

HIGHER EDUCATION COLLEGES ASSOCIATION (HECA)

RESPONSE TO

QQI's WHITE PAPER ON "REVIEW OF HEIs"

HECA warmly welcomes this White Paper and offers the following comments and observations:

Page 2: While accepting that QQI has a statutory remit to address QA procedures, HECA members believe that the absence of the word "enhancement" from Page 2 suggests a missed opportunity to set any evaluation in the context of continuing enhancement in the light of emerging best/better practice. It would perhaps be appropriate if "Enhancement" could be included in the "Improve" category of Figure 2 on Page 3.

Page 5: HECA would have welcomed a provision for positive directions, e.g. commendations, which seem to be absent from the final paragraph. Questions were also posed as to the possible consequences for an institution in the event of a QQI evaluation recommending discontinuation of certain processes, or making suggestions for enhancements? Would an institution be required to make such changes by revising its approved QA procedures with QQI while not altering the institution's status as having QQI approved procedures? Concern was also expressed about the manner in which Review Outcomes might be measured against the level of an institution's autonomy, noting that there is no other explicit reference to institutional autonomy in the White Paper.

HECA would also welcome reassurance from QQI that there will be a mechanism in place whereby a review team's negative comments in relation to any aspect of an institution's operation, and which have subsequently been addressed appropriately by that institution, that such negative comments will be removed once QQI is satisfied that the issue/s have been addressed to its satisfaction. HECA would be concerned if such negative comments, subsequently addressed, were to remain in the public domain until the next review.

Page 7: Reference is made to "the balance between compliance and enhancement being determined by the extent to which compliance can be assured through an existing evidence-basis" How will enhancement be assessed and how will institutions be appraised of emerging best practice? For example, if Institution A develops new procedures in respect of an aspect of its educational provision, (e.g. increased learner diversity), how might Institution B be assessed regarding the same development? Are anticipated enhancements predicated on those from QQI, ENQA and other bodies? What enhancements can institutions be reasonably expected to have embraced/adopted from year to year? Given the number of smaller niche providers within HECA, HECA would like to be assured that consideration will be given to the size and capacity of an institution while also recognising the fact that the same resources cannot be made available by an institution with 200 learners as can be made by an institution with 5,000 plus learners. In relation to best practice being evident in an institution, HECA suggests QQI might explore ways of disseminating this amongst providers.

HECA would welcome QQI presentations / updates on an annual basis – perhaps at its annual conference.

Page 8: HECA welcomes the statement that the Terms of Reference regarding expectations regarding compliance and enhancement will be agreed in advance with an institution.

Page 11: HECA members are very much aware of the value and importance of Reviews demonstrating as they do external validation and public accountability. However, HECA members provide a very wide diversity of programme offerings and so HECA believes that it is vitally important that the expertise of a panel is matched to the scope and scale of an institution. For example, a large HEI involved in both HET and FET may wish to review aspects ranging from higher research programmes with industry to entry level supports for learners at Levels 3 and 4 on the NFQ. When dealing with added complexities such as transnational and online delivery, review panel members may be required to have a very considerable breadth of experience in both HET and FET. HECA would also like QQI to give consideration to the possibility of appointing specialists, or to limiting the evaluation role of certain panel members to their specific area of expertise.

In relation to the reference to “student peer-reviewers”, HECA would draw attention to the importance of adequately briefing student peer-reviewers. For example, in small single-discipline colleges, learners may not have the same student experience, but the quality of the experience may be no less valid.

While accepting that there would be a cost factor involved, HECA would also welcome the possibility of training being provided to institutions to prepare them for participation in a review. Perhaps if QQI were to provide some basic training on-line that could prove to be most useful to any institution embarking on a review, particularly institutions at the beginning of a review cycle.

Page 12: With regard to the appointment of a Review Team, is it anticipated that institutions can participate in the nomination of candidates or the rejection of candidates on to a Review Team? Whilst acknowledging that different panel members can help to balance out each other’s views, HECA would welcome if some opportunity were afforded to institutions to participate in the nomination/rejection of Review Team candidates, particularly if an institution sought to benefit from particular expertise, either national or international. It is understood that any such recommendations would have to pass the test of real or perceived conflicts of interests.

Page 13: It is suggested that *“the potential of the review process should not be limited to audit or inspectorial approaches, but should be explored using other techniques, such as disciplinary or thematic reviews and by the development of meta-analyses of the outcomes at the sub-sector and system”*. HECA agrees that it is appropriate that national enhancement themes should inform a review, but would stress that institutions should be notified in advance of the themes by which the review will be conducted. HECA also would like further clarity on how QQI will decide which techniques/approach it will adopt for any given review.

HECA is very conscious of the fact that QQI’s biennial reporting provides an ideal opportunity to celebrate, acknowledge and disseminate best practice. Would QQI consider using case studies to demonstrate and advance practices across the whole sector? The more “enhancement” and “expectation of best practice” that is adopted, the sooner institutions can move from “compliance” and external control.

Page 14: The contents of a review’s Terms of Reference include a QQI institutional information profile including a description of the specific lifecycle of engagement for an institution. Where an institution profile is not available, will a QQI profile be provided for equivalence purposes to ensure appropriate parity of process?

Page 15: Reference is made to an institution’s own mission and strategy. Does QQI intend to check on the suitability of an institution’s mission, notwithstanding the fact that institutions must take

responsibility for their own mission statements? HECA feels that a focus on how an institution intends developing its procedures for the future might also be given consideration by a review team.