# Policy on Monitoring

# Policy on Monitoring

# 1    SUMMARY

Quality and Qualifications Ireland (QQI) was established in November 2012 by the Qualifications and Quality Assurance (Education and Training) Act 2012 (the 2012 Act). The 2012 Act sets out the functions of QQI which includes monitoring of the landscape of qualifications and quality assurance (QA) in Ireland.

This document sets out the QQI policy approach to its monitoring function. Other QQI policies and processes support this policy document.

QQI policy is developed through a consultative process involving all stakeholders. Details of the policy development process are available on www.QQI.ie. QQI policy is adopted by the Board and implemented by the executive accordingly.

# 2    INTRODUCTION AND RATIONALE

This policy outlines the overarching organisational approach that QQI will take to monitoring the qualifications and QA landscape. It will set parameters for detailed guidelines and procedures for monitoring of education and training providers (ELT, FET and HET), as well as the QA guidelines that QQI issues under Section 27(1) of the 2012 Act. The principles underpinning QQI monitoring activity are both explicitly stated and embedded within this policy.

QQI's approach builds on past experiences of monitoring and the implementation of the 2012 Act.

 The aim of the policy is to provide the rationale and architecture for the general types of monitoring activity carried out by QQI. It explains:

•    What monitoring is and what types of monitoring take place

•    The overarching principles which apply to all types of monitoring.

# 3    LEGAL AND ORGANISATIONAL CONTEXT

The 2012 Act explicitly requires QQI to "monitor" a range of provider activities including:

•    The effectiveness of providers' QA procedures (Section 9(c))

•    Validated programmes including re-validation (Section 9(d))

•    Delegated authority (DA) to make awards (Section 9(f))

•    Implementation of providers' procedures for Access, Transfer and Progression (ATP) (Section 9(g)).

Providers are also required by the 2012 Act to provide QQI with data, reports and other documentation and information from time to time and on request by QQI.

The 2012 Act doesn't define monitoring or set out what monitoring should involve specifically. There is, however, an implicit obligation to monitor provider activities that

are associated with QQI services and other activities not listed specifically in the 2012 Act.

QQI is also committed[1] to:

· Being learner centred

· Supporting the enhancement of the quality of education and training

· Providing relevant, timely and comprehensive information to the public about the quality of education and training.

QQI monitoring works towards these strategic goals.

The experience of monitoring in QQI's predecessor organisations and the sectors they dealt with was varied. QQI's approach to monitoring will also vary between sectors and types of provider. Future QA guidelines (and other guidance) issued by QQI for specific types of provider and modes of provision will specify implications for monitoring.

# 4       POLICY

## 4.1     Monitoring

Providers are ultimately responsible for the quality of their provision; the implementation and evaluation of their own QA procedures; and on-going enhancement.

QQI monitoring is an external QA process that involves both routine and once-off evaluations, analyses, observations and recording of provider activities.

QQI's approach is underpinned by the principles that monitoring:

a)      Assists providers in demonstrating the effective implementation of their QA procedures

b)      Supports public confidence in the National Framework of Qualifications, the awards within it and the providers offering programmes leading to these

c)      Activities will be focussed on programmes leading to QQI awards, but not limited to them

d)      Provides a source of public information through the publication of the outcomes of monitoring

e)      May have positive and negative consequences for providers (some of which may be significant)

f)      Will involve engagement with other bodies (other agencies and government departments for example) and the sharing of information with these

g)      Provides public assurance and accountability where there is a cause for concern

h)      Provides opportunities for reflection and enhancement of quality.

1  For further details, see the QQI Strategy Statement 2014 - 2016.

Equally, monitoring is not:

- The statutory review of effectiveness of providers' QA procedures (under procedures Section 34 of the 2012 Act)

- A means for providers to implement their QA policies and procedures

- A means of actively policing the education and training landscape for corruption, incompetence or poor quality provision. This is a shared responsibility between all members of the education and training community.

The outcomes of monitoring may contribute to QQI's understanding of the effectiveness of a provider's QA procedures and their implementation as well as the quality of their provision more generally.

QQI will continue develop procedures and guidelines for types of provider and for different provider activities which will include implications for monitoring[2].

## 4.2    Types of Monitoring

QQI will monitor different types of providers in different ways depending on their scope and activity. There are broadly three types of monitoring.

### a)    Type 1- Provider Self-Monitoring

Provider Internal Review and Follow-up Activities Relating to Statutory Engagements

This type of monitoring is a shared responsibility between providers and QQI. Self-evaluation and reporting on QA by providers (as per their agreed/notified procedures) is key to QQI monitoring[3].

Statutory engagements between a provider and QQI; as set out in the provider's lifecycle of engagements; may generate conditions, recommendations and other actions for follow-up. Providers must internally review and follow-up on these (self-monitor) and then report on them to QQI.

In this way self-monitoring guides providers in demonstrating the effective implementation and enhancement of their QA procedures. It also helps QQI to provide public information on the quality of programmes and the standards of the awards that they lead to.

Failure on the part of a provider to internally monitor and report accordingly may lead to intervention by QQI, as a result of a cause for concern (See Type 3 on Monitoring Causes for Concern below).

Designated Awarding Bodies (DABs) and Institutions with DA – Dialogue and Engagement

Self-monitoring and reporting is also a responsibility of the institutions that can make their own awards (either under DA or as DABs). These institutions identify priorities for their QA activities and undergo review of effectiveness of their QA procedures by QQI. These priorities and review also generate actions for follow-up.

---

2  For more details see QQI Policy on Quality Assurance Guidelines [to be published]

3  The relevant QQI Quality Assurance Guidelines provide detailed guidance on the establishment of self-monitoring procedures

QQI engages with these institutions in Annual Dialogue Meetings and also receives Institutional Quality Reports, which provide information and engagement on institutional activities to do with QA.

### b)        Type 2 - Routine Information Provision

Providers are obliged (in different ways depending on their type and activity) to routinely provide information to QQI, including:

a)        Self-monitoring and follow-up reports (as outlined above)

b)        Information on system or sectoral QA instruments (external examiner and authenticator feedback for example)

c)        Information and statistical data relevant to the education and training system and for QQI's programmes and awards directory, such as:

- Details of changes affecting programmes leading to QQI awards

- Details of changes in the scope of provision of the provider[4]

- Details of arrangements for the Protection of Enrolled Learners[5] and Access, Transfer and Progression

d)        Incidents or risk factors which may affect learners, or the approval of QA procedures (for example: breaches of the 2012 Act (or any other law), financial Issues, capacity issues impending media disclosures etc. that may relate to academic quality) and constitute a cause for concern and which may trigger direct intervention by QQI.

Providers' specific information provision requirements will be explained in the provider's lifecycle of engagements. If a provider fails to provide routine information to QQI or information that may be considered a cause for concern.

### Provision of Public Information

Providers are obliged to provide certain public information as well. The outcomes of QQI monitoring may also be made public. This information may be used by QQI (possibly in collaboration with other bodies) to create system level reports and analyses which will lead to enhancements for the education and training system.

Monitoring of this nature helps to track QA implementation and identify any difficulties being encountered by learners, providers or other stakeholders. It may also highlight potential problems before they become serious national issues.

The availability of good quality data from providers is essential to enable QQI to carry out its monitoring functions effectively.

### Sharing and Using Provider Information – QQI, Providers and Third Parties

QQI will share and make use of publicly available information coming from engagements (statutory and non-statutory) that providers have with other bodies

---

(agencies, funders, government departments etc.) as well as with QQI.

Where QQI and a third party have relevant non-public information about a provider, the sharing (or not) of this information will be governed by data protection and freedom of information law and national policy on sharing of information.

QQI will work to reduce the burden on providers to provide data to state agencies and also to ensure the efficient use of this data and information once collected.

## c)     Type 3 - Causes for Concern

QQI may become aware of causes for concern about a provider. Causes for concern may include (but are not limited to):

- Failure by a provider to effectively implement QA procedures as agreed/notified with QQI

- Failure by a provider to meet the expectations set out in their provider lifecycle of engagements

- Concerns regarding the quality of education and training provision and standards attained by learners

- Failure by a provider to follow-up on conditions and recommendations arising from statutory engagements

- Breach by a provider of the terms of the 2012 Act, or other law.

Causes for concern may arise from Type 2 monitoring – routine information provision (outlined above) or otherwise. This may include:

- Complaints made by learners, or third parties

- Concerns raised by another agency or body (notwithstanding data protection law)

- Protected disclosures[6] by employees of a provider

In relation to causes for concern whether complaints, concerns or protected disclosures, QQI will:

- Seek to establish the veracity of the cause for concern

- Investigate the cause for concern

- Protect the confidentiality of the source of the cause (where possible and appropriate)

 If a cause for concern is a legitimate one, QQI will begin a series of engagements with the provider to address the issue.

---

6  *For more details see the Protected Disclosures Act 2014*

### 4.3 Consequences of Monitoring

The outcomes of all QQI monitoring activities may be published, including the provider's response.

It is expected that monitoring will, in general, result in positive and enhancement oriented actions by providers and QQI, arising from provider self-monitoring. QQI expects that monitoring will contribute to the dissemination of effective practice throughout Irish education and training.

Follow-up actions and outcomes arising from monitoring will depend on the circumstances and the relationship between QQI and the provider and their activity.

Possible consequences include (but are not limited to):

a) The provider undertaking a self-evaluation using independent peer review

b) The imposition of additional conditions on a provider

c) Re-validation of a programme

d) A requirement to provide additional information to QQI

e) Revision of the provider's lifecycle of engagements

f) Withdrawal of programme validation

g) Withholding of learner certification

h) Initiation of a statutory review under the 2012 Act

i) Withdrawal of authorisation to use the IEM

j) Withdrawal of DA

k) Withdrawal of recognition of awards within the National Framework of Qualifications

l) A moratorium on further access to QQI services (for example, validation of new programmes).

### 4.4 Guidelines

QQI's Quality Assurance Guidelines provide detailed guidance and outline procedures to guide providers in their obligations under this monitoring policy.

Further advice in relation to specific processes and QQI functions and how they relate to monitoring is available on QQI's website in relation to specific functions.

### 5 REVIEW OF THIS POLICY

This policy and QQI's principles and approach to monitoring will be reviewed two years after the option of this policy, or earlier if necessary.
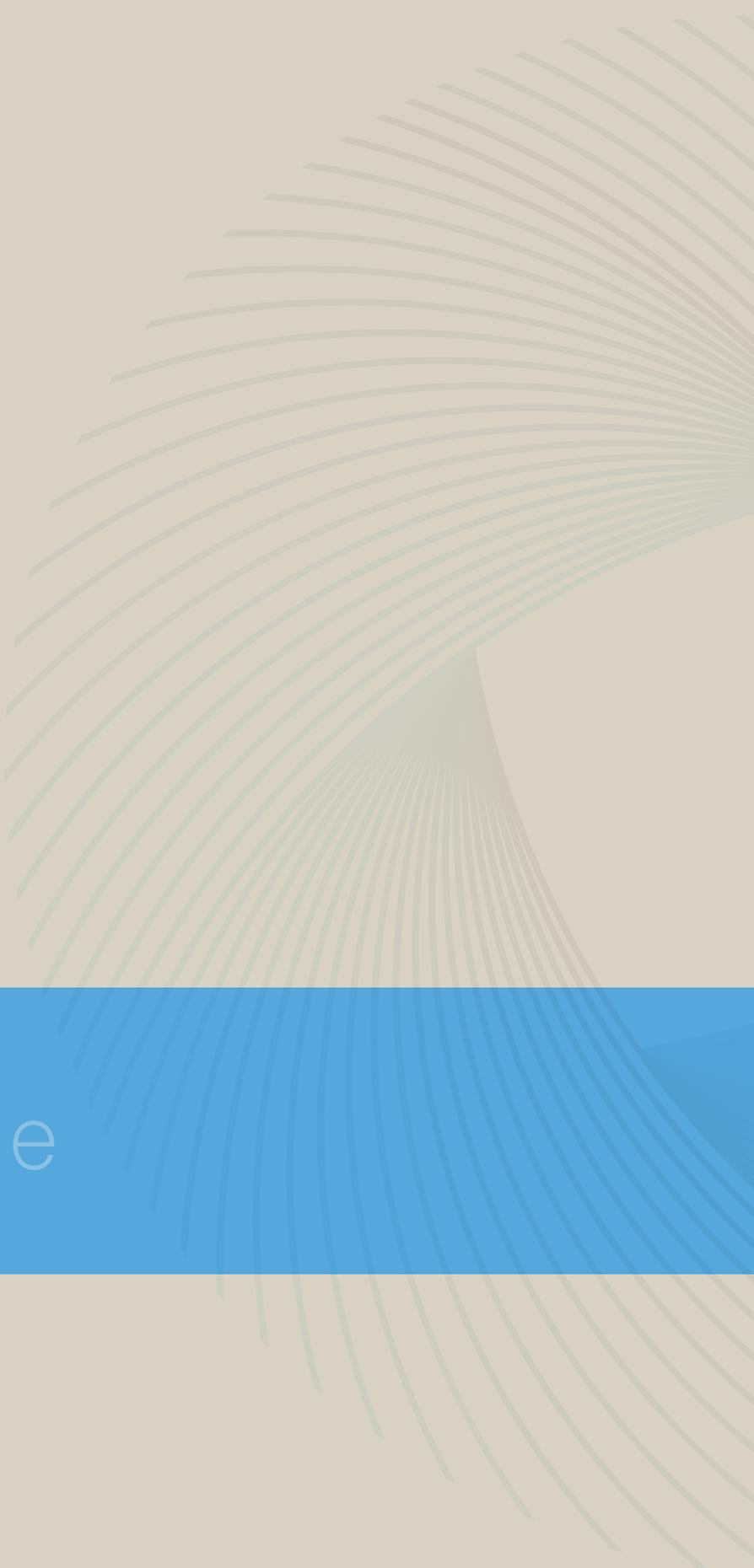
## NOTES

www.QQI.ie

26/27 Denzille Lane,
Dublin 2,
Ireland.
t +353 (0) 1 905 8100