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# ENQA AGENCY REVIEW: QUALITY AND QUALIFICATIONS IRELAND (QQI)

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# Contents

EXECUTIVE SUMMARY .....	3
INTRODUCTION .....	5
<b>BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS .....</b>	<b>5</b>
<b>BACKGROUND OF THE REVIEW .....</b>	<b>5</b>
<b>MAIN FINDINGS OF THE 2014 REVIEW .....</b>	<b>5</b>
<b>REVIEW PROCESS .....</b>	<b>5</b>
<b>HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY .....</b>	<b>7</b>
<b>HIGHER EDUCATION SYSTEM .....</b>	<b>7</b>
<b>QUALITY ASSURANCE .....</b>	<b>8</b>
<b>QUALITY AND QUALIFICATIONS IRELAND (QQI) .....</b>	<b>8</b>
<b>QQI'S ORGANISATION/STRUCTURE .....</b>	<b>9</b>
<b>QQI'S FUNCTIONS, ACTIVITIES, PROCEDURES .....</b>	<b>9</b>
<b>QQI'S FUNDING .....</b>	<b>11</b>
FINDINGS: COMPLIANCE OF QQI WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG) .....	12
<b>ESG PART 3: QUALITY ASSURANCE AGENCIES .....</b>	<b>12</b>
<b>ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE .....</b>	<b>12</b>
<b>ESG 3.2 OFFICIAL STATUS .....</b>	<b>13</b>
<b>ESG 3.3 INDEPENDENCE .....</b>	<b>15</b>
<b>ESG 3.4 THEMATIC ANALYSIS .....</b>	<b>16</b>
<b>ESG 3.5 RESOURCES .....</b>	<b>18</b>
<b>ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT .....</b>	<b>21</b>
<b>ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES .....</b>	<b>22</b>
<b>ESG PART 2: EXTERNAL QUALITY ASSURANCE .....</b>	<b>23</b>
<b>ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE .....</b>	<b>23</b>
<b>ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE .....</b>	<b>25</b>
<b>ESG 2.3 IMPLEMENTING PROCESSES .....</b>	<b>26</b>
<b>ESG 2.4 PEER-REVIEW EXPERTS .....</b>	<b>28</b>
<b>ESG 2.5 CRITERIA FOR OUTCOMES .....</b>	<b>30</b>
<b>ESG 2.6 REPORTING .....</b>	<b>31</b>
<b>ESG 2.7 COMPLAINTS AND APPEALS .....</b>	<b>32</b>
CONCLUSION .....	34
<b>SUMMARY OF COMMENDATIONS .....</b>	<b>34</b>
<b>OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS .....</b>	<b>34</b>

<b>SUGGESTIONS FOR FURTHER DEVELOPMENT .....</b>	<b>35</b>
<b>ANNEXES .....</b>	<b>36</b>
<b>ANNEX 1: PROGRAMME OF THE SITE VISIT .....</b>	<b>36</b>
<b>ANNEX 2: TERMS OF REFERENCE OF THE REVIEW .....</b>	<b>38</b>
<b>ANNEX 3: GLOSSARY .....</b>	<b>44</b>
<b>ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW.....</b>	<b>45</b>
<b>DOCUMENTS PROVIDED BY QQI .....</b>	<b>45</b>
<b>ANNEX 5. QQI'S MAPPING TO PART 1 OF THE ESG.....</b>	<b>47</b>

# EXECUTIVE SUMMARY

This external review report analyses the compliance of Quality and Qualifications Ireland (QQI) with the 2015 Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). It is based on a review process that involved the production of a Self-Assessment Report by QQI, the review of this and supporting documentary evidence by an expert peer-review panel, and a subsequent site visit by the panel to QQI's offices in Dublin in March 2019. The judgements against each standard, recommendations, commendations and commentary contained within this report are all based on the triangulation of evidence from these sources over a four-month period.

QQI was established in 2012 as a result of four antecedent bodies merging together. This formation was sanctioned in legislation and QQI therefore has a number of statutory duties, many of which span all post-secondary education. As well as cyclical reviews of higher education providers, QQI has a wide range of responsibilities not common to all agencies, including: the maintenance of the National Framework of Qualifications, the validation and awarding of awards to learners studying at providers without their own awarding powers, the delegation of authority to providers to make their own awards, and the approval of providers' internal Quality Assurance Procedures. An amendment to the 2012 legislation being considered at the time of this review was set to give additional responsibilities to QQI, including: the implementation of the International Education Mark (a kitemark of providers delivering a quality experience for their international students), the management of a national learner protection fund and the provision of assurance that the corporate structure and financial affairs of independent private providers do not pose a risk to quality.

In the seven years since QQI's establishment and especially in the five years since QQI's first ENQA review, a significant amount of progress has been made in creating a unified organisation and a new framework of policies and processes to guide its external quality assurance activities. QQI is now moving from a phase of intensive development, including a notable amount of consultation, to a phase focused on its contribution to the assurance, enhancement and strategic development of higher education, as set out in its recently published Statement of Strategy 2019-21.

A small number of legacy issues are recognised and being addressed by QQI, several of which relate back to the limited resources and flexibility available to QQI in the years after the 2008 financial crash, just as QQI was forming and might have otherwise structured itself differently. These issues are addressed through the text of the report and in two recommendations, however there are plans in place which should address these and allow progress to be seen by the time of QQI's follow up report to ENQA before fully resolving them in good time for the next ENQA review.

Overall, the panel concluded that QQI's progress to date and the quality of its external quality assurance activities were exemplary. QQI is still progressing towards full implementation of its activities and towards the most optimal organisation structure, but QQI staff are acutely aware of where it needs to focus its energy in the coming years and has clear plans for doing so, not least through an ambitious and appropriately focused Statement of Strategy 2019-21.

**The panel has reached the judgement that QQI is fully compliant in all ESG except two where the judgement is substantially compliant: 3.5 Resources and 2.3 Implementing Processes.**

The panel make formal **commendations** to QQI in the following two areas:

- The effectiveness of the agency's approach to enabling higher education providers to take on more responsibility for quality assurance as they mature, including through delegating authority to make higher education awards. (ESG 2.1)

- The way in which policy and external quality assurance methodologies are developed through comprehensive and engaging consultation with stakeholders. (ESG 2.2)

The panel make formal **recommendations** to QQI in the following two areas:

- Continue to work with the Department of Education and Skills to improve the funding model so that the agency can take a longer term approach to planning and not be so vulnerable to the fluctuations in on-demand income. (ESG 3.5)
- Accelerate and complete reengagement and institutional review with independent providers. (ESG 2.3)

# INTRODUCTION

This report analyses the compliance of Quality and Qualifications Ireland (QQI) with the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG). It is based on an external review conducted between December 2018 and May 2019.

## BACKGROUND OF THE REVIEW AND OUTLINE OF THE REVIEW PROCESS

### BACKGROUND OF THE REVIEW

ENQA's regulations require all member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they act in substantial compliance with the ESG as adopted at the Yerevan ministerial conference of the Bologna Process in 2015. As this is QQI's second review, the panel is expected to provide clear evidence of results in all areas and to acknowledge progress from the previous review. The panel has adopted a developmental approach, as the *Guidelines for ENQA Agency Reviews* aim at constant enhancement of the agencies.

### MAIN FINDINGS OF THE 2014 REVIEW

QQI underwent a review soon after the merger of its four antecedent bodies and was therefore in an intensive period of development. Using the 2005 version of the European Standards and Guidelines, the review panel concluded that at the time, QQI was substantially compliant with seven standards (2.3 criteria for decisions, 2.4 processes fit for purpose, 2.5 reporting and 2.6 follow-up procedures, 3.1 use of external quality assurance procedures, 3.4 resources and 3.7 External quality assurance criteria and processes used by the members). The review panel concluded that QQI was partially compliant with standards 2.8 system-wide analysis and 3.8 accountability procedures. QQI was deemed to be fully compliant with the remaining eight standards.

Overall, the review panel recognised QQI as a well-connected and respected part of the Irish higher education sector, which was in no small part because of the extensive experience of its staff and reviewers. This was set in a challenging context, both in terms of QQI's evolving dual role as an awarding body and an evaluation body, and of the complex transition from four ways of working to a single unified QQI approach. It was in this context that a number of recommendations were made to inform the pace, focus and form of the work to bring together the four antecedent bodies.

QQI was subsequently granted full membership of ENQA<sup>1</sup> and was included in the European Quality Assurance Register<sup>2</sup>, each for the maximum period of five years. Following up on the original review, QQI set out the action taken in response to these recommendations in a letter to ENQA in October 2016<sup>3</sup>. Based on QQI's own assessment and the evidence subsequently provided in the 2019 review, the review panel considers QQI to have satisfactorily addressed each recommendation.

### REVIEW PROCESS

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<sup>1</sup> <https://enqa.eu/wp-content/uploads/2014/09/Letter-ENQA-to-QQI-250914.pdf>

<sup>2</sup> [https://backend.degar.eu/reports/EQAR/A22\\_QQI\\_ApprovalDecision\\_2015.pdf](https://backend.degar.eu/reports/EQAR/A22_QQI_ApprovalDecision_2015.pdf)

<sup>3</sup> <https://enqa.eu/wp-content/uploads/2016/12/QQI-Follow-up-Report-to-ENQA-October-2016.pdf>

The 2019 external review of QQI was conducted in line with the process described in the *Guidelines for ENQA Agency Reviews* and in accordance with the timeline set out in the Terms of Reference. The panel for the external review of QQI was appointed by ENQA and composed of the following members:

- **Professor Jean-Marc Rapp** (Chair), Professor of Law, University of Lausanne, Switzerland (nominee of EUA, the European Universities Association)
- **Dan Derricott** (Secretary), Senior Assistant Registrar (Education Policy and Quality), University of Warwick, United Kingdom (nominee of ENQA, the European Association for Quality Assurance)
- **Doris Herrmann**, Managing Director, Agency for Quality Assurance through Accreditation of Study Programmes, Germany (nominee of ENQA, the European Association for Quality Assurance)
- **Marija Vasilevska**, Bachelor's degree student, Ss. Cyril and Methodius University, Republic of North Macedonia (nominee of ESU, the European Students' Union)

### **Self-assessment report**

The review commenced with the production of a Self-Assessment Report (SAR) by QQI. The SAR articulates the agency's approach to complying with each of the European Standards and Guidelines as well as where it had identified opportunities to strengthen compliance in the future. It also provided helpful context on the Irish higher education system, on QQI's creation and evolution, and on the activity undertaken by QQI.

QQI undertook the self-assessment process at the same time as preparing its new Statement of Strategy 2019-2021. This provided a timely opportunity to seek the feedback of staff and external stakeholders on the effectiveness of the agency and its work, and to use this feedback to inform both documents. The SAR was therefore informed by input from a wide range of people and drafted by a small group of senior staff who formed a Steering Group for the ENQA review.

The panel received the SAR in December 2018 and found the SAR to be especially helpful in understanding the complex landscape in Irish higher education, and how QQI organises its activities around this. Furthermore, the panel found the SAR to contain a healthy amount of honesty and self-critique about the areas in which compliance could be strengthened, which allowed discussions during the site visit to focus more productively on plans to address these areas.

A substantial amount of documentary evidence was supplied to the panel alongside the SAR, which the panel found useful in focusing its lines of enquiry as the review progressed. This initial tranche of evidence, together with that which the panel subsequently requested from QQI, is listed in Annex 4.

### **Site visit**

A three-day site visit to QQI's offices in Dublin took place at the beginning of March 2019. This commenced with a brief meeting with QQI's Chief Executive and QQI's project manager for the ENQA review to further discuss and build the panel's understanding of QQI's context.

The site visit consisted of sixteen meetings between the panel and various groups including:

- QQI's Chief Executive, Executive Management Team and wider groups of staff;
- Members of QQI's Board and its committees;
- Senior officials of the Department of Education and Skills and the Higher Education Authority;
- Members of expert panels in different methods, including student and international members;
- Representative bodies of students, trade unions, employers and higher education providers; and
- Heads, Quality Directors and other senior staff of public and private higher education providers.

A full schedule of meetings held during the site visit can be found in Annex 1.

Each of these meetings was informative and productive for the panel, which allowed the panel to address the lines of enquiry established at the outset of the site visit. The discussions in these meetings were triangulated with the Self-Assessment Report and the documentary evidence supplied to inform the panel's judgements and the contents of this report.

The panel also noted the significant number of senior leaders from all parts of the Irish higher education sector who travelled to meet the panel in person, and the high standing with which they regarded QQI while still offering full and frank feedback to inform the agency's development.

## HIGHER EDUCATION AND QUALITY ASSURANCE SYSTEM OF THE AGENCY

### HIGHER EDUCATION SYSTEM

Higher education in Ireland has long been distinctive for valuing, having strengths in and seeking to maintain both traditional and technical higher education. While providers may not exclusively offer just one of these in the present day, the evolution of the Irish system has been characterised by different types of providers emerging and developing over time to diversify away from a system once comprising just a small number of universities. Both publicly- and privately-funded providers operate in the Irish higher education system although the majority, around 87%, of students still study through publically-funded universities and institutes of technology.

Until recently, higher education in Ireland has been delivered by universities (including via linked providers), institutes of technology, the Royal College of Surgeons in Ireland, and independent private providers. Participation rates in Ireland are high, however in a relatively small country, this still represents a large number and complex range of providers delivering higher education.

In the publically-funded part of the sector, existing legislation is now being used to facilitate the merger of institutes of technology into technological universities<sup>4</sup> with full awarding powers of their own, as opposed to these being delegated. Technological University Dublin was established through the merger of three institutes of technology in January 2019 and a further seven institutes are involved in three consortia pursuing applications to merge and become technological universities.

In the privately funded part of the sector, an amendment to legislation was being considered by the Irish parliament, the Houses of the Oireachtas, at the time of this review, which includes a provision to give QQI greater powers to scrutinise private providers. It is also expected that some more established private providers may seek delegated authority to make their own awards.

Over the last decade, the higher education system in Ireland, along with the public sector more widely, has been managing the implications of the 2008 financial crash, which the Irish economy was particularly impacted by. Policies of fiscal consolidation were adopted by the Irish Government resulting in a net reduction in funding for many higher education providers and for the publically funded sector bodies. That situation is now changing but the ramifications are still evident in the higher education sector.

At present, the funding and regulatory relationships with the state vary greatly depending on the type of provider. Public funding in the education system is deployed strategically and in line with policy goals to deliver a high-performing system. Providers in receipt of public funding therefore have an accountability to the Higher Education Authority, a state agency tasked with the strategic development of the Irish higher education and research system. The focus of this accountability is distinct and

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<sup>4</sup> <http://hea.ie/policy/he-reform/technological-universities/>

separate to providers' accountability to QQI on quality and qualifications, however they do overlap and sometimes feature similar reporting requirements of providers.

## QUALITY ASSURANCE

The emergence and evolution of different types of higher education providers had brought with it different systems of quality assurance in the last two decades. In 2008, the Irish Government announced their intention to amalgamate four bodies which collectively had responsibilities in both further and higher education for the oversight of quality assurance arrangements, the maintenance of the National Framework of Qualifications and the granting of awards to learners studying at providers without their own awarding powers. These bodies were:

- The **Higher Education and Training Awards Council (HETAC)**, established in 2001 as a successor to the National Council for Educational Awards (NCEA), which itself was established in 1972. HETAC was the awarding body for learners studying for higher education awards at institutes of technology and independent private providers.
- The **Further Education and Training Awards Council (FETAC)**, established in 2001 as a success for to the National Council for Vocational Awards (NCVA), which itself was established in 1991. FETAC was the awarding body for learners studying for further education awards in Ireland.
- The **National Qualifications Authority of Ireland (NQAI)**, established in 2001 to introduce, maintain and promote Ireland's National Framework of Qualifications (NQF) comprising ten levels mapped to the European Qualifications Framework.
- The **Irish Universities Quality Board (IUQB)**, incorporated in 2006 by the universities as an independent body to review the effectiveness of each university's own quality assurance arrangements in accordance with the Universities Act 1997.

HETAC, NQAI and IUQB each held membership of ENQA following reviews demonstrating their compliance with the European Standards and Guidelines. FETAC operated exclusively in the further education sector and was therefore not within the scope of ENQA's activities.

It was this merger, enacted on 6 November 2012 through the Qualifications and Quality Assurance (Education and Training) Act 2012, which resulted in the establishment of Quality and Qualifications Ireland (QQI) as independent state agency with statutory responsibilities.

## QUALITY AND QUALIFICATIONS IRELAND (QQI)

Since being established seven years ago, QQI has been the single body responsible for quality assurance and qualifications in post-secondary education in Ireland. No other quality assurance agencies have statutory responsibilities in Ireland's higher education sector.

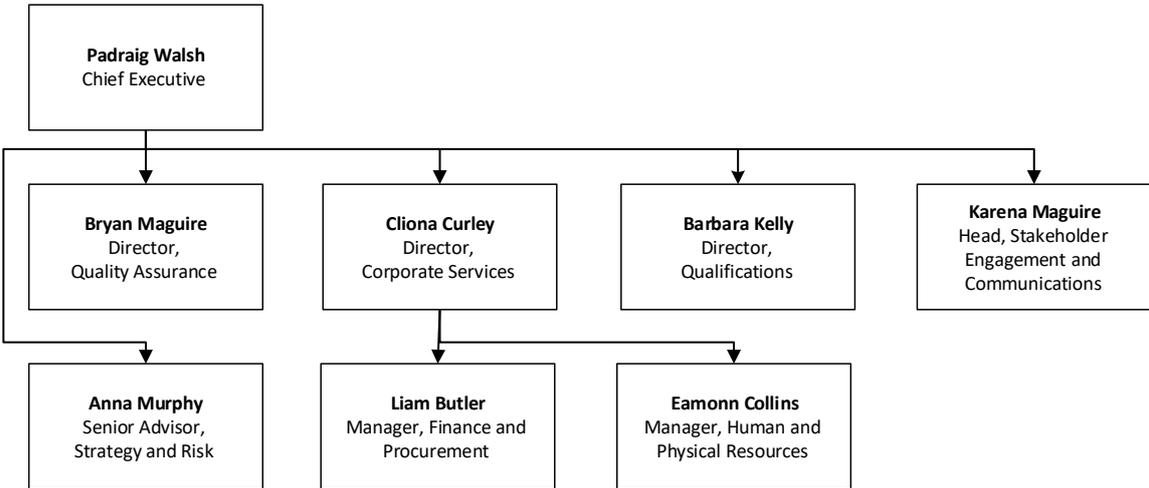
The merger of four antecedent bodies that were distinct in their practice was a significant task and has been the primary focus of QQI since its inception. There have been two major strands to this merger: the unification of the organisations into a single entity and operating model, and the development of a single policy and process framework across the breadth of its complex remit informed by a single set of QQI values. At the time of QQI's first ENQA review in 2014, one to two years on from the merger, the agency was still in 'establishment mode' and operating the four policy frameworks it had inherited. A first iteration of the unified organisational structure had been implemented and a policy development programme had been started, however both were in their infancy and not yet in a position to be fully assessed on their effectiveness.

Five years on from that review, QQI's context is very different. The organisational structure, operating model and culture of the agency look and feel considerably more developed. This has not been straightforward and some change management issues continue to be addressed, however this is now a more effective organisation effectively delivering a complex range of responsibilities across post-secondary provision.

There is also now a well-developed framework of policy and process in place. There are some areas still to be fully developed or implemented, which are addressed in the detail of this report, but the scale of the progress made since the last ENQA review is impressive and should give the agency's staff and stakeholders a sense of pride.

**QQI'S ORGANISATION/STRUCTURE**

Since the last ENQA review, QQI has reorganised its staff (approximately 75 people) and functions into three directorates (Quality Assurance, Qualifications and Corporate Services) and a fourth team, Stakeholder Engagement and Communications. The Director/Head of each reports directly to the Chief Executive and, together with the Strategy & Risk Advisor, Finance Manager and Human Resources Manager, they form QQI's Executive Management Team.



*QQI's Executive Management Team*

The Chief Executive is a member of and is accountable to the Board of QQI alongside nine independent members appointed by the Minister for Education and Skills. It is the Board of QQI which has overall responsibility for the governance of QQI as an independent state agency. The Board is supported in its role by six committees, four of which have delegated responsibility for discharging its quality assurance responsibilities and two of which advise on corporate issues:

- Programmes and Awards Executive Committee (PAEC) (established October 2013)
- Programmes and Awards Oversight Committee (PAOC) (established April 2014)
- Policies and Standards Committee (PSC) (established March 2014)
- Approvals and Reviews Committee (ARC) (established November 2014)
- Audit and Risk Committee (established March 2013)
- Human Resources and Organisation Committee (established April 2017)

**QQI'S FUNCTIONS, ACTIVITIES, PROCEDURES**

QQI has – due to the merging of four bodies and the complexity of the higher education system - a wide range of functions across all parts of post-secondary education sector in Ireland, most of which are defined in legislation. In its Self-Assessment Report, QQI summarise these as to:

- promote, maintain and develop the Irish National Framework of Qualifications (NFQ), a 10-level framework for the development, recognition and awarding of qualifications in Ireland;
- approve (validate), monitor and review programmes offered at a variety of further and higher education and training institutions. These programmes lead to qualifications (QQI awards) listed in the NFQ, which are recognised internationally;
- regulate and promote the quality of programmes leading to QQI awards for the benefit of learners, employers and other interested parties;
- monitor and periodically review the effectiveness of providers’ quality assurance procedures
- ensure that providers<sup>5</sup> offering national qualifications provide a positive, high-quality experience to international learners coming to study in Ireland. QQI will do this by authorising the International Education Mark (IEM);
- provide academic advice on the recognition of foreign qualifications in Ireland through a service called NARIC Ireland – the National Academic Recognition Information Centre. QQI also provides advice on the recognition of Irish qualifications abroad;
- inform the public about quality assured education and training programmes and qualifications through a database of programmes and a register of providers;
- manage a national scheme for the quality assurance of English language services (Accreditation and Coordination of English Language Services - ACELS); and
- advise the Minister for Education and Skills about national policy on quality assurance and improvement in education and training.

For the purposes of this ENQA review, which was only concerned with higher education, QQI, ENQA and EQAR confirmed that the following seven activities and procedures were in scope:

- **Approval of QA Procedures**
  - **New provider approval:** Providers seeking to offer programmes leading to QQI Awards for the first time are required to undergo the Initial Access to Validation process, whereby the provider-level QA Procedures are approved, before progressing onto programme validation.
  - **Re-engagement for non-public providers:** The approval of QA Procedures for providers that had oversight from one of QAA’s antecedent bodies is undertaken through a one-off ‘re-engagement’ process with QQI which is tailored depending on the type of provider.
- **Programme validation:** Similarly to programme accreditation in many other European countries, programmes leading to a QQI award must first undergo this process to provide assurance that learners will be able to attain and demonstrate the necessary knowledge, skills or competences.
- **Programme re-validation:** As programmes are significantly changed or as they reach the maximum period of their initial validation, they must be considered through this process if they are to continue leading to a QQI award.
- **Institutional quality review:** Once a provider’s QA Procedures are approved, an external review is undertaken periodically to evaluate their implementation and effectiveness.
- **Focused reviews:** Where there is cause for concern outside of the usual cycle of external review, a focused review may be undertaken to determine whether the provider’s QA processes continue to meet QQI’s requirements and be effectively implemented.
- **Delegated authority to make awards:** Mature, established providers that do not have their own authority to grant awards may have this authority delegated to them by QQI, the management of which is specifically considered through external reviews.

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<sup>5</sup> Provider refers to any college or institution offering programmes leading to awards included in the NFQ.

## QQI'S FUNDING

QQI's functions comprise a mix of those which are cyclical, mandatory and often engage at provider-level, and those which are provided 'on-demand' at the wish of a provider and often engage at programme-level. QQI's income is therefore principally made up of recurrent state funding from the Department of Education and Skills and of on-demand fee income which varies from year to year.

The most recent financial statements audited and authorised by Ireland's Comptroller and Auditor General are for 2017. These showed a total income in 2017 of €12.6m and a total expenditure of €13.7m, resulting in a net deficit of €1m. The draft financial statements for 2018 were made available to the panel and, subject to audit, show a more positive net position than in 2017. This fluctuation was under review with the Department of Education and Skills at the time of this ENQA review. This is further explained later in the report under [ESG 3.5 Resources](#).

# FINDINGS: COMPLIANCE OF QQI WITH THE STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN THE EUROPEAN HIGHER EDUCATION AREA (ESG)

## ESG PART 3: QUALITY ASSURANCE AGENCIES

### ESG 3.1 ACTIVITIES, POLICY, AND PROCESSES FOR QUALITY ASSURANCE

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a regular basis. They should have clear and explicit goals and objectives that are part of their publicly available mission statement. These should translate into the daily work of the agency. Agencies should ensure the involvement of stakeholders in their governance and work.

#### 2014 review recommendation

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.

#### Evidence

QQI was established with a specific purpose to promote quality and accountability in education and training in Ireland. This is articulated clearly in its mission statement: “QQI sustains public confidence in the quality of education and training, promotes trust in the National Framework of Qualifications and drives a culture of continuous improvement by education and training providers.” Furthermore this purpose translates into the strategic aims of the agency, as set out in the Statement of Strategy 2019-21, and into the daily work of the agency.

In practice, QQI regularly undertakes a wide range of external quality assurance activity, ranging from initial approvals and validations (on-demand and the revalidations occur at least every five years) that enable entry to the HE sector, through to ongoing monitoring and engagements (annual and biennial), through to external reviews (cyclically every seven years or sooner through focused reviews where there is cause for concern). The interdependency and relationship of these is becoming clearer as they are each implemented and they are beginning to form a cohesive system that is applied proportionately to providers of different sizes and maturity.

Stakeholders are involved throughout the lifecycle of these activities, from their development through extensive consultation (see ESG 2.2), to their delivery as members of expert panels (see ESG 2.4), to their governance as members of oversight committees (namely the Programmes and Awards Executive Committee, Programmes and Awards Oversight Committee, Policies and Standards Committee, and Approvals and Reviews Committee as detailed in SAR section 4.4).

The panel reviewed a range of documentation that underpins QQI’s external quality assurance activity, including guidance for providers and expert panels on each methodology (including [Core Statutory QA](#)

[Guidelines](#); [Policy on QA Guidelines](#); [Policy and criteria for provider access to initial validation of programmes](#); [Overarching Re-engagement Policy](#); [Policy and criteria for the validation of programmes of education and training](#); [Monitoring Policy](#); [AIQR Handbook](#); [Procedures for Focused Reviews by QQI of the Implementation and Effectiveness of Provider QA Procedures](#); [Policy for Cyclical Reviews of Higher Education Institutions](#)), the reports produced from each methodology including, but not limited to, the sample listed under 211a-I in [Annex 4](#)), schedules of recent and upcoming activity, and [minutes of the meetings](#) of QQI's oversight committees. The panel also discussed how the QQI's external quality assurance activity was implemented and received in practice with QQI staff, providers, experts, student representatives and senior government officials.

The panel found there to be clear documentary evidence and an overwhelming consensus amongst stakeholders that the amount of progress made by QQI in developing, consulting on, establishing and operationalising its wide range of responsibilities was commendable.

### **Analysis**

QQI has a remit that is broader than most European quality assurance agencies and this is due to become even wider with the introduction of additional legislation, which makes managing the full range of activity underway particularly complex. However, there is clarity of purpose in each activity and an increased focus on ensuring they operate coherently as an overall system of external quality assurance. This is one example of how QQI has not 'stood still', but rather has matured significantly since it was established.

The publication of QQI's most recent Statement of Strategy, the third such publication, is another example of this. The first two focused on establishing QQI as an organisation and establishing a framework of policies and processes, whereas the most recent iteration focuses on learning from the findings of QQI's activities and maximising their impact. QQI has already started to effectively demonstrate its potential in this area, such as through its thematic analysis reports (see ESG 3.4).

As discussed later in this report, QQI is working to evolve its organisational structure and funding model in order to make full use of its available capacity to deliver its increasing range of responsibilities. This will help QQI to become even more productive and effective as an agency, thereby ensuring the daily work of the agency continues to be driven by the goals and objectives of its external quality assurance activities.

QQI achieves an impressive balance between remaining an independent authority on quality assurance matters and engaging diverse groups of stakeholders in its governance and work. There is evidence of this engagement positively impacting the design and delivery of QQI's activities, policy, and processes for quality assurance without compromising their integrity. In particular, the approach to consulting stakeholders during the development of new policy is considered commendable, as set out in ESG 2.2.

**Panel conclusion: Fully compliant**

### **ESG 3.2 OFFICIAL STATUS**

Standard:

Agencies should have an established legal basis and should be formally recognised as quality assurance agencies by competent public authorities.

### **Evidence**

The Qualifications and Quality Assurance (Education and Training) Act 2012 (“the 2012 Act” hereafter) provided for the dissolution of the National Qualifications Authority of Ireland (NQAI), the Higher Education and Training Awards Council (HETAC) and the Further Education and Training Awards Council (FETAC). In their place, the 2012 Act established the Qualifications and Quality Assurance Authority of Ireland, which operates as Quality and Qualifications Ireland (QQI). Additionally, the Act tasked QQI with fulfilling the functions of the Irish Universities Quality Board (IUQB), which itself was not a statutory body but was similarly merged into QQI.

QQI’s statutory functions are defined in the Act, giving it responsibility on behalf of the State for, amongst other things, the following which relate to the scope of this review:

- *Promote, maintain, further develop and implement the Framework;*
- *Advise the Minister in relation to national policy on quality assurance and enhancement in education and training;*
- *Review and monitor the effectiveness of providers’ quality assurance procedures;*
- *Validate programmes of education and training, and review and monitor the validated programmes;*
- *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;*
- *Make awards, delegate authority to make an award where it considers it appropriate and review and monitor the operation of the authority so delegated.*

Source: <https://data.oireachtas.ie/ie/oireachtas/act/2012/28/eng/enacted/a2812.pdf>

QQI is the only quality assurance agency recognised by the Irish state as having statutory responsibilities in relation to Irish higher education awards made by Irish higher education providers. There are several providers delivering higher education awards to students in Ireland but these are typically based in other jurisdictions, such as the Open University based in the United Kingdom, and subject to the oversight of a relevant body in that country, such as the Quality Assurance Agency for Higher Education (QAA) in the United Kingdom. Reciprocally, where an Irish higher education provider with awarding powers makes awards outside of Ireland, QQI remains responsible for overseeing the quality assurance of those awards. QQI has established memoranda of understanding or similar bilateral agreements with QAA and other bodies to help ensure a coordinated, robust approach across jurisdictions.

### **Analysis**

QQI fulfils the external review and evaluation functions of a typical quality assurance agency but also has a broader range of responsibilities that would not always be found in other agencies, including the maintenance of Ireland’s National Framework of Qualifications (NFQ) and the making of awards to learners not studying with an awarding body. These responsibilities extend across the breadth of post-secondary education and training, including further education and higher education awards.

The breadth of its responsibilities and powers are defined in legislation and therefore have a sound legal basis as well as being recognised formally by the Irish Government. Through discussions with providers, representative bodies, senior government officials and other stakeholders, the Panel found that in practice, QQI’s responsibilities were clearly understood within the agency and by the broad range of stakeholders it interacts with. The panel found no evidence to suggest that the decisions of QQI, be they regulatory or not, were not accepted or treated with the seriousness that would be expected.

**Panel conclusion: Fully compliant**

**ESG 3.3 INDEPENDENCE**

Standard:  
Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

**Evidence**

QQI is a state agency under the aegis of the Irish Government’s Department of Education and Skills (“the Department” hereafter). It therefore forms part of the machinery of Government in Ireland but the 2012 Act states that “subject to this Act, the Authority shall be independent in the performance of its functions” (part 2, section 9, subsection 4). This relationship with a Ministry is not uncommon for a public agency but the panel took great care to investigate and consider how the risk to the agency’s organisational and operational independence were being managed and mitigated. This included scrutiny of the relevant legislation, the Oversight Agreement and annual Performance Delivery Agreement instruments used to govern the Department’s relationship with the agency, the minutes of the agency’s Board meetings, and the agency’s Self-Assessment Report. This investigation involved in-depth discussions with the agency’s Executive and Board, senior officials of the Department, senior officials of the Higher Education Authority, and representatives of higher education providers and students.

From the evidence scrutinised and the discussions held, the panel found that the Minister of Education and Skills had responsibility for appointing members of the agency’s Board. These appointments are made from a shortlist of candidates that had applied in response to an open call and a robust selection process used for many ‘State Boards’ in Ireland. This process is initiated by the agency when a position on the Board becomes vacant and is managed by Ireland’s Public Appointments Service in consultation with the agency. The process ensures that the Minister is only presented with candidates who are suitably qualified. Furthermore, the agency’s Board is not established as a representative board and therefore members are not championing the views of any third-party but rather are acting in the best interests of the agency and the fulfilment of the agency’s statutory responsibilities. This is reinforced through a statutory Code of Practice applying to State Boards in Ireland, including QQI’s Board.

The panel found that the Department establishes and has in place ‘Performance Delivery Agreements’ with its subsidiary bodies, including the agency. The Agreement forms a contract between the two bodies, setting out an agreed level of service that is expected of the agency in that year. It is established early in the calendar and financial year and performance against the agreement is then reviewed through mid- and end-of-year meetings; these meetings are attended by senior executives of both bodies. A significant amount of the agency’s income comes through a grant from the Department and this agreement provides accountability for the use of those public funds, ensuring value for money for the Irish Government. In practice, the priorities in the Performance Delivery Agreement are derived from the agency’s annual Corporate Plan, which itself exists to translate the agency’s three-year Statement of Strategy into specific deliverables and inform the work-plans of the agency’s directorates. There is, therefore, a direct relationship between the agency’s strategic plan, which is formed and owned by the agency’s Board, and the contents of the Performance Delivery Agreement. In reviewing the contents of the approved 2018 Agreement and the draft 2019 Agreement, the panel found that the contents did in fact align with the implementation of QQI’s own strategic plans, although these

plans were in themselves not controversial or contradictory to the direction of travel in government policy on higher education.

The panel also explored the relationship between the agency and the Department with regards to human and financial resources. This is detailed under ESG 3.5 (Resources) but in summary it was not found to compromise the organisational independence of the agency.

The development and implementation of methods and procedures for each of the external quality assurance activities in the scope of this review are managed autonomously by the agency. As described in other sections of this report (ESG 2.2, 2.3, 2.4), the agency takes a comprehensive approach to policy development with several stages where proposals are published and consulted on with stakeholders in an open, transparent way. The agency makes use of and independently appoints diverse expert panels in its methods for approving and reviewing the effectiveness of providers' quality assurance procedures. The conclusions of these panels are received and considered by committees of the agency's Board which test, challenge and ensure their robustness. The panel found that in practice this was a system that enabled the formal outcomes of external quality assurance processes to be reached independently without interference.

In discussions with various stakeholders including providers, representative bodies and experts, the panel found there was consensus amongst them that QQI operated independently and took care to maintain its independence.

**Analysis**

QQI's status as a state agency could, in theory, bring the risk of perceived or actual interference from the Department. The panel concludes that, in practice, this risk is appropriately mitigated through the transparent and structured nature of formal interactions between the Department and the agency. The Department's relationship with the agency predominantly focuses on ensuring that the agency's statutory responsibilities are fulfilled, that the agency develops and delivers a clear strategic framework, and that the agency's human and financial resources are adequate for the agency to fulfil its responsibilities whilst ensuring value for money for the Irish Government. The Department's relationship with the agency does not interface with or influence its quality assurance responsibilities. These responsibilities are executed independently by the agency through its panels of experts and its transparent system of governance.

Beyond Government, the panel concludes that the agency's organisational design and quality assurance methods do not create the opportunity for or allow their independence to be compromised by undue influence from higher education providers, students or other stakeholder groups. Furthermore, there are sufficient checks and balances in place within the organisation to ensure that no one member of staff or committee member can take decisions on the formal outcomes of quality assurance processes.

**Panel conclusion: Fully compliant**

**ESG 3.4 THEMATIC ANALYSIS**

Standard:  Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.
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**2014 review recommendation**

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).

## **Evidence**

As already noted, QQI is still in the early stages of implementing its quality assurance processes. This limits the scope for thematic analysis to be undertaken until sufficient data becomes available. Nonetheless, in the five years since the last ENQA review, QQI have produced the following substantive analyses:

- [‘Quality in an Era of Diminishing Resources’ Irish Higher Education 2008-15](#)
- Quality Within Higher Education: A Summary Report – [2016](#), [2017](#) and [2018](#) editions
- A Thematic Analysis of Reports on the Accreditation/Approval/Review of Programmes of Higher Education, [Stage 1: QQI Validation and Revalidation](#)

A second stage of the final report, considering programme approval and validation, was being produced at the time of the review and would focus on programmes offered or validated by providers with their own awarding powers.

The panel discussed the aims, usefulness and impact of these reports with the agency’s staff and a range of stakeholders, including those with responsibility for quality assurance in providers who could, in theory, make particular use of the reports. The panel found that each of the reports was known about by a range of stakeholders and that there was a clear sense of them being valuable to particular groups of stakeholders. In particular, the report on *Quality in an Era of Diminishing Resources* was cited as influential in national policy discussions about quality and funding in higher education. Similarly, the more recent work on the operation of programme approval and validation processes was considered useful to institutions in learning from different approaches, given that they typically only see their own processes.

QQI’s Statement of Strategy 2019-2021 has four high level aims, the second of which is to *‘use our unique position as the agency that spans all post-secondary education and training to analyse and demonstrate the impact of measures taken to improve the quality of education and training for the benefit of learners’*. This establishes a clear commitment to undertaking more analytical work that draws on the findings of their external quality assurance activities, and uses this to inform the continued enhancement of quality and development of quality assurance in Irish higher education. The agency’s Corporate Plan 2019, which translates the Statement of Strategy into clear deliverables each year, includes several actions that will enable progress towards achieving this aim and the panel heard from QQI’s staff that some of this work is already underway. Furthermore, the agency’s recent reorganisation of staff has introduced a new Research and Standards Team and further capacity is being built in this area to deliver on QQI’s plans.

## **Analysis**

Despite not having completed full cycles of all external quality assurance activities, the agency has been proactive and effective in producing thematic analysis reports that are considered useful in the sector for improving quality and quality assurance. Each report (or series) has a different focus and the extent to which they draw on the findings of activity that can be explicitly considered external quality assurance varies, however the panel concludes that a pragmatic and appropriate approach has been taken. The agency has published several reports over the last five years and more were in production at the time of this review; the panel considers that the agency does therefore publish thematic analysis reports regularly. The panel concludes that this is a noteworthy achievement given that QQI was

constrained in its ability to recruit staff in its early years and understandably prioritised the development and implementation of policy and processes.

**Panel suggestions for further improvement**

The agency is still developing its approach to and capacity for producing thematic analysis. This will become simpler as the breadth and depth of findings from its external quality assurance processes increases. There are clear plans in place to inform the direction of this work, including in the Strategy of Statement 2019-2021. These plans are appropriate and the panel has confidence in the agency’s ability and resolve to deliver them. Defining a clear multi-year programme of research and analysis could help to align the agency’s ambitions in this area with the resources available, and also to engage stakeholders in confirming the usefulness of analysis work before it is commenced.

**Panel conclusion: Fully compliant**

**ESG 3.5 RESOURCES**

Standard:  
Agencies should have adequate and appropriate resources, both human and financial, to carry out their work.

**Evidence**

*Human Resources*

QQI’s formation through the merger of four antecedent bodies in 2012 provided an established staffing base with which to form the organisation. An initial organisational structure was implemented that brought together similar functions from across the four bodies into a unified structure. This took place at a time when Ireland was working to recover from the 2008 financial crash, including through a focus on policies of fiscal consolidation and spending reductions across the Irish Government. One of the measures in place to deliver this was a moratorium on recruiting staff, which applied to QQI’s parent Department and as such to QQI directly. In practice, this meant that as the four organisations were merged, QQI was not able to restructure fully as new posts could not be recruited to if they were not easily filled by existing staff. This moratorium was lifted for the Department of Education and Skills in 2015 and QQI were permitted to begin recruiting staff.

More recently, an organisational review of QQI has been undertaken independently by consultants commissioned jointly by QQI and the Department. This review aimed to ‘assess the extent to which the current organisational and staffing structure of QQI supports the efficient and effective delivery of its statutory obligations and strategic objectives, and identify the most appropriate structure for QQI in the future’. The review made a number of recommendations on the structure and flexibility of resource allocation across QQI’s functions which have largely been accepted by QQI’s Board and Executive. A Steering Group, which included representatives of the Department and an external chair, has since been established to implement the recommendations, including a new allocation of portfolios which took effect shortly before the site visit of this review, and to forward-plan how the organisation can further evolve. Specialist capabilities around change management and IT business analysis have been contracted in by QQI to help deliver this programme of work, and these have proved valuable, independent voices to inform the process.

In reviewing the outcomes of the organisational review and in discussions with staff, Board members, officials of the Department and other stakeholders, the panel found that the new managerial

assignments were early in their implementation. However, there was a clear recognition of its need and its potential for enabling QQI to deliver on its ambitious new Statement of Strategy, which itself called for QQI to evolve from establishment mode to a more mature, proactive and impact-focused agency.

### *Financial Resources*

QQI's income primarily comes from two sources: state funding from the Department of Education and Skills to deliver its statutory functions and fees paid by providers engaging QQI's 'on-demand' services such as validation and certification. In 2017, around 92% of QQI's income was from these two sources and each accounted for just over €4m. The small remainder comes from relationship fees for services to awarding bodies (universities, technological universities, the former DIT and RCSI) and from European Union funded programmes.

State funding is allocated as a maximum grant which QQI 'draws down' throughout the year as needed to fund its activity. Where QQI's income from other sources is higher than expected and covers a greater proportion of QQI's planned costs, a smaller amount of the grant is 'drawn down'. This means that when the volume of 'on-demand' activity in the agency increases, there is not necessarily more income available to resource this work. As the level of on-demand activity fluctuates each year, it is difficult for the agency to forward plan its activity with any certainty under the current funding model.

An amendment to the 2012 Act was being progressed through the Irish parliament at the time of this review. If the draft provisions pass into law, they will give QQI additional statutory responsibilities and powers. These include powers to review the corporate form and financial affairs of independent providers, powers to establish and manage a national Learner Protection Fund in support of students left at risk if their provider closed, powers to implement the International Education Mark, a kitemark confirming that international students studying at Irish providers are well supported, and powers to include additional awarding bodies, including HEIs, in the NFQ. The Government's intention is that much of the work undertaken to fulfil these new responsibilities will be self-funding, i.e. the cost will be borne by the higher education provider under review. However, before income starts to be generated through the delivery of these activities, there are significant phases of development, including the establishment of new capabilities and expertise in the organisation, which will incur costs but are not currently accounted for in the state grant.

The panel reviewed financial statements, minutes of Board meetings and correspondence with the Department, and discussed QQI's funding model and ability to plan at length with staff, Board members and senior officials of the Department. The panel found that there was a recognition within QQI and the Department that the current funding model creates difficulty for QQI in being able to plan effectively. The panel did find a clear commitment from the Department to review and amend the current model with a view to moving towards a more predictable funding model. Furthermore, the panel found a clear commitment from the Department to funding the necessary staff resources that are required to support QQI in implementing its new functions arising from the legislative amendment under consideration.

The panel also found that in return QQI was progressing with two major strands of work to enable a more evidence-based approach to these discussions with the Department. First, a workforce planning exercise was underway at the time of this review to determine more precisely the staffing needs of current and future activities. Second, a bottom-up, analytical review of the costs of each activity are helping to better understand, and subsequently recoup from the appropriate source, the full economic cost of different activities. This will also help to inform a case for reviewing the price point of on-demand fees charged for statutory activities, which are subject to approval by the Department.

### **Analysis**

QQI has had to contend with the expected and complex challenges of merging four organisations into one whilst not being able to restructure or recruit new staff. In these circumstances, the panel concludes that the progress made by the agency since its establishment is impressive, which is largely a result of the impressive commitment and talent of QQI's staff at all levels. However, the pace of delivery has been slower than the agency would have liked and than the panel might have otherwise expected to see. The recent actions to review the fitness for purpose of the organisational structure is timely and to be welcomed. This will enable the agency to optimise the capacity of its existing staffing base whilst also ensuring that it is better placed to deliver on new or newly prioritised activity in its Statement of Strategy 2019-21.

The financial constraints outlined above have limited QQI's ability to develop financial plans beyond the next financial year and to confidently plan the activity it will undertake. Whilst there is no evidence of QQI not being able to deliver its statutory responsibilities, the pace of delivery on some work has been slow and the full range of activities are only just beginning to become operational, seven years on from being established. With a more predictable financial model, which more effectively offsets the income of busier years with the fixed costs still incurred in quieter years, the agency would be significantly better placed to deliver its statutory responsibilities and the ambitions set out in its Statement of Strategy 2019-2021. This is not about proposing an increase in funding but rather about making full use of those funds already committed and, most importantly, about increasing the stability and predictability of the financial model to enable longer-term planning. The Department's commitment to delivering this with QQI is welcomed but judgement on the impact of this change will need to be reserved until final proposals are agreed, implemented and evaluated.

The recent separation of QQI's in-house human resources and finance functions, and the subsequent appointment of a qualified accountant to manage the finance function, are already proving productive in moving these discussions forward. Similarly, the inclusion of the managers of these functions in the agency's Executive Management Team is helping to ensure that planning and resource allocation discussions are central to wider discussions about strategy and priorities.

In summary, the panel concludes that in principle QQI does have adequate staffing and financial resources to carry out their work. However, these do not currently enable the agency to organise and run their external quality assurance activities in a way that is as effective and efficient as they could be. There are several strands of work underway to change this situation, each of which is sensible and to be encouraged, however it is too soon for their impact to be fully felt. In order to be fully compliant with the standard and guidelines, QQI will need to deliver on these strands of work and be in a position where it can access and make full use of the total resources earned by or allocated to it.

### **Panel recommendations**

Continue to work with the Department of Education and Skills to improve the funding model so that the agency can take a longer term approach to planning and not be so vulnerable to the fluctuations in on-demand income.

### **Panel suggestions for further improvement**

There are several areas for improvement needed to become fully compliant, however these have been identified by the agency and are being progressed effectively. The panel advises that the agency see their current plans through to implementation and continue to maintain an ongoing strategy for organisational development.

### **Panel conclusion: Substantially compliant**

### ESG 3.6 INTERNAL QUALITY ASSURANCE AND PROFESSIONAL CONDUCT

Standard:

Agencies should have in place processes for internal quality assurance related to defining, assuring and enhancing the quality and integrity of their activities.

#### 2014 review recommendations

Develop a formalised comprehensive system of data gathering and reporting in order to improve QQI's accountability.

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

#### Evidence

Since the last ENQA review, QQI developed and approved an Internal Quality Assurance Policy in January 2017, which sets out high level principles underpinning the agency's approach to the internal quality assurance of the external quality assurance of providers. These principles articulate a commitment to proactively defining high standards of service and to continuously monitoring and reviewing the quality of the services provided by QQI, including through a system of performance indicators and management information reporting.

In practice, the agency ensures consistency and minimum standards in its work by publishing its external quality assurance processes and by articulating how these processes should be delivered by QQI staff in a series of Standard Operating Procedures (SOPs). SOPs are collated together into QQI's Quality Manual, which serves as a managed reference point for staff in undertaking their work. The agency reviews each SOP at least every two years or sooner where there is an operational need, with just read-only soft copies available to ensure that the most recent version is used.

The agency monitors and seeks feedback from stakeholders on the implementation of its external quality assurance processes in a number of formal and informal ways. Formally, providers and expert panels provide feedback on the process at the end of each validation, external review and other similar engagement with a provider. This provides real-time insight for QQI staff and can be collated to offer a more holistic view across a cycle of reviews. Furthermore, feedback is periodically sought from a wider group of stakeholders on the agency's work through surveys. Most recently, the agency surveyed stakeholders to inform the development of the Statement of Strategy 2019-2021, which provided high-level feedback on their strategic direction but also operational feedback that can be used to inform the enhancement of external quality processes.

In talking to staff and stakeholders about how the agency improves its processes, the panel found a widespread and genuine sense of appreciation for the informal and open approach to stakeholder engagement fostered by all staff in the agency, including the Executive Management Team. In practice, this meant that stakeholders were able to offer feedback in a timely, discursive way that helped staff to fully understand how processes were being experienced when implemented. The agency does not intend that this should replace the more formal, structured approach to internal quality assurance outlined above but it does add value above and beyond this approach.

#### Analysis

The agency’s Internal Quality Assurance Policy has been in place for two years as a number of external quality assurance processes have become operational. In this time, the agency’s approach has developed well and there is a widely understood range of internal controls, such as Standard Operating Procedures, in place and in use by staff that ensure the quality and integrity of activities. Furthermore, there is a commitment to understanding stakeholders’ perspectives on the implementation of external quality assurance processes and how they might be improved. Both the formal and informal approaches to engaging stakeholders add value to and enable the continuous improvement of the agency’s work.

**Panel suggestions for further improvement**

While the agency’s approach is embedded and effective, it is still maturing and there is potential to develop it further over the coming years. In particular, as the remainder of the agency’s external quality assurance processes are operationalised, sometimes with nuanced differences for each type of provider, there should be a focus on maintaining the integrity of decisions taken about programmes and providers. This is not to question the integrity of decisions already taken but to highlight the scaling up of QQI’s operations that will take place and the associated risk of divergence that comes with this. There is an opportunity for the agency to think proactively about how it further evolves its approach to internal quality assurance in this context.

**Panel conclusion: Fully compliant**

**ESG 3.7 CYCLICAL EXTERNAL REVIEW OF AGENCIES**

Standard:  
Agencies should undergo an external review at least once every five years in order to demonstrate their compliance with the ESG.

**Evidence**

This is the second ENQA review of QQI following the agency’s establishment in 2012. Prior to this, each of the three antecedent bodies that operated in higher education quality assurance – IUQB, HETAC and NQAI - held membership of ENQA following successful reviews. The agency has also undergone further scrutiny of its compliance with the European Standards and Guidelines as part of its successful application for inclusion in the European Quality Assurance Register. The agency has taken comprehensive action in response to the recommendations of its last ENQA review and the panel found that the European Standards and Guidelines were routinely used as a reference point when developing new policy and process.

**Analysis**

The agency does undergo an external review every five years, which includes judgements on the agency’s compliance with each of the European Standards and Guidelines. The agency builds on this minimum level of engagement between reviews by maintaining its knowledge of the European Standards and Guidelines through continued engagement in European networks which it applies to its policy and process at the point of development and throughout their implementation.

**Panel conclusion: Fully compliant**

## ESG PART 2: EXTERNAL QUALITY ASSURANCE

### ESG 2.1 CONSIDERATION OF INTERNAL QUALITY ASSURANCE

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

#### 2014 review recommendation

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.

#### Evidence

QQI has a policy framework setting out their expectations of providers' approaches to quality assurance. This comprises 'Shared Quality Assurance Infrastructure', such as the National Framework of Qualifications, which apply equally to all providers and tailored policy for different types of provider which recognises the various levels of delegated authority in the Irish system. The panel found this policy framework to comprehensively align to and meet standards and guidelines in part 1 of the European Standards and Guidelines.

One of QQI's core functions is to approve providers' Quality Assurance Procedures where they meet the requirements of QQI's clear published policy and criteria. For new providers, this takes place as part of the **Initial Access to Validation** Process and for existing providers this is undertaken as part of the **Re-engagement** process. The seven previously established universities with degree awarding powers are not required in legislation to have their Quality Assurance Procedures approved by QQI, however they are required to submit them for consultation purposes, which provides an opportunity for QQI to discuss and establish confidence in the procedures. Any changes to a provider's Quality Assurance Procedures would be considered by QQI through an annual engagement, such as the Dialogue Meetings. This core activity provides assurance that a Provider's Quality Assurance Procedures take account of QQI's policy framework, which in turn provides assurance of compliance with Part 1 of the European Standards and Guidelines.

The 2012 Act makes provisions (sections 52-55) for QQI to receive and consider applications from certain types of providers seeking **delegated authority** to make higher education awards, and for QQI to subsequently review and withdraw this delegation where necessary. The 2012 Act requires that any provider must first meet a number of criteria, including that it has established procedures for quality assurance under section 28 of the Act, meaning that a provider would have an established relationship with QQI before seeking delegated authority. This delegation may be made in particular discipline areas and/or for awards up to a particular level of the NQF, and subsequently broadened in scope. Following [consultation in through a White Paper](#), QQI published its [Procedures and Criteria Relating to Delegation of Authority](#), which set out how QQI considers applications in respect of both the programme(s) and the overall operation and management of the provider. At present, Institutes of Technology have delegated authority to make awards, however the Irish Government has enabled this to become full awarding powers as they merge into technological universities (see [Higher Education System](#)) and therefore the scope of this activity is temporarily reducing. Further amendments to the legislation will in the future enable independent providers to seek delegated authority where they have not previously been able to. This will see a resurgence in this activity for QQI and whilst the

Panel is confident that the policy framework in place for considering these applications, together with QQI's comprehensive engagement with and knowledge of likely applicants to date, there was naturally limited evidence to review of how the policy had been applied in practice in recent years.

Following these 'gateway' processes that initially enable a provider to deliver recognised higher education, regular engagement with and periodic external quality assurance reviews of different providers in the Irish system allow QQI to regularly assure itself that providers continue to adhere to the expectations of their policy framework:

- **Programme validation and re-validation** involve an independent evaluation of the proposal against QQI's core validation criteria, including criteria that the programme is well managed and interfaces effectively with the provider's QQI-approved QA procedures (para 17.12, [Policies and criteria for the validation of programmes of education and training](#)). A (re-)validation report may propose that minor changes are made to the provider's QA procedures as a result of evaluating their application to the programme.
- **Institutional quality review** is undertaken periodically with the explicit scope of 'evaluating the effectiveness of the institution-wide QA procedures for the purposes of establishing, ascertaining, maintaining and improving the quality of education, training, research and related services the institution provides' ([Policy for Cyclical Review of Higher Education Institutions](#)).
- A **focused review** of a provider is undertaken specifically to determine that the QA procedures established by a provider have been implemented and to evaluate the effectiveness of those procedures ([Procedures for Focused Reviews by QQI of the Implementation and Effectiveness of Provider QA Procedures](#)). A focused review can take place 'in response to concerns that have come to its attention in relation to the implementation and effectiveness of a provider's QA procedures'. It is possible for a focused review to be undertaken where QQI suspects there might be grounds for withdrawing delegated authority, using the powers granted in section 54 of the 2012 Act.

In reviewing QQI documentation and in discussions with higher education providers, the panel found that institutional responsibility for the quality of their provision is embedded as a core principle of QQI's approach to quality assurance. Proposed amendments to the 2012 Act provide for Institutes of Technology to have full awarding powers up to level nine of the National Framework of Qualifications, which is accepted as a natural progression in the Irish system after several years of QQI first delegating authority for these providers to make their own awards. Furthermore, the Department of Education and Skills' intention to introduce secondary legislation following the amendment to the 2012 Act will provide for QQI to delegate authority to independent private providers where they are sufficiently established and mature to make their own awards. This represents a shift towards greater institutional autonomy in the most formal sense, however the panel also found that QQI takes other steps to promote institutional responsibility for quality assurance, such as enabling providers to compose their own panels to undertake revalidation of their programmes which lead to a QQI award.

QQI's mapping of their external quality assurance activities to Part 1 of the European Standards and Guidelines can be found in Annex 5.

## Analysis

The Irish higher education system has several types of provider, each of which operates in a different legislative and regulatory framework. For a small country, this is a complex arrangement and in response to this complexity, QQI has developed external quality assurance processes which effectively respond to the needs of each type of provider, and indeed the different levels of maturity within each type of provider. Whilst providers may engage with QQI through different external quality assurance

processes, QQI’s approach is consistently underpinned by a number of common elements, including a focus on the effectiveness of providers’ internal quality assurance processes. This is strengthened by the requirement that QQI approves providers’ quality assurance processes, and therefore their approach to internal quality assurance, as it establishes a shared understanding of what they are trying to achieve before QQI seeks to evaluate the effectiveness of this approach through annual engagements and cyclical review.

Furthermore, QQI’s approach is strengthened by the fact that it is not too rigid. It has mechanisms to delegate additional responsibilities to mature providers with the capacity for more independently managing the quality assurance of their higher education provision. QQI’s work in this area is enabling the Irish Government to consolidate the progress made so far in legislation and to introduce additional powers for QQI to extend this approach to new parts of the sector. The panel concluded that this approach was exemplary and that it firmly underlined a commitment to embedding the principles underpinning the European Standards and Guideline in the Irish system.

**Panel commendation**

The effectiveness of the agency’s approach to enabling higher education providers to take on more responsibility for quality assurance as they mature, including through delegating authority to make higher education awards.

**Panel conclusion: Fully compliant**

**ESG 2.2 DESIGNING METHODOLOGIES FIT FOR PURPOSE**

Standard:  
External quality assurance should be defined and designed specifically to ensure its fitness to achieve the aims and objectives set for it, while taking into account relevant regulations. Stakeholders should be involved in its design and continuous improvement.

**2014 review recommendations**

Development of the missing policy document emerging from the green papers and white papers and the consultation 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.

Signature of 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 (with QQI) and the Strategic Dialogue (with the HEA) meetings.

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.

Strengthen and diversify the internationalisation of QQI’s structures and evaluation procedures.

**Evidence**

QQI has a broad remit and undertakes a wide range of activities. The areas of external quality assurance activity within the scope of this review (approval of QA procedures; programme validation and revalidation; focused review; and institutional review) are each articulated through a collection of policies, guidance and templates which are detailed in [Annex 5](#) and available through QQI’s website. These documents confirm the purpose, aims and scope of each activity and also set out the methodology for achieving these in substantial detail.

QQI has developed each of its policies in the last seven years, since the merger of its legacy bodies. Throughout this time, QQI’s Comprehensive Policy Development Programme has taken a planned, thoughtful approach to policy development. This involves the publication of Green Papers setting out the issues under consideration and seeking feedback, which in turn enables the publication of White Papers that set out draft policy for consultation. This is sometimes supplemented with consultation events that facilitate face-to-face engagement.

In discussions with numerous stakeholder groups, the panel found a strongly- and widely-held view that QQI is effective in consulting during the development of policy. The model of Green Papers and White Papers is welcomed by stakeholders and is felt by them to provide a clear, robust and staggered approach to consultation which brings “no surprises” and engenders trust in the system.

**Analysis**

In bringing together the four disparate policy frameworks of its antecedent bodies, QQI has effectively developed its own framework based on a single set of high-level shared principles and requirements. Methodologies for each external quality assurance activity are underpinned by these principles but are also nuanced to the circumstances of each type of provider. In particular, the panel found the agency’s new CINNTE external review methodology to be well-designed and received positively by those providers and expert panels that have engaged with it so far.

As previously outlined, QQI faced significant resourcing challenges in its early years and this could have encouraged a rushed approach to policy development, however it has maintained its resolve to consult widely and develop robust, effective policy and methodologies. The panel concludes that this has resulted in a range of methodologies being produced that are fit for purpose. Furthermore, the panel concludes that the approach to stakeholder engagement and consultation is exemplary.

**Panel commendation**

The way in which policy and external quality assurance methodologies are developed through comprehensive and engaging consultation with stakeholders.

**Panel conclusion: Fully compliant**

**ESG 2.3 IMPLEMENTING PROCESSES**

Standard:

External quality assurance processes should be reliable, useful, pre-defined, implemented consistently and published. They include:

- a self-assessment or equivalent
- an external assessment normally including a site visit
- a report resulting from the external assessment
- a consistent follow-up

## **2014 review recommendation**

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

### **Evidence**

The guidance published about each of QQI's external quality assurance activities defines the methodology and process to be followed by QQI, its expert panels and providers throughout the activity. The implementation of each activity is guided by these published methodologies and guidance. In comparing the reports published with the methodologies set out, the panel found that the implementation of QQI's different activities was in line with the published methodologies.

Of the five external quality assurance activities within the scope of this review, three of them make full use of self-assessments or similar submissions, site visits, reports and follow-up activity. These are programme validation and revalidation, focused review and institutional review. Additionally, the approval of QA procedures makes use of these when undertaken with independent providers.

The approval of QA procedures for providers with self-awarding powers or delegated authority is lighter touch in recognition of the greater responsibility held by those providers. In place of an expert panel and site visit, this approval is managed through Dialogue Meetings undertaken as part of QQI's Monitoring activity. Following this process, a recommendation is made to the Programme and Awards Executive Committee, which formally approves (or otherwise) the QA procedures for the self-awarding bodies (with the exception of the previously established universities).

Monitoring of providers involves different approaches depending on the type of provider, including the submission of Annual Institutional Quality Reports and Dialogue Meetings for providers with their own or delegated awarding powers. This is an ongoing exercise centred on annual submissions and is undertaken directly by QQI staff.

The operationalisation of these different activities across the various types of providers has been dependent on the development and approval of the necessary policies first. As already outlined, this has been an iterative process over several years and has been slowed by the resourcing challenges faced by the agency. The majority of activity has now been operationalised and is gradually being delivered with the full range of providers as appropriate.

However, the operationalisation of Re-engagement, whereby QQI approves a provider's QA procedures, has not yet been completed for independent private providers. Legal advice taken by QQI on their interpretation of the 2012 Act has resulted in QQI not being able to commence cyclical institutional review with these providers as this is intended to assess the effectiveness of a provider's QA procedures, which are not fully in place until they are first approved by QQI.

In discussion with QQI staff and providers, the panel found that re-engagement has taken place with some independent private providers and they are expected to begin undergoing institutional review from 2020, however the majority are still a number of years from their first institutional review by QQI and may go up to 12 years without such a review. The risk of concerns about quality going unnoticed in these providers is partly, but not wholly, mitigated by QQI having more intensive engagement with them through their validation relationship.

### **Analysis**

Where QQI has developed its external quality assurance processes and moved to full implementation, this is proving to be successful and valuable in both the assurance and enhancement of quality in higher

education providers. The panel concludes these processes are useful, pre-defined, implemented consistently and published.

The exception to this is in the implementation of QQI's processes with independent private providers, where no cyclical institutional reviews have taken place as a result of the delay in approving those providers' Quality Assurance Procedures through Re-engagement. The panel concludes that this is not the result of poor intentions on the part of the agency but rather that this activity is the final part of a very significant policy framework to operationalise following QQI's creation. QQI may have been able to progress this work sooner with more staff but in the circumstances it has faced, the panel remains impressed with the scale of the progress made in QQI's work overall. However, in reaching a judgement on whether this standard is met, the panel is unable to conclude that QQI is fully compliant until its processes are being fully and effectively implemented across each type of provider.

#### **Panel recommendation**

Accelerate and complete reengagement and institutional review with independent providers.

#### **Panel conclusion: Substantially compliant**

### **ESG 2.4 PEER-REVIEW EXPERTS**

Standard:

External quality assurance should be carried out by groups of external experts that include (a) student member(s).

#### **2014 review recommendation**

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

#### **Evidence**

With the exception of Monitoring activity, QQI's external quality assurance activities include a panel of external experts that reviews a submission from the provider, undertakes a site visit and produces a report for consideration by the relevant committee of the QQI Board. The composition of panels varies, however they always include a student member:

- **Initial Access to Validation:** A Quality and Capacity Evaluation Panel is established to undertake stage one assessments at provider-level before a stage two application for the validation of specific programmes can be made. ([Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards](#))
- **Programme validation and re-validation:** The panel comprises independent evaluators with 'expertise in the programme's discipline area and in generic areas including pedagogy, assessment, quality assurance and all the other areas indicated by QQI's validation criteria'. The number of evaluators is determined on a case-by-case basis by QQI depending on the case but will always include a student member. ([Policies and criteria for the validation of programmes of education and training](#))
- **Institutional quality review:** Review teams are composed by the QQI officer managing the review processes and will include student and staff peer reviewers from similar institutions. Panels vary in size depending on the size and complexity of the provider but will be balanced to include an

international reviewer, an Irish reviewer, a student representative and a representative of external stakeholders ([Policy for Cyclical Review of Higher Education Institutions](#)). **Focused reviews** follow a similar approach to standard cyclical reviews, although expertise is more specifically sought in the type of institution and, where relevant, the concern under review ([Procedures for Focused Reviews by QQI of the Implementation and Effectiveness of Provider QA Procedures](#)).

The handbooks and terms of reference for the methodologies set out core roles in the panel, such as the Chairperson, Coordinating Reviewer and Student Reviewer. They also set out broad parameters for the rest of the panel whilst allowing some flexibility for QQI staff to tailor it depending on the profile of the provider.

The small scale of the Irish higher education sector poses an increased possibility for conflicts of interest arising where national experts are used by QQI. A system for proactively identifying possible conflicts of interests is therefore in operation, providing both members of the panel and providers to raise concerns at an early stage if needed. In discussions with QQI staff, experts and providers, the panel found there to be consensus that QQI's approach was pragmatic and effective.

This small scale of the sector, together with the sector's desire to be outward-looking, has resulted in QQI making extensive use of international members of its expert panels in institutional quality reviews and occasional use in programme (re-)validations. In discussions with experts, it was felt that panels benefitted from the additional independence, objectivity and perspectives brought by international experts.

QQI also work with representative bodies to source experts from industry who can 'bring a third mission perspective'. In discussing this with experts, representative bodies and providers, the panel found that this was a valuable addition in theory but that experts from industry were not supported as effectively as they could be to understand the review process and make the fullest contribution possible. Beyond this specific area for improvement, the panel found that training and support for experts was effective and responsive to the needs of experts with different levels of experience.

Since 2016, QQI has worked with the Union of Students in Ireland and the Higher Education Authority to establish, fund and sponsor the National Student Engagement Programme (NStEP). NStEP supports the development of student engagement within higher education providers and now also works with QQI to recruit and manage a pool of trained student experts. This pool is drawn upon to appoint student members of expert panels for validations and institutional reviews. In discussions with student members of panels, the Union of Students in Ireland, NStEP, QQI staff and providers, the panel found that student members were effectively trained before participating in reviews and were able to fully contribute to the work of panels.

## **Analysis**

QQI makes full use of peer-review by experts in its key validation and review activities. Experts are drawn from different communities within and outside of the higher education sector, and from within and outside of Ireland. This approach draws together a depth and breadth of expertise that reinforces the credibility and impact of QQI's external quality assurance activities.

The training and support for expert panels is effective and sufficient, however there are opportunities to further strengthen this, especially for those experts from industry, to fully utilise their expertise. This should look to include greater use of online and blended methods to ensure that the level of engagement with training is maximised. This would build on the excellent practice established in supporting student members of panels, in partnership with NStEP.

The panel concludes that QQI's proactive and pragmatic approach to identifying and managing conflicts of interest amongst its expert panels is robust and ensures the independence of its external quality assurance activity.

**Panel conclusion: Fully compliant**

## ESG 2.5 CRITERIA FOR OUTCOMES

Standard:

Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.

### Evidence

QQI has operationalised its external quality assurance activities through the use of handbooks, templates and training for experts which consistently refer back to the published criteria for that methodology:

- **Approval of QA Procedures (new provider approval and re-engagement for non-public providers):** [Core Statutory QA Guidelines](#); [Policy on QA Guidelines](#); [Overarching Re-engagement Policy](#);
- **Programme validation and re-validation:** [Policy and criteria for provider access to initial validation of programmes](#); [Policy and criteria for the validation of programmes of education and training](#); [Monitoring Policy](#); [AIQR Handbook](#);
- **Institutional quality review:** [Policy for Cyclical Reviews of Higher Education Institutions](#)
- **Focused reviews:** [Procedures for Focused Reviews by QQI of the Implementation and Effectiveness of Provider QA Procedures](#)
- **Delegated authority to make awards:** [Procedures and Criteria Relating to Delegation of Authority](#)

The panel assessed reports (see 211a-l in Annex 4) and [terms of reference](#) for the approval of QA Procedures, re-engagement, programme validation, programme re-validation, institutional quality review and focused review against these published criteria and discussed them with QQI staff and expert panel members. The panel found the approach to be effective in guiding panels to only recommend formal judgements that are within the scope of the methodology and to make use of the criteria in reaching those judgements. As [outlined under ESG 2.1](#), the scope of current legislation has limited the pool of potential applicants for delegated authority to make awards and as such, the Panel has not been able to assess the operationalisation of this methodology to the same extent.

QQI reserves the final decision about a provider for committees of its Board which provide oversight for each quality assurance activity. For example, the Programmes and Awards Executive Committee receives and considers the recommendations of expert panels involved in programme validation. Given the number of expert panels considering proposals for programme validation, this enables a degree of moderation so that any divergence in the approach of panels can be mitigated. This is in addition to the benefit gained from QQI staff managing the process and being well-placed to support panel members in applying the criteria consistently.

### Analysis

The panel concludes that QQI’s approach to reaching sound judgements based on the published criteria for each of its external quality assurance activities is robust and effective. The systematic approach to creating and consistently making use of handbooks and templates throughout the process ensures that any risk of divergence between panels is proactively minimised. Where divergence in approach may still occur, the consideration of panel recommendations by committees of QQI’s Board is effective as a further safeguard to identify and manage this so that the ultimate outcomes of the process are consistently reached.

**Panel conclusion: Fully compliant**

**ESG 2.6 REPORTING**

Standard:  
Full reports by the experts should be published, clear and accessible to the academic community, external partners and other interested individuals. If the agency takes any formal decision based on the reports, the decision should be published together with the report.

**2014 review recommendation**

Development of QQI’s own website, as a common platform of information substituting the website 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.

**Evidence**

QQI publishes reports on its website (<https://qsearch.qqi.ie/>) as a result of each external quality assurance activity that makes use of an expert panel: programme validation and revalidation, institutional review, focused review, and the approval of quality assurance procedures for independent providers. The procedures for these activities make clear that providers have the opportunity to comment on the factual accuracy of an expert panel’s report before it is finalised. As the final decision is taken by a committee of the QQI Board, the decisions of the relevant committee are also published alongside the report and in the minutes of the Committee’s meeting.

Templates are in place and used consistently for each methodology (see examples listed under 211a-1 in [Annex 4](#)). Each template has a clear structure setting out contextual information, the findings of the panel and the recommended outcomes. Where a methodology requires a more detailed report, such as the CINTE external review, a summary is also published to ensure the outcomes are accessible to different audiences.

In discussions with providers who have been through validation or external review and with members of QQI’s Board committees, the panel found that the reports produced were helpful in informing both the final outcome of the process and the provider’s ongoing improvement of quality.

**Analysis**

There is a wide range of external quality assurance activity undertaken by QQI covering diverse types of providers, however a consistent approach is successfully taken to reporting on these activities. The panel concludes that this consistency ensures that a public record of QQI’s work and of the effectiveness of each provider’s quality assurance arrangements is available and helpful. It also helps

to ensure that the outcome of each activity is informed by a report based on robust evidence, thereby strengthening the process overall.

QQI remains vigilant in ensuring that panels produce reports that adhere to their expectations, which is challenging with so many panels. Specific training has been developed and offered to experts on how to write reports in line with QQI's common style, which the panel concludes is a helpful intervention and demonstrates QQI's commitment to continuous improvement in this area.

**Panel conclusion: Fully compliant**

**ESG 2.7 COMPLAINTS AND APPEALS**

Standard:  
Complaints and appeals processes should be clearly defined as part of the design of external quality assurance processes and communicated to the institutions.

**Evidence**

QQI has separate published processes for providers to appeal the outcome of a quality assurance process and for any customer of QQI's services to formally complain about their dissatisfaction. Both processes are publically available on QQI's website.

The 2012 Act legislates on the scope and handling of appeals against the decisions of QQI in external quality assurance processes, including a list of specific decisions which can be appealed. These cover the outcomes of processes concerning the approval of QA procedures, programme validation, and the delegation of authority to make awards. Appeals are heard by an appeals panel, which comprises 17 independent people appointed by the Minister for Education and Skills, three of whom would be drawn upon to hear an individual case.

The list of decisions that can be appealed does not cover the outcomes of the cyclical review process (CINNTE) as this process does not arrive at a categorical outcome and as such, there is no decision to be appealed. Where QQI has specific concerns about a provider and wishes to pursue this in a way that could have regulatory implications for the provider, a focused review would be undertaken and any subsequent decision to withdraw validation, delegated authority or approval of QA procedures could then be appealed specifically.

Complaints of service can be made where a customer wishes to express their dissatisfaction concerning the provision of a service by QQI. The complaints process is staged and begins with informal resolution by the staff involved and, if needed, escalation to a relevant senior manager. Complainants will receive an outcome within 15 days or, where this is not feasible, an indication of when an outcome will be communicated. Where complainants remain unhappy with the outcome, a formal review of the outcome can be requested from the Director of Corporate Services and, once QQI's internal procedures have been exhausted, from Ireland's Office of the Ombudsman.

Since being established, QQI has received no appeals and one complaint of service.

**Analysis**

As each of the external quality assurance activities becomes fully operationalised (see ESG 2.3 implementing Processes), there will be a greater volume of decisions that could be appealed on the statutory grounds in the 2012 Act and engagements with providers that could result in a complaint of service. The volume of activity thus far has been limited and as such there is little or no evidence to

draw on in determining the effectiveness of QQI's complaints and appeals processes, however the panel concludes that the design of these processes is appropriate and provides potential complainants and appellants with an opportunity to pursue their case.

The outcomes of cyclical quality reviews are not listed in the legislation as decisions that can be appealed and considered by the appeals panel. Although the outcomes are not categorical decisions and a critical review report may not lead to QQI recommending withdraw of validation or approval, a provider may still wish to challenge the findings in a way that would be better suited to an appeals process rather than a complaints process. QQI should monitor the fitness for purpose of the current arrangements as it undertakes a greater volume of reviews and manages the full range of outcomes.

**Panel conclusion: Fully compliant**

# CONCLUSION

## SUMMARY OF COMMENDATIONS

2.1 Consideration of internal quality assurance	The effectiveness of the agency's approach to enabling higher education providers to take on more responsibility for quality assurance as they mature, including through delegating authority to make higher education awards.
2.2 Designing methodologies fit for purpose	The way in which policy and external quality assurance methodologies are developed through comprehensive and engaging consultation with stakeholders.

## OVERVIEW OF JUDGEMENTS AND RECOMMENDATIONS

3.1 Activities, policy and processes for quality assurance	<b>Fully compliant</b> with no recommendations.
3.2 Official status	<b>Fully compliant</b> with no recommendations.
3.3 Independence	<b>Fully compliant</b> with no recommendations.
3.4 Thematic analysis	<b>Fully compliant</b> with no recommendations.
3.5 Resources	<b>Substantially compliant</b> with one recommendation:  Continue to work with the Department of Education and Skills to improve the funding model so that the agency can take a longer term approach to planning and not be so vulnerable to the fluctuations in on-demand income.
3.6 Internal quality assurance and professional conduct	<b>Fully compliant</b> with no recommendations.
3.7 Cyclical external review of agencies	<b>Fully compliant</b> with no recommendations.
2.1 Consideration of internal quality assurance	<b>Fully compliant</b> with no recommendations.
2.2 Designing methodologies fit for purpose	<b>Fully compliant</b> with no recommendations.
2.3 Implementing processes	<b>Substantially compliant</b> with one recommendation:  Accelerate and complete reengagement and institutional review with independent providers.
2.4 Peer-review experts	<b>Fully compliant</b> with no recommendations.

2.5 Criteria for outcomes	<b>Fully compliant</b> with no recommendations.
2.6 Reporting	<b>Fully compliant</b> with no recommendations.
2.7 Complaints and appeals	<b>Fully compliant</b> with no recommendations.

In light of the documentary and oral evidence considered by it, the review panel is satisfied that, in the performance of its functions, QQI is in compliance with the ESG.

## SUGGESTIONS FOR FURTHER DEVELOPMENT

QQI works closely with the Higher Education Authority (HEA) to provide regulatory oversight of higher education providers in Ireland. The roles of the two organisations are distinct and the focus of their engagement with providers differs, however there is some overlap in the information that providers are required to report to each about their higher education provision. Furthermore, it is important that QQI understands and is sensitive to the context of a provider’s relationship with the HEA when engaging with that provider, such as the outcomes of their strategy and performance dialogue with the HEA, and vice-versa.

The two organisations have long held this view and now have in place their second Memorandum of Understanding to help further develop the ways in which they work together. This is overseen by a steering group of staff from the two organisations and stakeholders from the sector, and informs the day-to-day work of staff at various levels in each organisation.

The progress made to date is good and there is a much more structured approach to managing this relationship than at the time of the last ENQA review in 2014. However, the panel heard on a number of occasions, especially from providers and their representatives, that there is still potential for more progress to be made. In particular, there was a desire for providers to report information once and for it to be shared between QQI and the HEA rather than needing to report it repeatedly.

This does not relate to any of the ESG but the panel would nonetheless encourage QQI to continue its work with the HEA in this area and to consider how it might be more ambitious in its plans. However, the Panel recognises that this is a matter for QQI and HEA to determine the feasibility of.

# ANNEXES

## ANNEX 1: PROGRAMME OF THE SITE VISIT

Sunday 3 March 2019		
TIME	MEETING	PERSONS FOR INTERVIEW
15.30 – 17.30	Review panel's kick-off meeting and preparations for day 1	
17.30 – 18.30	Pre-visit meeting with agency contact to clarify elements related to overall system and context	<b>Padraig Walsh</b> , CEO QQI <b>Ross Woods</b> (agency contact)
Monday 4 March 2019		
TIME	MEETING	PERSONS FOR INTERVIEW
8.30 – 9.00	<b>Review panel's private discussion</b>	
9.00 – 10.00	<b>Meeting 1:</b> Meeting with QQI CEO and Chair of QQI Board	<b>Padraig Walsh</b> , CEO QQI  <i>The Chair of the QQI Board was unfortunately unable to participate due to illness.</i>
10.15-11.00	<b>Meeting 2:</b> Meeting with team responsible for preparation of the self-assessment report	<b>Peter Cullen</b> , Head of Research and Standards (former Head of Validation and Delegation) <b>Orla Lynch</b> , Head of International (former Head of Cyclical Reviews) <b>Bryan Maguire</b> , Director of Quality Assurance <b>Karena Maguire</b> , Head of Stakeholder Engagement and Communications <b>Ross Woods</b> , Stakeholder Engagement
11.30-12.30	<b>Meeting 3:</b> Meeting with representatives from QQI Executive Management Team	<b>Cliona Curley</b> , Director of Corporate Services <b>Barbara Kelly</b> , Director of Qualifications <b>Bryan Maguire</b> , Director of Quality Assurance <b>Karena Maguire</b> , Head of Stakeholder Engagement and Communications Division
12.30–13.15	Lunch	
13.15-14.15	<b>Meeting 4:</b> Meeting with key staff in charge of assessment processes	<b>Walter Balfe</b> , Head of QQI Awards (formerly Head of Provider Approval) <b>Peter Cullen</b> , Head of Research and Standards (former Head of Validation and Delegation) <b>Marie Gould</b> , Head of Higher Education Review <b>Carmel Kelly</b> , Validation Manager <b>Alex Keys</b> , Apprenticeship Quality Assurance Manager <b>Orla Lynch</b> , Head of International (former Head of Cyclical Reviews)
14.30-15.15	<b>Meeting 5:</b> Meeting with staff supporting QA processes and staff in charge of other key processes	<b>Andrea Boland</b> (Validation) <b>Mairead Boland</b> (Cyclical Reviews, formerly Validation) <b>Ann Graves</b> (Validation) <b>Colette Harrison</b> , Awards and Certification Manager <b>Angela Lambkin</b> , Head of Information (including NARIC and Qualifax) <b>John O'Connor</b> , Head of Framework Integrity (including listed awarding bodies) <b>Liliana O'Reilly</b> (English Language Education) <b>Ross Woods</b> (formerly Cyclical Reviews)

15.30–16.30	<b>Meeting 6:</b> Meeting with representatives from QQI Board and sub-board committees	<b>Barbara Brittingham</b> , QQI Board member and Chair of the Programme and Awards Oversight Committee <i>by phone</i> <b>Kevin Ryan</b> , Chair of the Approvals and Reviews Committee <b>Irene Sheridan</b> , QQI Board member <b>Anne Walsh</b> , QQI board member and Chair of the Policies and Standards Committee <b>Padraig Walsh</b> , QQI CEO and Chair of the Programme and Awards Executive Committee
16.45-17.30	<b>Meeting 7:</b> Meeting with senior QQI Staff from cross-organisational services	<b>Liam Butler</b> , Finance and Procurement Manager <b>Andrew Bridgett</b> , Internal Audit and Compliance Manager <b>Eamonn Collins</b> , Human and Physical Resources Manager <b>Gráinne Mooney</b> , Communications Manager <b>Mary Sheridan</b> , Head of Provider Compliance and Learner Protection (Formerly Head of Legal and Risk)
17.30 – 18.30	<b>Review panel's private discussion</b>	
<b>Tuesday 5 March 2019</b>		
<b>TIME</b>	<b>MEETING</b>	<b>PERSONS FOR INTERVIEW</b>
8.15 –8.45	<b>Review panel's private discussion</b>	
8.45 – 9.25	<b>Meeting 10:</b> Meeting with Department of Education and Skills	<b>William Beausang</b> , Assistant Secretary General (Further and Higher Education), Department of Education and Skills <b>Padraig Hennigan</b> , Department of Education and Skills <b>Wendy Ross</b> , Department of Education and Skills
9.30 – 10.10	<b>Meeting 11:</b> Meeting with Higher Education Authority	<b>Tim Conlon</b> , Head of System Governance and Performance Management <b>Gemma Irvine</b> , Head of Policy and Strategic Planning <b>Vivienne Patterson</b> , Head of Skills, Engagement and Statistics
10.15-10.55	<b>Meeting 12:</b> Meeting with Union of Students in Ireland and National Student Engagement Programme (NStEP)	<b>Síona Cahill</b> , President, Union of Students in Ireland <b>Oisín Hassan</b> , Vice President for Academic Affairs, Union of Students in Ireland and QQI board member <b>Cat O'Driscoll</b> , National Co-ordinator of National Student Engagement Programme (NStEP) <b>Terry Maguire</b> , Director, National Forum for the Enhancement of Teaching and Learning (NFETL) – <i>by phone</i> <b>Sean O'Reilly</b> , Data Analyst, Technological Higher Education Association (formerly Irish Survey of Student Engagement)
11.05-11.45	<b>Meeting 13:</b> Meeting with Panel Reviewers (programme validation)	<b>Marian Duggan</b> , Limerick Institute of Technology (Chair/Secretary) – <i>by Skype</i> <b>Patricia Moriarty</b> , Dundalk Institute of Technology (Chair) <b>Ebba Ossiannilsson</b> , Swedish Association for Distance Education (Subject Expert/International Representative) – <i>by Skype</i> <b>Sinead O'Sullivan</b> , National College of Ireland (Chair/Secretary) <b>Carmel Mangan</b> , Blackrock Clinic
11.55-12.40	<b>Meeting 14:</b> Meeting with Panel Reviewers (Institutional Review)	<b>Crichton Lang</b> , University of the Highlands and Islands, Scotland (Chair) <i>by Skype</i> <b>Catherine Maunsell</b> , Dublin City University (QA expert)

		<p><b>Kim O' Mahony</b>, University of Limerick (Coordinating Reviewer)</p> <p><b>Oluwasegun Seriki</b>, Technological University Dublin (Student Representative) – <i>by Skype</i></p> <p><b>Joanna Siewierska</b>, University College Dublin (Student Representative)</p>
12.40-13.30	Lunch	
13.30-14.15	<b>Meeting 15:</b> Meeting with HEI representative bodies	<p><b>David Carpenter</b>, Chair of HECA (Higher Education Colleges Association)</p> <p><b>Jim Murray</b>, Deputy CEO and Director of Academic Affairs, THEA (Technological Higher Education Association)</p> <p><b>Lewis Purser</b>, Director Learning and Teaching and Academic Affairs, IUA (Irish Universities Association)</p>
14.20-15.05	<b>Meeting 16:</b> Meeting with Public HEI Representatives	<p><b>Ken Carroll</b>, Technological University Dublin</p> <p><b>David Croke</b>, Royal College of Surgeons in Ireland</p> <p><b>Roy Ferguson</b>, University College Dublin</p> <p><b>Paul Hannigan</b>, President of Letterkenny Institute of Technology</p> <p><b>Brian McCraith</b>, President of Dublin City University</p> <p><b>Aisling McKenna</b>, Dublin City University</p> <p><b>Colin McLean</b>, Institute of Technology, Sligo</p> <p><b>Patricia Mulcahy</b>, President of Institute of Technology, Carlow</p> <p><b>Gary Walsh</b>, University of Limerick</p>
15.15-16.00	<b>Meeting 17:</b> Meeting with employer representatives and Consultative Forum representatives	<p><b>Tony Donohoe</b>, IBEC (Irish business representative agency)</p> <p><b>Paul Heaney</b>, Certified Public Accountants Ireland</p> <p><b>Aidan Kenny</b>, Teachers Union of Ireland</p> <p><b>Paul Lyons</b>, Dental Council of Ireland</p> <p><b>Frank Vaughan</b>, Irish Congress of Trade Unions</p>
16.05-16.50	<b>Meeting 18:</b> Meeting with Private HEI Representatives	<p><b>Andrew Conlan-Trant</b>, Dublin Business School</p> <p><b>Naomi Jackson</b>, CCT College, Dublin</p> <p><b>Gina Quin</b>, President of National College of Ireland</p> <p><b>Sean M Rowland</b>, President of Hibernia College</p> <p><b>Neil Gallagher</b>, President of CCT College Dublin</p>
16.50 – 17.45	<b>Review panel's private discussion</b>	
17.45-18.00	Clarification meeting	
<b>Wednesday 6 March 2019</b>		
<b>TIME</b>	<b>MEETING</b>	<b>PERSONS FOR INTERVIEW</b>
08.30 – 10.30	<b>Review panel's private discussion</b>	
10.30-11.15	Meeting with CEO to clarify any pending issues	<b>Padraig Walsh</b> , CEO QQI
11:30 – 12:15	Final debriefing meeting with senior QQI staff to inform about preliminary findings	<p><b>Padraig Walsh</b>, CEO QQI</p> <p><b>Cliona Curley</b>, Director of Corporate Services</p> <p><b>Barbara Kelly</b>, Director of Qualifications</p> <p><b>Bryan Maguire</b>, Director of Quality Assurance</p> <p><b>Karena Maguire</b>, Head of Stakeholder Engagement and Communications Division</p> <p><b>Liam Butler</b>, Finance and Procurement Manager</p> <p><b>Eamonn Collins</b>, Human and Physical Resources Manager</p>

## ANNEX 2: TERMS OF REFERENCE OF THE REVIEW

## **TERMS OF REFERENCE**

September 2018

### **1. Background and Context**

Quality and Qualifications Ireland (QQI) is responsible for the external quality assurance of further and higher education and training (including English language provision) in Ireland and validates programmes and makes awards to certain providers in these sectors.

QQI is also responsible for the maintenance, development and review of the National Framework of Qualifications (NFQ).

QQI was established in November 2012, following the amalgamation of the functions of four bodies that had awarding and external quality assurance responsibilities. As an amalgamated agency, QQI was reviewed by ENQA in 2014 and was successful in its reconfirmation of membership. It has been an ENQA member since then. QQI is applying for renewal of its membership in 2019.

QQI has been registered on EQAR since 2015 and is applying for renewal of registration.

### **2. Purpose and Scope of the Evaluation**

This review, will evaluate the way in which and to what extent QQI fulfils the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will provide information to the ENQA Board to aid its consideration of whether membership of QQI should be reconfirmed and to EQAR to support QQI's application to the register.

The review panel is not expected, however, to make any judgements as regards granting membership.

#### **2.1 Activities of QQI within the scope of the ESG**

In order for QQI to apply for ENQA membership and for registration in EQAR, this review will analyse all QQI activities that are within the scope of the ESG, i.e. reviews, audits, evaluations or accreditation of higher education institutions or programmes that relate to teaching and learning (and their relevant links to research and innovation). This is regardless of whether these activities are carried out within or outside the EHEA, and whether they are obligatory or voluntary.

The following activities of QQI have to be addressed in the external review:

- |  |  |
|--|--|
| 1) Institutional quality review                  | 5) Delegated authority to make awards              |
| 2) Focused reviews                               | 6) New provider approval                           |
| 3) Programme validation                          | 7) Re-engagement process for non-public providers. |
| 4) Programme re-validation (programmatic review) |  |

### **3. The Review Process**

The process is designed in the light of the *Guidelines for ENQA Agency Reviews* and in line with the requirements of the *EQAR Procedures for Applications*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;

- Self-assessment by QQI including the preparation of a self-assessment report;
- A site visit by the review panel to QQI;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the ENQA Review Committee;
- Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership;
- Follow-up of the panel's and/or ENQA Board's recommendations by the agency, including a voluntary follow-up visit.

### **3.1 Nomination and appointment of the review team members**

The review panel consists of four members: one or two quality assurance experts, an academic employed by a higher education institution and student member. One of the members will serve as the chair of the review panel, and another member as a review secretary. For ENQA Agency Reviews at least one of the reviewers is an ENQA nominee (most often the QA professional[s]). At least one of the reviewers is appointed from the nominees of either the European University Association (EUA) or the European Association of Institutions in Higher Education (EURASHE), and the student member is always selected from among the ESU-nominated reviewers.

In addition to the four members, the panel will be supported by the ENQA Secretariat review coordinator who will monitor the integrity of the process and ensure that ENQA expectations are met throughout the process. The ENQA staff member will not be the Secretary of the review and will not participate in the discussions during the site visit interviews.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide QQI with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards QQI review.

### **3.2 Self-assessment by QQI, including the preparation of a self-assessment report**

QQI is responsible for the execution and organisation of its own self-assessment process and shall take into account the following guidance:

- Self-assessment is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;
- The self-assessment report is broken down by the topics of the evaluation and is expected to contain, among others: a brief description of the national HE and QA system; background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis; each criterion (ESG part II and III) addressed individually. All agency's QA activities (whether within their national jurisdiction or outside of it, and whether obligatory or voluntary) will be described and their compliance with the ESG analysed.
- The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which QQI fulfils its tasks of external quality assurance and meets the ESG and thus the requirements of ENQA membership.
- The self-assessment report is submitted to the ENQA Secretariat who has 4 weeks to pre-scrutinise it before forwarding the report to the panel of experts. The purpose of the pre-scrutiny is to ensure that the self-assessment report is satisfactory for the consideration of the panel. The Secretariat will not judge the content of information itself but whether the necessary information, as stated in the Guidelines for ENQA Agency Reviews, is present. For the second and subsequent reviews, the agency is expected to enlist the recommendations provided in the previous review and to outline actions taken to meet these recommendations. In case the self-assessment report does not contain the necessary information and fails to respect the requested form and content, the

ENQA Secretariat reserves the right to reject the report and ask for a revised version within 4 weeks. In such cases, an additional fee of 1000 € will be charged to the agency.

- The report is submitted to the review panel a minimum of six weeks prior to the site visit.

### **3.3 A Site Visit by the Review Panel**

QQI will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel at least two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2,5 days. The approved schedule shall be given to QQI at least one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by QQI in arriving in Dublin, Ireland.

The site visit will close with a final de-briefing meeting outlining the panel's overall impressions but not its judgement on compliance or granting of ENQA membership.

### **3.4 Preparation and completion of the final evaluation report**

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under articles 2 and 2.1. It will also provide a clear rationale for its findings with regards to each ESG criterion. A draft will be first submitted to the ENQA review coordinator who will check the report for consistency, clarity and language and it will be then submitted to QQI within 11 weeks of the site visit for comment on factual accuracy. If QQI chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by QQI, finalise the document and submit it to ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in length.

When preparing the report, the review panel should also bear in mind the *EQAR Policy on the Use and Interpretation of the ESG*, so as to ensure that the report will contain sufficient information for the Register Committee for application to EQAR.

QQI is also requested to provide a letter addressed to the ENQA Board outlining its motivation for re-applying for membership and the ways in which QQI expects to contribute to the work and objectives of ENQA during its membership. This letter will be discussed along with the final evaluation report.

## **4. Follow-up Process and Publication of the Report**

QQI will consider the expert panel's report and will publish it on its website once the ENQA Board has made its decision. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. QQI commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting a follow-up report to the ENQA Board. The follow-up report will be published on the ENQA website, in addition to the full review report and the Board's decision.

The follow-up report will be complemented by a small-scale visit to the agency performed by two members of the original panel (whenever possible). This visit will be used to discuss issues, based on the ESG, considered as of particular importance or challenge by QQI. Its purpose is entirely developmental and has no impact on the judgement of membership and/or compliance of the agency with the ESG. Should the agency not wish to take advantage of this opportunity, it may opt out by informing the ENQA Review Coordinator about this.

## 5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is used by the Board of ENQA for the purpose of reaching a conclusion on whether QQI has met the ESG and can be thus admitted/reconfirmed as a member of ENQA. The report will also be used for registration on EQAR, and is designed so as to serve these two purposes. However, the review report is to be considered final only after being approved by the ENQA Board. Once submitted to QQI and ENQA and until it is approved by the Board the report may not be used or relied upon by QQI, the panel and any third party and may not be disclosed without the prior written consent of ENQA. QQI may use the report at its discretion only after the Board has approved of the report. The approval of the report is independent of the decision on membership.

The Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

## 6. Budget

QQI shall pay the following review related fees:

Fee of the Chair	4,500 EUR
Fee of the Secretary	4,500 EUR
Fee of the 2 other panel members	4,000 EUR (2,000 EUR each)
Fee of 2 panel members for follow-up visit	1,000 EUR (500 EUR each)
Administrative overhead for ENQA Secretariat	7,000 EUR
Experts Training fund	1,400 EUR
Approximate travel and subsistence expenses	6,000 EUR
Travel and subsistence expenses follow-up visit	1,600 EUR

This gives a total indicative cost of 30,000.00 EUR VAT excl. for a review team of 4 members. In the case that the allowance for travel and subsistence expenses is exceeded, QQI will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to QQI if the travel and subsistence expenses go under budget.

The fee of the follow-up visit is included in the overall cost of the review and will not be reimbursed in case the agency does not wish to benefit from it.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

## 7. Indicative Schedule of the Review

Agreement on terms of reference	June/July 2018
Appointment of review panel members	October 2018
Self-assessment completed	By Mid-November 2018
Pre-screening of SAR by ENQA coordinator	November 2018
Preparation of site visit schedule and indicative timetable	December 2018/January 2019
Briefing of review panel members	February 2019
Review panel site visit	March 2019

Draft of evaluation report and submitting it to ENQA coordinator for pre-screening	By May 2019
Draft of evaluation report to QQI	May 2019
Statement of QQI to review panel if necessary	June 2019
Submission of final report to ENQA	June/July 2019
Consideration of the report by ENQA Board and response of QQI	September 2019
Publication of the report	September/October 2019

## ANNEX 3: GLOSSARY

2012 Act	Qualifications and Quality Assurance (Education and Training) Act 2012 <a href="http://www.oireachtas.ie/documents/bills28/acts/2012/a2812.pdf">http://www.oireachtas.ie/documents/bills28/acts/2012/a2812.pdf</a>
AIQR	Annual Institutional Quality Reports
CINNTE	QQI's Institutional review cycle
DA	Delegated Authority
DAB	Designated Awarding Body
DM	Dialogue Meetings
ENQA	European Association for Quality Assurance in Higher Education
EQF	European Qualifications Framework
ESG	<i>Standards and Guidelines for Quality Assurance in the European Higher Education Area, 2015</i>
HE	Higher education
HEA	Higher Education Authority
HECA	Higher Education Colleges Association
HEI	Higher education institution
HETAC	Higher Education and Training Awards Council
IEM	International Education Mark
IOT	Institute of Technology
IQA	Internal quality assurance
ISER	Institutional self-evaluation report
IUA	Irish Universities Association
IUQB	Irish Universities Quality Board
NFQ	National Framework of Qualifications
NQAI	National Qualifications Authority of Ireland
PAEC	Programmes and Awards Executive Committee
PAOC	Programmes and Awards Oversight Committee
PEU	Previously-established university
PSC	Policies and Standards Committee
QA	Quality assurance
QQI	Quality and Qualifications Ireland
SAR	Self-Assessment Report
THEA	Technological Higher Education Association
TNE	Transnational Education
USI	Union of Students in Ireland

## ANNEX 4. DOCUMENTS TO SUPPORT THE REVIEW

### DOCUMENTS PROVIDED BY QQI

In addition to Self-Assessment Report itself and the evidence referred to in the footnotes throughout it, the panel considered the following additional documentary evidence supplied after the submission of the Self-Assessment Report:

<u>ID #</u>	<u>Document supplied</u>
201	Expert Review Report 2014
202	QQI and HEA Memorandum of Understanding 2018-20
203	QQI Organisational Chart (Jan 2019)
204	Staff numbers in each team
205	Commentary on recommendations made by PAOC to PAEC
206a	Commentary on the policy development schedule
206b	Comprehensive Policy Development Programme - Snapshot in 2013
206c	Comprehensive Policy Development Programme - Snapshot in 2017
206d	Draft policy papers and policies adopted by the Policy and Standards Committee
207a-d	CINNTE Review handbooks and reviewer briefing notes
208a-c	Validation Panel Members training materials
209	Commentary on procedures or plans for further thematic analysis.
210a	SAR Survey Responses
210b	Strategy Survey Results May 2018 (used to inform development of QQI's Strategy Statement)
211a-l	Two reports for each of six external quality assurance processes in scope <ul style="list-style-type: none"><li>• 211a QA Approval - Institute for Supply Chain Excellence</li><li>• 211b QA Approval - Cork Counselling Services</li><li>• 211c Re-engagement - IBAT College</li><li>• 211d Re-engagement - CCT Reengagement Report and Provider Response</li><li>• 211e Validation - Hibernia College Dublin - Bachelor of Science (Honours) in Nursing in General Nursing</li><li>• 211f Validation - IBAT College Dublin - Certificate in Arts in Business</li><li>• 211g Re-validation - Carlow College - Bachelor of Arts (Honours) in Applied Social Studies (Professional Social Care)</li><li>• 211h Re-validation - Dorset College - Bachelor of Business (Honours) in International Business</li><li>• 211i Focused Review - Section 46 review of validated programmes at Grafton College of Management Sciences</li><li>• 211j Focused Review - Section 46 review of validated programmes at IBAT College</li><li>• 211k Institutional Review - Institute of Technology Sligo</li><li>• 211l Institutional Review - Mary Immaculate College</li></ul>
212	Staff List showing current and previous roles
213a	Financial Statements for 2017 (final)
213b	Financial Statements for 2018 (draft)
214	QQI Corporate Plan 2019
215	Report of the Clarion Organisational Review commissioned by the DoE
216	DES Oversight Agreement with QQI 2018
217	DES / QQI Performance Delivery Agreement 2018
218	Code of Practice for the Governance of State Bodies in Ireland
219a	Example Standard Operating Procedure - QA Programme Validation
219b	Example Standard Operating Procedure - Annual Monitoring of Public HEIs

219c	Example Standard Operating Procedure - Development of QA Guidelines
219d	Example Standard Operating Procedure - Cyclical Review of Public HEIs
220	Statistical Overview of Validation Activity for 2017
221	Current Position of Reengagement with Independent Providers
222a	Explanation on the HEA/QQI MOU Forum
222b	Note of the 9th meeting of the HEA–QQI MoU Forum
222c	HEA/QQI Meeting to discuss the Memorandum of Understanding (MOU)
222d	HEA QQI MoU Arrangements / Report on Implementation to date
222e	Engagement between the QQI HEA and the HEIs in relation to information provision
223	QQI and International Engagement - Internal Policy Paper
224	Overview of current international engagement

## ANNEX 5. QQI'S MAPPING TO PART 1 OF THE ESG

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
<p><b>1.1 Policy for quality assurance</b></p> <p>Institutions should have a policy for quality assurance that is made public and forms part of their strategic management. Internal stakeholders should develop and implement this policy through appropriate structures and processes, while involving external stakeholders.</p>	<p><a href="#">Core Statutory QA Guidelines</a> (This is the key document that ensures compliance with 1.1 and it underpins all QQI's quality assurance activities. Sections 1 and 2 are especially relevant).</p> <p>Supplementary QA guidelines and the overarching policy for our QA Guidelines.</p> <p><a href="#">Policy on QA Guidelines</a></p> <p><a href="#">Independent/Private Statutory QA Guidelines</a></p> <p><a href="#">Designated Awarding Body Statutory QA Guidelines</a></p> <p><a href="#">Institute of Technology Statutory QA Guidelines</a></p> <p><a href="#">Apprenticeship Statutory QA Guidelines</a></p>	<p>The QA approval process is where we check that a provider's quality assurance procedures are consistent with our guidelines and fit-for-purpose. The relevant policy documents are listed below:</p> <p><a href="#">Policy and criteria for provider access to initial validation of programmes</a></p> <p><a href="#">Overarching Re-engagement Policy</a></p> <p><a href="#">Higher Education Re-engagement Policy</a></p>	<p>According to our <a href="#">Core Policy and criteria for the validation of education and training</a> a provider cannot access validation unless they have approved quality assurance procedures.</p> <p>The core policy is supplemented by:</p> <p><a href="#">Policy for collaborative programmes, transnational programmes and joint awards</a></p> <p><a href="#">Research Degree Programme Policy and Criteria</a></p> <p>The following operational documentation is also</p>	<p>Monitoring helps ensure that providers' quality assurance procedures are consistent with the guidelines. The key policies and procedures are listed below:</p> <p><a href="#">Monitoring Policy</a></p> <p><a href="#">AIQR Handbook</a></p> <p><a href="#">AIQR website</a></p>	<p><a href="#">Procedures for Focused Reviews by QQI of the Implementation and Effectiveness of Provider QA Procedures</a> help ensure our guidelines are reflected in policies and procedures as written and as implemented. They explain that a focused review is carried out at institutional level and is intended to (abbreviated):</p> <ul style="list-style-type: none"> <li>- determine that the quality assurance procedures established by a provider have been implemented;</li> <li>- evaluate the effectiveness of a provider's quality assurance procedures; and</li> </ul>	<p>Cyclical reviews Review measures institution accountability for compliance with European standards for quality assurance, regard to the expectations set out in the QQI quality assurance guidelines or their equivalent and adherence to other relevant QQI policies and procedures as established in the lifecycle of engagement between the institution and QQI.</p> <p><a href="#">Policy for Cyclical Reviews of Higher Education Institutions</a></p>

<sup>6</sup> The QA guidelines infrastructure underpin all our quality assurance activities. We will not keep repeating this point, it should be understood to apply to the whole table.

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
	<a href="#">Research Degree Statutory QA Guidelines</a>  <a href="#">Blended Learning Statutory QA Guidelines</a>		available and may be helpful:  <a href="#">Programme validation manual</a>  <a href="#">Conflict of interest and confidentiality form for peer reviewers</a>  <a href="#">Roles, responsibilities and code of conduct for reviewers and evaluators</a>  <a href="#">Validation report writing style guide</a>		- confirm that directions previously issued by QQI have been complied with.	<a href="#">CINNTE Handbook for Institutes of Technology</a>  <a href="#">CINNTE Handbook for Universities and DABs</a>
<b>1.2 Design and approval of programmes</b>  Institutions should have processes for the design and approval of their programmes. The programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly	Section 3 of our Core QA guidelines addresses Programmes of Education and Training including: <ul style="list-style-type: none"> <li>- Programme development and approval</li> <li>- Learner admission, progression and recognition</li> <li>- Programme monitoring and review</li> </ul>	As the Core Guidelines and Validation Policy are primary references for panels evaluating a provider's QA, it follows that the QA Approval processes focusses heavily on how providers implement, manage and govern programme design and approval.  An expert panel will evaluate the provider's	Our Core <a href="#">Policy and criteria for the validation of programmes of education and training</a> describes a process for the external approval of new programmes and reapproval following review, of updated versions of programmes that have been previously approved.  The QQI validation process is not a			

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
specified and communicated, and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area.	<p>Our <a href="#">Policy and criteria for access, transfer and progression</a> applies to all providers offering awards in the NFQ and is also relevant here: section 4 deals with entry arrangements and section 5 deals with information provision to learners.</p> <p>Our <a href="#">National Framework of Qualifications</a> provides the standards infrastructure for higher education.</p>	procedures with reference to the guidelines and validation policy and will communicate their findings to the provider and to QQI.	<p>programme development process.</p> <p>Validation Criterion 2 requires that programmes specify Minimum Intended Programme Learning Outcomes (MIPLOs) that are consistent with our awards standards and therefore the NFQ.</p> <p>Our <a href="#">Policy for determining awards standards</a> explains how standards are developed and maintained and how they relate to the NFQ.</p> <p>Our suite of HE awards standards is published here: <a href="#">List of published awards standards</a></p> <p>Our <a href="#">Policy and criteria for making awards</a> explains our approach to certification.</p>			

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
<p><b>1.3 Student-centred learning, teaching and assessment</b></p> <p>Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.</p>	<p>Sections 3, 4 and 5 of our Core QA Guidelines address Programmes of Education and Training; Teaching and Learning; and Assessment of Learners:</p> <p>Section 5.1 is most relevant guiding, for example that the learning environment “Encourages a sense of autonomy in the learner, while encouraging adequate guidance and support for the learner”</p> <p>There is a requirement that programmes are designed and updated with the involvement of students (section 3.1 bullet 3 and section 3.3)</p>	<p>The QA Approval process will ensure that providers have policy and procedure for Teaching and Learning and Assessment.</p> <p>The provider’s procedures will be evaluated for completeness and for potential effectiveness.</p>	<p>Our Core <a href="#">Policy and criteria for the validation of programmes of education and training</a> provides additional support for this principle through:</p> <p>For example, criterion 17.5(b):</p> <p>In so far as it is feasible the programme provides choice to enrolled learners so that they may align their learning opportunities towards their individual educational and training needs.</p> <p>And to a lesser extent 17.8(b):</p> <p>Learners can interact with, and are supported by, others in the programme’s learning environments including peer</p>			

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
			<p>learners, teachers, and where applicable supervisors, practitioners and mentors.</p> <p><a href="#">Assessment and standards</a>, which sets out our expectations on assessment for providers seeking validation or delegated authority takes a student-centred approach. For example: section 2.1.1(3)(f) states:</p> <p>Teachers and learners share in the responsibilities for effective learning. Learners' involvement in the construction of assessment tasks and criteria can enhance learning.</p> <p><a href="#">Effective Practice Guidelines for External Examining</a> addressed the external moderation of assessment.</p>			

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
<p><b>1.4 Student admission, progression, recognition and certification</b></p> <p>Institutions should consistently apply pre-defined and published regulations covering all phases of the student “life cycle”, e.g. student admission, progression, recognition and certification.</p>	<p>Admission is addressed in sections 3.2 of our <a href="#">Core Statutory QA Guidelines</a>: (Learner admission, progression and recognition) and certification in the sector-specific guidelines for example Section 6.1 of <a href="#">Designated Awarding Body Statutory QA Guidelines</a>.</p> <p>Our <a href="#">Policy and criteria for access, transfer and progression</a> applies to all providers offering awards in the NFQ and is also relevant here: section 4 deals with entry arrangements and section 5 deals with information provision to learners.</p> <p>Our <a href="#">Policy on Recognition of Prior Learning</a> is also relevant.</p>	<p>The QA Approval process will evaluate a provider’s policy and procedure for compliance with QQI policy on Access, Transfer and Progression. This is a prerequisite for any provider seeking validation for the first time.</p> <p>The provider’s procedures will be evaluated for completeness and for potential effectiveness.</p>	<p>Criterion 4 of our Core <a href="#">Policy and criteria for the validation of programmes of education and training</a> addresses access, transfer and progression.</p> <p>For programmes leading to QQI awards the responsibility for certification rests with QQI and QQI determines the general standard for the awards. However, the provider must propose the specific standard through the MIPOs (minimum intended programme learning outcomes) that are approved by QQI at validation. Furthermore, QQI has no role in assessment, that is entirely the providers responsibility. QQI certifies when requested to do so by a provider with a</p>			

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
			currently validated programme.			
<b>1.5 Teaching staff</b>  Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.	Section 4 of our <a href="#">Core Statutory QA Guidelines</a> comprehensively addresses this.	The QA Approval process will evaluate a provider's policy and procedures for staff recruitment, management and development  The provider's procedures will be evaluated for completeness and for potential effectiveness.	Validation criterion 17.6 in Core <a href="#">Policy and criteria for the validation of programmes of education and training</a> addresses this more specifically for QQI validated programmes. There are additional criteria for research degree programmes: in the supplementary criteria for research degree programmes in: <a href="#">Research Degree Programme Policy and Criteria</a>			
<b>1.6 Learning resources and student support</b>  Institutions should have appropriate funding for learning and teaching activities and ensure that adequate and readily accessible learning	Section 7 of our <a href="#">Core Statutory QA Guidelines</a> deals with student support and learning resources, the learning environment and assessment of learners are addressed in sections 5 and 6 respectively are also relevant here.	The QA Approval process will evaluate a provider's resources, policy and procedures for learner supports.  The provider's procedures will be evaluated for completeness and	Many of the criteria in Core <a href="#">Policy and criteria for the validation of programmes of education and training</a> especially criteria 6, 7, 8, 9, 10 and 11.			

1	2	3	4	5	6	7
<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
resources and student support are provided.		for potential effectiveness.				
<p><b>1.7 Information management</b></p> <p>Institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes and other activities.</p>	Section 8 of <a href="#">Core Statutory QA Guidelines</a> addresses this directly.	<p>The QA Approval process will evaluate a provider’s resources, policy and procedures for information management.</p> <p>The provider’s procedures will be evaluated for completeness and for potential effectiveness.</p>	<p>Criterion 12 in <a href="#">Core Policy and criteria for the validation of programmes of education and training</a> requires: “The programme includes intrinsic governance, quality assurance, learner assessment, and access, transfer and progression procedures that functionally interface with the provider’s general or institutional procedures.”</p>			
<p><b>1.8 Public information</b></p> <p>Institutions should publish information about their activities, including programmes, which is clear, accurate, objective, up-to date and readily accessible.</p>	<p>Section 9 of Core Statutory QA Guidelines addresses this directly.</p> <p>Our <a href="#">Policy and criteria for access, transfer and progression</a> applies to all providers offering awards in the NFQ and is also relevant here: section 5 deals with information provision to learners.</p>	<p>The QA Approval process will evaluate a provider’s resources, policy and procedures for providing and managing information for the public.</p> <p>The provider’s procedures will be evaluated for</p>	<p>Criterion 4 of our <a href="#">Core Policy and criteria for the validation of programmes of education and training</a> addresses access, transfer and progression.</p>			

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<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
		completeness and for potential effectiveness.				
<p><b>1.9 On-going monitoring and periodic review of programmes</b></p> <p>Institutions should monitor and periodically review their programmes to ensure that they achieve the objectives set for them and respond to the needs of students and society. These reviews should lead to continuous improvement of the programme. Any action planned or taken as a result should be communicated to all those concerned.</p>	<p>Section 11 of <a href="#">Core Statutory QA Guidelines</a> deals with review and self-evaluation of quality, including review of programmes of education and training, research and related services.</p> <p>Section 9.3 deals with the publication of quality assurance evaluation reports and, where relevant, quality improvement plans.</p>	<p>The QA approval process pays particular attention to providers' systems for keeping themselves informed on programme quality and stakeholder feedback through effective monitoring systems.</p> <p>The provider's monitoring process will be evaluated for completeness and for potential effectiveness.</p>	<p>Programmes are validated for five years and must be revalidated before new learners can be enrolled.</p> <p>Ongoing monitoring and revalidation are governed respectively by criterion 12 (especially sub-criterion (f)) and section 13 of our <a href="#">Core Policy and criteria for the validation of programmes of education and training</a></p> <p><a href="#">Effective Practice Guidelines for External Examining</a> is relevant as external examining contributes to quality enhancement.</p>		<p>Outside of cyclical programme review and revalidation processes, the Authority, under Section 46 of the 2012 Act, may carry out a review of validated programmes from time to time as it sees fit in order to determine that a programme continues to meet the Authority's validation criteria; that conditions imposed at validation are being complied with and that there are no other issues that present reasonable grounds for withdrawing validation. Two reviews under Section 46 of the 2012 Act have been conducted by QQI, both of which resulted in withdrawal of validation. Reports of those reviews are available <a href="#">here</a> and <a href="#">here</a>.</p>	

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<b>ESG (2015) Part 1 Standard</b>	<b>Shared QA infrastructure used by all QA activities<sup>6</sup></b>	<b>QA Approval</b> (Initial access to Validation and Re-engagement)	<b>Validation and Revalidation</b>	<b>Monitoring</b>	<b>Focused Review</b>	<b>Institutional Review</b> (including CINNTE)
<p><b>1.10 Cyclical external quality assurance</b></p> <p>Institutions should undergo external quality assurance in line with the ESG on a cyclical basis.</p>			<p>Programmes are validated for five years (normally) and need to be revalidated if they are to continue to run. Revalidation is described in section 6. A provider can apply for an extension if it needs more time to complete a programme review to support an application for revalidation.</p>			<p>All higher education institutions are required to undergo periodic (at least every seven years) institutional review.</p> <p>The CINNTE review process is aligned with the ESG.</p>



**THIS REPORT** presents findings of the ENQA Agency Review of Quality and Qualifications Ireland (QQI), undertaken in 2019.

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**2019 ENQA AGENCY REVIEW**