

Submission to the Joint Committee on Education, Further Education and
Higher Education, Research, Innovation and Science
in relation to its examination of the Future Funding of Higher Education

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QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Adding Value to Qualifications

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INTRODUCTION

Quality and Qualifications Ireland (QQI) welcomes the opportunity to make a brief submission to the Joint Committee on Education, Further and Higher Education, Research, Innovation and Science as part of the Committee's examination of the Future Funding of Higher Education. In line with the invitation to make a submission, we focus on those areas that most concern our work in quality assurance and qualifications, as follows:

- I. Future Funding of Higher Education in general
- II. Future Expansion of the Technological Universities
- III. Future Expansion of Craft Apprenticeships and New Generation Apprenticeships
- IV. Access, Diversity and Inclusion to include Digital Learning and Student Grant Support
- V. Life-Long Learning, Progression Pathways and Continuous Professional Development (CPD) to support staff
- VI. Research, Innovation and Engagement

Our submission is informed by our role as the state agency responsible for promoting the quality, integrity and reputation of Ireland's further and higher education system. We work with stakeholders in further and higher education (public and private), funding agencies, professional regulatory bodies, and the Department of Further and Higher Education, Research, Innovation and Science.



EXECUTIVE SUMMARY

This submission makes the following key points:

1. The overall level of funding of higher education institutions impacts the quality of teaching, learning and research. Institutions have maintained a commitment to quality despite financial constraints. The design of the funding model impacts teaching and learning, assessment, research, the development of programmes and the learner experience. It impacts the diversity of institutional offerings and profile, their collaboration and engagement, including their offers at different levels of the National Framework of Qualifications. This is particularly important for the newly established Technological Universities.
2. The quality assurance system demonstrates confidence in the quality of teaching, learning, assessment and research. It provided the infrastructure to enable the rapid shift to online and blended methods in the Covid 19 pandemic whilst maintaining the value of qualifications and the reputation of higher education.
3. Targeted funding initiatives, such as for teaching and learning, and dedicated funding programmes like Springboard and the Human Capital Initiative effect behaviour and change. ***QQI recommends that seed funding be provided to support academic integrity as it comes increasingly under pressure from the activities of contract cheating services (also known as essay mills).***
4. QQI undertakes specific pieces of work to develop new apprenticeships and ensure that they are of high quality; provides information on learner pathways; supports the Recognition of Prior Learning. Our work on the National Framework of Qualifications (NFQ) provides the backbone for the articulation, communication and recognition of qualifications, at home and abroad.



MAIN POINTS

I. Future funding of higher education

1. QQI's work on quality assurance and qualifications with higher education institutions, public and private, funding bodies, regulatory bodies and the Department of Further and Higher Education, Research, Innovation and Science, shows the impact of public funding on teaching and learning, assessment, research, the development of programmes and the learner experience. Whilst the relationship between funding and quality is not linear, broad effects can be seen. For example, in 2015, QQI commissioned an external expert to analyse the published quality review reports of academic departments, schools and programmes in the universities and institutes of technology. The analysis focussed specifically on commentary in over 90 institutional reports on any perceived impact on the quality of teaching and learning because of the reduced public funding available to the institutions, in the period of austerity, 2008-15.
2. The resulting report, ***Quality in an Era of Diminishing Resources Report*** (2016)¹ found that reduced funding, coupled with the Employment Control Framework and increases in student numbers, impacted areas of staffing (reduced numbers, increased workload), reduced promotion and staff development opportunities, and increasing tension between time spent on teaching and on research. It also impacted the quality of the teaching and learning offering, and environment (facilities, equipment, IT infrastructure and library resources). Some reports indicated that units had reached a 'tipping point' where continued cuts/reductions could have serious implications for their sustainability. At the same time, the institutions retained their commitment to enhance the learner experience and the continued commitment of staff to rationalise, innovate and minimise the impact of reduced resources on students.
3. QQI's ***Quality in Irish Higher Education 2020***², a synthesis of 20 annual institutional quality assurance reports from the public higher education institutions and the National University of Ireland, shows that

'Financial constraints remained a concern across the sector, with reference in several reports to the difficulties caused by reduced funding from the state. For example, one submission alluded to references in quality review reports produced during the reporting period to the impact of continued reductions in funding, while another pointed out that a reduced capacity to make improvements to physical resources has led to a corresponding reduction in the space available to students.'

¹ [Quality in an Era of Diminishing Resources Report \(FINAL March 2016\).pdf \(qqi.ie\)](#)

² [QQI Insights Quality in Irish Higher Education 2020.pdf](#)



However, although funding restrictions and reductions did in some cases lead to the need to reduce both investment in physical infrastructure and staff resourcing (despite a frequent growth in HE enrolments), institutions nonetheless proved themselves resourceful and innovative in sourcing alternative streams of revenue and allocating existing revenue’ (p.15). The individual institutional reports³ provide detail on these.

4. The institutional reports show clearly that institutions respond to financial incentives. This signals the importance of targeted funding to delivering specific objectives within and between institutions. For example, specific funding initiatives have, at various times, facilitated the appointment of quality officers in higher education institutions, the development of NStEP (the National Student Engagement Programme), and the National Forum for the Enhancement of Teaching and Learning in Higher Education. Looking ahead, based on QQI’s work and legislative responsibility for academic integrity, there is a need to provide financial support for academic integrity and the work of the National Academic Integrity Network (NAIN)⁴, particularly in the context of remote and blended learning and assessment. Beyond these initiatives, the higher education institutions have responded positively to funding programmes like Springboard and the Human Capital Initiative. These have driven innovation, the development of programmes and initiatives to promote upskilling, access, equality, diversity and inclusion.
5. The individual institutional quality reports confirm their dedication to maintaining and enhancing quality of provision in the areas of research, teaching, learning and assessment, both individually and collaboratively, with sectoral, industry and community partners.
6. This dedication was also manifest in their individual and collective responses to swiftly shift to blended and online teaching, learning and assessment in the Covid pandemic. This shift is captured in the 2020 report, ***The impact of Covid-19 modifications to Teaching, Learning and Assessment in Irish Further Education and Higher Education***⁵. This shift, whilst safeguarding

³ Annual Institutional Quality Reports available at **Quality and Monitoring Review Reports | Quality and Qualifications Ireland (qqi.ie)**. For example, University of Limerick cites impacts on number of research staff and difficulties in attracting talented researchers [university-of-limerick-cinnte-quality-report-2020.pdf \(qqi.ie\)](#) p.20; UCD reports that *‘It has achieved improvements in student satisfaction; research quality, quantity and impact; student-faculty ratio and gender equality. Notable achievements have been made in the area of engagement. These achievements... were enabled by the development of non-exchequer income* (p.84) [ucd-annual-quality-report-2021.pdf \(qqi.ie\)](#)

⁴ National Academic Integrity Network | Quality and Qualifications Ireland (qqi.ie)

⁵ The Impact of COVID-19 Modifications to Teaching, Learning and Assessment in Irish Further Education.pdf (qqi.ie)



standards and the reputation of higher education, leveraged the quality assurance infrastructure to guide and decide the necessary changes. Critically, for learners, funders and employers, the quality assurance system was able to demonstrate confidence in those changes. The value of decades-long investment in developing learning outcomes enabled institutions to guide the switch to alternative teaching and assessment arrangements whilst maintaining a focus on those outcomes, and ultimately the value of qualifications. This and the outcomes of the 2020 annual dialogue meetings with each public higher education institution, is reported on the ***QQI Insight on Higher Education Quality and Qualifications 2021***⁶. QQI expects that the impact and evaluation of institutional and collaborative responses will be detailed in the next set of annual institutional reports (to be completed in 2022).

II. Future Expansion of the Technological Universities

7. Public funding to pave the way for technological universities has been essential to their development. It is important that the future funding model for higher education enables them deliver their diverse missions (set in the Technological Universities Act, 2018, section 19) to ‘reflect the needs of individuals, business, enterprise, the professions, the community, local interests and other stakeholders’ in their regions; and to promote the involvement of those same stakeholders in the design and delivery of their programmes. The EUA report on the implementation of the national framework for Doctoral Education in Ireland (below at 15), noted that some ‘interviewees from the IoTs were concerned about the knock-on effect on teaching as the institutes increase PGR (postgraduate) enrolment. They are aware that the funding model, the staff contracts and institutional quality enhancement and quality assurance (QE and QA) arrangements should be reviewed to ensure that they are supporting the TU aspirations. Concerns were expressed that the TU development might add to already existing funding pressures in the higher education sector. Ireland’s core funding model is based on student numbers, which encourages institutions to grow their enrolment, but within a fixed envelope’ (p.7).
8. QQI assists the technological universities to develop their own identifies through our institutional reviews of designated Technological Universities within eighteen months of their designation.

III. Future Expansion of Craft Apprenticeships and New Generation Apprenticeships

9. QQI has facilitated government policy to launch new apprenticeships (in new areas, involving new collaboration amongst providers, employers, awarding bodies and funders and new qualifications) by developing specific quality assurance guidelines and awards standards with stakeholders and the Apprenticeship Council. This enabled the establishment of 37 consortia-led apprenticeships by October 2021. The guidelines and standards serve to give assurance that

⁶ [qqi-insight-on-higher-education.pdf](#)



the apprenticeships safeguard public and employer investment, the quality of the apprentice experience and the qualifications attained. In line with its commitments under the **Action Plan for Apprenticeships 2021-2025**,⁷ QQI is undertaking a comprehensive review of the quality assurance, governance arrangements and processes for the consortia-led apprenticeships⁸. This will inform their future development to ensure the best possible outcomes for apprentices.

IV. Access, Diversity and Inclusion to include Digital Learning and Student Grant Support

IV. Life-Long Learning, Progression Pathways and Continuous Professional Development (CPD) to support staff

10. The main role of QQI in relation to the above areas concerns access, transfer and progression, providing information on pathways across and between providers and institutions in further and higher education, and work on the National Framework of Qualifications (NFQ) which provides the backbone for the articulation, communication and recognition of qualifications, at home and abroad.
11. The access, transfer and progression arrangements of higher education institutions are reviewed as part of the institutional review process⁹ and are reported in the annual institutional reports to QQI. QQI is also supporting efforts to develop the Recognition of Prior Learning (RPL) and common approaches to it across the system.
12. As indicated at 4 above, **QQI RECOMMENDS that public funding be provided to support academic integrity as it comes increasingly under pressure from the activities of contract cheating services (also known as essay mills)**. Precisely, such funding has been provided to the Australian quality assurance agency, Tertiary Education Quality and Standards Agency (TEQSA).
13. The availability of funding to maintain and develop the qualifications system, comprising multiple actors, is critical to who develops and provides programmes and qualifications and to access for learners. Public funding of NFQ Level 6 programmes has a critical bearing on diversity and volume of programmes in higher education, pathways within and between further and higher education and collaboration between different colleges and institutions. Funding incentives have contributed to the decline in both demand for and the offer of Level 6 programmes in the technological university sector. Future funding needs to reflect policy choices about provision and pathways. In this regard, the QQI commissioned review of the (NFQ) Level 6 Advanced Certificate, offered in the Further Education and Training sector, and the Higher Certificate,

⁷ <https://assets.gov.ie/132640/00c012f4-531c-4578-b8bb-179db4351939.pdf>

⁸ [Microsoft Word - 2021-10-29 List of Apprenticeships as of Oct 19](#)

⁹ See **Quality and Monitoring Review Reports | Quality and Qualifications Ireland (qqi.ie)**



offered in the Higher Education sector, finds that although different these qualifications are broadly comparable, may inform these policy choices. This report will be published in 2022.

14. On student grant support, it is noted that students enrolled in private higher education institutions are not eligible for SUSI grants, even though these awards are validated and made by QQI, a State awarding body. This merits consideration in terms of the overall policy on private higher education, including access by them, and learners, to targeted funding initiatives such as Springboard and their place in the Higher Education Authority reform legislation.

VII. *Research, Innovation and Engagement*

15. QQI's work on research and engagement areas has focused on their quality assurance dimension. The institutional quality assurance reviews and reports capture research and engagement. QI jointly commissioned research on ***The National framework for doctoral education: report on its implementation by Irish Higher Education Institutions (2021)***¹⁰ notes that the State only introduced a core funding allocation for research to technological institutions in 2019, and that this, plus the lack of a national agreement on the academic staff workload and other anomalies, impacts their research capacity and collaboration. Also, the earlier ***Report of Expert Panel on the Quality Assurance of Research Degree Programmes in Irish Higher Education Institutions (2017)***¹¹ recommended that, *in recognition of the present diversity among Irish HEIs with respect to their capacities to host research degree programmes, Government and the HEA should act to ensure that all HEIs with the authority to operate research degree programmes have the conditions and resources necessary for their continued operation* (in accordance with statutory quality assurance guidelines) (p.44).

¹⁰ [national-framework-for-doctoral-education-implementation-report_0.pdf \(qqi.ie\)](#)

¹¹ [Expert Panel Higher Education Research Report.pdf \(qqi.ie\)](#)