



Hibernia College, Dublin, Submission in Response to Consultation Documents

Policy on Quality Assurance Guidelines

Core Statutory Quality Assurance Guidelines

Sector-Specific Quality Assurance Guidelines for Private and Independent Providers

Topic-Specific Quality Assurance Guidelines for Flexible and Distributed Learning

Hibernia College welcomes the publication of the four documents and the opportunity to provide feedback on them. Their clarity and comprehensiveness is appreciated. They will be helpful contributions to ensuring effective and rigorous education and training provided by the educational and training providers who are subject to the Quality and Qualifications Act 2012, as well as other national and international providers who are interested in models of good practice.

In particular the College welcomes QQI's *Specific Quality Assurance Guidelines for Flexible and Distributed Learning* and considers them to be an important and timely response to the expansion in the provision of flexible education opportunities, which has occurred over the past number of years. The demand for such offerings is likely to increase as the concept of life-long learning becomes more embedded throughout society. The College believes that the Guidelines will provide an invaluable framework that will assist all institutions providing flexible and distributed learning options to create and deliver high quality programmes that meet the needs of learners. In particular, we commend QQI's recognition of the importance of developing a coherent FDL strategy at the institutional level and the necessity to ensure that the appropriate structures and procedures are put in place at the organisational, programme and learner levels.

1. Policy on Quality Assurance Guidelines

Hibernia College recognises the work done in developing this policy and welcomes the clarity it provides. Also welcomed is the recognition that QA has a range of purposes including importantly ensuring that education and training is a key contributor to society and the common good as expressed in paragraph 4.

4.2 d states that the QQI QA Guidelines "are the" starting point for a provider establishing its own QA. Perhaps this might be changed to "a starting point" or "may be the" starting point, or something which recognizes the wider context of QA. E.g. the document already notes the UNESCO definition of QA and set the document in a wide context.

Perhaps paragraph 4.2 could also include a point indicating that the QQI Guidelines could contribute to an effective learner experience.

With regard to footnote 3 - 3 *The guidelines saved under Section 84 of the 2012 Act are considered "existing" for this purpose* could some of the text of section 84 be included so it is clear what this means. It is understood that a person can easily consult the Act, but it may be worth explicitly including.

Section 4.3 states that gaps in QA guidance arising from national policy will be addressed and examples are given. Whilst this is merely a list of examples and therefore not conclusive, it may be

useful to include as an additional example, or as part of the point on alliances - Public-Private Partnerships

In noting the sentence, *“In summary, the QQI approach to the development of QA guidelines is collaborative and evolutionary rather than revolutionary”*, we are cognisant of the context and intent expressed. Nevertheless perhaps the inherent conservatism in this sentence may inadvertently undermine freedom for new thinking, or approaches which may emerge at some future point in time.

With regard to 4.4 and the principles articulated, the clarity and breadth of understanding is welcomed. It would be useful to include some reference to the relationship between QA and management and governance also. In accepting that education and training is focussed on helping people learn and that currently good practice frames this around the expression of learning outcomes and the provision of an appropriate environment in which they can be achieved, greater recognition of an organisational context, management, leadership, governance, strategic planning, financial sustainability, etc. is important. Realistically QA cannot be separated from these things, even if not all are areas which QQI has a legislative mandate to review.

2. Core Statutory Quality Assurance Guidelines

With regard to the features/characteristics of good QA perhaps a couple of other might be included? For example, whilst related to some of those mentioned or perhaps implicit in some, it might be good to include:

genuinely valuing and listening to all stakeholders, whether, students, staff, clients, employers, suppliers, professional bodies, etc..

the prudent collection of relevant data and its use in effective decision-making.

With regard to the 11 areas in Section 2, could Programme Delivery perhaps be expressed as programme provision, which, whilst almost a synonym, seems to imply greater connectivity with the recipient.

Considering the heading Information Provision, one needs to do more than provide information. There is a need to firstly know what is the right information to collect and what its purposes may be, one of which may be to provide to various audiences. Would Information Management be more appropriate?

Paragraph 2.2.1 includes a sentence, *“This system, or governance structure, enforces separation of responsibilities between those who produce/develop material(s) and those who approve it”*. It is not very clear what separation is referred to here. Is this about the development of curriculum? Yet curricula are not approved outside of a programme, and a programme is a process, not a set of material. Perhaps this might be teased out a little.

Regarding the sentence *“learner results prior to submission for approval as qualifications/awards and certification”*, could clarity be provided on who the results are being submitted to in this scenario – is it referring to department vs college processes?

Regarding *a) A system of governance where objectives are aligned with mission and strategy*
The quality assurance system focuses on how, and whether, the provider achieves its objectives and

(periodically) on the suitability of the objectives in light of the provider's own mission and other criteria. Are there examples of the other 'criteria' contemplated by this sentence?

Regarding *c) A system of governance that protects the integrity of academic processes and standards* Might it merit the inclusion of sentence on promoting a culture of intellectual autonomy amongst the academy?

Regarding *d) A system of governance that considers risk* The areas included are representative of high profile failures in risk management. A less dramatic potential failure (than for example an international partnership), but perhaps a more common challenge, is to plan prudently ensuring capacity to provide adequate services for numbers of students recruited.

Regarding *e) A system of governance that considers the results of internal and external evaluation* Another important factor that will require management under this heading is the findings of external evaluations conducted by professional bodies and their alignment or non-alignment with external quality reviews.

Under 2.1.2 *Management of quality assurance* it states *Self-monitoring of processes, i.e. regular checks on the effectiveness of policies and procedures are carried out. Indicators are developed and data is collected which can be used to measure the effectiveness of policies and procedures.* Whilst seemingly redundant it may be helpful to include the word 'relevant' or 'appropriate' before the word "data". Typically institutions have access to a wealth of data, but utilising the right data for the right purpose can be a challenge.

Regarding *"Clear decision-making and follow-up. Systematic formal decision-making procedures are built into a provider's various evaluative mechanisms, including the procedures for oversight of such mechanisms by the governance system or equivalent. Management acts on the self-evaluation findings"* Would this be enhanced by the inclusion of 'criteria-based' decision-making?

Under 2.1.3 *Embedding a quality culture* it may be useful to include staff training, staff engagement in professional networks, an acknowledgement that HET is a collegial venture with links across institutions and fields.

Under 2.2.1 *Documented policies and procedures* there is the following paragraph

Policies and procedures are effective and fit-for-purpose. However, provider circumstances will change and effectiveness is not guaranteed. Therefore, quality assurance procedures are regularly self monitored by the provider. Policies and procedures found to be ineffective are amended or replaced. Perhaps the first sentence could be phrased, "policies and procedures are designed to be effective..."

Regarding the list of bullets describing what policies and procedure are or have, an addition may be – are cognisant of relevant European and other policy guidance.

Regarding the statement - *Quality assurance policies and procedures will drive change, but effective quality assurance systems drive improvement and enhancement*, it is one that would benefit from unpacking, but perhaps this is not the document in which to do it. Is it necessary here?

Under 2.3.1 *Programme development and approval*. At the end of this section there is a sentence - *Provider procedures ensure that they have due regard to other topic-specific statutory quality assurance guidelines as appropriate to the programme, for example Flexible Delivery Learning guidelines and Research Degree guidelines*. However, should there be a specific point in the preceding bullets identifying a need to design a programme bearing in mind the mode of provision, and also the intended learning environment.

Also should there be mention of needing to meet or set a qualification standard – in tandem to addressing the NFQ?

Under 2.3.2 *Learner admission, progression and recognition*. Might QQI consider ceasing the use of the word ‘admission’, notwithstanding its current use across the HE sector? Its meaning can seem contrary to the philosophy of access to education, and it suggests privilege, rather than right and accessibility. Words such as entry or enrolment typically can be used instead.

Under 2.3.3 *Programme monitoring and review* should the word ‘attrition’ be replaced by ‘persistence’?

Under 2.4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT, there are frequent and appropriate mentions of teaching staff. Perhaps these could be complemented with some guidance which recognises that standards are also required in respect of other staff categories and that staff in these group may significantly contribute to the learning of and learning environment for students.

Under 2.5.2 *A provider environment that promotes learning* there is a list of bullets. The last one reads » *Has appropriate procedures for dealing with learner complaints*. Perhaps this could be rephrased to ‘responding to learner complaints’.

Under 2.5.4 *Learning environment* Should there be specific mention of the work placement environment, which is central to certain types of programmes and relevant to many.

Under 2.6.1 *Assessment of learning achievement*

The assessment framework incorporates procedures and systems for the security and integrity of the assessment process, to include:

Should communications with learners around assessment be a separate category – this would include everything from feedback, to issuing of results, certification, to viewing of scripts

The sentence *Credit is normally linked to achievement of minimum intended learning outcomes.1* has a footnote reference but no footnote.

Under 2.8.2 *Learner information systems*, is there merit in including something about keeping learner records in perpetuity?

Additionally is there usefulness in stating that records should receive as little manual manipulation as possible, with single touch points established for required processes and that internal systems should where possible speak to each other avoiding duplication of handling, etc..

Under 2.8.7 *Data protection and freedom of information*, for the avoidance of doubt should the guidance state that all providers are subject to data protection legislation?

Under 2.9.2 *Learner information*, it may be useful to include guidance on indicating an equivalent Framework level where it is available, where a particular programme is being provided in another country. It would be important also to include information on any professional regulation required. This may also have additional relevance for transnational provision.

Under 2.10.3 *Expert panellists, examiners and authenticators*, there is a requirement to ‘make available to QQI’ the names of panellists etc.. It is not clear if this is introducing a requirement to proactively forward these to QQI or if this is simply to make them available as requested.

The clarity around self-evaluation express in 2.11.3 is welcomed.

Under 2.11.4 it may merit noting that some providers can have engagements with multiple external bodies and that QA should streamlined to manage this, but also there should be clarity on whether such relationships are parallel or hierarchical, or a variation.

3. Sector Specific QA Guidelines for Independent/Private Providers

Hibernia College welcomes the publication of this white paper on sector specific quality assurance guidelines for Independent/Private Providers and acknowledges that these guidelines add to the Core Statutory Quality Assurance Guidelines by addressing the more specific requirements of independent private providers. Hibernia College’s usage of the guidelines is in the context of validated programmes leading to QQI awards and it does not currently make use of the International Education Mark (IEM) also covered by these guidelines.

Governance and Management

Hibernia College welcomes and supports the basic principle that academic decision making is independent of commercial considerations or the undue influence of business owners. An appropriate governance and management system should ensure that a provider’s activities are adequately resourced and risk managed and in so doing provides protection to learners and the business alike.

Programmes of Education and Training

Hibernia College supports the statutory obligations for the protection of enrolled learners as set out in *Protection of Enrolled Learners: Protocols for Implementation of Part 6 of the 2012 Act*. There may be situations where alternative provision arrangements are not possible due to capacity or policy restrictions in which case refunding of fees must be provided for. In this case either a financial bond or an insurance policy could be used to provide the necessary protection to the learner.

Staff Recruitment, Management and Development

The recruitment, management and professional development of faculty is central to a provider's reputation and therefore the quality of its awards. Hibernia College recognizes that the largest investment it makes is in its staffing resource and therefore supports fully recommendations around quality assurance of full staff lifecycle (recruitment, induction, professional development, appraisal, etc.).

As the learning and teaching modalities used at Hibernia College make greater use of online and blended learning than in more traditional providers this has resulted in more faculty who are external and part-time. In recognition of this our recruitment, development and management systems have been developed and are being enhanced to reflect this distinctiveness. As it is likely that other more traditional institutions will make greater use of online and blended learning in future it is recommended that the guidelines in the white paper reflect this.

Assessment of Learner Achievement

Fair and consistent assessment of learners is fundamental to the integrity of awards and quality assurance procedures must comply with all QQI conventions and guidelines in this area. Fairness and consistency must apply across programmes, cohorts/intakes of students, levels of awards on the NFQ Framework and across comparable awards from different providers, both public and private. In this context Hibernia College supports the guidelines set out in this white paper on assessment of learner achievement.

European Commitments

Hibernia College supports the recommendation that all providers, public and private, align and reference their quality assurance policies and procedures to the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, May 2015. In particular, it is important that joint programmes, joint awards, collaborative programmes and transnational programmes are developed, approved and operated as set out in the relevant national and European QA framework.

Certification

Hibernia College supports the recommendation of robust quality assurance procedures to support the management, integrity and persistence of learner result data.

Other Parties Involved in Education and Training

Hibernia College has, from time to time, entered into partnership/collaborative arrangements with other higher education providers such as the University of Plymouth. In considering such collaborations due diligence is conducted on legal, reputational, compliance, resourcing, governance, programme development and programme delivery. We therefore support these specific guidelines in this white paper.

4. *Specific Quality Assurance Guidelines for Flexible and Distributed Learning*

Based on the College's experience in the development and provision of online and blended academic programmes, we have identified some clarifications and additions that relate to this aspect of flexible provision. We hope that these might prove useful across the sector.

1. We would suggest that a key principle that might be worth emphasising is that of close collaboration between the academic and the technical teams. Notwithstanding the fact that key staff such as academic developers and learning technologists may be in place to bridge the technology/pedagogy gap, it is important that IT systems staff are also embedded in the planning, provision and evaluation processes in order to deliver an optimal learning experience for students.
2. Contact hours – There is a need to reconceptualise the notion of contact hours to encompass the variety of student engagement activities that may take place in an online environment. These may include items such as interactive presentations, forum discussions, online tutorials or simulations.
3. Digital reputation - While there is some mention of protocols in relation to working online, it is becoming more and more apparent that online learners need to become aware of the ways in which their online interactions – e.g. comments, photos, videos, etc. – can coalesce to create a 'digital persona' that may have reputational implications. We would suggest that this is an area that should be addressed more robustly in this document.
4. Data protection - Learners often have significant concerns in relation to data protection issues and while this is addressed in the document, the college feels that it must be emphasised that clear parameters in relation to data protection must be set out by an institution.
5. Learners can have significant concerns over the quality of tutors and equally, the level of support that they will receive from tutors. Clear parameters in relation to this must be set out by an institution for the protection of the learner. With regard to online learning, tutors should not just be subject experts, but trained appropriately in teaching online.
6. Communities of Practice (CoP) – part of the beauty of FDL is the use of CoPs. Institutions should have a clear strategy on how to build and support CoPs.
7. 'Flexible' – With regard to the use of the term 'Flexible and Distributed Learning' (FDL), it would be useful/necessary to clarify the meaning and nuances of the word 'flexible' as from our experience, it can affect learners' expectations. Learners should be very clear as to what is required of them, and they should be crystal clear on what they must attend/participate in i.e. forums etc. The concept of a programme is central to this.

8. We see this framework as an excellent opportunity to promote innovation in pedagogical approaches and suggest that it might be beneficial to add something in this regard, e.g. the addition of the highlighted text to the first paragraph in Section 2:

For example, online and e-learning, mobile and digital technologies, social media, and Massive Open Online Courses (MOOCs) are all harnessed to a greater or lesser extent by many providers, offering opportunities for flexible and distributed delivery of learning, the development of new competences and the possibility of innovative pedagogical approaches. Examples include:

- More authentic forms of assessment through the use of eportfolios for evidence gathering and reflection
- Engaging in communities of practice, both within and beyond the institution through social media tools
- Enhancing digital literacy and cultivating a digital identity
- The use of multimedia tools to create more engaging learning activities

9. We suggest the following additions to points within the text

3.1.2d *Intellectual property rights*, specifically around the use of copyrighted materials within a virtual learning environment, *and software licencing issues are addressed in the development and delivery of FDL.*

3.1.4e *The provider can demonstrate that, before offering FDL to learners outside Ireland, it has tested delivery systems to ensure that learners outside Ireland will have equal access to support and to learning resources.* An example that may be worth including here is that of commonly used platforms such as YouTube not being available in certain jurisdictions (e.g. China).

It would also be useful to clarify explicitly in the text that QQI deems this transnational provision and that additional QA requirements also arise for an institution, as well as potentially qualification recognition issues.

3.3.2e *There are arrangements in place to provide assurance that all those involved in teaching or supporting learning are appropriately qualified, supported and developed to provide effective FDL. For example, induction is provided for learners and staff on all aspects of the FDL experience.* This should not be limited to technical proficiency but should encompass understanding of the opportunities and challenges of teaching online/with technology, e.g. developing online presence and fostering communication and the exchange of idea through expert facilitation of online discussions.

10. We feel that the inclusion of point 3.2.1f is unnecessarily restrictive and is likely to hamper innovation. The learning technologies space is constantly evolving, throwing up new and innovative ways of designing learning activities. Within this context it might sometimes be appropriate to experiment with tools that are outside the institutional platform in order to deliver the best experience. Moreover, exposure to digital tools outside the confines of the conventional LMS can be a way to enhance the digital literacy of students and should be seen as a benefit in itself.

3.2.1f *Individuals developing FDL elements use the platform the institution has committed to and are bound by the institutional policies, systems, hardware and processes for FDL.*

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