White Paper:

Review of Higher Education Institutions

Quality & Qualifications Ireland

A contribution to the consultation from Athlone Institute of Technology

October 2015

Contact name and details	Authority	Permissions
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Athlone Institute of Technology acknowledges the invitation from the Authority to engage with this important consultation and offers the comments below for consideration. This institution also supported the consolidated return to this White Paper submitted on behalf of the subsector by Institutes of Technology Ireland.

Quality & Qualifications Ireland took the courageous decision to commission and publish the Review of Reviews which it published in March 2014. In the concluding remarks of that report, the chair, Mr Peter Williams, and his team, state that the legacy processes inherited by QQI provide much useful information and experience on which to build a new institutional review system. This consultation is perceived here as an element within that reconstruction phase. This institution is of the view that higher education, through its providers and its statutory agencies, shares the common purpose of safeguarding standards and enhancing the experience of our students in a manner that is transparent and accountable to the public. The Review of Reviews wisely draws us back to the core principles: the basic purposes of reviews and the design of a system that must start from the purposes and objectives it is intended to achieve.

Addressing the purpose of review, the Review of Reviews stated that future institutional review process must be developed on the basis that its form reflects its functions and its functions are clearly and unambiguously stated. It is in the context of this advice that the White Paper is measured.

It is reasonable to take the twelve principles set out in the Review of Reviews and, in cases, to realign them to establish the basis for the approach to future review. While this is a helpful step on the road to advancing the discussion, this institution is not persuaded that this is the optimum format for the final document. The White Paper sets out a context for policy rather than a policy itself; it sets a tone, and a positive tone at that. But it is a series of principles that will inform the policy and it sits uneasily with the very title "Policy". The Enhancement-led Institutional Review documentation from the QAA Scotland (Handbook May 2012) covers some of the same ground and does so in a focused manner that is imbued with the same philosophy that informs the QQI approach. The sense here is that this paper does not so much contain policy as the basis for policy and as such it is strong and consistent with other QQI documentation. This comment is not, however, an argument against a principles-based document.

Section 27 of the Quality and Qualifications Act 2012 is cited in the draft paper. Within that Section a series of actions is proposed commencing with the issuing by the Authority, as soon as is practicable after the establishment day, of guidelines for the establishment of procedures for quality assurance. It is appreciated that the Authority has had a busy initial few years and has achieved a considerable amount in that period; it is also appreciated that the diversity of the constituency it serves makes this a major undertaking and that the Authority has set out on this path and indicated how it intends to address this requirement. But there is a relationship between those guidelines and the clarity around the purpose of review that is advocated by the Review of Reviews. The thesis here is that the guidelines when issued and published will assist providers in informing their approach to review. It would appear that this was also the thinking of those who contributed to the drafting of the legislation. It may be a technical point, but under Section 34 the Authority's mandate to review the effectiveness of the procedures established by a relevant provider comes into play from the issue of guidelines under section 27(1)(a). This suggests a sequence.

On the question of review procedures, in Section 4 of the White Paper, mention is made of a 5-year review cycle. This echoes current or inherited practice in this subsector. There was talk, well-founded or otherwise, of a shift to septennial review. In this institution we have just completed full programmatic review in respect of each faculty. The process, when one takes preparation, review, and follow-through, takes years and is hugely demanding of energy and focus. Its value is not questioned, but our reflection is that such a major review might be more appreciated if spaced differently and if complemented by other more focused or thematic reviews. This institution would encourage reflection on the optimum spacing of major institutional reviews given that they are, in the words of the White Paper, interdependent on and integrated with other QQI functions. And indeed these functions might be extended to include internal QA processes and various professional body evaluations also. In this regard, the legislation specifically mentions, under Section 34, review at least once every 7 years; It is appreciated that this is a maximum frame and it is qualified by the clause which states *from time to time as the Authority thinks appropriate*. But given the interlocking quality interfaces and the record of strong and constructive engagement between the Authority and recognized higher education providers, this institute believes that the specific mention of a 5-year review cycle might occasion further reflection.

Arising from the point above, the Review of Reviews in commenting on the comprehensive model of review notes that its disadvantage lies in the greater time and resource demands it makes on QQI, reviewers, and participants in the institutions. There is much to recommend the comprehensive approach, and the Review of Reviews sets out these advantages, especially if the outcomes can be communicated in a manner accessible to the general public. However, the burden upon all actors concerned remains a consideration and informs the suggestion made above. You will likely receive comments from institutions regarding the capacity to engage with review; this reflects the fact that there are increasing demands in respect of accountability and reporting at a time when resources have been cut as a result of the economic crisis. This is important work and it will be undertaken but proportionality in respect of the detail and demand, and especially in light of other known demands, might be kept in mind.

The institutional quality profiles mentioned within the consultation paper might be fashioned in a manner that allow for ease of access.

Having facility for an enhancement focus, where appropriate, is appreciated. The previous review cycle invited institutions to consider a thematic approach to reflect local priorities and, presumably, to assist in unifying the review experience. But consideration might be afforded other thematic approaches, such as the enhancement themes sponsored by the National Forum, and whether there might be the danger of confusion in too many such approaches. Again some alignment might be advisable.

Benchmarking of quality has been a focus of discussion for some time and can be challenging. AIT welcomes the intent that an institution's own strategy and selected quality indicators along with European and national quality standards and guidelines will be employed in this regard. Two comments arise: first, while institutions are appropriately developing in distinct ways, there might be merit in a broader conversation around the benchmarks to ensure the fullest understanding and toward ensuring maximum transparency. Second, in this one can't but be minded of the parallel annual strategic discussions that have been initiated by the HEA. These too are founded in each institution's own strategic plan and cannot ignore the approach to matters such as quality and its impact upon learning and teaching, research, engagement, and the broader student experience. This institution supports the subsectoral submission as issued by the Institutes of Technology Ireland

which encourages some consideration of alignment, or at very least the avoidance of duplication, in this regard.

In a similar vein, the term "directions" is introduced in this White paper. The general sense is understood and the positive intent is applauded; should a major evaluation take a turn that raised a serious concern, then it would be ceased and a more focused "for cause" review be instituted. However, the teasing line that states *Though cyclical review can lead to directions, it is not linked to directions and outcomes that may change the status of QQI's approval of a provider's Quality Assurance Procedures* is inevitably going to raise the question as to what such directions might entail. It is appreciated that the governing Act under Section 35 announces the term and introduces the sanction for such directions but as these are issued following consultation with the relevant provider concerned it might be advisable at this stage to envisage and share the types of scenario and possible directions that might result. As this comment is founded in an evaluation of the effectiveness of the quality assurance procedures established by a relevant provider under Section 28 and the implementation of same, it would be anticipated that any concern short of reason to institute a "for cause" review which might suggest a direction from the Authority will have been identified through the normal quality engagements or in the preparation for the cyclical review. That being said, this institution acknowledges and respects the role that is mandated the Authority through legislation and especially in this respect its function under Section 9 to review and monitor the effectiveness of providers' quality assurance procedures. The recommendation recorded in this return might assist in realizing the aim set out in the draft paper to ensure that there is sufficient consistency in approach between similar institutions to allow for comparability and shared learning.

The commentary above is specific and responds to the possible form and particular elements within the consultation paper. In broader terms, this institute compliments the Authority on the manner in which it has approached its functions and in its determination to meet its obligation to consult with providers of relevant providers. The differentiated approach to review is also appropriate and it responds to the differing legislative contexts and capacities of providers within the QQI constituency. In this respect, a tailored model of review makes sense. It will allow for optimum construction of panels and the balance between enhancement and compliance can be weighed with propriety. Concerning this balance, the Authority has established itself as one of the leaders within the European Higher Education Area and its enlightened approach has sponsored increasing levels of institutional autonomy where such autonomy can be shown to be merited. In that regard, and consistent with good practice, this institution would wish to see the enhancement approach foregrounded.

In the initial returns to the Authority, the sense was that relevant providers valued the public accountability that attaches to review and, from AIT's perspective, we see the Authority and the institution having common cause in this respect. Mention has already been made above about the desirability of resulting institutional quality profiles that can be accessed without difficulty by the public. In addition, the process of review might also be constructed to be dynamic over time in a manner that acknowledges the shifting context for education and training and with a view to continuing enhancement.