

Core Statutory QA Guidelines Irish Universities Association (IUA)

The following is a very brief summary response from the Irish Universities Association (IUA) to the current QQI consultation on Core Statutory QA Guidelines.

It is IUA's understanding that individual universities have submitted more detailed responses as part of this same consultation process.

The over-riding concern of the university sector regarding the proposed guidelines is the apparent application by QQI of a "one size fits all" approach. The IUA suggests that the core guidelines should reflect the relative responsibilities of relevant bodies under the 2012 Act. A strong imbalance between the proposed core QA guidelines and emerging sector-specific guidelines is evident in the consultation papers available so far. The core QA guidelines consultation document is over 50 pages in length, with the main guidelines section (section 2) over 30 pages in length, whereas the current draft of the DAB sector guidelines stands, *in toto*, at 9 pages.

These compare to the main guidelines section of the 2015 European Standards and Guidelines which is 15 pages in length, covering all three parts (internal QA, external QA and QA for agencies). The main guidelines section of the QQI consultation document includes 11 subsections, and enters into considerable detail in many of these subsections, many of which stretch to 3 pages in length, and some to 4, compared to half a page for the corresponding subsections in ESG 2015.

It is IUA's contention that the current level of detail proposed by QQI is unhelpful, in that not all of it is relevant to all providers, and much of it could more usefully be included in the relevant sector-specific guidelines and other documentation. The current level of detail as proposed is also unhelpful from the perspective of providing efficient briefing and preparation for external reviewers in the university sector.

The second main concern of the university sector regarding the consultation draft is that it is heavily weighted towards procedures rather than towards enhancement. The universities have extensive procedures of their own in each of the areas covered by the consultation draft, and place much greater value on the quality enhancement process than in verification of procedures. The guidelines should reflect this, and the procedural elements should be concentrated in those sector-specific documents where they may be required. Unfortunately, the enhancement-oriented sub-sections only form a very small proportion of the current draft.

The IUA would like to point out that the issue of QA of research remains unclear in the current draft.

The IUA would also like to state that any work on defining quantitative metrics as referred to in the consultation document would need to take full cognisance of existing data sources and definitions agreed between the universities and the HEA. Details regarding additional quantitative fields are also under development/negotiation with the HEA. Any use of quantitative metrics by QQI should be firmly referenced to existing agreements and procedures in place, and if further such metrics are identified as desirable, that agreement regarding definitions etc. also involve the HEA. The existing MOU between the HEA and QQI should underpin any work in this area.

The IUA would be happy to work with QQI over the coming period to rebalance the documents as suggested above and to ensure that all guidelines reflect those elements which are foreseen in the 2012 Act.