Royal College of Surgeons in Ireland

Feedback on the QQI White Paper on Review of Higher Education Institutions (2015)

Overall feedback on the White Paper

RCSI welcomes the release of this White Paper (WP) on review of Higher Education Institutions (HEIs) for consultation. It is useful to gain an insight into QQI thinking on the future shape of Institutional Reviews in the aftermath of the 'Review of Reviews' (2014).

We are disappointed at the decision to adopt a 'one size fits all' model for future reviews. While it does offer economies of effort, we regard it as being a 'blunt instrument'. The Independent Review Team which conducted the QQI 'Review of Reviews' pointed out that:
> *(a 'one size fits all' model)…ignores sectoral differences by adopting a generic approach and assumes that the differences between the sub-sectors are of secondary importance and of less significance than the basic shared requirements of any quality assurance system.*
> **Report of the Independent Review Team (2014)**

An inspection of the proposed reviews schedule (Appendix 2) underlines the fact that there are three distinct sub-sectors – DABs, IoTs & 'Others' – which would be better served by either a 'Core + Sub-sector' or 'Sub-sector' form of review. At the very minimum, the DABs need a different form or model of review than that which will apply to HEIs with delegated authority.

The WP gives no indication of how DAB reviews of their Linked Providers (LPs) will be captured in the Institutional Review process.

No mention of the attribution of Review costs is made by the WP. Given that the HEIs are now liable for substantial 'Relationship Fee' payments to QQI, RCSI would expect the WP to include a specific statement that the Review costs will be borne by QQI in their entirety. Even then, the issue of 'value for money' must be considered – over the seven-year Review Cycle, RCSI will (at the 2015 rate) have paid approx. €343,000 to QQI, and it is difficult to foresee an Institutional Review costing more than 10-15% of that sum.

Finally, there is a worrying vagueness in the WP around a number of key issues, such as:
- What does QQI mean by 'quality' and how do they envisage it being measured? No QA indicators or metrics are specified
- The WP makes repeated reference to 'directions' arising from reviews and to 'for cause' reviews, issues upon which the 2012 Act is largely silent. These must be enlarged upon so that the HEIs can consider their implications
- The WP seems to assume that statutory approval of institutional QA procedures will precede the commencement of the Review Cycle in Autumn 2016, but the HEIs have heard nothing specific from QQI concerning that approval process (which heretofore had been coupled with the IEM Authorisation mechanism – presumably now in abeyance)

Specific comments & queries

Section 1:
- Reference is made to 'directions' and to 'for cause reviews'. Both terms must be defined clearly. In re the latter, while specific reference is made to Section 27 (1) (b) of the 2012 Act, the term 'for cause review' does not appear in the Act.

Section 2.1:
- What is meant by '…selected quality indicators and benchmarks'? Will these be selected for individual HEIs or for groups within the sector (e.g. DABs vs. IoTs)? Will they be selected by QQI or in consultation with the HEI under review?
- Who selects 'specific enhancement themes' for individual HEI reviews?
- Again, the references to 'directions' and to 'for cause reviews' need to be clarified and fleshed out

Section 2.2:
- The text comments that 'The objectives of a review may be extended to include…'. Arguably, this may lead to a single review trying to cover far too much ground.
- Can reviews of the DABs omit compliance since this is covered by the AIQR submissions?
- What implications does this have for reviews by the DABs of their LPs?

Section 2.3:
- In relation to the balance of a review between compliance and enhancement, what precisely is the role of the Review Panel in evaluating compliance?
- What experience / competence will the Panel members have to allow them to make this evaluation?
- Will QQI specify in advance a 'minimum data-set' that will be required of all HEIs based upon which the evaluation will be made?
- Surely, this will operate differently for the DABs versus the IoTs!

Section 2.4:

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

[b] Comparability
- What is implied by the notion of 'comparability' here?
- How is it relevant, if at all, to HEA Compacts (for those HEIs which have them)?
- Does QQI envisage developing 'league tables' based upon the review outcomes?
- Surely, comparability can apply only to the effectiveness of QA procedures across HEIs? If it extends beyond this, it will be a matter of great concern for the HEIs

[c] The focus for 'initial review'
- The DABs (with the exception of NUI) all have been reviewed twice in the past, variously by IUQB & NQAI. The relevant review reports must obviate the need for an 'initial review' to allow for a '…thorough evaluation of the effectiveness of…quality assurance procedures'!

[d] Institution-specific standards & benchmarks
- How sensible is it to suggest that individual HEIs would have latitude to identify their own standards & benchmarks?

[e] 'For cause' reviews
- Again, this issue must be fleshed out to allow the HEIs to assess what QQI intends.

Section 2.5:

[a] Review Team size
- Review Teams '…will include at least one member with international expertise'. This could be read to infer that Teams will be smaller and/or more local than in previous reviews.

[b] Institution-specific standards & benchmarks
- Again, how sensible is it to suggest that individual HEIs would have latitude to identify their own standards & benchmarks?
- What ' international sources' are being referred to here?

Section 2.6:

[a] Review terms of reference
- Will these be institution-specific or sector-specific (i.e. DABs vs. IoTs)?

[b] Site-visit duration
- Indicative minima & maxima should be stated.
- If 'compliance' is covered by the AIQR submissions (especially for the DABs), surely five-day Main Review site-visits will no longer be necessary?

[c] Review Team composition
- There should be an explicit statement of the requirement that a majority of Review Panel members would have relevant experience of institutional QA procedures / processes as they apply to Ireland.

Section 2.8:

[a] 'National' themes for quality?
- When & how does QQI propose to develop and agree such themes?

[b] Thematic reviews
- Where the text refers to a '…common, thematic approach to reviews…', does QQI anticipate running thematic reviews across HEIs within Ireland in parallel with Institutional Reviews?
- Given its current level of organisation, staffing and resources, does QQI have the capacity to run such reviews?

Section 3:

[a] The relative emphasis given to compliance vs. enhancement?
- This will differ between sectors (DABs vs. IoTs)
- It will differ within sectors depending on the scale & relative maturity of the HEIs
- One size does not fit all……

[b] Key questions & lines of enquiry
- The questions are acceptable
- However, the focus here seems to be worryingly 'compliance-heavy'!

[c] Time-line
- Has a diagram been omitted from this section?

Section 4.1:
- Why does the proposed procedure accord a role to the HEA in approving the Terms of Reference for the reviews?

Section 4.2:
- Again, QQI must clarify what it means by 'for cause' reviews

Appendix 1:
- How, if at all, does the 'thematic review methodology' relate to the 'enhancement themes' involved in the proposed HEI Institutional Reviews?
- What benchmarks does QQ propose to use in '…evaluating relative equivalence with well-functioning quality assurance systems'? Why is meant by 'relative equivalence'?

Appendix 2:
- The Schedule commits QQI to running between 5 and 8 reviews in each year of the Cycle. Is this realistic?

David T. Croke
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