



QQI

Dearbhú Cáilíochta agus Cáilíochtaí Éireann
Quality and Qualifications Ireland

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

FEEDBACK REPORT

FOLLOWING CONSULTATION PROCESS ON

White Papers on Topic-Specific Quality Assurance

Guidelines for Providers of Research Degree Programmes

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1. Introduction

The overall structure and approach towards the development of the statutory quality assurance (QA) guidelines is set out in this [diagram](#). The structure involves [CORE QA Guidelines](#) which capture in one place those elements which are fundamental and common to all providers associated with QQI. All other categories of guidelines are a supplement to the CORE QA guidelines. Sector and topic-specific QA guidelines are examples of additional guidelines on specific areas beyond the core. They apply as appropriate to individual providers.

QQI has published sector-specific guidelines for the Designated Awarding Bodies (universities, DIT and RCSI) and Institutes of Technology. These guidelines contain a brief reference to research activities (other than degrees). Sector-specific guidelines have also been published for Private and Independent Providers. They capture specific legislative requirements for each set of providers.

QQI is also developing a series of topic-specific QA guidelines, which apply to a particular topic or type of provision. This includes topics that are optional for providers depending upon the range and type of their provision, such as the **Statutory QA Guidelines for Providers of Research Degree Programmes**. Topic-specific QA guidelines have been published for providers of apprenticeship programmes and are in development for providers of programmes which involve blended learning and planned for transnational provision.

This report also sets out the response of QQI to the feedback received on the development of these QA guidelines and describes the next steps in the finalisation of this QA Guideline. While it has not been feasible to capture the full extent of every comment made by each contributor in the consultation process, this report tries to capture the most salient points and the areas for action by QQI. The feedback on the White Paper was used to inform the final quality assurance guidelines published¹.

¹ [Quality Assurance Guidelines for Providers of Research Degree Programmes](#)

2. Background to the development of the guidelines for providers of research degree programmes

QQI appointed a panel of national and international experts to review existing policy and guidelines for the quality assurance of research degree programmes in Irish higher education institutions. The report produced by the expert panel was in keeping with, and followed up on, implementation of some aspects of the *National Framework for Doctoral Education*² (NFDE) [[Terms of Reference](#) for the project]. In the latter part of 2015, the expert panel met with a broad range of representatives of Irish higher education institutions involved in research provision (including research supervisors, research students and graduates) and representatives of employers, funding bodies, HEA and Government Departments. The panel extended their initial deadline to conclude on both parts of the project – a) the report and b) an initial set of national QA guidelines for research degrees building on existing QA procedures in the institutions and any legacy QA guidelines for research degrees. The panel produced [the report](#) in 2016 and were then tasked with developing the first draft of the National QA Guidelines for Research Degree Programmes for consultation with research providers and other core stakeholders, published as a White Paper in July 2016.

The main starting point for the draft QA Guidelines for Research Degree Programmes evolved from the priorities identified by the expert panel in their report. The panel was mainly concerned about the following areas in the quality assurance of research degree programmes:

1. Ongoing monitoring of the effectiveness of procedures (and consequences).
2. Supervision of research students, the success or otherwise of the various models adopted.
3. Career advice – research students’ misconceptions in relation to having an academic career and the subsequent need for career advice for students.
4. Other significant messages such as a review of effectiveness for all arrangements, in particular those with the range of collaborative partners and third party involvement.

The remainder of this document provides an overview and summary of the feedback received from the institutions, students, graduates and other core stakeholders on the draft(s) of the quality assurance guidelines.

² [National Framework for Doctoral Education](#) published in 2015

3. Consultation process

During the initial consultation on the draft QA guidelines it was decided to extend the period of consultation which commenced in July 2016 to 20 February 2017. The following is a summary of the consultation process:

The first draft *Quality Assurance Guidelines for Research Degree Programmes* for consultation with providers and all other stakeholders was published as a White paper on the [QQI consultations page](#) on 14 July 2016. QQI received early feedback from institutions and other interested stakeholders on the proposed guidelines. A variety of consultation methods were used to gather feedback. The White Paper was also circulated to all stakeholders who had met in 2015 with the expert panel appointed to review existing policy and guidelines on QA of research degree programmes³. QQI also organised a series of meetings and briefings with representatives of the higher education institutions and core stakeholders including those bodies that QQI is obliged to consult with, as stated in the 2012 Act. Consultation on the first White Paper closed in November 2016.

The QQI response to initial feedback was to develop a more high-level set of statutory QA guidelines; and to also develop a more detailed *Code of Practice for Research Provision* in close collaboration with providers.

A revised outline draft of the guidelines was developed and circulated to the higher education institutions (Deans, Heads of Research and Quality Officers) and their respective representative bodies, the Irish Universities Association (IUA) and the Technological Higher Education Association (THEA); The Department of Education and Skills; and the Higher Education Authority (HEA). Further written submissions from HEIs resulted in another revised version of the draft guidelines which went out for a final round of open public consultation with all stakeholders from 17 January to 20 February 2017. This revised version of the White Paper was also published on the [QQI consultations page](#). The Union of Students in Ireland (USI) also provided direct feedback to QQI on this second draft of the QA guidelines following their own consultation with research students and graduates. The consultation process closed on 20 February 2017 and gathered a small amount of additional feedback.

³ [Report of the Expert Panel on the Quality Assurance of Research Degree Programmes in Irish Higher Education](#)

4. Sources of feedback

Feedback on the White Papers for the QA Guidelines for Research Degree Programmes was received from a range of institutions, representative bodies, policy making bodies and other bodies involved in funding or research policy development and research provision. In keeping with the QQI consultation framework, all submissions received through the formal public consultation processes were published on the QQI website, unless otherwise requested. The list of individuals and organisations who contributed to the consultation is provided in Appendix 1. QQI would like to thank all contributors to the consultation process. The feedback received was excellent and made a significant contribution to the content of the quality assurance guidelines and the decision to establish the Code of Practice. QQI is grateful to all those who took the time to provide feedback and demonstrate their absolute commitment to the quality and standard of research degrees in Ireland.

5. Summary of feedback

Existing quality assurance references for research

Some of the feedback from the consultation processes involved comparisons with other existing guidelines such as the *IUQB Good Practice in the Organisation of PhD Programmes in Irish Higher Education*, published in 2005, and revised in 2009. These were developed collaboratively, are extensive and enjoy widespread acceptance as tools for continuous enhancement of PhD programmes among. They were adopted by HETAC as a reference in the Research Policy used for accreditation and evaluation. The standing of this and other legacy documents was raised by providers.

QQI response

The QQI quality assurance guidelines when finalised will have a different standing. The QQI guidelines are statutory guidelines and institutions are expected to have regard to these in the context of internal QA procedures. Independent private providers will also be expected to have regard to, and establish procedures under, these guidelines in addition to any additional criteria required to demonstrate capacity if undergoing a research programme accreditation process. This is in addition to other relevant QQI policies. The statutory QA guidelines are based on the ESG 2015, national policy and the various elements of the 2012 Act. All statutory QA guidelines are designed to

be an addition to the Core Statutory Quality Assurance Guidelines. The content of the *IUQB Good Practice in the Organisation of PhD Programmes in Irish Higher Education, 2009*, should be carried over to the *Code of Practice for Research Degrees* currently under development in collaboration with providers.

Initial feedback on structure and content

Feedback in general indicated a level of concern that the first White Paper did not address any new or evolving issues and missed an opportunity to contribute to the quality of research degrees.

Feedback indicated that the document did not communicate the more important messages coming from the findings in the expert panel's report. It was felt that a more principled approach to the document may represent the modern robust cutting edge quality system required to support the vision portrayed in the *National Framework for Doctoral Education*⁴.

Options proposed for a restructure include:

- Using the structure of the Core QA guidelines for the QA Guidelines for Research Degree Programmes
- Developing two types of documents or two sections within one document – one prescriptive and one for existing providers of research degree programmes
- Using the principles of the *National Framework for Doctoral Education* as an organising scheme, with any noticeable gaps to be filled. Providing more routine detail in a separate section.

QQI response

The main source of feedback from providers indicated that they expected a different type and style of document to statutory QA guidelines. Some providers expected an updated good practice guide or a Code of Practice for the higher education system. They considered that the development of the new guidelines was an opportunity to create space for innovation in institutions and to focus on the quality of research projects. They expected the QA guidelines to be closer to extended statements articulating the principles of the National Doctoral Framework. QQI restructured the White Paper and agreed to work with the HEIs to develop a second more detailed 'good practice document' or 'code of practice' that could be used to supplement a set of high level statutory QA guidelines for

⁴ [National Framework for Doctoral Education](#)

research degrees. This supplementary document will embrace work completed to date and include, for example:

- appropriate content in the IUQB publication on *Good Practice in the Organisation of PhD Programmes in Higher Education, second edition, 2009*;
- high level statements reflecting provider input on the national expectations for research in general, focusing in particular on research creativity and innovation – following on from the high-level principles in the National Doctoral Framework;
- reference to other national work carried out by HEIs on research ethics and other effective practice publications.

The QQI QA policy sets out general principles to assist providers in the development of all their own internal QA procedures.

Content and additional matters to be addressed

Feedback on the level of detail was considered to be overly prescriptive by some stakeholders while others requested more detail and guidance on processes and appropriate procedures. Others again requested that the content reflect some of the precise practices, tools/methodologies, naming conventions and attributes currently used in certain, but not all, research environments. Although some considered the content added little additional value to the guidelines that currently exist, others welcomed the level of detail as a guide to facilitating internal policy development. In general, the content was considered to be very detailed and compliance-orientated, particularly for topics that institutions consider to be very well established.

Broad guidelines at a high level were suggested, to enable institutions to develop their own fit-for-purpose procedures. Feedback indicated that some of the more recent complexities associated with research provision were not dealt with in enough detail or in some instances reference to them was completely omitted – examples include the following:

- Collaborative context – not currently addressed. This is a significant issue. The range of potential partners, legal complexities associated with different jurisdictions
- Joint and other awarding contexts e.g. responsibilities, processes
- Students at a distance – how is access managed and supervised?
- QA of accredited and non-accredited learning

- Funded students – the boundary between the employer/institution and students – the student as an employee; the ombudsman process
- Grievance procedures, monitoring satisfactory outcomes for all – e.g. what happens to funding? (progression)
- The rights of the supervisor need to be covered
- The responsibilities of research students
- Physical facilities and the adequacy of same are critical for the research student
- Monitoring completion rates and time to completion was identified as a high risk area
- Practice-based research degrees should also be referenced – all types referenced initially only as the professional degree descriptors can also apply to PhD
- Reference to ethical and professional standards – the research integrity statement could be referenced or adopted by the QQI guidelines as a direct reference. Alternatively, they could be included in a resource section – a clear inclusion should be established
- Reference to ESG 2015 would cover the student base without going into specific details

Feedback highlighted by agencies and policy organisations

The feedback included:

- A request for reference to scientific reproducibility, ‘best lab’ safety practice and additional reference to research integrity.
- Additional and more specific reference to ensure ‘scientific rigour is adhered to....’
- A request for the timeframe for the implementation of research QAGs across all institutions.
- Positive endorsement of the strong emphasis placed on openness and transparency and the clarity around the lifecycle of the research student.
- Positive feedback on the provisions for generic skills, including ethics, IP, commercialisation, research integrity, etc. among the other generic and transferable skills such as communication and grant management. Endorsement of individualised training plans for all PhD trainees/students, supervisory training, more collaboration among institutions regarding the recognition of credits when students move or attend different modules, joint supervision of students moving away from the more traditional relationship of supervisor and one student.
- Other detailed feedback received will be transferred into the proposed supplementary document on ‘good practice’.

QQI response

Although internal procedures appear to be well established by providers, the effectiveness of those procedures and monitoring of same was a significant consideration of the expert panel, following feedback from the range of stakeholders involved in research degrees programmes, particularly students, graduates and supervisors.

Overall the level of detail and prescription in the QA guidelines was reduced throughout. The guidelines no longer attempt to account for exceptions but expect providers to ensure procedures are in place, accessible and published. Appropriate references to the issues highlighted in the feedback from providers and other stakeholders were included in the final version issued for consultation from January to 20 February 2017. Additional information for those providers that are seeking more detail on best practice will be covered in the 'Code of Practice for Research Degrees'.

6. Next steps

The 'Good Practice Document' or 'Code of Practice' will be developed collaboratively with all HEIs providing research degrees. The process of development and collaboration will be led by Dr Lisa Looney, Dublin City University. This process commenced at the time of publication of this report. QQI will publish the collaborative document and formally adopt it as supplementary developmental guidance for HEIs. It will also be referenced as part of the QQI accreditation of those HEIs that require research programme accreditation. HEIs were consulted on this new approach and feedback was positive.

The final version of the topic-specific QA guidelines for providers of research degree programmes incorporating the changes set out in this document is now published on the QQI website.

The overall aim is that, for several years to come, the National Doctoral Framework, the Statutory QA Guidelines for Research Degrees and the Code of Good Practice will together form the basis of a shared vision for quality assurance of and quality enhancement of research degrees in Ireland.

Appendix 1

Names and representative organisations of those individuals who engaged in the consultation process:

Athlone Institute of Technology

Prof. Charles F. A. Bryce, Emeritus Professor, Edinburgh Napier University

The Department of Education and Skills

Dublin City University

Dublin Institute of Technology

Dundalk Institute of Technology

Enterprise Ireland

Griffith College

Health Research Board

Higher Education Authority

IBEC

Institute of Art Design and Technology, Dun Laoghaire

Institute of Technology Blanchardstown

Institute of Technology Carlow

Institute of Technology Tralee

Irish Research Council

Irish Universities Association

Mary Immaculate College

Maynooth University

National University of Ireland Galway

Royal College of Surgeons in Ireland

Royal Irish Academy

Science Foundation Ireland

SIPTU

Teagasc

Technological Higher Education Association

Trinity College Dublin, the University of Dublin

Union of Students in Ireland

University College Cork

University College Dublin

University of Limerick