



Response to QQI Consultation Documents 5th February 2016

1.1 Core Statutory Quality Assurance (QA) Guidelines White Paper

Trinity College Dublin, the University of Dublin welcomes the opportunity to provide feedback on the core statutory guidelines and the assurance that the European Standards Guidelines (ESG 2015) have been integrated as is evident in the eleven areas outlined in Section 2.

We acknowledge the statements in the introduction of the document that set the context for how the guidelines are to be used by previously existing universities as opposed to other providers. In particular, that universities are recognised as autonomous and are required to ‘have regard to’ rather than ‘give due regard to’ the guidelines or do not require QQI approval of their quality assurance procedures.

Trinity, as are all universities, is disappointed that QQI and the HEA have chosen to adopt a one-size-fits-all approach, which drives a focus on ‘performance’ and ‘reporting’ rather than on enhancement, which was the desired model by the majority of HEIs in earlier consultation on the Review of Reviews and indeed of the reviewers who conducted that review.

In terms of the elements on enhancement our preference is that these should be integrated into each section of the core statutory guidelines rather than primarily driven by acting on data and information as seen in section 2.8 and 2.11. We view quality enhancement as central to a quality culture and would welcome an increased focus on enhancement in sections 2.1.3 and 2.4.3, as well as recognition that enhancement has resource implications in terms of staff and systems development.

The White Paper represents a higher level of prescription expected of a ‘core’ document’ and Trinity, like other universities, would have preferred to see a different balance between the ‘core’ and ‘sector specific’ guidelines. The language in the body of the document, despite the assurances in the introduction, is of compliance and does not distinguish between designated awarding bodies and others, for example, it refers to ‘common requirements’ that do not currently pertain to designated awarding bodies:

- 2.8.5 ‘completion rates are collected, used and made available to QQI’;
- 2.10.3 ‘that the names of external panellists, examiners, authenticators and other external experts are made available to QQI’;
- 2.11.2 escalation of identified risks to QQI.

Trinity requests that in the final draft of the core statutory guidelines QQI addresses the lack of differentiation between ‘previous existing universities’ and other providers. This can be achieved by amending the content of ‘What Providers Must Do’ in Appendix 1 to clearly differentiate those parts of the Act that do not apply to ‘previous-existing universities’. This will ensure that external review panels are clear as to the level of compliance required for different institutions in the context of an institutional review.

The white paper does not provide sufficient clarity on what is expected of institutions in in order to comply with the legislation, for example:



- Referring to ‘Research activity’, it is not clear if the quality assurance guidelines apply to research programmes (NFQ L 9 and 10), for which we are anticipating a future set of guidelines, or institutional research carried out in institutes and centres. If it is the latter, it is our view that reports from the funding bodies on activities funded by them constitute a quality approval and this adhere to the externality principle (Principle 5 in the Policy on Quality Assurance Guidelines).
- In the area of key quality indicators and benchmarks (Section 2.3.3, 2.8.1 and 2.8.2), Trinity would welcome action by the HEA, as suggested in the letter of the 15th January 2016 and circulated at the Quality Officer Group on 24 January 2016, to provide clear and agreed data definitions as the basis of provision of reports that can be interpreted consistently across the sector. The HEA should work with providers to incorporate these into the HEA Data Upload with which we already engage. The data could be provided to QQI under the existing MOU between both agencies and be included in the profile information provided to review panels. This would streamline the effort on all parties to fulfil requirements.
- The White Paper makes several statements on the resource base required within HEIs to provide a sustainable quality assurance system, monitoring and continuous improvement planning. These statements need to be understood within the context of the current economic climate, the constraints of the Employment Control Framework, and the suspension of HEA Capital Grants, all of which continue to negatively impact on the business of the university and infrastructure projects. QQI need to define what is meant by an ‘acceptable threshold of quality’ in this context in which many of the ‘elements (that) work together to support learning’ (Section 2.5.4) are outside provider control.
- In areas across the University where ‘industry standards’ are applied such as ISO or in the IT Services ‘TickIT’, it would be sensible for the QQI to accept monitoring reports that align with these standards (Sect 2.5.4, 2.7.1 and 2.8.2).

1.2 Towards a White Paper- Sector Specific Guidelines for Designated Awarding Bodies

Trinity recognises that this document does not have a formal White Paper status at the time of consultation and welcomes the opportunity to provide feedback and to inform QQI of our needs, in particular in terms of our role as Designated Awarding Bodies (DABs).

Rather than repeat Trinity’s feedback above, I specifically refer to:

- the balance between the Core Statutory QA Guidelines and Sector Specific Guidelines for Designated Awarding Bodies;
- the incorporation of items that are not ‘common requirements’ for previously existing universities vis a vie other providers;
- clarity on the definition and differentiation of ‘research’ across institutional research activity and research programmes (L9 and L10 on the NFQ).

Trinity questions the content under Section 2 -Scope vis-à-vis what is stated in the Act. The QA Guidelines are in fact more prescriptive and constraining than the Act itself in defining what QA procedures should cover:



- regular periodic review of study programmes;
- quality reviews of academic, administrative and service departments and as appropriate in units such as schools, faculties and colleges; as well as
- thematic reviews of institution wide issues.

We ask that the content in the Scope be reconsidered to reflect the maturity of the Designated Awarding Bodies, who are in their third cycle of internal and external quality assurance. As autonomous institutions we would welcome the freedom to pursue reviews that are linked to strategy and enhancement rather than exhaust our limited resources conducting structured review of units as prescribed in the Guidelines. This would also benefit the embedding of a quality culture as it is seen as responsive to internal concerns as well as complying with external regulatory directives.

Trinity, like other universities, has specific concerns in relation to Quality Assurance of Linked Providers, which have increased as a result of a recent consultation held on 29 January 2016 by QQI.

- On page 1 of the Guidelines it states that “QQI is mindful of its own statutory responsibilities to provide QA guidelines directly to linked providers which it intends to do in consultation with designated awarding bodies”. On 29 January, attendees were informed that the QQI no longer intends to provide quality assurance guidelines directly to Linked Providers and that they saw this as the responsibility of individual designated awarding bodies. Trinity strongly advocates that QQI fulfil its original intention to provide QA Guidelines directly to linked providers. DABs will supplement the QQI Guidelines to reflect the different arrangements they may have with Linked Providers other than that as a validating body for programmes of education and training.
- Following the consultation event on the 29 January, Trinity would welcome clarification as to the point in time Trinity is recognised as being in a statutory arrangement with a Linked Provider under the Act for new and existing providers. In particular where the Designated Awarding Body has proceeded with an external quality review of a Linked Provider as a means to formally review and approve their quality assurance procedures rather than formally approving them prior to an external quality review, what is the status of that review under the QQI Act and at what stage does the Designated Awarding Body have authority to make directions under the Act?

1.3 Flexible and Distributed Learning

Trinity is grateful for the opportunity to provide feedback on the Flexible and Distributed Learning (FDL) Guidelines. Trinity has an Online Education Strategy and is committed to growing provision via this mode of delivery. We recognise the need to adapt systems, processes, regulations and supports for students studying distant or remote from the main campus, whether nationally or internationally, while at the same time wishing to avoid segregating our student population into cohorts of students on the basis of their mode of participation in education programmes.

The QQI are invited to consider the following issues/concerns that were identified as part of our consultation process on the FDL Guidelines.



- There is some concern over the term ‘Flexible and Distributed Learning’ in so far that upon initial reading of the document, it is not immediately clear that this includes e-learning, online learning and/or blended learning. The HEA use of the term ‘flexible’ for example includes part-time students. It is recommended that this term be reviewed in consultation with the stakeholders to ensure a shared understanding of the term.
- Overall, the guidelines are thorough, comprehensive, easy to follow and fit-for-purpose. The structure of the document is clear and follows a logical order from institutional responsibilities in best-practice FDL provision down to the learner experience.
- The guidelines clearly distinguish the need for policy development to address specific aspects of the online environment, however, we recommend that more research is conducted to include guidance on how to address:
 - authentication of learner identify in the context of submission of assessments in the online environment;
 - cyber bullying in the FDL environment;
 - managing and archiving formal or informal learning conversations between learners or learners and teaching
 - the conduct of *viva voce* for online students-face to face, videoconferencing, skype.

1.4 Sector Specific Quality Assurance Guidelines for Independent /Private Providers coming to QQI on a voluntary basis.

Trinity recognises the existence of recurring themes as set out in the Sector Specific Guidelines for Independent /Private Providers and those for Designated Awarding bodies. These Sector Specific Guidelines will further inform the development of procedures for quality reviews of our Linked Providers.

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