

Maynooth University submission re QQI White Paper on Core Statutory Quality Assurance (QA) Guidelines

Maynooth University welcomes the opportunity to make a submission on the QQI White Paper on Core Statutory Quality Assurance Guidelines and related documents.

The purpose of the Core Guidelines is stated to be *“to assist providers in the development of quality assurance systems which are appropriate to individual provider contexts”* and *“to guide providers through their legal responsibilities for the development of QA procedures...”* (p.5). We welcome the developmental emphasis of this statement of purpose and the clarity provided in the text and Appendices in relation to the statutory obligations. We also welcome the clarification that *“A provider’s scale and scope of activity will determine the level of complexity of their QA procedures, which should be fit-for-purpose and context”* and that *“these guidelines do not prescribe the manner in which providers must implement their QA procedures”* and that they are *“not intended as a ‘how to’ manual for providers on the establishment of their QA procedures.”* In our view it is essential that the acknowledgment of differentiation between providers, and that all of the boundaries specified above will be fully adhered to in the implementation of QA Reviews in the future.

We have a number of strategic and other concerns that are detailed below.

Overall approach to QA Reviews

The emphasis in the approach proposed in the Core Guidelines is very much oriented towards demonstration of compliance. We appreciate that this is driven by the diversity of providers to which the Guidelines will apply, but we are deeply concerned that the Guidelines will be read and applied in a restrictive fashion. In practice it could result in a major shift from the model that in the past systematically addressed four key questions: what are the institution’s strategic priorities?; how effective are its QA and QE procedures in enabling it to achieve its strategic priorities?; how can current procedures be improved? (self reflection supported by external benchmarking); and, can the institution demonstrate that its procedures enable it to comply with any statutory requirements or guidelines and also with international standards as per ESG? The emphasis in the draft guidelines is very much on the last of these questions.

A review that systematically addresses each of the questions listed above will, *a fortiori* in the university setting, be more helpful to the institution or unit under review than one which is predominantly compliance focussed. The Guidelines as drafted provide limited scope for self assessment and peer review of institutional

achievements and progress in relation to the core activities which form the context within which the effectiveness of QA procedures should be reviewed.

In the implementation of the draft guidelines there is a risk that most of the preparatory work for the Self Assessment Report could be left to a small number of experienced administrative personnel without securing participation of the wider academic staff and student communities. This would severely weaken the value of a process that should lead to a wider and deeper understanding of the concept of a quality culture, and of an appreciation of suitably benchmarked achievements, while also identifying areas where further or different interventions may be required. The risk is that a process that is intended to be supportive of a quality culture could be transformed into a regulatory audit type exercise which could weaken the value of QA reviews, and impact negatively on the participative and inclusive approaches that have characterised such reviews in the past.

The roles of QQI and HEA in relation to quality assurance and accountability

The draft Core Guidelines do not provide sufficient clarity on the differing roles of QQI and HEA, and the critically important distinction between external and internal quality assurance procedures and accountability for performance. This is a significant concern for us as there is potential for confusion in relation to our differing responsibilities to QQI and to HEA. In our view our responsibilities in relation to QQI and the HEA are entirely different. The role of QQI is to establish guidelines for quality assurance, and to review the effectiveness of a university's quality assurance procedures and their implementation. The Universities have separately entered into performance compacts with the HEA, which provides a mechanism by which institutions are accountable for performance against strategy and for efficient and effective use of resources. Notwithstanding the provision, under Section 34 (4) of the Qualifications and Quality Assurance (Education and Training) Act 2012, that QQI shall consult with the HEA in reviewing the effectiveness of a university's quality assurance procedures and their implementation, there is a clear distinction between the role of QQI and the role of HEA. It would be deeply problematic if the institutional review process were loaded with, distorted by or distracted by some of the functions and concerns of the HEA. It is very important that the design and implementation of QQI reviews should be decided independently of the HEA.

University autonomy

The distinction in page 7 between universities as autonomous entities and other providers is vitally important so that the flexibility and differentiation in QA procedures envisaged in the statement of purpose can be achieved in practice. However, the statement that QA seeks "to ensure that the learning environment reaches an *acceptable threshold of quality*" (p.8) immediately begs the question who determines what an acceptable threshold is? For autonomous universities there is only one answer – the university itself, taking account of its profile and the wider context in which it operates and guided by appropriate benchmarking.

Research

We note that research is included within the scope of the reviews. The Guidelines are particularly sparse on what might be considered appropriate for inclusion in a review of QA procedures for research. Is it intended to focus only on the QA procedures that may be pertinent to doctoral education? or, is it intended to include QA procedures to assess the quality of research outputs. There are already comprehensive review procedures in place for research outputs, especially for research funded by SFI, IRC and many other national and international funding agencies. Any move towards a comprehensive quality assessment of research outputs will require

extensive consultation with the research community and will need to be much more thorough than the consultation for this particular White Paper. Further clarification is needed in relation to what is envisaged as the extent of the focus on research. A quality assurance review of a university that does not appropriately include research risks reducing the review to an exercise primarily about teaching, and thereby omitting the defining attribute of an institution designated as a university.

Data and data definitions

However, in order to achieve efficiency in the preparation for QA reviews it will be necessary to achieve inter-agency coordination (QQI, HEA, DES) especially in relation to key metrics (including definitions, data sources, measurement dates, etc) and avoidance of duplication. In so far that any metrics are mentioned (p. 22) it would seem that metrics on retention, non-progression and achievement might be more easily measured and more appropriate than completion rates which are subject to time lags.

Content and presentation of the Guidelines

The Core (Statutory) Guidelines include 11 themes that are organised into four broad categories. This section is lengthy (30 pages), includes a lot of detail written in a prescriptive style, and the overall thrust is mainly on demonstrating QA compliance, with Self Evaluation only appearing very late in the final Guideline. It may be more appropriate to have Self evaluation, Monitoring and Review embedded in each of the previous sections on Quality Management, Programme Delivery and Information Provision. This would facilitate a complementary focus on QE throughout the document. It would also greatly assist users of the Guidelines if the text for each Guideline could be shortened to a few sentences with the suggestions on examples transferred to an Appendix.

We have a particular concern about some of the text related Guideline 2.4.1 on Staff Recruitment. This particular Guideline seems to be linked to Standard No. 5 in the ESG (2015) which states that *Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff.* The following sentence in the QQI draft Guidelines (p.24): *“Appraisal of teaching (including assessment) ability is a key part of the selection procedures for any persons employed to teach learners”* is much more prescriptive than any of the ESG text and highly problematic in practice. It is unclear what is meant by ‘Appraisal’ in this context, and furthermore, it does not recognise the reality that almost all academics are appointed to undertake both research and to provide teaching. Increasingly, applicants for academic posts may have had limited opportunities to teach and assess while they developed the early stage of their careers as researchers. Institutions have considerable experience in supporting new staff and using probation and early reviews to assess if an appointee can deliver on all aspects of the post to which she / he may be appointed. We strongly recommend that the sentence quoted in italics above should be deleted from the Guideline on Staff Recruitment. If that is not possible, given the diversity of providers to which the Guidelines apply, we request that the Guideline on academic staff recruitment will explicitly acknowledge that appointments in the designated universities are based on a number of criteria including ability to teach, and that the QA requirement is that the university can formally confirm this is the case in practice.

The section on Provider-Owned (Internal) QA (p. 9) includes a long list of features of successful QA systems. It is notable that the list includes a blend of assurance or compliance features supplemented by QE activities, and also performance metrics. This list based on ‘national and international experience’ is reflective of a broader approach to QA than is evident throughout most of the remainder of the document.

The **sector specific QA guideline for Designated Awarding Bodies (DABs)** is taken as a supplement to the Core Guidelines. The overall approach mirrors the approach underpinning the Core Guidelines. The procedures outlined for QA of linked providers are very much compliance oriented and are also of an administrative nature – e.g., approving, monitoring, reviewing. In practice the review process could be reduced to a desk based exercise. If that became the case the opportunity for QA to be a development and enhancement process for the linked provider will be lost. We recommend that the purpose and scope of such reviews be reconsidered.

The Guidelines re **Flexible and Distance Learning** seem to refer mostly to distance learning. The HEA usage of the term Flexible learner includes part-time students. Many of the issues raised in this document are also pertinent to part-time students. We consider this document as a supplement to the Core Guidelines. The feedback from colleagues with experience in this area is generally positive and they welcome the recognition that FDL students are different in many respects from other learners and therefore some additions to the Core Guidelines seem merited. The rationale for additional Guidelines and their content is well documented.

In terms of overall presentation it would help if all the Guideline statements were consolidated onto one page and the specifics were transferred to an Appendix. Much of the material on page 3-9 could be edited down for a more concise presentation.

In summary, we welcome the opportunity to make a submission. We have focused mostly on matters of strategic importance that need to be addressed before the QA Guidelines are finalised. We hope that you will find these observations of assistance. We will be happy to discuss with you the points raised above in more detail if that is considered necessary.

Yours sincerely,



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