

QQI White Paper: Review of Higher Education Institutions – Feedback from IOTI

IOTI, on behalf of the Institutes of technology, welcomes the publication of the above White Paper which sets out QQI's proposed policy and procedures for the cyclical quality review of higher education institutions. This submission contains observations on the paper from the IoT sector as a whole. Individual institutions may also have particular views on different elements of the White Paper, including, for example, comments on their place in the proposed schedule of reviews (pp. 22-23).

General comments

The cyclical institutional review is a critical piece of the architecture of the quality assurance system in Irish higher education, as defined in the Qualifications and Quality Assurance (Education and Training Act) 2012. It is also a critical piece of the European quality assurance architecture as set out in the recently revised *Standards and Guidelines for Quality Assurance in the EHEA*. The publication, then, of QQI's proposed policy and procedures is a key milestone in establishing, in a concrete rather than theoretical fashion, the new integrated approach to QA heralded by the foundation of QQI.

In broad terms, IOTI would commend the approach adopted in the paper. Not only does it set out clearly the integrated nature of institutional review across all higher education institutions, neatly encapsulated in the illustration on page 3, but it is also well thought through in terms of grounding the policy and process for institutional review on the twelve principles identified by the 2014 Review of Reviews exercise. These principles are rooted in the previous experiences of the institutions and QQI's antecedent agencies in undertaking institutional reviews, and will provide a solid and coherent basis for conducting QA reviews in the future.

While IOTI is supportive of the general thrust of the policy and procedures proposed in the White Paper, there are some areas that might be given further consideration or elaboration. One area is the vexed question of the overlap of functions between QQI and the HEA. For example, principle 2.1 highlights the notion of 'performance focus' and indicates that institutional review 'should examine the overall performance of institutions and their success in meeting their mission statements and objectives'. While this is undoubtedly a legitimate concern for institutional reviews, the fact that another state agency, the HEA, is also concerned with 'performance' in the context of its own strategic dialogue and performance compact processes, raises the spectre of an unnecessary administrative duplication occurring amongst the state agencies, and an unnecessary administrative burden being imposed upon the higher education institutions. Perhaps the White Paper should be proof read from this perspective and instances of duplication clearly identified and examined by QQI and the HEA in the context of their MOU, and also by the QQI-HEA MOU forum.

It is also worth observing that the policy and process articulated in the White Paper assumes the existence of quality assurance guidelines, which QQI is obliged to develop under the 2012 Act (section 27), and which are intended under the act to be a key reference point for HE providers in developing their own institutional quality procedures (section 28).

Institutional review will inter alia review the effectiveness of these procedures (section 34), so the guidelines, just as much as the policy and process for review, are an essential piece of the architectures of the QA system. Ideally, this White Paper should be considered in tandem with QQI's QA guidelines (and, indeed, with a finalised version of an agreed template for annual institutional reporting). This has not been possible due to variety of factors. However, now that the policy and process for institutional review has appeared, IOTI would urge that QQI would move quickly to develop and consult upon draft QA guidelines, so that the institutions will have a full picture of the new QA system and can comment in a more overarching way on the system as a whole.

Apart from these general observations, the following comments on particular parts of the text are offered for further consideration.

Comments on Section 1 Introduction and Scope

- It is noted in the document (p. 2) that 'cyclical review can lead to directions'. While it is acknowledged that the general parameters of what such directions might entail are set out in section 35 of the 2012 Act, perhaps some concrete examples of the specific areas they might cover could be provided for clarity's sake.
- In Figure 1 on the Quality Framework for awarding bodies (p. 3), the awarding body's QA activities are listed. These include unit reviews. Does this imply that unit reviews are mandatory or is the list a menu of activities from which an awarding body, depending on its legislative remit, selects its review activities?

Comments on Section 2.1 Clarity, Depth and Quality Performance-Focus

- On page 5 it is stated that 'the standards against which review findings are compared, are each institution's own mission and strategy and selected quality indicators and benchmarks'. Would these include selected benchmarks and indicators from an institution's performance compact with the HEA, or would they also include the system level indicators agreed by DES and the HEA?
- As in bullet point one above, could QQI provide some examples of the kind of areas that 'for cause' reviews (p. 5) might cover?

Comments on Section 2.2 Economy and Efficiency

- IOTI welcomes the commitment from QQI to ensure that 'time and money are always used to good effect by the review procedures', that reviews are proportionate and that they do not revisit objectives that have been met through other engagements. IOTI would also again reiterate that this approach needs to be implemented not just in relation to QQI activities, but also in relation to processes and activities initiated by other agencies, especially amongst those agencies within the DES family.

Comments on Section 2.3 Effectiveness

- IOTI welcomes QQI's commitment to instituting an evidence-based approach to reviews that balances the compliance and enhancement aspects of quality. It is in this context that the need to publish quality guidelines becomes a high priority, because it is difficult for institutions to estimate how the evidence-based approach will play out, and how the balance between compliance and enhancement aspects will be achieved, without any reference to the agency's expectations as defined in the statutory QA guidelines (pp. 6-7).

Comments on Section 2.4 Consistency and Diversity

- IOTI welcomes the fact that different terms of reference will be established for individual institutional reviews on the basis of the awarding status of different HEIs, and that this will be given effect within a broader, consistently applied framework for institutional reviews (p.8). It is also noted that the initial QQI reviews will focus on an evaluation of the effectiveness of the institution's quality assurance procedures, which once again highlights the urgent need for QQI to publish QA guidelines, especially given the fact that these reviews are envisaged to commence next year (2016).

Comments on Section 3 Outline Contents of Review Terms of Reference

- As in section 2.1, there is reference to review criteria that will include unspecified 'selected quality indicators and benchmarks' (p. 15). Could more be said about this and are the indicators likely to include some of the metrics and performance indicators used in the HEA strategic dialogue process and the institutional compacts?

Comments on Appendix 1

- It is stated in the White Paper that one of the purposes of QQI reviews is to support systems-level improvement of the quality of higher education, through the publication of synoptic reports and institutional quality profiles, and through ensuring that similar institutions adopt consistent approaches to QA (p. 21). It is important once again that this work complements existing institutional profiling and does not create duplicate or, worse, inconsistent sources of information for interested stakeholders.