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Response to Review of Higher Education Institutions [White Paper], QQI



October 19 2015

Mary Immaculate College (MIC) welcomes the opportunity to present feedback to QQI in response to its White Paper *Review of Higher Education Institutions* (July 2016). The College is committed to the shared mission of embedding and enhancing a quality culture in Irish higher education and has set such a goal for itself in its current institutional strategic plan (2012-2016). MIC looks forward to an imminent institution-level review, in collaboration with the University of Limerick (its award accrediting body).

The College fully agrees with the principles proposed by the independent Review Team established by the QQI and cited in the White Paper. In particular, the following are seen as vitally important:

- “Reviews should contribute to a better understanding and valuing of quality culture at all levels and go beyond a superficial overview of the existence of quality procedures.”¹

MIC regards over-reliance on identification of quality assurance instruments and (current) methodologies, to the detriment of critical analysis and penetrating discussion of quality-related strategy and operations as counter-productive to the goal of instituting a quality culture based on the understanding and acceptance of all personnel such as to instill quality culture.

- “It is important that the review process should include nothing in the process that cannot be shown to be necessary for the achievement of its purposes and objectives. It should also seek to use as little time and resources as are compatible with a useful and defensible outcome... (and the review procedures should be) ... means to an end and not ends in themselves.”²

Avoidance of the tyranny of method over subject is paramount, lest the inherent value of quality assurance is eroded in the eyes of its stakeholders. It is also difficult to strike the correct balance of resource allocation to quality assurance at a time for higher education institutions in which the bureaucratic burden is heavy, not to mention the reduced capacity potential to meet teaching, learning and research goals which has been effected by sectoral funding cuts against a (welcome) trend towards significantly increased participation. This is not simply a question of winning hearts and minds from encumbered staff, but a real issue in terms of what is appropriate and relevant. The last thing that is needed to ensure a functional and thriving

¹ QQI *Review of Higher Education Institutions* (White Paper), Quality & Qualifications Ireland, 2015, p. 5.

² *Ibid.* pp. 6-7

quality assurance culture is report fatigue and more shelves filled with descriptive accounts of administrative procedures.

The statement by QQI that institutions “*will be equipped with clear guidelines on the content and length of self-evaluation reports to ensure that they are analytical in focus and do not contain unnecessary information,*”³ is warmly welcomed. Frankly, however, such guidelines are long promised and it is now urgent that they materialise within an appropriate and fully inclusive consultation framework.

- “*The range of HEIs under QQI’s supervision is very large and diverse; reviews should, therefore, be capable of accommodating that diversity and should not impede the enhancement of mission diversity and effectiveness.*”

QQI and its partners are faced with an admittedly difficult challenge in reconciling the need for tools, such as KPIs and benchmarks, that provide for necessary comparisons within the system context as well as within a longitudinal one. MIC proposes that QQI engage closely with the Higher Education Authority (HEA) on this issue. The HEA began a process of strategic dialogue in 2011/12 that sought to valorise mission diversity within the continuum of Irish higher education, whilst at the same time seeking to create an enhanced performance management framework. There is evidence that the strategic dialogue did not succeed, initially, in providing ample space for the accommodation of a diverse range of missions and ethos types in the new higher education landscape. However, persistence with a mutually respectful dialogue has succeeded in reversing the risk of homogeneity by helping the HEA to realise the value and complexity of institutions as autonomous and individual entities within the Irish higher education system. Similarly, there are healthy signs of progress in the institutions’ responses collectively, and individually, to the process of performance management, transparency and accountability. If this dialogue is, as it seems, leading towards a balance that meets all stakeholders’ requirements and, above all, enhances the quality of Irish higher education provision, it behoves QQI to seek to learn from it.

- “*Quality assurance matters to everyone with a stake in Irish higher education; QQI reviews should therefore engage all relevant participants in the process, including students, academics, and representatives of relevant business, professional, and societal groups.*”⁴

³ *Ibid.* p. 8

⁴ *Ibid.* p. 11

QQI is asked to confront a notoriously difficult question here. Who is best qualified to speak to 'quality' in the context of academic teaching, learning and research? It goes without question that peers that enjoy a panoply of respect and credibility for their professional expertise and accomplishments are the best suited to know the appropriate benchmarks of quality within discipline-specific areas and to judge how individual institutions are performing in terms of those areas. That said, the notion that a multiplicity of accords hold a stake in academic quality has gained much acceptance. Industry and business require graduates with knowledge and skills. Similarly, the Humanities and Social Sciences provide professional education opportunities that must meet sectoral and societal needs. It is also true that there can be a gap in understanding between educational institutions and external stakeholders in respect of singularity of their respective missions as well as the symbiosis that, potentially, pertains between them. The fostering of more inclusive participation in quality assurance at higher level could play a part in bringing about a measure of balance and mutual understanding that contributes more fully to quality outcomes for the learner, the institution and extra-mural partners.

For this reason, the rather narrowly scoped response given by the QQI to this principle in the White Paper appears to suggest that in-depth consideration of the review team's recommendation has not yet taken place. MIC believes that principle is an important one and form part of the model of quality review being developed by QQI.

- “*Quality assurance is a complex matter that requires particular professional knowledge, skills, continuous reflection and updating; the reviews should be supported by wide opportunities for training for both the pool of reviewers, the institutions taking part in the reviews, and the QQI staff managing them.*”⁵

MIC agrees with this statement and would underline the need for training at institutional level especially. To date, a lacuna has existed in this regard and this militates strongly against the steady enhancement of a quality culture. Institutional stakeholders, both in management and programme or service delivery functions require more training support, not just in the mere instrumental aspects of quality assurance, but in its conceptual foundations and inherent value. This is best done in a dialogue, rather than didactically, but regardless, QQI has a core role to play as an enabler rather than simply as a servant of legislative or policy-level imperatives. This is not evident in the response given by QQI to the principle stated by the review team and MIC urges greater consideration of this essential practicality.

⁵ *Ibid.* p. 12

- “The potential of the review process should not be limited to audit or inspectorial approaches, but should be explored using other techniques, such as disciplinary or thematic reviews and by the development of meta-analyses of the outcome at the sub-sector and system levels.”⁶

MIC wholly concurs with this statement and welcomes QQI’s positive response which indicates that cross-institutional approaches may be established as a methodology. MIC would add that unit-level self assessment reviews, as well as appropriate bi-lateral or multi-lateral institutional reviews (by regional clusters, for example) should be explored as options.

MIC looks forward to publication of the Draft Policy by QQI.

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⁶ *Ibid.* p. 13