University College Dublin

QQI White Paper Consultation – Review of Higher Education Institutions

Academic Council Committee on Quality – 15 September 2015

UCD Feedback on the White Paper.

University College Dublin welcomes the opportunity to provide feedback on the QQI White Paper (WP) – Review of Higher Education Institutions, and will be willing to engage with QQI further, as the review policy and guidelines develop.

General Points

1. UCD believes that as set out in the 2012 Act, there is benefit in keeping separate, providers falling within the definition of a Designated Awarding Body and other higher education providers.

2. The WP does not sufficiently acknowledge the autonomy of universities in the area of quality assurance.

3. The WP would benefit from a clearer description of the intended role of QQI in the review process eg. Section 4.1 – *publication of the self-evaluation report* - the self-evaluation has not been made public in the past and this should remain the case; *findings of QQI* - the findings are established by the review team, not QQI.; *approval of findings by QQI* - this implies that QQI has the power to veto review team findings which would not be acceptable.

4. The mix of policy and procedure within the WP inhibits clarity eg it moves between overarching policy statements to specific questions to be asked by review teams.

5. Further clarity is needed regarding how much flexibility (if any) DABs will have to develop their own QA procedures?

6. A glossary of terms would be useful. Consistent use of terminology is essential - eg page 5 refers to '*quality indicators*', whereas page 10 refers to '*standards*' for quality.

7. P.2 - There is reference to withdrawal of '*quality assurance approval by QQI* ' - under section 36 (1) this does not apply to universities.

8. Numbered paragraphs would have helped facilitate feedback.

Specific Points

9. P.2 - The process refers to reviews incorporating compliance review in relation to the IEM "*where reasonable and subject to timing*" (para 2) – what does this mean? Are there potential implications for a consistent approach if timing is variable?

10. P.5 - It is unclear how the process will engage with 'research' quality (para 1). What does the WP mean by this? Does it refer to Graduate Taught / Research Students?

11. P.5 - Reference to institutional "*quality indicators and benchmarks*" (para 4) – there is a risk that the line between QQI and HEA will become blurred.

12. P.5 Para 3 – enhancement themes – UCD supports the introduction of sector-wide enhancement themes, however, a reasonable lead time would be required to enable institutions to engage with the theme(s) (eg. institutions at any given time will have different strategic priorities). Would the introduction of enhancement themes be better initiated as a 'pilot parallel project' rather than be integral to a new formal review process?

13. P.5 Para 5 – there is reference to positive review outcomes resulting in "*greater degrees of institutional autonomy*"…regarding "*quality and quality assurance*". What does this mean in practice? Does QQI have discretion here? (The 2012 Act specifies review requirements). Universities have been through two institutional review cycles yet there appears to be no reduction in the level of scrutiny.

14. P.6 - "*Review is complementary and proportionately related to the specific lifecycle of engagement of the institution and other engagements between the institution and QQI*" – it is unclear, how this proportionality will be operationalised?

15. P.6 - In Section 2.2 the WP states that QQI will provide institutions with *"clear guidelines on the content and length of the self-evaluation report"* - this will be a key document. QQI must ensure that the new QA guidelines avoid complexity and a mechanistic or 'tick box' approach to institutional review.

16. P.6 - To convey and reinforce the message, that responsibility for 'QA' is a cross – institution activity (eg. module evaluation, periodic School review, research student progression, management of assessment, HR appointment processes etc), it might be helpful if the WP reinforced this with more examples, to minimise the perception that QA and Institutional Review is only a function of each University Quality Office. Perhaps at appropriate points, the WP should refer to the scope of institutional QA processes such as:

    • Learning and Teaching Quality/Enhancement

    • Enhancing the Student Experience

    • Institutional Approach to Collaborative Activity

    • Engaging and Supporting Staff

    • Setting, maintaining and reviewing academic standards eg. Governance, module/programme approval, External examiners etc.

    • Code of Practice for the IEM

17. P.6 – It may benefit the review process if the procedures are subjected to a LEAN process.

18. P.7 - Para 1 states that *"Review primarily exists to provide / independent external review of the institutions own internal reviews"*. This statement is potentially misleading as QA in HE has a much broader application, beyond 'reviews' eg. HR appointment process, staff development; staff-student feedback; L&T innovations etc. - see scope of ESG. This point is also acknowledged in the WP on Page 5.

19. P.8 - Para 2 refers to enhancement themes providing a lense through which a Review Team can explore Institutional QA. Is this an appropriate approach? More clarity is needed. As stated above, institutions may, for strategic or resource reasons, be at different stages of development relative to an enhancement theme at any given point in time. How will this aid comparability (para 5)?

20. P.9 - Para 2 – will universities be considered to be beyond the 'initial' review?

21. P.10 Para 2 – this sentence is ambiguous. The reference to *"reviews being evaluated"* – does this refer to the broad scope of higher education QA mechanisms as represented in the ESG? Or does it refer only to the internal statutory review process? QQI need to be explicit about what is being evaluated.

22. P.11 - '*Terms of reference for reviews are confirmed with institutions…*' what does this mean? Is it an agreed sector-wide terms of reference or terms of reference agreed at an institutional level?

23. P.11 Para 2 – duration of review visits may vary depending on the <u>size</u> of the institution – some minimum/maximum time limits should be identified. P8. states that every review has the same purpose and that the same enhancement themes will be pursued – should the duration of a review visit not be determined on factors other than scale? (eg. innovative developments? aspects of institutional practice reflecting good practice/concern?)

24. P.11/12 - What criteria will be used to select reviewers?   Will institutional staff have an opportunity to undergo similar "training" to gain an understanding of how reviewers will approach a review?

25. P.13 Para 2 - refers to *'national themes for quality'* while p.8 refers to '*enhancement themes*' – if these are the same, the language should be consistent.

26. P.13 Para 2 – '*the enhancement themes <u>are used</u> by institutions in shaping their internal reviews*' – again, what is meant by "reviews"? Is it the holistic QA Framework? To what extent 'shaped'? eg. would a more meaningful objective perhaps be stated as: "…as appropriate, inform the on-going development of institutional QA mechanisms"   Greater clarity is required. What about institutional autonomy?

27. P.13 Para 3 – also refers to a '*thematic approach'* to reviews – this refers to a different application of 'theme' - this is a parallel process to the institutional review process. This distinction needs to be clear.

28. P.14 - Under Purpose and Objectives – some clarification is needed regarding "*a statement about the relative emphasis to be given by the Review Team to compliance and enhancement in the review*". If an institution has an emphasis on compliance while another has an emphasis on enhancement – does this not frustrate the objective of comparability (p8)? What criteria is used to determine the appropriate emphasis?

29. P.15 - It is important that the WP does not diminish the current focus on <u>quality enhancement</u>.

30. P.16 - Is the Timeline data page incomplete?

31. P.17 Section 4.1 - Review Terms of Reference are confirmed with the institution <u>and</u> the HEA? What role does the HEA have in institutional quality assurance which QQI oversees?

32. P.21 Second point – the drive for comparability would appear to push institutions towards a common approach to QA rather than affording institutions some scope to develop QA mechanisms that are effective and/or innovative for them. To what extent can institutions experiment and/or innovate regarding approaches to QA? How well does this WP objective sit with institutional autonomy?

33. P.22 – Provide a comment in relation to the rationale for the institutions selected.

34. QQI need to be explicit about what they mean by key terms such as: *"quality", "quality assurance"* and *"reviews"*.

35. UCD notes that related guidelines will follow the final version of this policy document, which will take some time to develop and finalise. This development time will erode the time available for the first institutions on the schedule to prepare for review – which will take as a minimum, approx. 12 months. The timetable as set out in Annex 2 will need to 'fit' institutional strategic timelines and other related business cycles – has this been factored in?

UCD Quality Office
September 2015