

## Department of Jobs, Enterprise and Innovation

Thanks for the opportunity to comment on the draft QA guidelines; QQI is to be commended for the open and consultative approach it has adopted in developing these guidelines.

*Innovation 2020*, the recently published national strategy for Research and Development, Science and Technology, sets out the clear ambition for Ireland to be among the innovation leaders in Europe and the adoption of uniform and rigorous QA processes across providers of training, education and research will make an important contribution to this national goal.

Ireland is an open economy which both benefits from, and is exposed, to international flows in investment and people. Therefore, the quality of Ireland's training, education and research is of paramount importance in maintaining Ireland's attractiveness for both commodities. The quality "brand" must be robustly protected. The guidelines should be mandatory for providers of training, education and research and be rigorously applied, with meaningful penalties for failures in compliance.

The guidelines should apply to all providers, both public and private. Failures in the private sector will be as detrimental to the national brand as failures in the public sector. All providers should be held to the same standard.

Two high-level observations on the documents.

- In relation to the **Policy on Quality Assurance Guidelines**, I believe that the Externality Principle should be strengthened to ensure that QA incorporates international bench-marking. Providers operate in a competitive, international market and in order to attract and retain the best students and researchers the quality of their offering must be in the top tier internationally.
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- In relation to the **Core Statutory Quality Assurance Guidelines**, I think that more detailed consideration should be given to the unique challenges of establishing QA processes for postgraduate *research* programmes. QA processes developed for education programmes are not appropriate for the less formal, and highly individualised nature of research programmes. This difficulty is compounded by the diversity of research programmes, ranging from research masters, to structured doctoral programmes, to traditional apprenticeship-type doctoral programmes.

I hope that these comments are helpful. Best wishes for the completion of the exercise.

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