

Quality and Qualifications Ireland (QQI)

26-27 Denzille Lane,

Dublin 2

D02 P666

IRELAND

Ms Maria Kelo

Director

European Association for Quality Assurance in Higher Education (ENQA)

Avenue de Tervuren 36-38 – bte 4

1040 Brussels

BELGIUM

28 October 2016

Dear Maria,

Following the decision of the ENQA Board to renew the membership of Quality and Qualifications Ireland (QQI) in September 2014, QQI was requested to submit a follow-up report on progress with the recommendations in the external panel report to the ENQA Board after a two-year period.

Please find this follow-up report enclosed.

Yours sincerely,



Dr. Padraig Walsh

Chief Executive, QQI

**Quality and Qualifications Ireland (QQI) follow-up report (October 2016)
to ENQA Review 2014**

Following a panel review, QQI's full membership of ENQA was reconfirmed in September 2014. The ENQA Board indicated a follow-up report should be prepared within two years of the decision to update on the recommendations made in the panel report.

ENQA recommendations were as follows:

1. Complete the merger by addressing the following areas as priority:
 - i) QQI policies and procedures to replace that of legacy agencies
 - ii) The development of QQI's website
 - iii) The development of a comprehensive internal quality system
2. Memorandum of Understanding with the Higher Education Authority (HEA)
3. Devolvement of awarding power to mature institutions
4. Development of system-wide analysis
5. Cautious development of the International Education Mark (IEM)
6. Extend periodic dialogue with HEIs
7. Strengthen follow-up procedures
8. Develop a formalised, comprehensive system of data gathering and reporting
9. Strengthen training programmes
10. Strengthen and diversify QQI's structure

This report addresses each of the recommendations made.

1. ***(i) Development of the missing policy documents emerging from the green papers and white papers and the consultations in progress; it is recommended that, within a matter of months (not years) there should no longer be "HETAC procedures" or "NQAI procedures", but only fully-fledged QQI procedures on the activities and internal culture of QQI; QQI might wish to consider "upgrading" immediately the status of all policy documents and evaluation guides, making them QQI policies and procedures instead of HETAC or NQAI documents – even though most of these may be changed in the course of the revision process in progress;***

In line with the recommendation, QQI went through a process of 'brown-wrapping' the legacy policy documents and removing legacy references from policies that were in use. The new QQI website was launched in October 2014. Great care was taken to ensure that policies referred to QQI (the new agency) with limited references to the legacy agencies.

Since the panel report was published, QQI has progressed its development of policy and procedures publishing a suite of statutory quality assurance guidelines (Appendix 1, Part 1) for our diverse provider base as well as policies and criteria for the validation of programmes of education and

learning (Appendix 1, Part 2). QQI has also published its policy on periodic quality review of Higher Education Institutions (Appendix 1, Part 3). A timetable for the third cycle of institutional reviews (IR) of the designated awarding bodies and institutes of technology has been agreed and will commence in 2017. Following consultation with the higher education institutions, the handbook for these reviews will be finalised by the end of November 2016 and the deadline for receipt of the self-evaluations reports for the first two institutes of technology undergoing review have been agreed as being by December 2017. A full list of the new QQI policies and procedures can be found in Appendix 1 complete with appropriate hyperlinks to the QQI website.

- 1 (ii) Development of QQI's own website, as a common platform of information substituting the websites of the legacy agencies and showing all policy documents, criteria / procedures and decisions of QQI, irrespective of the legacy agency from which some of these procedures and decisions may have been taken over; users seeking e.g. international evaluation reports should not be referred much longer to the HETAC website, but should find it handily on the QQI site;**

When QQI was established in 2012 it launched an interim website that provided information on QQI as a new agency, it also linked to the legacy websites. When the QQI website (www.QQI.ie) went live in October 2014 the legacy websites were immediately made redundant.

New content was written for each section of the website. In drafting content, QQI was positioned as the key agency with references to the legacy agencies kept to a minimum

Prior to the closure of the legacy sites, a review and analysis of the information contained on the legacy sites was carried out and key information identified. Subsequently validation reports, progress reports, institutional reviews and policy related documents were 'brown-wrapped'. This meant editing legacy documents and where possible removing the legacy logos and references and replacing them with a reference to QQI.

Reports that would have been available on the legacy sites such as institutional reviews were uploaded to the new QQI site and are available (in addition to any QQI review reports) through the publication search feature¹. The website also features searchable functions on policies, reviews, programmes, awards and providers.

- 1 (iii) Development of a comprehensive formalised system of internal quality covering all the various educational sectors under the purview of QQI, substituting this unified, homogenous system to the current fragmentation of internal quality control – however solid these partial approaches may be in the respective areas.**

New policies and related procedures and criteria have been developed and published across the range of functions of QQI, replacing the legacy policies inherited from the antecedent agencies. The majority of these policies and procedures relate to QQI's core quality assurance activities such as quality assurance guidelines and review; programme validation and delegation of authority to make awards. Most of these policies have only been agreed and published in 2016 (Appendix 1, Part 1, 2,

¹ Institutional Reviews conducted by QQI (from 2012) (or the legacy agencies pre-2012) are searchable at <http://qsearch.qqi.ie/WebPart/Search?searchtype=reviews>

3, and 5). This has impeded the development of a comprehensive internal quality assurance (IQA) system.

A programme plan on internal quality assurance for the QA directorate of QQI has been developed, comprising projects in the following areas:

- i) Development of a policy setting out an approach to IQA for the QA Directorate, including an internal monitoring system for IQA;
- ii) Publication of all QQI validation and programmatic review reports to the QQI website (a) for 2016 and (b) reports produced since the establishment of QQI in 2012;
- iii) Mapping and formal documentation of procedures for major, recurrent internal activities within the QA Directorate, to form a contribution to an overall organisational “QA manual” and
- iv) Development of a system for document management. This programme of activity will commenced in September 2016 with most elements scheduled for completion by year end 2016.

2. Signature of a Memorandum of Understanding with the Higher Education Authority (HEA) in order to clearly establish the sharing of tasks between the two bodies and coordinate their interaction with HEIs, in particular with respect to data collection by both agencies and to the Annual Dialogue Meeting (with QQI) and the Strategic Dialogue Meeting (with the HEA) meetings;

In April 2015, QQI published the Memorandum of Understanding (MoU) with the Higher Education Authority (Appendix 1, Part 4).

A significant element of the MoU is collaboration with the higher education sector as a whole. The view of both organisations, and of the Department of Education and Skills, is that the MoU must be tangible in terms of how the relationship between QQI and the HEA can evolve. As a result, it includes a number of identified actions to support the realisation of stated objectives over the next three years. These include scheduled engagement between the senior management teams of both organisations and an annual presentation by the CEO of each organisation to the Board of the other.

The MoU covers the period January 2015 - December 2017. In discussion between QQI and the HEA to date, both organisations identified common priority areas to develop. These include bringing parties in both organisations together to build a common understanding of individual roles and organisational functions and fostering bilateral working relationships. The MoU also refers to the establishment of a forum between QQI, HEA, Department of Education and Skills, Irish University Association and the Technological Higher Education Association (formerly IOTI), a development which could be very beneficial to all participants. The objectives of this forum and how it will be resourced will also require agreement as part of the implementation of the MoU.

3. Reduction of the area of potential conflict of interest between QQI as evaluating body and QQI as awarding body; the Panel encourages QQI to devolve as much awarding power as possible to mature institutions, in order to limit the risks that the agency may be faced

with cases where its dual role may undermine its credibility in the higher education community

QQI adopted *Policy and Criteria for the Delegation of Authority to the Institutes of Technology to make Higher Education and Training Awards (including joint awards)* in May 2014 (See Appendix 1, Part 5) and has subsequently developed protocols to implement the delegation of authority for Masters degrees (Appendix 1, Part 5) and joint degrees (Appendix 1, Part 5) to those institutes that have requested these powers in accordance with the protocols agreed. There was a modification of the legacy policy and criteria for delegated authority.

QQI has recently developed new draft policy and criteria for the delegation of authority to make awards. These were published for consultation as a white paper in September 2016 (Appendix 1, Part 5). The extension of delegated authority to private institutions requires changes to primary and secondary legislation. This is part of the current legislative programme of the Department of Education and Skills.

4. Development of system-wide analyses, in particular through disciplinary benchmarking and overall trends and issues in Irish higher education (in line with the national agenda for higher education and research set out by the Government)

QQI's primary quality assurance function in relation to the self-awarding sector (universities and other designated awarding bodies) is the evaluation of the effectiveness of the quality assurance procedures put in place by the institutions (termed Institutional Review). As a consequence of the global financial crisis from 2008 onwards, and its particular impact on Ireland, human and financial resources in the higher education system were reduced. The potential impact on quality of reduced resources filtered its way into the reports of the institutional quality reviews conducted by the legacy agencies in the period 2008-13. However, there are richer, more numerous and more granular sources of evidence present in the institutional-led quality reviews of academic departments and disciplines which are published by the institutions, in line with QQI's quality assurance guidelines. In 2015, QQI commissioned a report outlining an analysis of published institutionally-organised quality review reports of academic departments, schools and programmes in the 21 Irish public higher education institutions. The study was a thematic analysis of the commentary in the report related to the quality of teaching and learning and the student experience during that period of significant reduction in the resources available to the institutions. The study analysed 90 of the 160 such reports published over the period 2008-15. The subsequent report *Quality in an Era of Diminishing Resources: Irish Higher Education 2008-15* was published by QQI in April 2016 (see Appendix 1, Part 6).

5. Cautious development of the International Education Mark (IEM), in order to focus it on the most relevant quality indicators and avoid the IEM becoming a quality standard of its own (alongside institutional review and programme validation / accreditation), which might create some confusion in the projection of Irish quality seals towards the external world

The establishment and implementation of an International Education Mark (IEM) is provided for under the Qualifications and Quality Assurance (Education and Training) Act 2012. A High Court case

in December 2014 relating to the connected policy area of international student immigration regulations has impacted on the anticipated implementation schedule for the IEM. It has also led to a further examination of the 2012 Act in order to ensure that the bases upon which the IEM will be introduced are sufficiently secure. QQI continues to engage with the Department of Education and Skills (DES) regarding the IEM and will work towards its introduction as soon as practicable. This will, however, require changes to primary (and the possible introduction of secondary) legislation.

QQI has progressed policy development in this area including the development of a *Code of Practice for provisions of Education and Training to International Learners* which was published in July 2015 (Appendix 1, Part 7).

6. *Extend the periodic dialogue with the HEIs – that may not have to be annual but must be coordinated with the HEA – with a view to building up institutional strategies in line with quality enhancement, institutional profiles and national priorities*

In 2015 periodic dialogue was extended to all institutes of technology. Periodic dialogue currently takes place on an annual basis for all public higher education institutions.

This MoU between the HEA and QQI provides an agreed framework for cooperation and communication between the two organisations in the interests of the higher education sector as a whole. It has been developed in accordance with the relevant statutory provisions, national strategies, and government policies, and with due regard to the Code of Practice for the Governance of State Bodies.

Among the agreed actions for the two agencies are:

- The HEA will satisfy itself within the process of strategic dialogue and other interactions, of the fulfilment by institutions of their quality assurance obligations, using the documented outcomes of legislative monitoring and quality review conducted by QQI in the form of annual dialogue or periodic review reports, and the Annual Institutional Quality Reports produced directly by institutions.
- Where available, QQI will utilise the data produced by the HEA to satisfy itself, within the process of annual dialogue and periodic review, of its institutional data requirements.
- The organisations will fully acquaint themselves with the reporting obligations of higher education institutions to both organisations and commit to reducing, with a view to eliminating where possible, requests for the same or similar information.
- The organisations will inform themselves of the reporting and meeting schedules associated with annual and strategic dialogue events.
- QQI and the HEA will share corporate plans with each other on an annual basis.
- A copy of any system level communication by either organisation will be forwarded to the Chief Executive of the other organisation and to the appointed liaison person for dissemination (see below).
- A nominee from each organisation will be identified to ensure that communication and information is exchanged on a timely basis between the organisations.

- The Chief Executive of each organisation will be invited to meet with the Board of the other on an annual basis.
- The full senior management teams of the organisations will meet on an annual basis to update each other on developments.
- The organisations will actively seek to identify where information and communication should be extended to other parties in the interests of national coherence and consistency.

7. Strengthen its follow up procedures on the basis of all information available to it

QQI has two primary statutory quality assurance functions in relation to higher education: (a) to issue QA guidelines and to review the effectiveness of providers' quality assurance procedures and (b) the validation of programmes of education to providers without their own awarding powers (either by right or under delegated authority from QQI).

In respect of (a) above, QQI may review (under its legislation) providers (i) on a cyclical basis and (ii) from time to time as QQI requires. Following a type (a) (i) review, the provider must provide a follow-up report (within the specified timeframe) indicating compliance with any conditions and reporting progress with any recommendations contained within the review report. All such follow-up reports are published on the QQI website in the Reviews section and are placed alongside the institutional review report. Following any review, QQI may also issue statutory directions to providers with which they must comply.

The policies for reviews of type (a) (i) above are covered by the cyclical review policy (Appendix 1, Section 3). This policy states, inter alia, that if information is uncovered during the review process that raises significant concern about an institution it may be necessary to call a halt to the cyclical review process and commence a 'for cause' (a type (a) (ii)) review.

Reviews initiated as type (a) (ii) reviews are termed 'focused' (or 'for cause' type reviews) which are initiated by QQI on foot of concerns of deficiencies in a provider's quality assurance identified through any of QQI's monitoring process.

In respect of reviews of type (a) (ii) QQI is currently preparing a white paper on *Procedures for Focused Reviews by QQI of the implementation and Effectiveness of Provider QA Procedures* that will be considered by the QQI Policies and Standards Committee at its meeting in November 2016.

It is intended that QQI will conduct non-cyclical reviews in response to concerns that have come to its attention in relation to the implementation of a provider's QA procedures. The following non-exhaustive list of concerns may give rise to a review by QQI:

- i) Suspicions that a provider is failing or has failed to effectively implement established QA procedures;
- ii) Concerns regarding the quality of education provision offered by the providers and standards attained by learners;
- iii) Failure by a provider to follow-up on conditions and recommendations arising from statutory engagements;

- iv) Failure by a provider to respond in a timely and/or agreed manner to requests for data by QQI;
- v) Failure by a provider to co-operate with QQI in the fulfilment of the agency's statutory functions;
- vi) Suspicion that a provider has deliberately misled QQI through the provision of false or misleading information;
- vii) Concern that a provider has breached the terms of the 12012 Act, or other national legislation

Under the draft procedures, it is proposed that in all instances, QQI will:

- i) Seek to establish the veracity of the identified concern
- ii) Investigate the concern
- iii) Protect the confidentiality of the sources identifying the concern (where possible and appropriate)

If it is found that a concern is legitimate, QQI will begin a series of engagement with the provider designed to address the issue. Ultimately, QQI may conduct a review of the provider's QA procedures to assure itself and the public fully that such procedures are being implemented as agreed and are effective in ensuring the quality of education, training and related services offered to learners.

QQI will consult broadly with external stakeholders, including providers and other relevant state bodies, on the draft procedures, which will be submitted to the QQI Policies and Standards Committee for approval.

To date, QQI has conducted a 'for-cause' review of validated programmes under Section 46 of the 2012 Act. This was in response to concerns raised through QQI's own monitoring activities. The result of the review was that validation of the reviewed programmes was withdrawn, Further Section 46 reviews are currently in progress.

In respect of (b) above (programme validation), QQI validates all programmes conditionally (these usually refers to the imposition of standard conditions such as co-operating with QQI in the performance of its functions etc.) or conditions relating to a change in an award title, an award specification or an award standard. Validation is always time limited in terms of the interval during which learners may be enrolled on the programme. Under Section 10 of the 2016 QQI validation policy (Appendix 1, part 2), QQI must monitor the satisfactory implementation of the conditions of validation together with any special conditions imposed by QQI on foot of the independent evaluation report that recommended the validation of the programme. The approach to monitoring is based on the level of uncertainty involved, risk equalisation across programmes monitored by QQI and QQI's December 2014 *Policy on Monitoring* (See Appendix 1, Part 8). A statutory review of validation may be triggered by QQI's monitoring policy (as described in the preceding paragraph).

8. *Develop a formalised comprehensive system of data gathering and reporting in order to improve QQIs accountability*

QQI publishes a corporate plan each year (Appendix 1, Part 9) setting out its objectives and actions for the year ahead. The corporate plan aligns to QQI's three-year Strategy Statement (Appendix 1, Part 9). Progress is tracked and reported on a quarterly basis to the CEO and the Board. In addition to this, QQI also works closely with the Department of Education and Skills,

each year drafting a detailed Management Framework Agreement. This aligns the corporate plan targets with the objectives of the Department. QQI also publishes an Annual Report that details the outputs for the relevant year, including the specific details for quality assurance on the number of programme validations, institutional reviews, monitoring activities, publications, policies and events.

In 2016, QQI developed an [infographics](#) system that presents details on the number and type of awards (including higher education awards) made by QQI. This may be filtered by programme field, geographical location, level on the National Framework of Qualifications (Level 6-10, in the case of higher education awards). In time and with the assistance of the HEA (to whom the institutions supply such data), details on the programmes of the self-awarding institutions (universities and other designated bodies) and the institutes of technology (with delegated authority to make awards) will also be included on the database of providers, programmes and awards.

QQI has also taken steps to embed its Project and Programme Office. Staff are encouraged to use project methodology when planning significant change in work practices. Business cases for programmes and projects must be made to and approved by a central Programme Board (which includes the CEO, all Directors, the Head of ICT and an external person with expertise in ICT and project management).

9. *Strengthen the training programmes and retrain all experts for the new procedures and policies that will be published soon by QQI*

Institutional Quality Reviews: In the case of each institutional review that QQI conducts since establishment, there is a 2 stage process. The full review team is brought over to Dublin for a one-day training/briefing session followed by a planning site visit to the institution under review by the Team Chair and co-ordinating reviewer, accompanied by the Head of Cyclical Reviews at QQI. This is followed by a main visit by the review team. All training is provided in the context of the 2016 QQI *Policy for Cyclical Review of Higher Education Institutions* (Appendix 1, Part 3)

Following deployment, each reviewer receives a Reviewer Briefing Note to supplement the information provided in the Handbook. The agenda for the training day comprises: background information and the context for quality assurance; institutional and sector profiles, the higher education landscape and funding models for the higher education sector in Ireland; the current context for institutions being reviewed; the review process, role of the reviewers and the allocation of tasks among team members.

In the case of the current QQI review of Mary Immaculate College of Education (a linked college of the University of Limerick), bespoke terms of reference² and a bespoke handbook³ were created for the process.

Programme Validations: In the case of programme validations, QQI provides guidelines to experts appointed to validation panel. The document *Participating on Evaluating Panels as a Peer Reviewer* -

² Terms of Reference. Institutional Review of Mary Immaculate College, 2016.

<http://www.qqi.ie/Publications/MIC%20Institutional%20Review%202016%20Terms%20of%20Reference.pdf>

³ Handbook. Institutional Review of Mary Immaculate College, 2016.

<http://www.qqi.ie/Publications/MIC%20Institutional%20Review%202016%20Handbook.pdf>

*Guidelines*⁴ was revised in April 2015 and forms part of an information pack provided to panel participants.

QQI is organising a training session for all validation panel Chairs in October 2016. At each validation panel meeting organised by QQI, a member of QQI staff is in attendance, normally as an observer, to provide guidance to the panel should it be required. All training is provided in the context of the 2016 QQI *Policies and criteria for the validation of programmes of education and training*. (Appendix 1, Part 2).

10. Strengthen and diversify the internationalisation of QQI's structure and evaluation procedures

The QQI Board contains (in statute) an international member (as one of the 10 Board members⁵). The QQI Policy and Standards Committee contains two international experts within its 10⁶ [members](#)).

In 2016, QQI published a *Policy for Cyclical Review of Higher Education Institutions* (see Appendix 1, Part 3). The policy states that the composition of each review team will be balanced to ensure that it includes (at least one) international reviewer, an Irish reviewer, a student representative and a representative of external stakeholders. In practice (and in line with previous practice by the legacy agencies that merged to form QQI) and for instance, in the current review of Mary Immaculate College of Education (a linked college of the University of Limerick), 3 of the 6 members of the review team⁷ were international members.

In 2015, QQI processed a total of 136 programme validations (44 for new programmes and 92 revalidations of existing programmes). Because of the number of programmes involved and the cost, it is not practical to involve international reviewers in all programme validations. However, for new or niche procedures, such as the recent applications for higher education apprenticeships, an international reviewer formed part of the panel.

Through a national initiative in relation to gender equality in higher education, QQI has committed to ensuring that review teams are gender balanced, with a minimum 40% women and 40% men. The review team for the current review of Mary Immaculate College of Education consisted of 50% male and 50% female members.

⁴ Participating on evaluation panels as a peer reviewer: <http://www.qqi.ie/Publications/Peer%20Reviewer%20Guidelines.pdf>

⁵ Membership of QQI Board: <http://www.qqi.ie/Publications/QQI%20Board%20biographies%20updated%20Dec%202015.pdf>

⁶ Membership of QQI Policies and Standards Committee. <http://www.qqi.ie/Pages/Policies-and-Standards-Committee---Membership.aspx>

⁷ Review Team – Evaluation of Mary Immaculate College of Education <http://www.qqi.ie/Pages/Mary-Immaculate-College---Institutional-Review-2016.aspx>

Appendix 1

New QQI policies, guidelines, reports and plans

1. Statutory Quality Assurance Guidelines

- [Policy on Quality Assurance Guidelines](#) (Published: December 2014, Revised: April 2016)
- [Core Statutory Quality Assurance \(QA\) Guidelines](#) – Statutory QA Guidelines developed by QQI for use by all providers (Published: April 2016)
- [Sector Specific Quality Assurance \(QA\) Guidelines](#) – Statutory QA Guidelines developed by QQI for Independent/Private Providers coming to QQI on a Voluntary Basis (Published: April 2016)
- [Topic Specific Quality Assurance \(QA\) Guidelines](#) – Statutory QA Guidelines developed by QQI for providers of Statutory apprenticeship Programmes (Published: June 2016)
- [Sector Specific Quality Assurance \(QA\) Guidelines](#) - Statutory QA Guidelines developed by QQI for Designated Awarding Bodies (Universities, Dublin Institute of Technology and the Royal College of Surgeons in Ireland) (Published: July 2016)
- [Sector Specific Quality Assurance \(QA\) Guidelines](#) - Statutory QA Guidelines developed by QQI for Institutes of Technology (other than DIT) (Published: July 2016)

2. Programme Validation

- [Policies and criteria for the validation of programmes of education and training](#) (Published: April 2016)

3. Institutional Review of Higher Education

- [Policy for Cyclical Review of Higher Education Institutions](#) (Published: February 2016)

4. Memorandum of Understanding

- [Memorandum of Understanding between the Higher Education Authority and Quality and Qualifications Ireland](#) 2015-17 (Signed: January 2015)

5. Delegation of Authority to make Awards

- [Policy and Criteria for the Delegation of Authority to the Institutes of Technology to make Higher Education and Training Awards \(including Joint Awards\)](#) (Published: May 2014)
- [Sectoral Protocol for the Awarding of Research Master's Degrees at NFQ Level 9 under delegated authority \(DA\) from Quality and Qualifications Ireland \(QQI\)](#) (Published: November 2014)
- [Sectoral Protocol for the Delegation of Authority \(DA\) by Quality and Qualifications Ireland \(QQI\) to the Institutes of Technology \(IoTs\) to make Joint Awards](#) (Published: November 2014)
- [White Paper - Procedures and Criteria Relating to Delegation of Authority](#) (Published: September 2016)

6. System-wide analysis

- [Quality in an Era of Diminishing Resources: Irish Higher Education 2008-15](#) (Published: March 2016)

7. Code of Practice for International Learners

- [Code of Practice for provision of Education and Training to International Learners](#) (May 2015)

8. Monitoring

- [Policy on monitoring](#) (Published: December 2014)

9. Strategy Statement and Annual Corporate Plans

- [QQI Strategy Statement 2016-18](#)
- [QQI Corporate Plan 2016](#)
- [QQI Corporate Plan 2015](#)