

Maynooth University feedback on QQI White Paper on Review of Higher Education Institutions

Maynooth University welcomes the opportunity to provide feedback on the QQI White Paper on Review of Higher Education Institutions. We are committed to the practice of periodic reviews of the effectiveness of institutional quality assurance procedures. Reviews at this level have in the past provided strategic recommendations that have been supportive of development and embedding of a quality culture in the University.

Our observations here are at a high level. More detailed feedback is being provided by the IUA on behalf of all universities following a deliberative process that we have been part of.

1. The White Paper proposes to apply a review model with a high level of uniformity applicable to all providers. This makes sense in relation to the broad approach involving preparation of a self assessment report, a peer review group (PRG) site visit, followed by a report from the PRG and a written response from the institution. It is also wise that the proposed overarching standards for reviews as set out in page 15 of the WP are consistent across all providers.
2. The purposes of reviews are described as multi-dimensional in p.4 and followed immediately on p.5 by paragraphs commencing with
“Review evaluates...
“Review measures....
“Review explores....
which are linked in the next paragraph to the ‘standards’ for reviews.
This outline makes sense as a high level statement of purposes (objectives) but it is not aligned with the content of Appendix 1 which provides a much more detailed and somewhat different statement of purposes. There should be no ambiguity in relation to the primary purposes of Reviews.
3. The focus on uniformity in approach must be balanced against the need to respect the diversity in the range of providers to be reviewed. The diversity relates to prior experience of institutional quality reviews, institutional missions, scale and scope of activities, and importantly, different legislative underpinnings. Section 29 of the Qualifications and Quality Assurance Act 2012 establishes clearly the distinctive position of “previously established universities” and states that such universities *will consult with the Authority before establishing procedures* for quality assurance under Section 28. This implies that the initiative comes from the university in the light of guidelines that may be prepared by QQI. It is important that the relationship between a previously established

university and QQI in relation to institutional review will be in accordance with the Act. To that end we also note Section 27 (6) (a) of the Act which affirms that “The Authority may issue different quality assurance guidelines for different relevant or linked providers.....”

4. The proposed focus on both quality assurance and quality enhancement in the Review is welcomed. However, more clarity is required on how the two very different dimensions of the Review will be reconciled in practice. There is merit in the proposal that much of the compliance dimension of quality assurance may be undertaken via the annual report and annual dialogue process with presumably a summary for inclusion in the SAR, and also some confirmation by QQI to the PRG that the compliance matters have already been monitored. This should happen prior to the first visit of the Peer Review Group. The scope of compliance extends to the ESG, the IEM code of practice, and procedures access, transfer and progression.
5. The references to enhancement themes raise a number of queries. Section 2.4, p.8 mentions that “every review is underpinned by the same enhancement themes” It is not clear who will select the theme(s) and what input the University will have into the decision. It is also not clear how the proposed approach to the enhancement theme dimension can be reconciled with the first overarching standard for reviews: “the institution’s own mission and strategy ...”(p.15). We submit that the university should select the enhancement theme and that the themes may differ between universities depending on their strategic priorities at the time of review. It would be very unwise to contemplate a fixed set of enhancement themes for all universities over the duration of the next cycle of reviews without taking account of the different strategic trajectories that each university has or will identify over the period of the next cycle.
6. The scope of the Review as stated on p.7 “Review primarily exists to provide an independent external review of the institution’s own internal reviews” is too restrictive. The internal reviews are only one component of a complex web of procedures used by the University to assure quality – for example, external examiner reports, student engagement and module feedback surveys, HR appointment and promotion procedures, programme approval and accreditation procedures. All of these need to be considered in the SAR and shared with the PRG.
7. The references to quality indicators and benchmarks are vague. A short list of easily measurable indicators could be provided. QQI should explore the potential for deriving relevant indicators from the institutional profiles prepared by the HEA.
8. The role of QQI in the review process is unclear. Precisely, who is undertaking the review? Is it the Peer Review Group on behalf of QQI, and if so how much autonomy will they have within any guidelines that may be prepared by QQI? The language in parts of section 4 on Review Procedures is a cause for concern. For example, in the middle of p.18 there is a mention of QQI “editing the final report” followed by “consideration of findings by QQI”. The University as the entity being reviewed by an independent expert panel does not envisage a role for QQI in “editing the final report”. Section 4.2 on Outcomes states that the “findings are approved by QQI and published in the Quality Profile”. The meaning of the terms “findings” and “approved” in this context is unclear and potentially of concern to us.

9. The mention on p.17 that the Self Evaluation Report will be published represents a significant departure from the practice in previous reviews. The SAR is a very important part of the process requiring considerable input from many staff in the University. The greatest value is obtained when the report is able to openly comment on the deliberative self-evaluation process which relies on a willingness to be self-critical. This can only happen in a context where the SAR remains confidential to the University and the review team. If the report is likely to be published the content is likely to be very measured and weak on critical self evaluation.
10. The content of the SAR, the size of the PRG and duration of the PRG visit are more a matter for the university following consultation with QQI than for QQI to decide unilaterally.
11. The proposed Schedule “is based primarily on previous review dates, taking into account the revised landscape for higher education”. Maynooth University was the first reviewed in the previous cycle. Being the first to implement any type of review places a considerable additional burden on the institution involved, as all parties are engaged in new procedures so that extra work is involved resolving unforeseen problems and issues. It also exposes the institution to added risks. Academic year 2016/17 will be a particularly challenging one for Maynooth when the new curriculum will be made available to all incoming students. With resources already very stretched it will not be possible to take on an institutional review which itself is a resource intensive exercise. A deferral for at least two years would allow time for implementation of key aspects of the new curriculum and for monitoring of progress. It is hoped that this major innovation will contribute to an enhancement of teaching and learning which could become the focus of the enhancement theme for the Maynooth review.

We note the reference to the ‘revised landscape for higher education’. However, we do not see any evidence of it in the draft schedule which has the institutions that constitute our regional cluster and the 3U Partnership listed for review in 2016/17, 2017/18 (2) and 2021/22 (2).

We therefore, request that the draft schedule be withdrawn.

We hope that the points made above will be reflected in the next iteration of the proposals for the Review of Higher Education Institutions.

Yours sincerely,



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