 and 2.2.3 respectively. All Providers are responsible for the re-validation of research programmes.

QQI is currently considering a new research policy approach. Follow-up on an earlier HETAC research evaluation process is core to the consideration of this new policy approach. In 2010 HETAC undertook an evaluation for the purpose of continuing approval of a subset of research degree programmes that received approval (*at Level 9, or Levels 9 and 10 in the NFQ*) under a 'grandparenting' arrangement of an old HETAC policy launched back in 2005. A total of 14 providers were involved including 13 Institutes of Technology. Five panels were appointed by HETAC in the core discipline-areas of *Art, Design & Music; Business; Engineering; Humanities; and Science*. The findings of the panels are reflected in five separate panel reports⁸⁰. QQI is currently following up on the final outcome of the reports in the form of new

policy development for Institutes of Technology – under delegated authority.

8.7 ESG Standard 2.7 Periodic Review

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.

8.7.1 Institutional-Level Quality Review Processes – Periodic Review

8.7.1.1 Institutional Review

Periodic review is a feature of all institutional review models operated by the legacy agencies and completed by QQI. The second cycle of university evaluation was completed in December 2102 when QQI reviewed the outstanding university using the IRIU methodology. Three further reviews of independent providers (initiated by HETAC in 2012) were completed in 2013. QQI performed an Institutional review of the Royal College of Surgeons in Ireland in November 2013.

⁸⁰ Separate panel reports for research accreditation for continued approval for providers (HETAC): http://www.hetac.ie/publications_accred.htm

The 2012 Act provides for a cycle of reviews of the effectiveness of a provider's quality assurance procedures (at least 7 years from the issue of QA guidelines). The Act also provides for the review of programmes at any time.

As part of its comprehensive policy development programme, QQI issued a Green Paper on Review in May 2013. A white paper on Quality Assurance Guidelines will be published and consulted on in June 2014. Following the recommendation of the "Review of Reviews" report, consultation on a new methodology of institutional review will commence in 2014 and it is expected that the 3rd cycle of university reviews and the 2nd cycle of reviews of the Institute of Technology sector and independent higher education institution sector will commence in 2015, within the 7 year cycle.

8.7.1.2 Provider Access to Initial Validation of Programmes leading to QQI Awards - New Provider Registration Process (HETAC)

Periodic review for applications commenced under the New Provider Registration Process and completed by QQI refers to follow-up on the re-validation of programmes. The next periodic review in sequence is the institutional review process. The institutional review process will among other things consider the effectiveness of the programme re-validation process carried out by the provider under internal quality assurance procedures. The QQI policy on *Provider Access to Initial Validation of Programmes leading to QQI Awards* was launched in October 2013. This policy is the first point in the cycle for new providers and they will also be subject to periodic institutional level or other form of review of effectiveness of quality assurance procedures. The QQI policy development process will determine if this will follow a full cycle of programme delivery (equivalent to one cycle of re-validation). QQI is

currently working on draft policy for institutional review and provider monitoring.

8.7.2 Programme-Level Quality Review Processes – Periodic Review

8.7.2.1 Programme Validation

QQI continued to manage periodic review of programmes and research accreditation from November 2012 using the policies saved under section 84 of the 2012 Act. Periodic review (re-validation/programmatic review) of programmes is compulsory for all providers before the period of initial validation has expired. This is referred to currently as programmatic review and also includes re-accreditation of research areas. Programmatic review is entirely a provider-owned process. Guidelines and criteria for Programmatic Review are set out in the *Provider Monitoring Policy and Procedures, 2010*. This document refers to the responsibilities, scope and objectives for programmatic review including the re-validation criteria; the terms of reference and guidelines on the process for programmatic review and how it links back to the section 3 criteria in the *Core Validation Criteria, 2010*.

The effectiveness of the programmatic review process managed by all providers (including Institutes of Technology re-validating programmes under delegated authority) was previously considered as part of the HETAC Institutional Review Process as one of the seven elements of the ESG - "Approval, Monitoring and Periodic Review of Programmes and Awards".

8.7.2.2 Research Validation

As described in the section above, periodic review of research accreditation is similar to that of programme re-validation. In 2010 HETAC undertook an evaluation for the purpose of continuing approval of a subset of research degree programmes that received approval

(at Level 9, or Levels 9 and 10) under a ‘grandparenting’ arrangement of an old HETAC policy launched back in 2005. A total of 14 providers were involved in this evaluation/re-approval process in the core discipline-areas of *Art, Design & Music; Business; Engineering; Humanities; and Science*. QQI is currently following up on this review outcome with an amended policy for delegated authority to make awards.

8.8 ESG Standard 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.

8.8.1 Institutional-Level Quality Assurance Processes – System-Wide Analyses

8.8.1.1 Institutional Review

In August 2012, QQI published the terms of reference for a system review (Review of Reviews) and appointed a panel of international experts (chaired by a former ENQA President) to conduct an evaluation and prepare a report on the outcomes and impact of the institutional review models and

processes conducted by HETAC, IUQB, NQAI and QQI from 2008-13. The terms of reference for the system review⁸¹ are wide ranging and include a system impact analysis of institutional review in addition to system findings. The report of the system review will be published in April 2014.

Other system level reviews/analysis

Following the review of the first four universities under the IRIU methodology IUQB undertook an evaluation of the outcomes and published a synthesis report entitled Mid-Cycle Analysis of the Fitness for Purpose, Impact and Outcomes of the IRIU Process 2009-2011⁸² in November 2011.

8.8.1.2 Provider Access to Initial Validation of Programmes leading to QQI Awards - New Provider Registration Process (HETAC)

As part of its internal analysis and preparation for the new QQI policy on Provider Access to Initial Validation of Programmes leading to QQI Awards, QQI commissioned an external expert to review the report findings (including engagement with expert panel members) for the HETAC New Provider Registration Process over the previous four years (2008 – 12). Lessons learned from this report were used to develop the new QQI policy.

HETAC carried out a review of its New Provider Registration Policy in 2010 following feedback from panel members and in response to the findings of the 5 year institutional review. Amendments made resulted in the procedures for the implementation of the policy being revised to reflect more clearly Part 1 of the ESG.

81 Terms of Reference for the system review -Review of Reviews (QQI, 2013): http://www.qqi.ie/Downloads/Reviews/130356-QQI%20ROR%20TOR%20July%202013_final_combined.pdf

82 Mid-Cycle Analysis of the Fitness for Purpose, Impact and Outcomes of the IRIU Process 2009-2011 (IUQB (2011): <http://www.iuqb.ie/GetAttachmentf5cd.pdf?id=259eeb54-be55-41c9-9617-6aa93a9efe67>

8.8.2 Programme-Level Quality Assurance Processes – System-Wide Analyses

8.8.2.1 Programme Validation

The Core validation Policy and guidelines, 2010 was developed as a result of routine policy review following feedback from providers and stakeholders. The area of learner assessment was an area of persistent difficulty as recognised by providers and the agency. Detailed guidelines and protocols were developed by HETAC in 2009 in consultation with the HEIs and a broad range of stakeholders. These protocols, policy and guidelines are referred to as Assessment and Standards, 2009. This new policy suite was to provide HEIs with an opportunity to take responsibility for sub-processes in the programme validation (for private HEIs) and research accreditation processes (for IOTs). This is referred to as the Devolution of Responsibility for Validation Sub Processes – section 5 of the Core Validation Criteria, 2010.

8.8.2.2 Research Accreditation

QQI has committed to developing a Doctoral Framework with the national funding authority for higher education in Ireland – The Higher Education Authority (HEA). QQI will lead a system wide analysis of the effectiveness of the existing quality assurance procedures in place across all higher education institutions. This system review will identify further work on the quality assurance procedures supporting research provision and work in partnership with the HEIs to develop a code of practice for research provision.

9. QQI: Compliance with European Standards and Guidelines (Part 3)

9.1 ESG Standard 3.1 Use of external quality assurance procedures for higher education (ENQA membership criterion 1)

STANDARD

The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

Guidelines

The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions.

The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

QQI's quality assurance procedures, processes and guidelines take into account the ESG and have already been described in Section 8. The ESG are explicitly integrated into the processes QQI applies in its external quality assurance of higher education institutions and (where relevant) their programmes.

In relation to institutional review, the practices of IUQB, NQAI and HETAC have been carried into QQI and five institutional reviews commenced by these legacy agencies have been completed by QQI since its establishment. In relation to programme validation, the HETAC programme validation process has been carried into QQI. These validation procedures were developed to take ESG explicitly into account.

9.2 ESG Standard 3.2 Official status (ENQA membership criterion 2)

STANDARD

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

QQI was established on 6 November 2012 with the commencement of the Qualifications and Quality Assurance (Education and Training) Act (2012)⁸³. This Act dissolved two statutory quality assurance bodies that previously had responsibility for quality assurance in higher education; the Higher Education and Training Awards Council (HETAC) and the National Qualifications Authority of Ireland (NQAI). The Act made QQI the legal successor to HETAC and NQAI and made statutory provision for HETAC and NQAI staff to transfer to QQI and also included a Transitional and Savings Provisions (Section 84) that permitted the completion of external quality assurance processes (such as institutional review and programme validation) already in train.

The 2012 Act also repealed Section 35 of the Universities Act (1997) which set out the quality assurance procedures in relation to the Irish university sector and whereby the governing authorities of the universities had delegated this responsibility to the Irish Universities Quality Board (IUQB). The 2012 Act made external quality assurance of the Irish university sector the responsibility of QQI and permitted the completion of institutional reviews commenced by IUQB under Section 35 of the 1997 Act to be completed by QQI.

83 Quality Assurance and Qualifications (Education and Training) Act (2012): <http://www.oireachtas.ie/documents/bills28/acts/2012/a2812.pdf>

Thus, QQI is the legal successor to HETAC, IUQB and NQAI.

Where Irish self-awarding bodies make awards outside of Ireland, QQI remains responsible for the quality assurance of those awards. In all cases, any additional quality assurance requirements in the host country are taken into account.

QQI complies with its statutory responsibilities including the publication of an annual report and is externally audited by the Office of the Comptroller and Auditor General on an annual basis.

9.3 ESG Standard 3.3 Activities (ENQA membership criterion 1)

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.

QQI’s statutory quality assurance activities at institutional and programme level have been outlined in Section 8.2 and represent a core function of the agency.

These functions require QQI to undertake external quality assurance activities at institutional level (for designated awarding bodies such as universities and for awarding bodies where QQI has delegated authority to make awards) and at programme level (in respect of providers where QQI makes such awards). Such reviews are required to take place at least once every seven years as specified in the 2012 Act that established QQI.

9.3.1 Institutional-Level Quality Assurance Processes - Activities

9.3.1.1 Institutional Review

As described in Sections 8.1 and 8.2, QQI is required under the 2012 Act to develop procedures to review the effectiveness of the internal quality assurance procedures established by higher education institutions and the application by the higher education institution of the quality assurance procedures so established.

Under Section 84 (Transitional and Savings Provisions) of the 2012 Act, any institutional quality reviews that had commenced but had not been completed before November 2012 by IUQB (1 review), HETAC (3 reviews) or NQAI (1 review) were completed by QQI using the legacy (and legislatively saved) methodologies.

In August 2013, QQI consulted on and published terms of reference for a 'Review of Reviews' to consider the outcomes and impact of the institutional review processes operated by the legacy bodies HETAC, IUQB and NQAI (and carried into QQI) and to suggest options for future QQI methodologies for the review of the effectiveness of quality procedures in higher education institutions in Ireland. The report arising from this review will be published in April 2014.

Following the publication of the *Review of Reviews*, QQI will, following consultation with providers, issue guidelines to higher education institutions in relation to quality assurance procedures (including reviewing the quality assurance procedures of existing providers). Following agreement of these guidelines for quality assurance procedures, QQI will consult on the methodology to be adopted for future periodic cycles of institutional review in line with the legislative requirement to conduct such reviews at least once every seven years.

9.3.2 Programme-Level Quality Assurance Processes - Activities

9.3.2.1 Programme Validation

Programme validations and re-validations (termed programmatic reviews) that had commenced by HETAC but had not been completed before November 2012 were completed by QQI using the previous (and legislatively saved) HETAC methodology. New programmes for existing QQI providers continue to be validated using the HETAC validation policy which has now been adopted as QQI policy.

Prior to QQI's establishment, HETAC validated programmes in Institutes of Technology (at levels above which the Institutes had delegated authority to make awards) between 2008 and 2012 and also validated programmes in independent (private) providers that accessed HETAC awards. Such programmes were revalidated on a five-year cycle. This practice has been carried into QQI.

9.4 ESG Standard 3.4 Resources (ENQA membership criterion 3)

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 *and staff* ⁸⁴

84

84 Text in italics refers to additional element for ENQA membership criterion 3

Financial Resources

QQI is funded by an annual grant from government and from fees charged for demand-based statutory quality assurance services provided to independent (private) providers such as programme validation, programmatic review and institutional review.

The annual grant to QQI for 2013 was €7.4m. In addition, QQI received fee income of approximately €3,110,000 in 2013 (the higher education portion of this amounted to €448,000).

The provisional grant for 2014 has been advised as €7.2m. As public higher education institutions are required to engage with QQI for quality assurance services, they contribute relationship fees to QQI's funding based on their size (and relative portion of the state higher education budget). These relationship fees were set at €1.1m for 2014. Fee income from independent higher education institutions is estimated to be €450,000 for 2014.

Human Resources

QQI has wide responsibility for quality assurance and qualifications for further education and training (including English language training) in addition to its higher education responsibilities. It currently has a staff of 78 full-time equivalents to perform these functions.

The amalgamation of four agencies to form QQI was part of a strategy by the Irish government to create greater efficiencies in the public service. Following the global financial crisis in 2008, there has been a moratorium since 2009 on staff recruitment in the Irish public service which remains in force in 2014. The operation of an Employment Control Framework has involved the non-replacement of public service staff following retirement, resignation or completion of fixed-term contracts. The staffing complement of the legacy agencies at the end of 2010 was 104 full-time equivalents.

The Quality Assurance Services (QAS) section of QQI has a staff of 27 persons to fulfil its responsibility in the areas of further and higher education and training. QQI's quality assurance services section is led by the Head of Quality Assurance Services. The Section has responsibility for the operation and management of QQI's quality assurance services including institutional review and programme validation. The Section's management team consists of:

- Manager Provider Recognition
- Manager Programme Accreditation
- Manager Awards and Certification
- Manager Monitoring and Dialogue
- Manager Review and Enhancement
- Manager Review and Enhancement (International Education)

In addition, the Provider Relations section of QQI (that has a complement of nine staff) liaises with providers of further and higher education and training. The Section has five Provider Relations managers, all of whom liaise with higher education institutions.

Agency-wide resources to support quality assurance activities

QQI has a Corporate Affairs and Communications section led by the Head of Corporate Affairs and Communications. This section (comprising 20 staff) has responsibility for all cross-organisational support in the areas of:

- Finance
- Human Resources
- Corporate Planning
- Facilities Management
- Event Management
- Information and Communications Technology
- Internal and External Communications

Physical Resources

The four legacy agencies were housed in separate premises across the city of Dublin. As part of the amalgamation, two of these premises were vacated. The main QQI office (which comprises of 1,200 sq.m over four floors) was completely re-designed into an open plan office environment that can house up to 78 staff and contains a Boardroom and three other meeting rooms. The second smaller premises (which is located 350m from the main office) houses the ICT unit of QQI in addition to providing additional meeting room space and training facilities for the organisation.

9.5 ESG Standard 3.5 Mission Statement (ENQA membership criterion 4)

STANDARD

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Guidelines

These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

85

85 <http://www.qqi.ie/About/Pages/Strategy-Statement.aspx>

QQI Mission Statement

QQI published its mission⁸⁵ (vision and values) as part of its first (statutory) Strategy Statement 2014-2016 that was adopted by the Board of QQI in November 2013.

The mission is published on the QQI website and in the QQI Strategy Statement and reads:

“QQI promotes the enhancement of quality in Ireland’s further and higher education and training, and quality assures providers.

QQI supports and promotes a qualifications system that benefits learners and other stakeholders”.

QQI Strategy Statement

The QQI Board and Executive worked to develop QQI's first Strategy Statement from early 2013 through workshops, discussions and meetings of advisory and working groups. A draft Strategy Statement 2014 – 2016 was approved by the Board in June 2013.

The draft Strategy Statement was circulated extensively for external consultation to Government departments, state agencies and providers and representative bodies in education and training. QQI received a significant amount of feedback and the draft Strategy Statement was revised to address the key issues raised as a result of external consultation.

The QQI Strategy Statement adopted in November 2013 elaborates the QQI Mission, outlines the role of QQI and defines its stakeholders. The Strategy outlines the six goals of QQI as:

- To establish a comprehensive, coherent set of QQI policies and procedures with the National Framework of Qualifications as a central organising feature;

- To prioritise learners in our policies and actions and in our relations with stakeholders;
- To quality assure providers and support the enhancement of the quality of education and training provision;
- To collaborate with stakeholders to create greater coherence within Irelands' education and training systems and with its qualifications system;
- To provide relevant, timely and comprehensive information to the public on the quality of education and training provision and qualifications;
- To build an organisational culture to enable QQI to perform successfully.

The QQI Strategy Statement 2014-16 is translated into a work programme through the agreement and publication of annual Corporate Plans (the 2014 Plan is published on the QQI website).

QQI Consultation Framework and Comprehensive Policy Development Programme

The Board of QQI has agreed a framework that guides QQI's public consultation on its policy and organisational developments. This is available in a public Consultation Framework⁸⁶.

In May 2013, QQI launched its Comprehensive Policy Development Programme consisting of a suite of 18 Green (issues) Papers. As part of this framework, QQI regularly consults with providers, professional bodies, state bodies, learners and the public on the development of policy and strategy. This allows QQI to seek the views of its stakeholders in developing policy and strategy that governs how the organisation carries out its functions. To this end, QQI is in the process of establishing the Consultative

86 Consultation Framework (QQI, 2013): http://www.qqi.ie/Downloads/Consultation/qqi_Consultation_Framework.pdf

Forum which will provide a comprehensive consultation and dialogue environment between QQI and stakeholders and is advisory in nature. The Forum will meet for the first time in April.

Respondents to QQI's consultation processes are informed that QQI publishes all submissions received (unless the respondent indicates that they do not wish their submission to be published). Following the analysis of the submission to the suite of Green papers, QQI published a Report on General Themes⁸⁷ emerging from the consultation process.

Following the consultation on a Green paper, QQI develops and publishes a White Paper. QQI White Papers⁸⁸ are published documents containing proposed QQI policy for public consultation and information. Following publication and consideration of the outcomes of consultation, they lead to draft QQI Policy which is adopted by the Board of QQI. Once adopted, QQI policy and procedures are developed and implemented accordingly.

QQI published a progress report⁸⁹ on the Comprehensive Policy Development Programme in November 2013.

87 General Themes emerging from Phase 1 Consultation Process (QQI, 2013): http://www.qqi.ie/Downloads/Consultation/Emerging_Themes_Phase%201%20Consultation.pdf

88 White Papers (QQI, 2013): http://www.qqi.ie/Consultation/Pages/White_Papers.aspx

89 Progress Report on Comprehensive Policy Development Programme (QQI, 2013): http://www.qqi.ie/Downloads/Progress_Report-November_2013.pdf

9.6 ESG Standard 3.6 Independence (ENQA membership criterion 5)

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.

Legislation and Governance

QQI was established through the commencement of the Qualifications and Quality Assurance (Education and Training) Act (2012). Section 9(4) of the Act

states that “subject to this Act, the Authority⁹⁰ shall be independent in the performance of its functions.”

As part of the Strategy Statement 2014-16, the Board of QQI adopted five values, one of which is “independent”. This is further elaborated in the extract from the statement below:

“Independent – although we work within the broad framework of Governmental policy, we are operationally independent in the performance of our functions and in our decision-making. We operate with integrity and in a transparent, fair, equitable, impartial and objective manner.”

Under Schedule 1 of the 2012 Act, the Authority (hereafter called the “Board”) consists of ten members including the Chief Executive.

The members of the Board, other than the Chief Executive, are appointed by the Minister. However, according to Schedule 1, the Minister, in appointing members of the Board, must ensure that they are “persons who have experience of and expertise in relation to the functions of QQI and furthermore must include”:

- At least one person who has international experience related to those functions
- At least two persons who are representative of learners, one of whom shall be a person nominated by the Union of Students in Ireland (the recognised national representative body for students of higher education)”.

.....
⁹⁰ The Act was commenced on 6 November 2012 and established “a body called the Qualifications and Quality Assurance Authority of Ireland (in (the) Act referred to as the “Authority”) to perform the functions conferred on it. The Minister (for Education and Skills) may, following consultation with the Authority, by order specify a name, other than the Qualifications and Quality Assurance Authority of Ireland, by which the Authority may describe itself for operational purposes. On 7 November 2012, the Minister specified the name Quality and Qualifications Ireland to describe the Authority for operational purposes. The acronym QQI is used to describe the organisation.

The Chair of the Board is appointed by the Minister. In the case of QQI, the Chair designate was required to appear before the Oireachtas (Irish Parliament) Joint Committee on Education and Social Protection prior to his appointment.

Although the members of the Board (apart from the Chief Executive) are appointed by the Minister, the Government must (since 2011) publicly advertise⁹¹ for applications to state boards through the Public Appointments Service⁹² (PAS). The appointment process is described on the Department’s website⁹³ In the case of QQI, three of the seven non-learner, non-executive members were appointed through this process⁹⁴.

Under Section 15 of the Act, the Chief Executive is appointed by the Board with the consent of the Minister. The mechanism of appointing Chief Executives of State Agencies in Ireland is through the PAS. The current position was filled through public advertisement and open competition.

Development of Processes

QQI is an independent agency with autonomous responsibility for its own operations. Its external quality assurance methodologies were developed (as required both by national legislation and the European Standards and Guidelines) in consultation with higher education institutions but its processes, procedures, decisions and judgements are not influenced by third parties.

QQI consults widely when developing or changing quality assurance methodologies (programme validation or institutional review) but the final

decision on such changes rests with QQI. The QQI Comprehensive Policy Development Programme and the QQI Consultation Framework has been described in detail in pages 17-19.

In common with all quality assurance agencies, QQI makes extensive use of external experts (including academic peers and students) in its quality assurance processes at programme and/or institutional level. Higher education institutions are consulted when developing the methodologies and terms of reference for QQI quality assurance processes and the evaluated institutions are afforded the opportunity to point out factual errors in any draft review report and to make formal responses to the reports in advance of their publication. However, the final review reports remain the responsibility of QQI.

Decisions relating to quality assurance matters – including the nomination and appointment of external experts involved in its quality assurance processes – are made by QQI in an independent manner, which is independent of influence from government, institutions or other sources. QQI’s selection criteria for evaluators include mechanisms to identify and avoid perceived, potential or real conflicts of interest so as to ensure the robustness and independence of the outcomes of its quality assurance processes.

9.7 ESG Standard 3.7 External quality assurance criteria and processes used by the agencies (ENQA membership criterion 6)

91 <http://www.education.ie/en/The-Department/Agencies/Details-of-Membership-of-State-Boards/>

92 Public Appointments Service(PAS): <http://www.publicjobs.ie>

93 Membership of State Board: <http://www.education.ie/en/The-Department/Agencies/Details-of-Membership-of-State-Boards/>

94 Ministerial Response to Parliamentary Question on Appointments to State Boards: <http://www.kildarestreet.com/wrans/?id=2014-01-28a.547>

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.

In a number of its processes, QQI makes formal quality assurance decisions which have formal consequences and has a statutory appeals procedure for these cases. These processes are described in Section 9.9.2 (Appeals System).

9.7.1 Institutional-Level Quality Assurance Processes

Institutional Review

QQI is strongly committed to ensuring that the processes, criteria and procedures used for its institutional reviews are publicly available.

To date, the processes, criteria and procedures used by QQI in relation to Institutional Review have been carried through in legislation from the legacy processes of IUQB, NQAI and HETAC in respect of evaluations commenced by the legacy bodies but not completed before their dissolution with the establishment of QQI. The criteria and procedures for these processes are described below.

As part of its Comprehensive Policy Development Programme, QQI has committed in 2014 to publishing White Papers and public consultation on new (i) quality assurance guidelines for higher education institutions and (ii) new procedures for the review of the effectiveness of the application of these quality assurance procedures at institutional level (Institutional Review). The development of the (new) Institutional Review process (es) will also be informed by the outcomes of the Review of Reviews described in Section 8.8.

The institutional review processes of the legacy agencies HETAC, IUQB and NQAI that have been carried into QQI contained the following steps:

- briefing and training of internal and external evaluators
- self-assessment by the institution

- an external assessment including a site visit by a group of experts (including international experts and a student member)
- publication of (depending on process) summary and main reports with judgements of compliance with legislative requirements, commendations, recommendations and conditions
- a follow-up procedure including a one-year progress report that was published

The IUQB institutional review process is described in the IRIU Handbook⁹⁵. The teams of experts conducting a review, the reports (main, summary and follow-up) arising from the reviews are available on the Reviews Catalogue⁹⁶ on the IUQB section of the QQI website. The terms of reference⁹⁷ for the NQAI review of DIT and the report⁹⁸ of the external panel were available on the NQAI section of the QQI website. The terms of reference⁹⁹ for the review of the degree-awarding powers of RCSI and the Report¹⁰⁰ of the expert panel are available on the NQAI section of the QQI website. The HETAC institutional review process is described in the Institutional Review Handbook¹⁰¹. The terms of

reference, self-evaluation report, final report, response from provider and one-year progress report for each of the reviews are available in the HETAC section of the QQI website¹⁰².

9.7.2 Programme-Level Quality Assurance Processes

Programme Validation

To date, the processes, criteria and procedures used by QQI in relation to Programme Validation have been carried through in legislation from the HETAC legacy process in respect of evaluations commenced by HETAC but not completed before its dissolution with the establishment of QQI.

An amended version of the HETAC criteria and procedures for programme validation was formally adopted as QQI policy by the QQI Board in September 2013.

95 IRIU Handbook (IUQB, 2009)
<http://www.iuqb.ie/GetAttachmente34c.pdf?id=ec40280c-1d8d-46ab-9921-3c64a588ec4f>

96 IUQB Quality Reviews catalogue
<http://www.iuqb.ie/Reviews/iuqb-uni-search.html>

97 Terms of Reference for the review of the effectiveness of quality assurance procedures of the DIT
<http://www.nqai.ie/documents/DITInstitutionalReview2010TOR20Sept2010.pdf>

98 Report on the effectiveness of quality assurance procedures of the DIT (NQAI, 2011)
<http://www.nqai.ie/documents/DITreviewreportoftheexternalreviewpanel150611FINAL.pdf>

99 Terms of Reference for the review of the commencement of degree-awarding powers by the Royal College of Surgeons in Ireland (NQAI, 2010)
<http://www.nqai.ie/documents/FINALRCSIReviewTermsofReferenceandCriteria.pdf>

100 Report of the review of the commencement of degree-awarding powers by the Royal College of Surgeons in Ireland (NQAI, 2010)
<http://www.nqai.ie/documents/RCSIReviewReport-FINALSeptember2010.pdf>

101 Institutional Review Handbook (HETAC, 2007 & 2009)
<http://www.hetac.ie/docs/Institutional%20review%20Handbook-%2007.08.2009.pdf>

102 Institutional Review Documents
http://www.hetac.ie/publications_instit.htm

9.8 ESG Standard 3.8 Accountability procedures (ENQA membership criterion 7)

STANDARD

Agencies should have in place procedures for their own accountability.

Guidelines

These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website;
2. Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance;
 - the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts;
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties;
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
- a mandatory cyclical external review of the agency's activities at least once every five years, *which includes a report on its conformity with the membership criteria of ENQA*¹⁰².

QQI is accountable to a wide range of internal and external stakeholders. It fulfils this accountability through a comprehensive range of internal quality assurance mechanisms.¹⁰³

As part of the development of its first Strategy Statement 2014-16, QQI worked with the Board, the Senior Management Team (SMT), the Heads and Managers Group and the Administrative Team, in a number of workshops. The draft Strategy Statement was also considered by a wide group of stakeholders in July 2013 including the Department of Education and Skills and submissions were received and analysed in September 2013. The Strategy Statement was approved by the Board in November 2013 and published soon thereafter.

QQI has an annual programme of internal audit in which the internal auditor (a member of staff with internal auditor qualifications) commissions audits of key areas of the agency's work. The QQI Audit and Risk Committee agrees the annual internal audit programme, receives audit reports and checks that management responses are appropriate and actioned. The draft minutes of the QQI Audit and Risk Committee meeting go to the QQI Board.

Feedback mechanisms

QQI encourages both internal and external feedback on its processes, for quality assurance and improvement purposes.

External: In May 2013, QQI introduced a Comprehensive Policy Development Programme which included the release of 18 separate Green (issues) Papers. These were introduced at two large public events in Dublin (the Capital) and Cork (Ireland's second city) that were attended by over 500 stakeholders in total. Feedback on the Green papers was staggered over the period May

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¹⁰³ Text in italics refers to additional element for ENQA membership criterion 7

to September. The submissions and the analysis were published in September. A number of the more urgent policy areas were progressed to White (policy) Papers in September and further feedback was sought, received and analysed.

A number of other Green Papers have been progressed to White Papers which were published in December 2013 including policy on delegating authority within the Institute of Technology sector for the making of joint awards.

In August 2013, QQI consulted on and published terms of reference for a 'Review of Reviews'. This involved the appointment of an international panel (chaired by a former President of ENQA) to consider the outcomes and impact of the institutional review processes operated by the legacy bodies HETAC, IUQB and NQAI and to make recommendations about future QQI methodologies for the review of the effectiveness of quality procedures in higher education institutions in Ireland. The report arising from this review will be published in April 2014.

QQI values external feedback on its processes, both in their development and following receipt of a QQI service. As part of the Comprehensive Policy Development Programme, QQI has developed a consultation framework¹⁰⁴ that is followed for all of its policy development.

This process of review has greatly assisted in informing and underpinning QQI's own development and improvement.

Internal: In 2013, QQI, following a tender process, appointed Mazars (consultants) to work with QQI staff on its change management programme. Throughout 2013, Mazars met on a number of occasions with members of the Senior Management Team (SMT), the Managerial group and the

Administrative Team. This followed a Training Needs Analysis. This has resulted in the commencement of a series of action learning projects led by a steering group. Mazars also conducted a two-day 'away day' with the SMT in November 2013.

In 2013, QQI also, following a tender process, appointed Carr Communications (communications and media consultants) to work on a strategy for both internal and external communications for QQI. In February 2014, QQI commenced a programme of internal staff development termed "One QQI". This programme consists of modules on internal relations, external communications, internal organisational skills and development of presentation skills.

External agency review

QQI is undertaking the current review under ENQA's merger criteria that require an agency that has substantially inherited the legal status of two or more ENQA member agencies to undergo a review within two years of establishment.

In relation to the agencies (with responsibility for quality assurance in higher education) that merged to form QQI in November 2012, HETAC was re-confirmed in 2007 as an ENQA member agency following a review, NQAI was confirmed as an ENQA member agency in 2007 following a review and IUQB was confirmed as an ENQA member agency following a review in 2009. Second reviews of HETAC and NQAI did not take place in 2011 and 2012 due to the ongoing amalgamation process (which was originally announced in October 2008).

Avoiding Conflicts of interest

QQI has mechanisms in place that ensure that there is no conflict of interest for those working on its behalf – be they members of the Board, staff or external.

104 QQI Consultation Framework
<http://www.qqi.ie/Consultation/Pages/default.aspx>

These include:

- The conflict of interest mechanisms specified in the Ethics in Public Office Act (2001) applicable to QQI Board members and members of the QQI Executive at manager level and above;
- The requirement that members of expert panels acting on QQI's behalf in institutional review or programme validation exercises disclose potential conflicts of interest;
- The requirement that institutions subject to such reviews are given an opportunity to identify (through prior notification of proposed panel composition) any potential conflict of interest of panel members.

9.9 ENQA membership criteria (in addition to ESG)

The ENQA membership criteria comprise Part 3 of the ESG and some additional requirements and guidelines. The requirements for ENQA membership Criteria 3 and 7 over and above ESG have already been referenced under ESG 3.1 and ESG 3.8 respectively. The three elements of ENQA membership Criterion 8 are addressed below.

9.9.1 ENQA membership criterion 8i

CRITERION

Consistency of Judgements

The agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgments and decisions are reached in a consistent manner, even if the judgments are formed by different groups.

Many of QQI's quality assurance processes result in formal decisions or published reports containing commendations, recommendations or conditions. The recommendations that lead to these decisions and the reports arising from the application of QQI procedures are frequently made by expert

panels appointed by the QQI Executive. To ensure that decisions and judgements are reached in a consistent manner, QQI is careful that panel members are trained or briefed extensively prior to undertaking an assignment. In the development of its processes and procedures, QQI ensures that clear written instructions are provided to panel members. This includes publicly available terms of reference for reviews and comprehensive published procedures for quality assurance processes. Clear guidance is given to panel members in relation to positive/negative or graded/ungraded decisions or judgements.

9.9.2 ENQA membership criterion 8ii

CRITERION

Appeals System

If the agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the agency.

QQI has the powers to make a number of statutory formal quality assurance decisions with potential negative impacts on providers:

- Refusal to approve (Section 31 of the 2012 Act) and withdrawal of approval (Section 36) of quality assurance procedures;
- Refusal to validate (Section 45) and withdrawal of validation of (Section 47) a programme;
- Refusal to delegate authority or the delegation of authority with conditions (Section 53) and withdrawal of delegated authority (Section 55) to make awards.

In each of these cases, a provider has recourse to a statutory appeal as described in Section 68-70 of the 2012 Act which outlines the appointment by

the Minister of an Appeals Panel of no less than 10 members including a Chairperson and provides for the establishment by that Chairperson of an Appeals Board of 3 persons to adjudicate on each specific case sent for appeal. The Chairperson and the members of the Appeals Panel were appointed in February 2014.

9.9.3 ENQA membership criterion 8iii

CRITERION

Contribution to the aims of ENQA

The agency is willing to contribute actively to the aims of ENQA.

QQI and its legacy agencies have been active members of ENQA. The CEO of QQI is the current ENQA President, having been elected to this position in October 2013 and has served on the Board of ENQA since 2011 having previously been a co-opted member in 2009-10.

QQI is a member of the consortium running the current ENQA-led EU-funded project EQARep. Recent interactions by the legacy agencies included the hosting of an ENQA Board Meeting in 2012; an ENQA Conference on Quality Assurance and Qualifications Frameworks in 2012 and an ENQA Training of Reviewers in 2010.

10. QQI: Current Challenges and Areas for Future Development

Reflections And Challenges For The Future

In October 2008, the Irish government announced that it proposed to merge the four bodies responsible for qualifications and quality assurance of higher education and training in Ireland. This coincided with a dramatic downturn in the global economy which triggered recession across most of the developed world. Ireland was particularly

exposed to this downturn and no sector, including higher education, escaped the effects.

In particular, the funding of higher education by central government has been reduced significantly over the period 2009-14. All Irish citizens have seen increases in their direct and indirect tax burden and public sector employees (including those in higher education institutions and state agencies) have had their salaries reduced. Since 2009, there has been an Employment Control Framework (ECF) applied to the public sector in Ireland which has essentially led to the non-replacement of staff who leave or retire from the public service.

These changes have occurred at a time when the demographics in Ireland, unlike many of its European counterparts, are leading to increased demand for and enrolment in higher education. The increase in the unemployment rates from 4% in 2008 to close to 15% in 2013 has also increased the pursuit of higher education qualifications.

All of the above place significant challenges on government and higher education institutions, who are trying to satisfy increasing demand for education at a time of diminishing resources and particularly the challenges of ensuring that the quality of higher education does not suffer in the process.

The process of amalgamation of the four legacy agencies and the establishment of QQI has taken place in the turbulent environment described above. In addition, the landscape of Irish higher education and the institutional structures and governance are also undergoing significant change. Since the adoption in 2011 by the present Government of the recommendations contained in the National Strategy for Higher Education to 2030, the statutory body for funding of higher education, the Higher Education Authority (HEA) has been charged by the Department of Education and Skills with

redeveloping the landscape of higher education institutions in Ireland, paving the way for a number of the Institutes of Technology to merge and apply for Technological University status. Other Institutes of Technology are forming closer alliances with each other and with universities in their regions. Stand-alone smaller colleges, largely in the area of teacher education, are also to be incorporated into the university sector and all higher education institutions are required to collaborate with regional clusters including the further education colleges in these regions.

As QQI is responsible for the external quality assurance of all of the above institutions and also makes the awards for a large number of other smaller independent higher education institutions, this will require an energetic approach to the development of quality assurance processes that will be fit for purpose across a heterogeneous and changing higher education sector. QQI (and the agencies from which it was formed) has been and continues to be subject to the employment control framework (ECF) which has meant that overall staff numbers have been cut by over 20% since 2009.

The spectrum of providers that QQI works with is very diverse ranging from small vocational training entities to large public universities. In all, QQI currently has relationships with close to 900 providers. It has been a challenge to develop a structure that covers the range of responsibilities that QQI has been charged with: as custodian of the Irish National Framework of Qualifications (NFQ) that includes general, further, professional and higher education; as a body that validates further and higher education programmes and make awards for certain classes of providers and that has a role in the external quality assurance of all post-secondary education in Ireland.

Notwithstanding the above, it has been an exciting challenge and an opportunity to develop new structures, policies, procedures and processes in such a dynamic environment. This self-evaluation exercise has permitted QQI to take stock of how it has undertaken this challenge; to gather feedback from its own staff and Board and the many stakeholders, including higher education institutions, as to how successful QQI has been in reacting to this challenge.

With signs that the Irish economy has begun to recover in 2014, QQI looks forward to developing a framework for quality assurance and enhancement that will allow it to deliver on its mission and vision as outlined in its first Strategy Statement 2014-16.

Recognising that institutional review will be a process common to all institutions with which QQI has either statutory or voluntary relationships, QQI looks to building on the findings of the Review of Reviews that will be published in April 2014 and will report on the areas of good practice and challenges identified in the institutional review processes developed by the legacy agencies. Based on the feedback contained in this report, any upcoming institutional review process will have to take steps to ensure that:

- Review processes have clear purposes and definition, are trust-based and reflective of the level of maturity of institutions;
- Institutions receive good guidance, advice and feedback;
- Review processes are sufficiently flexible and that the tasks entrusted to the review teams are achievable in the time available;
- The burden of bureaucracy is no more than required and that a good balance between compliance and enhancement is achieved;

- Review reports are accessible to the various audiences that could benefit from the review outcomes and that there is good public dissemination of reports.

QQI as the sole agency now responsible for the external quality assurance of higher education in Ireland looks forward to being able to play a positive role in supporting quality enhancement across all of Irish higher education by acting as a convenor and by offering opportunities to highlight good local practice in quality enhancement that can be developed into areas of good national practice.

QQI also looks forward to working with all of the institutions of higher education that will be pursuing mergers and institutional consolidation in the years ahead. QQI is eager to work with the Higher Education Authority in a way that balances our respective statutory responsibilities for the quality of educational outcomes in publicly-funded institutions and for the quality assurance of higher education, in supporting its enhancement and for informing the public about these matters.

QQI welcomes engaging with the ENQA-appointed external panel during the site visit. QQI will seriously address any or all of the recommendations for improvement in the panel's report when it is finalised and commits to thorough and public follow-up to any of the recommendations arising from the external panel report.

Appendices

Appendix 1

Legacy Agencies for ENQA membership: Review recommendations and progress

Progress since Reviews of HETAC (2007), NQAI (2007) and IUQB (2009)

In 2006 HETAC published the **first self-evaluation report**¹⁰⁵ for compliance with the ESG. The external panel report was published in 2007¹⁰⁶. From that report stemmed some recommendations made by the Panel reviewing HETAC's performance. These recommendations related to training of reviewers, sustainability of support by staff, approach to validation and practice of report publishing. Each of the recommendations were subsequently addressed by HETAC in a **progress report**¹⁰⁷, published in 2007.

NQAI published its **self-evaluation report** in May 2007. The external panel report was published in 2007¹⁰⁸. The Panel recommended that NQAI build on the support identified by the panel from a wide range of stakeholders for a broader, national approach to quality assurance in higher education. The Panel concurred with NQAI's stated intention to explore system-wide analyses in the context of the Irish Higher Education Quality Network (IHEQN)

In follow-up, NQAI collaborated with the IHEQN members to develop, where appropriate, quality assurance and quality improvement measures. This included its role as secretary to the network and the provision, where possible, of resourcing. In addition, NQAI completed the two reviews cited by the panel;

- review of national and international practice concerning professional doctorates (which fed into the development of NFQ descriptors for the doctorate)
- review of national and international practices and trends in the classification or grading of awards.

Further action on system-wide analysis was suspended in 2010 pending the amalgamation of the quality assurance and qualifications bodies.

In 2007, IUQB commissioned the HEA to undertake an evaluation of IUQB's operations including its compliance with ESG. The self-evaluation report was published in November 2007¹⁰⁹. The external panel report was published in 2008¹¹⁰. IUQB was accepted as a member of ENQA in 2009.

In response to the panel report, The Panel outlined a number of recommendations and in September 2009 IUQB published a progress report¹¹⁰ that addressed these.

The recommendations made by ENQA were under the following categories: Planning and finance, governance, quality assurance and quality improvement, IUQB external quality reviews and challenges in the external review process.

105 Self -evaluation Report (HETAC, 2006):
<http://www.hetac.ie/docs/HETAC%20Self%20Evaluation%20Report.pdf>

106 Review of HETAC (2007):
<http://www.hetac.ie/docs/Review%20Report.pdf>

107 Progress Report (HETAC, 2007):
<..\Progress Reports\HETAC Review - Progress Report September 2007.doc>

108 Quality Review of the National Qualifications Authority of Ireland (2007):
http://www.nqai.ie/docs/about/External_Panel_lowRes12_09.pdf

109 Self-evaluation report (IUQB, 2007):
http://www.heai.ie/files/files/file/archive/policy/IUQB%20Review/IUQB_Self-Evaluation_Report_and_ESG_Compliance_Statement.pdf

110 Review of IUQB Panel Report (2008)
<http://www.iuqb.ie/GetAttachmenta2f6.pdf?id=a24f7941-8514-4c46-a9da-fd5f70d2576d>

Report Recommendations	HETAC Progress Update
<p>Recommend the HET Awards Council consider its current approach to validation might be varied, especially where a new programme or a programme at a level not previously offered by the provider is involved</p>	<p>The operational processes for programme accreditation will be reviewed to ensure that panels are focused on academic risk</p> <p>Policy on periodic review and re-accreditation of programmes will be reviewed, and its relationship to institutional review examined, particularly in the case of providers with a very small number of programmes</p>
<p>Review the qualifications, experience and expertise required of its reviewers with the aim of enabling the HET Awards Council to take a more strategic approach as opposed to what appears currently to be a rather pragmatic approach to their selection and deployment</p>	<p>Interim training arrangements for programme accreditation panels will include advance documentation and onsite induction.</p> <p>A comprehensive policy on training was prepared based on the international best practice, having regard to the training modalities instanced by the Panel.</p> <p>Training requirements were addressed in devising and documenting review processes.</p> <p>An advisory committee on training was appointed</p> <p>Selected programme accreditation panels are accompanied by a coach</p> <p>A conference of reviewers is convened periodically to help reviewers reflect on their experience and learn good practice</p> <p>All programme accreditation panel chairs undertake a formal training programme prior to chairing a review</p> <p>Training programmes and materials will be prepared for programme accreditation panels</p> <p>All programme accreditation panel members will undertake formal training prior to participating in a review</p> <p>The planning for the pilot phase of the institutional quality assurance review process will address training for all reviewers taking part in the pilots</p> <p>Training programme materials will be developed for the main phase of institutional quality reviews</p> <p>All panel members will complete post-panel surveys identifying issues in relation to their training</p> <p>The role of the chair will be expanded to include feedback on the performance of the panel and the adequacy of their preparation</p>
<p>Review the longer-term sustainability of the level and quality of support currently given by staff considering individual programmes submitted for validation</p>	<p>Produce guidelines on the level of support to providers</p> <p>Identify where the standards development process might be used to help a range of providers</p>

Consider publishing all its reports as a matter of principle, and publicising its intention in this regard.	<p>All programme validation decisions from 2005 onwards are published on the HET Awards Council website</p> <p>All institutions undergoing reviews and all participating reviewers are informed that future review reports will be published and a notification to this effect is placed on the HET Awards Council website</p> <p>All reports, including programme validation reports, will be published</p> <p>Publication of reports, by providers, including programme validation and review, will be monitored</p>
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Report Recommendations	IUQB Progress Update
<p>1.1.</p> <p>The IUQB should immediately complete the preparation of a strategic plan for 2008 -2010 and should prepare business/operational plans on an annual basis.</p>	<p>The IUQB Corporate Plan 2009-11 was published in March 2009. An updated IUQB Operational Plan 2009 has been presented to the 9 March, 15 June and 21 September 2009 Board Meetings.</p>
<p>1.2</p> <p>In setting out this plan, the IUQB should clearly link specific goals and dates for completion.</p>	<p>The goals in the Corporate Plan link with the dates for completion in the Operational Plan.</p>
<p>1.3</p> <p>The IUQB should publish annual reports to include a specific section which comments on the sectoral issues and challenges of immediate concern.</p>	<p>Following the receipt of 2008 annual reports from the universities in January 2009, IUQB conducted an analysis of the sectoral issues and challenges of immediate concern. This analysis was presented to the IUQB Board at its meeting of 9 March 2009 and following the first in a series of annual dialogue visits held in the seven universities in April-June 2009, the draft sectoral commentary for the Annual Report was presented to the 15 June IUQB Board Meeting. The sectoral commentary was discussed with members of the HEA Executive in July 2009 and will be presented formally at the September 2009 meeting of the Authority.</p> <p>The 2008 IUQB Annual Report was published in September 2009 and contains the sectoral commentary on the outcomes of the annual reports from the universities and the annual dialogue visits.</p>
<p>1.4</p> <p>A budgetary and resource framework should be put in place to resource the implementation of the strategic plan.</p>	<p>The 2009 budgetary framework was presented at the 9 March 2009 Board meeting and supports the Operational Plan 2009 of the Corporate Plan 2009-11.</p>

Report Recommendations	IUQB Progress Update
<p>1.5</p> <p>The strategic and business plans should reflect the main objective for IUQB delegated to it by the universities and set out in its Memorandum and Articles of Association – the external review of quality assurance in the universities.</p>	<p>The primary initiative in the Corporate Plan 2009-11 is the Quality Framework for Irish Universities which incorporates the Institutional Review of Irish Universities (IRIU) process which was agreed in March 2009. The schedule of reviews of the seven universities for 2009-12 was approved by the IUQB Board at its meeting on 15 June 2009 and published thereafter. The first IRIU review will take place in December 2009.</p> <p>The review process, alongside the training, recruitment and deployment of reviewers, is entirely managed by the IUQB. The IUQB will recruit national and international experts to its Register of Reviewers biannually. The first tranche recruitment process, conducted between March and May 2009, resulted in the recruitment of 65 experts into the Register, from 16 international countries.</p>
<p>The governance of IUQB should be reviewed jointly by the HEA and the IUA. Issues for consideration in this review would include:</p>	
<p>2.1</p> <p>the desirability of ensuring the continued engagement of university presidents in the governance and work of the Board;</p>	<p>Four of the seven IUA nominees on the Board are serving presidents. (Six of the seven incumbent chief officers have served on the IUQB Board at some period since 2006.)</p>
<p>2.2</p> <p>ensuring the effective engagement of members external to the higher education sector;</p> <p>2.3</p> <p>development of a clear protocol/policy so as to encourage higher attendance levels at IUQB Board meetings;</p>	<p>Following the self-evaluation report, IUQB meetings were re-structured into two parts: matter for decision and matters for noting. A 'members section' of the IUQB website has been developed which provides greater and earlier electronic access to Board papers than was previously available.</p>
<p>2.4</p> <p>putting an effective budgetary framework in place for the medium term;</p>	<p>The matter of a medium-term budgetary framework has been superseded by the government decision in October 2008 to establish a new agency in 2010 that will take responsibility for the external quality assurance review of the universities currently performed by IUQB and the HEA.</p>
<p>2.5</p> <p>inclusion of a representative from HETAC/IOTI so as to bring a greater cohesion to quality review across the Irish higher education sector;</p>	<p>In January 2009, the HEA nominated Ms Marion Coy, President of Galway Mayo Institute of Technology to serve on the Board from 1 February 2009. Ms Coy replaced Dr Maria Hinfelaar, President of Limerick Institute of Technology who had served since 2006.</p>
<p>2.6</p> <p>The direct appointment of a representative from the HEA executive to the Board, so as to better support the IUQB in the implementation of its review findings should also be considered.</p>	<p>In January 2009, the HEA nominated its Chief Executive, Mr Tom Boland, to serve as a co-opted member of the Board from 1 February 2009.</p>

Report Recommendations	IUQB Progress Update
<p>3.1</p> <p>The panel recommends that efforts be made to strike an appropriate balance between the review, quality assurance and quality improvement functions of the IUQB.</p> <p>3.1.1</p> <p>The assurance and enhancement functions should be clearly linked and mutually supportive.</p> <p>3.1.2</p> <p>Among the enhancement activities, priority emphasis should be given to stimulating the improvement of quality assurance and quality improvement activities in universities. Promotion of good practice in sectoral areas and preparation of sectoral guidelines as discussed above is desirable but should not displace the IUQB's core activity of quality review.</p>	<p>The primary focus in the IUQB Corporate Plan 2009-11 is the Institutional Review Process for Irish Universities.</p> <p>The comprehensive Framework for Quality in Irish Universities process is an inter-linked process of: annual institutional reporting (AIR) to IUQB, annual dialogue (AD) visits by IUQB to the universities and a rolling cycle of external institutional quality reviews (Institutional Review of Irish Universities - IRIU).</p> <p>The Corporate and Operational Plans clearly outline the linkage between the assurance and enhancement functions and activities.</p>
<p>3.2</p> <p>There is a significant role for the IUQB to act as a lever for change in the universities given a willingness to challenge the status quo.</p>	<p>The introduction of the Annual Dialogue meetings with the individual universities has greatly facilitated this process. All seven universities were visited by the IUQB Executive between April and June 2009. A sector level commentary on the outcome of both the AIR and AD process is included in the 2008 Annual Report which was published in September 2009.</p>
<p>3.3</p> <p>IUQB is encouraged to stimulate a greater contribution in this domain (good practice) through collaboration between IUA, IOTI, the DIT, the IHEQN or through consortia of institutions. HEA competitive funding (such as the SIF referred to above) is one means of supporting this activity.</p>	<p>The IUQB actively engages with the IHEQN and its constituent member bodies to ensure delivery against the vision in the Corporate Plan of supporting a culture of quality across higher education in Ireland</p> <p>All IUQB seminars and publications are accessible to non-university staff. Participation in the IUQB Quality Seminar in November 2009 is open to all the Irish public third level institutions.</p> <p>The updating of the IUQB National Guidelines of Good Practice in the Organisation of PhD Programmes in Irish Higher Education (published in June 2009) involved (in addition to the seven universities) DIT, a number of Institutes of Technology and HETAC.</p>
<p>4.1</p> <p>Priority attention should be given to putting clear and effective processes in place to ensure effective and transparent follow-up to recommendations emerging from external quality reviews of the universities carried out or commissioned by the IUQB.</p>	<p>The IRIU process includes as the fourth core element of the review process, guidelines for institutional and sector level follow-up. This includes the production of an action plan by each university one year after the Main Review Visit submitted alongside the Annual Institutional Report to the IUQB (January each year) and discussed at the Annual Dialogue meeting held between March and June.</p>

Report Recommendations	IUQB Progress Update
<p>4.2</p> <p>These processes should include annual review meetings between the IUQB and the HEA which would be linked to the budgetary mechanisms used by the HEA for the financing of the universities and the IUQB. The HEA should through these mechanisms be more active in supporting the implementation of the IUQB's recommendations. The review panel recommends the publication of the records of these meetings on the websites of both the HEA and the IUQB.</p>	<p>Following the presentation of the draft sectoral overview in the Annual Report to the 15 June 2009 Board Meeting, the IUQB and HEA Executive met on 21 July 2009.</p> <p>IUQB presented its progress report on the implementation of the recommendations in the quality review to the HEA Authority meeting on 22 September 2009.</p>
<p>4.3</p> <p>That in its design of future review cycles IUQB should seek to develop further its own identity as an external agency.</p>	<p>The IRIU process has clearly established IUQB's identity as an external agency.</p> <p>The international acceptance of IUQB as an independent external quality assurance agency was confirmed when the organisation was granted full membership of the European Association of Quality Assurance in Higher Education (ENQA) in June 2009.</p>
<p>4.4 Future review cycles should ensure the engagement and inclusion of the linked and recognised colleges.</p>	<p>In accordance with The Act and the IUQB Memorandum and Articles of Association, the IRIU process will only apply to the seven Irish universities that provide 50% of IUQB's funding through annual subscription. It is not intended that the IUQB would apply the IRIU process to any institution other than the seven Irish universities, unless invited to do so.</p> <p>As outlined in the IRIU Handbook, when each of the seven Irish universities engages with the IRIU process, they are invited to incorporate into the review process information on the effectiveness of its approach to monitoring and reviewing the quality of the educational programmes leading to awards made by the university on behalf of linked and recognised colleges. Therefore the nature and extent of involvement of a linked or recognised college in the IRIU process would be decided by the University with which they are engaged and discussed with the Chair of the review team at the IRIU</p>
<p>4.5</p> <p>The IUQB should seek to include suitably qualified members of staff from the institute of technology sector on review panels, given the relatively small pool of Irish academia and thereby continuing the sharing of good practice between both sectors.</p>	<p>The IRIU process has prioritised the recruitment of a team of external stakeholders and international reviewers over a nationally dominated team. The six person team therefore consists of an employer or external stakeholder, a student, two international reviewers, a coordinating reviewer (acting as secretary) and one Irish/national reviewer. The national reviewer would have recent or former experience – within the last five years, at a senior level with quality assurance processes at an Irish university but not currently employed by an Irish university.</p>

Report Recommendations	IUQB Progress Update
<p>4.6.1 The IUQB should continue and conclude as a matter of urgency the consideration which it is giving to putting in place a continued cycle of institutional reviews as well as developing the capacity to undertake reviews itself.</p> <p>4.6.2 A cycle of rolling reviews is recommended. A four-year timetable with a sectoral report every fifth year is suggested, however the precise schedule should be the subject of further discussion between the HEA, IUA and IUQB.</p> <p>4.6.3 The rolling cycle should also allow for concurrent reviews of different institutions so as to avoid long gaps between institutional reports.</p>	<p>The Handbook for the IRIU process was published in March 2009. In June 2009, IUQB published the timetable for rolling cycle of IRIU reviews with all institutions being evaluated over the four-year period. The cycle provides for concurrent review of different institutions with a gap of no more than 6 years between reviews of individual institutions. The first review will take place in December 2009.</p> <p>The actual institutional reviews will be undertaken between 2009 and 2012 with a review of the effectiveness of the process (Part 2 ESG) conducted in 2013 in advance of a formal review of the IUQB's compliance with Part 3 ESG in 2014. The third cycle of reviews is anticipated to start in 2015.</p>
<p>5.1 The strategies proposed by the panel for review and follow-up pose substantial challenges for the organisation, the universities and the higher education system generally. In addition to the direct organisational and administrative challenges, other major issues include:</p> <ul style="list-style-type: none"> - the challenge of ensuring a consistent approach to the external review method across all institutions over a multi-annual period; - the challenge of ensuring objectivity – both in absolute and perception terms – so as to maintain the integrity of the processes and the confidence of stakeholders; - the challenge of achieving a balance between consistency and taking account of developments nationally and internationally in the context of a rolling review cycle. 	<p>The IRIU process has been developed and will reviewed and refined over the course of the cycle so as to take account of these challenges.</p>
<p>5.2 With regard to meeting these challenges the panel recommends that:</p> <ul style="list-style-type: none"> - a consistent framework be used for each cycle of external reviews as far as is practicable; - the composition of review panels should be such as to maintain confidence and effectiveness. 	<p>The handbook for the IRIU process was developed so as to provide a consistent framework for the cycle. The IRIU process will be reviewed and refined over the cycle using a 'learning from IRIU' methodology.</p>

Report Recommendations	IUQB Progress Update
<p>5.3</p> <p>Criteria in respect of meeting these challenges should include:</p> <ul style="list-style-type: none"> - ensuring a majority of personnel in all review teams are external to the Irish third level sector (universities, institutes of technology and other third-level providers); in the panels' view the 'internal' proportion should not exceed 30% - at least 30% of the membership should be drawn respectively from each of the following: <ol style="list-style-type: none"> 1. overseas academic communities and overseas higher education quality assurance agencies; and, 2. Irish internal and external stakeholders including students and employers. 	<p>The agreed composition of an IRIU review team is six persons whereby:</p> <ul style="list-style-type: none"> - less than 30% of the members are representative of the Irish third level sector; - at least 30% of the members are from overseas academic communities/ overseas higher education quality assurance agencies; - at least 30% of the review team is representative of students and external stakeholders.

Appendix 2

QQI Consultation for the Self Evaluation Report

Stakeholder	Date	Activity	Number	Key points
Quality Assurance Services Staff	27th November 2013	SWOT Analysis Workshop	22	<p>Strengths:</p> <ul style="list-style-type: none"> • Unique organisation • Good communication with external bodies • Good policy infrastructure in place with new policies being developed <p>Weaknesses:</p> <ul style="list-style-type: none"> • Over-reliance on certain people to participate in panels • QQI doesn't exploit its international value and presence as much as it should • Currently working with both old and new processes, difficult to keep track of <p>Opportunities:</p> <ul style="list-style-type: none"> • Review of legacy policies is an opportunity to improve on what we have • Higher education landscape is changing, QQI has an opportunity to influence <p>Threats:</p> <ul style="list-style-type: none"> • Reduction of staff – unable to recruit new staff due to moratorium and the Employment Control Framework • Unrealistic external expectations of QQI's roles and functions
Higher Education providers	11th December 2013	Structured Discussion group	4	<ul style="list-style-type: none"> • Overall provider registration process is positive • Need to consider due diligence of the financial health of companies getting recognition • Instead of rolling applications, a specific deadline would be better to take pressure off panel members • QQI has professional, firm structure for programme validation • Quality processes need to be rigorous when dealing with online mode of delivery • Difficult to get industry experts as panel members on <i>pro bono</i> basis • Concern over resourcing issues for QQI

Stakeholder	Date	Activity	Number	Key points
Higher Education providers	13th December 2013	Structured Discussion group	4	<ul style="list-style-type: none"> • QQI needs to be clear on what desk reviews consist of and what is involved • Guidelines for panel members are good • Timing on panels is an issue, a one day visit is too short • There is a uniqueness of interpretation of policy and process • QQI administration should have a role in evaluating the documentation that is relevant to the provider and not the programme • Panel should focus on 'core' validation issues • Processes such as programmatic review have improved over the years but could improve more • QQI documentation could be clearer – use of 'plain English' preferred

Stakeholder	Date	Activity	Number	Key points
QQI Board	17th December 2013	Q & A session	7	<ul style="list-style-type: none"> • QQI is a unique model as a merged agency dealing with further and higher education • QQI utilises external resources e.g. panel members • Expressed concern regarding QQI resourcing if further reductions in staffing occur • Amalgamations can lead to gaps in expertise, steps being taken to limit gaps with staff attending as panel observers and partaking in site visits to gain experience • Challenge for QQI in demonstrating its independence of governments and other institutions.

Stakeholder	Date	Activity	Number	Key points
Public	6-23rd December 2013	Online Survey	17 responses	<p>Provider registration:</p> <ul style="list-style-type: none"> • Access to initial validation was demanding. However, the rigour and thoroughness of the processes are key strengths • Well-laid out procedures, good mix of backgrounds in terms of panel members • Clear instructions by QQI staff to panel members, and very good support from QQI staff • Clear standards to be met • Process skewed towards applicant - too much scope for appeal, difficult to get to closure • The process is very iterative - it can be difficult, as a panel member, to know when one's commitment to a particular project has finished <p>Programme Validation:</p> <ul style="list-style-type: none"> • The process is demanding and thorough as stated and this is a key strength. • QQI can ensure consistency of programmes throughout the country • Robust QA applies and panel members are selected for their qualifications and experience • Having a designated person who could liaise with the HEI in relation to programme validation would allow the provider greater insight into the requirements and, for the provider would be of valuable assistance. • Difficulties in relation to individual panel members moving beyond the remit of programme validation which is problematic <p>Programmatic Review:</p> <ul style="list-style-type: none"> • Thorough and well-staged and allowed sufficient and ample time for the College to prepare • Supportive, proactive engagement • Detailed and thorough process which ensures QA and provides positive supportive feedback to providers • Programmatic review could be made a little more user-friendly through the provision of more support • Some confusion around the interpretation of rules regarding credits and weightings and the structure of programmes

Stakeholder	Date	Activity	Number	Key points
				<p>Delegated Authority:</p> <ul style="list-style-type: none"> • Rigorous, supportive of organisational development • overly difficult process, but the new proposed approach re DA for joint awards is most welcome • Panel need to engage in more detailed preparation identifying key issues and developing strategy for conducting review to enable them to provide an adequate incisive process <p>Devolved responsibility for programme validation sub-processes:</p> <ul style="list-style-type: none"> • It is a fair process <p>Research approval / research accreditation</p> <ul style="list-style-type: none"> • This process is very cumbersome and the many layers should be reconsidered • very detailed process <p>Devolved responsibility for research accreditation</p> <ul style="list-style-type: none"> • It is a fair process • Organisations have demonstrated that they are trustworthy when entrusted with the responsibility to assure delegated authority is managed in a professional manner • should not be a need for this once an Institute has demonstrated its capability in two or more discipline areas. <p>Agreement of quality assurance in relation to collaborative, transnational provision and joint awards</p> <ul style="list-style-type: none"> • Processes in relation to this area up to 2013 were a disaster, overly bureaucratic and placing unnecessary and ill-thought out constraints on providers • Proposed sectoral approach to devolving DA for this area is a very welcome development • A very detailed process which underpins robust QA • System too risk adverse to be able to accommodate significant changes in transnational education

Appendix 3

The higher education awards available in Ireland

Award Type - Undergraduate	NFQ level	Normal Duration	ECTS*
Higher Certificate	6	Two years	120
Ordinary Bachelor Degree	7	Three years	180
Honours Bachelor Degree	8	Three or four years	180-240
Higher Diploma	8	One year	60
Award Type - Postgraduate	NFQ	Duration	ECTS
Postgraduate Diploma	9	Usually one year	60
Masters Degree (Research and Taught)	9	One to two years	90-120
Doctoral Degree	10	Usually minimum of three years	No range
Higher Doctorate	10		No range

**European Credit Transfer System*

Appendix 4

Irish Universities

University of Dublin (Trinity College Dublin)

Dublin City University

University of Limerick

National University of Ireland (NUI)

Constituent Universities of the NUI

University College Dublin

University College Cork

National University of Ireland, Galway

National University of Ireland, Maynooth

Recognised Colleges of the NUI

Royal College of Surgeons in Ireland

Shannon College of Hotel Management

Milltown Institute

Uversity

Colleges of Constituent Universities of the NUI

National College of Art and Design

Institute of Public Administration

St. Angela's College, Sligo

Appendix 5

List of Institutes of Technology

- Athlone Institute of Technology
- Institute of Technology Blanchardstown
- Cork Institute of Technology
- Institute of Technology Carlow
- Dublin Institute of Technology
- Dun Laoghaire Institute of Art, Design and Technology
- Dundalk Institute of Technology
- Galway-Mayo Institute of Technology
- Limerick Institute of Technology
- Letterkenny Institute of Technology
- Institute of Technology Sligo
- Institute of Technology Tallaght
- Tralee Institute of Technology
- Waterford Institute of Technology

Appendix 6

Legislative Functions of QQI from the Qualifications & Quality Assurance (Education and Training) Act, 2012

The role and general functions of QQI, as set out in its legislation, are captured below in italics. They incorporate the previous functions of FETAC, HETAC and the NQAI in relation to the maintenance and development of the National Framework of Qualification, the validation and awarding of Qualifications, and the monitoring and review of providers. QQI also has responsibility for the external quality review of the universities; a function performed previously by the Irish Universities Quality Board (IUQB) in conjunction with the Higher Education Authority (HEA).

In addition, QQI has been assigned some new functions. It is responsible for the development and implementation of a register of programmes leading to awards in the NFQ. It will also establish a Code of Practice and International Education Mark for the provision of education to international learners.

Functions of Authority - Qualifications & Quality Assurance (Education and Training) Act, 2012, Part 2

(9) (1):

- (a) Promote, maintain, further develop and implement the (National) Framework (of Qualifications)*
- (b) Advise the Minister in relation to national policy on quality assurance and enhancement in education and training*
- (c) Review and monitor the effectiveness of providers' quality assurance procedures*
- (d) Validate programmes of education and training, and review and monitor the validated programmes*
- (e) Establish the standards of knowledge, skill or competence to be acquired by learners before an award can be made by the Authority or by a provider to which authority to make an award has been delegated*
- (f) Make awards, delegate authority to make an*

award where it considers it appropriate and review and monitor the operation of the authority so delegated

(g) Determine policies and criteria for access, transfer and progression in relation to learners, and monitor the implementation of procedures for access, transfer and progression in relation to learners by providers

(h) Establish a code of practice for the provision of programmes of education and training to international learners

(i) Authorise the use of the international education mark by a provider that complies with the code of practice

(j) Establish, maintain and develop a database providing information on awards recognised within the Framework, programmes of education and training which lead to awards recognised within the Framework and any other programmes the Authority thinks appropriate

(k) Establish and maintain the register

(l) Advise and consult with the Minister, or any other Minister, on any matter which relates to its functions, at that Minister's request

(m) Co-operate with international bodies on qualifications and quality assurance policies and their implementation and in particular to—

(i) Liaise with awarding bodies outside the State for the purposes of facilitating the recognition in the State of awards of those bodies, and

(ii) Facilitate the recognition outside the State of awards made in the State

(n) Ensure arrangements for the protection of learners are in place where learners have begun but not completed a programme of education and training where a provider ceases to provide the programme before completion

(o) Assist enrolled learners in finding alternative programmes of education and training where providers cease to provide a programme before completion, and

(p) Collect any information relating to the performance of its functions it considers appropriate.

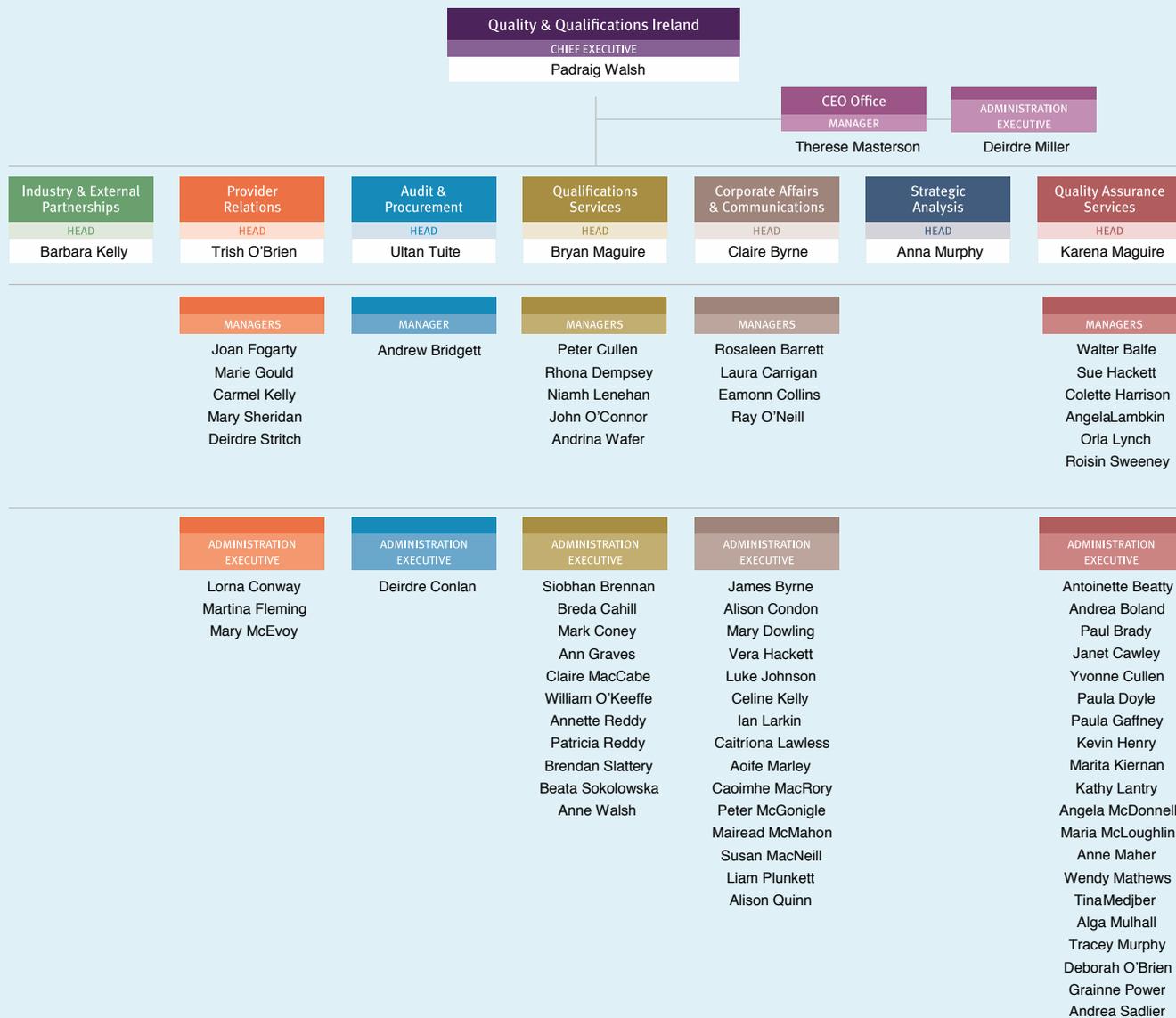
Appendix 7

QQI Executive representation nationally and internationally

1. European Qualifications Framework (EQF) Advisory Group
2. European Qualifications Framework (EQF) Advisory Group (Validation representative)
3. European Credit System for Vocational Education and Training (ECVET) Users Group
4. EQF National Coordination Point
5. UK-IE frameworks group (“5 countries”)
6. EQF Portal Working Group
7. NI EU Coordination Group for VET
8. European Skills/Competences, qualifications and Occupations (ESCO) Maintenance Committee
9. Bologna Follow-up Group (BFUG) Structural Reforms Working Group
10. Qualifications Frameworks - European Higher Education Area (QF-EHEA) National Correspondent
11. European Network of Information Centres - National Academic Recognition Information Centres (ENIC-NARIC)
12. UK Coordination group for VET
13. National Europass Centre contact person
14. Joint European Commission-Council of Europe Working Group on Qualifications Frameworks and Recognition
15. BFUG Network on Recognition of Prior Learning
16. Holy See NQF-HE self-certification
17. Council of Appeals: Agency for Assessment and Accreditation of Higher Education (in Portugal) (A3ES)
18. European Association for Quality Assurance in Higher Education (ENQA)
19. EQAVET Working Group
20. National Reference Point for QA in Further Education (QARANP)
21. Transparency of European Higher Education through public quality assurance reports (EQArep) Steering Committee
22. EQArep working groups (3 in total)
23. Court of the University of Ulster
24. FÁS Construction Skills Certification Scheme (CSCS) and Quarry Skills Certification Scheme (QSCS) working groups
25. National Strategy for Higher Education: Implementation Oversight Group
26. Association of Chief Executives of State Agencies (ACESA)
27. Management Board of the National Forum for the Enhancement of Teaching and Learning
28. Irish National Student Survey - Plenary Group
29. Irish National Student Survey - Survey Design Group
30. Irish Higher Education Quality Network
31. Steering Group established jointly with FÁS and IVEA in preparation for the establishment of SOLAS
32. Transitions Reform Steering Group
33. Education and Training Committee of Bord Altranais agus Cnáimhseachais na hÉireann
34. Standards Committee of Bord Altranais agus Cnáimhseachais na hÉireann
35. FÁS/SOLAS FET Strategy Advisory Committee (to oversee the FET Strategy Development Process)
36. FÁS/SOLAS Technical Working Group
37. Project team to establish a flexible lifelong learning system with Department for Employment and Learning (Belfast)
38. National Council for Curriculum and Assessment (NCCA) Board for Senior Cycle
39. E4 Group
40. Bologna Follow-Up Group (BFUG)

Appendix 8

Staff Organigram



Appendix 9

QQI Board Members

- Mr Gordon Clark (Chair)
- Dr Pdraig Walsh (Chief Executive)
- Dr Margaret Cullen
- Ms Mary Danagher
- Dr Ann Louise Gilligan
- Ms Joanne Harmon
- Mr James Moore

International Representative

- Dr Barbara Brittingham

Learner Representatives

- Ms Una Buckley
- Ms Cat O'Driscoll

Appendix 10

Consultative Forum - Nominations being sought from:

Representatives of public, further and higher education and training providers including the research community
Representatives of private further and higher education and training providers including the research community
Community and voluntary education sector representatives
Employer representatives
Labour market actors (trade unions, teacher representative bodies)
Representatives of occupational associations (professional recognition bodies, regulatory bodies)
Learner representatives
Government departments and agency representatives
Funders of education and training
International education and training awarding bodies

Appendix 11

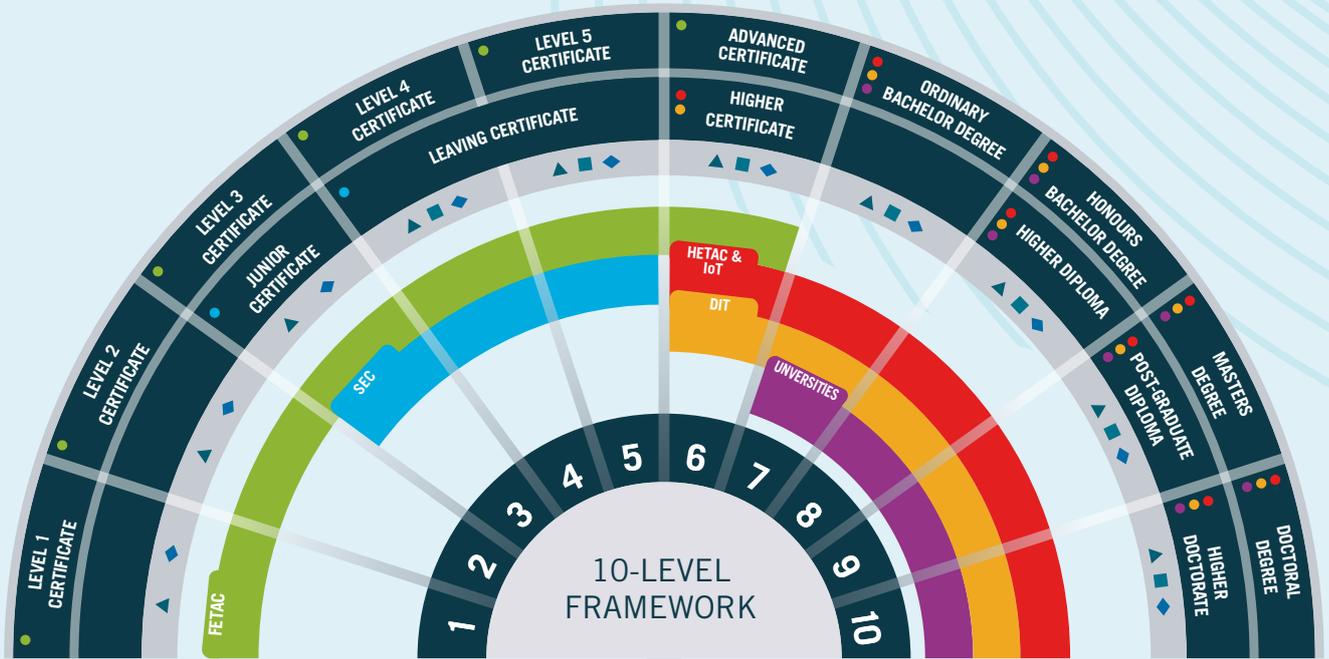
Table below indicates the Relationship between Standards and Guidelines for *Quality Assurance in the European Higher Education Area* and the QQI Policy Suite for Programme Validation.

ESG for Internal QA in HEIs	QQI Policy (Legacy agency Policy) Guidelines and NFQ	Criteria within Policy
1.1 Policy and Procedures for Quality Assurance	1. Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards, 2013	
	2. Quality Assurance Guidelines and Criteria for Provider Access to Initial Validation Programmes Leading to QQI Awards - Higher Education and Training, 2013.	The QA Guidelines - refers to all aspects required of the Providers internal QA Policy and Procedures Legacy and existing
	3. HETAC Core Validation Policy and Criteria, 2010	<p>S 3.2.2 (9) The provider should have appropriate quality assurance arrangements for the proposed programme. Any new quality assurance arrangements required should be agreed with HETAC. Where HETAC is the awarding body such new arrangements should be detailed with the application for validation.</p> <p>S 4.3. Internal Assessment by a Registered Provider</p> <p>Step 3 Page 11 External Assessment (Providers QA Procedures and Self-Assessment)</p> <p>Step 4 Expert Panel Report</p> <p>Section 4.5 Post Validation Follow up – External Examiners are established as a provider QA system feature</p> <p>Section 4.6.1 Changes to programmes Following Validation.</p> <p>Section 5 Devolution of Responsibility for Validation Sub-processes where HETAC is the Awarding Body.</p> <p>Section 6.2 - The essential conditions of validation for the provider of the validated programme</p> <p>Section 9 - Validation in the context of Delegated Authority</p>

<p>1.2 Approval Monitoring and Periodic Review of Programmes and Awards</p>	<p>Core Validation Policy and Criteria, 2013 (HETAC)</p> <p>Provider Monitoring Policy and Procedures, 2010 (HETAC)</p>	<p>Section 4.6 Revalidation of programmes under Provider QA</p> <p>General Conditions relating to programme validation refer to re-validation after a period of 5 years</p>
<p>1.3 Assessment of Students</p>		<p>All sections</p>

Appendix 12

The National Framework of Qualifications (NFQ)



AWARDING BODIES

- FETAC - awarded by Quality and Qualifications Ireland (QQI)
- SEC - State Examinations Commission (*Department of Education and Skills*)
- HETAC - awarded by Quality and Qualifications Ireland (QQI)
- IoT - Institutes of Technology
- DIT - Dublin Institute of Technology
- Universities

AWARDS IN THE FRAMEWORK

There are four types of award in the National Framework of Qualifications:

- Major Awards: named in the outer rings, are the principal class of awards made at a level
- ▲ Minor Awards: are for partial completion of the outcomes for a Major Award
- Supplemental Awards: are for learning that is additional to a Major Award
- ◆ Special Purpose Awards: are for relatively narrow or purpose-specific achievement

