

Clanwilliam Institute
18 Clanwilliam Institute
Dublin 2

Response to QQI consultation process for quality assurance guidelines.

The institute welcomes these guidelines. In this response the Clanwilliam Institute first considers the structure and content of the QO guidelines. We then move on to outline our own reflections on these guidelines.

The Institute welcomes the manner in which the series of guidelines operate together to provide a methodical approach to the development and implementation of quality assurance procedures. This organising structure clearly identifies compliance requirements and guides in their implementation. However it also goes beyond compliance, and allows for provider engagement with broad fields of quality discourses and practices. This, we believe, supports the development of quality cultures across further and higher education sectors.

We recognise that any guidelines on QA need to balance both compliance and enhancement objectives. In the main, there appears to be a workable and appropriate balance achieved in these guidelines. We welcome the detailed descriptions of what procedures should look like and the emphasis on quality enhancement and building a quality culture. The level of detail of descriptions of requirements appear to us to be appropriate and important in ensuring consistency across Institutions.

We do note that some terms are not clearly defined. While this can be useful, terms that have direct regulatory effect and are subject to multiple interpretations need clearer explanations. One particular example of such a concept is “capacity”.

The emphasis on quality enhancement seems important in ensuring that a focus on compliance does not obscure the overall purpose of quality discourses and practices. In this regard we welcome the approach of these documents in fostering engagement of multiple stakeholders in a culture of quality rather than merely requiring particular activities.

These guidelines clearly indicate what is required in QA and guides Higher Education Institutions [HEIs] as to what this should look like in practice. We welcome this, while at the same time noting that processes of quality assurance and common standards and guidelines are one significant aspect of quality but they are not quality itself. We suggest that the comprehensiveness and clarity of these guidelines can obscure some of the less clear but no

less important definitional and operational issues that arise when considering what quality enhancement might look like and what a culture of quality actually is.

We are not suggesting the inclusion of definitive definitions or operational guidelines as to what quality is, what its culture looks like and what the boundaries of quality enhancement are. To do so, we recognise, would be counter-productive, and close down conversations about these issues. On the contrary, our intention in naming this concern is to suggest consideration of how these guidelines could be used more specifically to open up such conversations. We note the emphasis in the Core Guidelines on “Promoting and supporting innovation and continuous improvement and enhancement in provider quality assurance methods”. One reading of this is that HEI’s are required to continue to do what they are doing, only to do it more effectively. This statement does not require that we reflect on the assumptions that we bring to our work, critically examine our beliefs, attitudes and behaviours and act on our findings to produce real change. The Institute suggests that these activities are core to developing a quality culture.

The institute perspective sees critical engagement with our own assumptions as one important aspect of fostering a vibrant, socially relevant Higher Education sector. This approach requires institutes, and the HE sector as a whole, to engage with what we mean by quality, whose meanings of quality are privileged and what other meanings might need to be considered. This requires that HEI’s do not take policies and guidelines as the only sources of meaning of what quality is and what it might look like. Instead, as part of the quality ethos of Higher Education in Ireland, we suggest that HEI’s should engage with varied and various discourses on quality, critique as well as improve their practices and attend to the practice implications of their own assumptions, commitments and beliefs. This places HEI’s in a central role of considering, from their own perspective, what counts as quality as well as considering discourses in wider social contexts on what quality is.

These guidelines are of considerable value to HEIs and their stakeholders. They foster essential quality activities. Systems that embrace change through data generation, use and self-assessment are more likely to offer quality education to students. Continuous assessment and improvement can focus on any or all dimensions of system quality: learners, learning environments, content, process and outcomes. In recognising that these are necessary considerations, the Institute also raises the question of whether they are sufficient. In addition, the Institute suggests, engaging with broader questions of what quality is and what it looks like

in practices are responsibilities of us all. Statutory bodies such as QQI are one place where quality practices in HE are conceptualised, standardized and regulated, and where important conceptions of quality in HE are formulated and articulated. However a vibrant Higher Education sector requires that all stakeholders engage with, critique and develop what quality in higher education means, and what it looks like in practice.