



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

SECTION 4.10

Green Paper on Quality Assurance Guidelines

FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the content of this proposed Policy Document please use the *Questions and Comments* area which appears immediately after it.

PLEASE NOTE:

13 SEPTEMBER 2013

CLOSING DATE FOR SUBMISSIONS

SECTION 4.10

Green Paper on Quality Assurance Guidelines

4.10.1 Introduction

The purpose of this Green Paper is to explore issues and options relating to the issuing of Quality Assurance (QA) guidelines as required by the 2012 Act.

This paper will explore the approach towards the development of QA guidelines and the overarching model(s) for QA. This includes the balance of responsibility between QQI and the provider's responsible for establishing, re-establishing and continuously improving their own QA and the teaching and learning environment.

QQI's role will focus on establishing the overarching system (principles, criteria and guidelines) for QA. The Provider Lifecycle of Engagements model is intended to highlight providers' QA responsibilities together with the wider responsibilities of members of the national education and training community.

4.10.2 Rationale

The rationale for developing QA guidelines can be seen in QQI's legal obligations, the European context and the combined effect of the historical and transitional arrangements for QA guidelines that are being used by QQI currently.

4.10.2.1 Legislative Context

The 2012 Act sets out QQI's responsibilities with regard to QA guidelines:

- Issue guidelines for the establishment of procedures for quality assurance under section 28 (27 1a).
- Consult with relevant providers, HEA, FAS / Solas, awarding bodies and linked providers before issuing quality assurance guidelines (27 2).
- May vary quality assurance guidelines for different relevant or linked providers or groups of relevant or linked providers if required (27 6a).

- Publish the quality assurance guidelines in such form and manner as it thinks appropriate (27 7).
- Consult with the National University of Ireland, issue guidelines for the establishment of procedures by the National University of Ireland under section 32(2).

Hence there is a legislative requirement for QQI to issue QA Guidelines to which providers must have regard in establishing their own QA procedures.

4.10.2.2 European Context

At a European level, key policy directions with respect to QA in both vocational education and training (EQAVET) and higher education (ENQA) emphasise a quality culture for providers, underpinned by European-wide guidelines.

In the case of FET, the EQAVET guidelines are organised by way of the European Quality Assurance Reference Framework for VET. This is a European-wide system to help Member States and stakeholders to document, develop, monitor, evaluate and improve the effectiveness of their VET provision and quality management practices. It can be applied at both system and provider levels and can therefore be used to assess the efficiency of provision. It is intended to be used in accordance with national legislation and practice.

For HET common guidelines are organised by way of the ENQA Standards and Guidelines for Quality Assurance in the European Higher Education Area (revised 2009). The purpose of these standards and guidelines is to serve as a means of assisting and guiding both higher education institutions in developing their own quality assurance systems and agencies undertaking external quality assurance, as well as to contribute to a common frame of reference, which can be used by institutions and agencies alike. QQI is also bound by the council of Europe/UNESCO Guidelines on Cross-Border Higher Education.

The legacy agencies and the IHEQN, as members of European-level networks, devised an approach aimed at improving quality assurance at national level making best use of the European-level guidelines and ensuring compliance with them. QQI is fully committed to continuing this approach to the adoption of European guidelines.

4.10.2.3 Legacy Arrangements

QQI has inherited a range of guidelines and adopted codes of practice from the legacy agencies. There are many instances of overlap between the existing guidelines, which is

understandable given the similar remit for some of the legacy agencies, albeit for different sub-sectors of Education and Training. There are also significant gaps in the existing guidelines, given the new legislative platform for provider quality assurance procedures brought about by the 2012 legislation.

Legacy guidelines include:

- FET Awards Council:
 - Quality Assurance in Further Education & Training – Policy and Guidelines Version 1.3.
 - Quality Assurance in Assessment: Guidelines for Providers (2007).
 - Monitoring: Guidelines for Providers (2012).
 - Information for Learners: Guidelines for Providers.
 - Programme Validation Levels 1 and 2: Provider Guidelines (2008).
 - Guidelines for Preparing Programme Descriptors (levels 3 to 6) for Further Education and Training Programmes (2013).
- ACELS:
 - Certificate in English Language Teaching Handbook for Course Providers: Key Standards & Guidelines (2007).
- HET Awards Council:
 - Guidelines and Criteria for Quality Assurance Procedures, 2011.
 - Assessment and Standards (2009).
 - A range of supplementary guidelines for review, external examining, assessment and panels.
- IUQB/IUA:
 - Good Practice for the Approval, Monitoring and Periodic Review of Programmes and Awards (2012).
 - A Framework for Quality in Irish Universities: concerted action for institutional improvement (October 2007).
 - IUA/IUQB Institutional Review of Irish Universities Handbook, 2009.
 - A series of good practice guidelines for PhD programmes, programme review, strategic planning, research and student support services.
- NQAI:
 - External Quality Assurance Procedures.
- IHEQN:
 - A range of guidelines outlining common principles; Provision of education to international students; code of Practice.

4.10.2.4 Organisational Context

QQI policy on QA guidelines must fit within, complement and support the suite of QQI policies impacting on how providers are expected to carry out their functions. This policy is required to enable QQI to implement its statutory approval and review functions.

QQI considers that the role of the QA guidelines is, *inter alia*, to enable and/or facilitate all providers to establish and improve their own QA procedures and systems. This will allow them to monitor and control activities relating to the provision of education and training and to engage effectively with QQI for the duration of the Provider Lifecycle of Engagements (see Section 1.5).

4.10.3 Anticipated External Expectations

Up to now QA guidelines have a range of meanings and implications across the education and training landscapes. Exploration of the roles and functions of QA in education and training are complicated by the polarised positions adopted by proponents and critics of QA in education. For instance: For some QA guidelines are comprehensive and all-encompassing and embrace all virtually all activities including: finance, pedagogy, facilities and resources, recruitment, health and pastoral care, teaching, learning opportunities and environment, assessment, staff, organisation, planning, communications, and management. For others they are a narrowly defined reference point relating to programme design and associated regulation.

The implication of this is that some providers may optimise the use of QA guidelines as a developmental tool, while others might see them as an obligation under compliance.

4.10.3 Transitional Arrangements

This paper is primarily concerned with the QA guidelines to be developed and published as part of the QQI policy development process as opposed to transitional arrangements. However it is important to clarify the transitional arrangements as set out below.

All providers currently associated with QQI had previously been associated with one of the legacy bodies which amalgamated to form QQI. These providers are operating quality assurance procedures and systems developed and agreed using legacy body criteria and guidelines. The 2012 Act (section 84) ensures that these procedures continue in effect. Most providers of HET have undergone statutory reviews of the effectiveness of their QA procedures. QQI has launched a comprehensive review of the range of existing institutional review arrangements for HET¹. See Section 4.8 - Green Paper on Monitoring and Dialogue and Section 4.9 – Green Paper on Reviews for further discussion of QQI’s on-going engagement with providers who have previously established QA procedures.

4.10.3.1 Re-Engagement with Legacy Providers

See Section 4.14 – Green Paper on the Re-engagement with Legacy Providers and Future Access to QQI Awards for information on the approach that QQI will take to re-engagement with providers that previously had a relationship with the FET or HET Awards Councils, the NQAI or IUQB.

4.10.3.2 Provider Access to Accreditation

Providers who do not have any current association with QQI under legacy arrangements and who apply for programme accreditation must, as part of this process, submit quality assurance procedures for approval by QQI. See Section 2 – Green Paper on Provider Access to Accreditation for discussion of the issues and options relating to QA guidelines for this process.

4.10.4 QA Guidelines – Issues for Consideration

Issue 1 The Nature and Purpose of QA Guidelines

Providers are responsible for QA of the education and training they provide. While the 2012 Act requires QQI to develop guidelines and sets out the function as guiding the QA procedures but it does not prescribe the nature or overall purpose (and purposes) of those guidelines.

The following purposes might be considered:

- To communicate the overall expectations that the wider society has of the education and training system (or sub-systems).

¹ Information on this review can be found at: <http://www.qqi.ie/quality/pages/reviews.aspx>

- To promote coherence in the system (or sub-systems) of the education and training.
- To bring about efficiencies of scale by articulating a common model(s) for use by providers.
- To provide guidance and support to providers in the development of their programmes and provision.
- To provide benchmarks for reviews of effectiveness of providers' QA procedures.
- To furnish threshold criteria for providers to access QQI accreditation and to engage in other evaluative processes such as for the IEM.
- To prescribe detailed templates for the internal operational procedures for the governance, teaching, learning, assessment and learner support.

Q.4.10.a Is anything missing from this list?

Q.4.10.b Is there anything that shouldn't be on this list?

Q.4.10.c How can QA Guidelines remain a stable and effective basis for providers' QA procedures while reflecting the evolution of the education and training landscape and QA practices?

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Issue 2 The Scope and Variation of QA Guidelines

The scope of guidelines is determined to some extent by the legal requirements and the relevant European standards, guidelines and frameworks to which Ireland has subscribed.

The 2012 Act (28 4) requires that providers' procedures shall include:

- Periodic evaluation by providers and by current and former learners of the education, training, research and related services provided.
- Review by the provider of the application of QA procedures.
- Reporting and publication of the outcomes of the review and measures taken in response.

QQI's QA guidelines must address these. The legislation also requires QQI to issue various sets of guidelines for certain specific purposes. For instance, in the case of DABs the guidelines have to cover these bodies acting as QA bodies for linked providers. QA guidelines also have to address the extension of a relevant provider's QA procedures to the provision of education and training that the provider procures from other providers that do not have a relationship with QQI.

Arising from Ireland's European commitments, there are common principles and obligations which QQI must incorporate into QA guidelines:

- Seven Elements of the Part I: Internal Quality Assurance, European Standards and Guidelines for Quality Assurance for Higher Education.
- The ten indicators specified in the European Quality Assurance Framework for Vocational Education and Training (EQAVET).

Aside from these obligations and commitments, QQI needs to determine the scope of QA guidelines and questions arise about the extent to which they should apply across the education and training sub-systems.

The scope of QA guidelines may be determined by their purpose. QA guidelines that are finely detailed and prescriptive may be seen as serving a supportive purpose. QA guidelines that are principled and high-level may be seen as expressing subsidiarity and encouraging provider autonomy and responsibility.

It may be the case that QQI issues a variety of QA guidelines for distinct categories of providers, sectors of provision or groups within. As such the scope and number of QA guidelines issues by QQI is to be determined. Indicative examples of approaches to the number and scope of QA guidelines include:

- A single high-level set of guidelines.
- Multiple sets of high-level guidelines for different types of providers and purposes.
- A single set of detailed guidelines, covering all relationships to varying extents.
- Multiple sets of detailed guidelines, covering specific interactions between QQI and providers.
- A modular suite of QA guidelines to reflect diversity and the varying purposes that QA guidelines may have in education and training.

Q4.10.d Do you have any comments on the nature and scope of QA guidelines to be issued by QQI?

Q410.e What are the implications for a change in the scope of QA guidelines?

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Issue 3 Approach to Development

Responsibility for QA rests with each provider. Hence their involvement in the development and ownership of QA Guidelines is crucial. Providers are the entities tasked with the establishment and implementation of QA procedures relating to their own specific context and activity. Best practice indicates that it is more appropriate for development and ownership to occur from the bottom-up with extensive consultation with providers. Moreover there is a legal requirement on QQI to consult with statutory bodies responsible for publicly funded providers.

Q4.10.f What should be the status of the quality assurance guidelines and criteria issued by HETAC, FETAC and IUQB/IUA currently in use in the various sectors? Could they be used as the basis for establishing new QQI QA guidelines?

Q4.10.g Where is the balance of responsibility between QQI and providers for the development of QA guidelines?

Q4.10.h Are there representative structures in place for providers in the various groups of providers to effectively contribute to the development of QA guidelines? If not, how can QQI engage with individual providers?

Q4.10.i Does QQI require a mechanism for continuous or periodic updating of QA guidelines?

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Issue 4 Relationship between QA guidelines QQI's regulatory functions

QA guidelines are public statements by QQI which indicate the expected behaviour and norms for quality assurance that are signalled by the 2012 Act as expected from providers of education and training seeking access to QQI awards and other DABs in Ireland.

QQI has at least three relevant sets of regulatory functions:

- Provider access to Accreditation leading QQI Awards (see Section 2).
- Delegation of authority to make awards (See Section 4.1).
- IEM (See Section 4.4).

Q4.10.j For each of these functions, can QA guidelines serve as relevant criteria?

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Issue 5 Relationship between QA guidelines and other aspects of the Provider Lifecycle of Engagements

The QA guidelines will have to have regard to other aspects of the QQI policy suite. These include:

- Access, Transfer and Progression.
- Data.
- Certification.
- Information for learners.
- Protection for enrolled learners.

Q4.10.k What is the relationship between QA guidelines as set out in the 2012 Act and the policies currently under consideration in this comprehensive policy development programme?

[Click here or click on respective bookmark to respond >>](#)

Questions and Comments

ISSUE 1 - SPECIFIC CONSULTATION QUESTIONS

Q4.10.A Is anything missing from this list?

Q4.10.B Is there anything that shouldn't be on this list?

Q4.10.c How can QA Guidelines remain a stable and effective basis for providers' QA procedures while reflecting the evolution of the education and training landscape and QA practices?

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Questions and Comments

ISSUE 2 - SPECIFIC CONSULTATION QUESTIONS

Q4.10.D Do you have any comments on the nature and scope of QA guidelines to be issued by QQI?

Q4.10.E What are the implications for a change in the scope of QA guidelines?

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Questions and Comments

ISSUE 3 - SPECIFIC CONSULTATION QUESTIONS

- Q4.10.F** What should be the status of the quality assurance guidelines and criteria issued by HETAC, FETAC and IUQB/IUA currently in use in the various sectors? Could they be used as the basis for establishing new QQI QA guidelines?
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- Q4.10.G** Where is the balance of responsibility between QQI and providers for the development of QA guidelines?
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- Q4.10.H** Are there representative structures in place for providers in the various groups of providers to effectively contribute to the development of QA guidelines? If not, how can QQI engage with individual providers?
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- Q4.10.I** Does QQI require a mechanism for continuous or periodic updating of QA guidelines

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Questions and Comments

ISSUE 4 - SPECIFIC CONSULTATION QUESTION

Q4.10.j For each of these functions, can QA guidelines serve as relevant criteria?

ISSUE 5 - SPECIFIC CONSULTATION QUESTION

Q4.10.k What is the relationship between QA guidelines as set out in the 2012 Act and the policies currently under consideration in this comprehensive policy development programme?

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If other please describe here

Contact email address

If you are satisfied with your comments please send them to us now by clicking the *Submit* button below.

You can also give feedback to QQI at: consultation@qqi.ie

Thank you for your time!