

Quality and Qualifications Ireland  
**Review of Reviews**

Report of the  
Independent Review Team

March 2014



**QFI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann



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# Introduction

## Background

1. This is the report of an independent review team commissioned by Quality and Qualifications Ireland (QQI). The task entrusted to the team was to analyse the strengths, weaknesses, impacts and other features of the higher education institutional review processes used by the three higher education organisations (the 'legacy organisations') that were incorporated into QQI following its foundation in November 2012. The team was also asked for its views on possible future approaches to institutional review, taking into account the current legislative obligations and strategic intentions of QQI. The full terms of reference of the Review can be found at [www.QQI.ie](http://www.QQI.ie)

## Membership

2. The independent review team comprised Mr Peter Williams CBE, former Chief Executive of the Quality Assurance Agency for Higher Education (QAA), UK and former President of the European Association for Quality Assurance in Higher Education (ENQA) - Chair; Dr Judith Eaton, President of the Council for Higher Education Accreditation (CHEA), USA; and Dr Pedro Teixeira, Director of the Centro de Investigação de Políticas de Ensino Superior (CIPES) and Professor of Economics, University of Porto, Portugal – Co-ordinating Reviewer.

## Scope

3. Until late 2012, when the Qualifications and Quality Assurance Act 2012 established a new integrated agency, QQI, responsibility for the external review of the quality and standards of Irish higher education institutions and awards rested with three organisations, set up as a result of various pieces of earlier legislation. The present review was concerned with the institutional review processes used by those organisations:
  - The Irish Universities Quality Board (IUQB)
  - The Higher Education Training and Awards Council (HETAC)
  - The National Qualifications Authority of Ireland (NQAI).

## Approach

4. The team undertook its task by combining interviews with key players who had been involved with the institutional reviews in one capacity or another, and a desk-based examination of relevant documentation. This documentation comprised the legislation, together with the regulatory and guidance documents prepared by the three organisations, and the institutional review reports published by them. Those interviewed by the team had either participated in the development, management and operation of the various processes, or had experienced them in their capacity as members of institutions that had been reviewed, or had roles representing the interests of the various further and higher education sub-sectors. In some cases, interviewees had been involved with institutional review in more than one of these capacities. A list of those interviewed is shown in the Appendix.

5. In addition, and at the team's request, QQI circulated to all institutions that had been subject to institutional reviews, and to those who had participated in the processes as reviewers, review secretaries or co-ordinators, a questionnaire containing the following five questions:
  - Describe the features of past reviews that were most and least helpful to you.
  - What concerns you most about the future of quality and quality assurance in Irish higher education?
  - What, in your view, are the main obstacles to improving the quality of Irish higher education?
  - What features should a new review system include to best serve the quality of Irish higher education?
  - What outcomes would you like to see from the Review of Reviews?
6. These questions formed the framework underpinning the team's enquiries and provided opportunities for respondents to offer their views on both the past and the future of institutional reviews. The responses received, both in writing and in the course of the interviews, were candid, invariably constructive and thoughtful and indicated a high level of engagement with the complex questions surrounding quality assurance in Irish higher education.
7. In total, the review team met 66 people representing the 7 universities, 14 institutes of technology, 11 independent institutions and 10 other organisations. The team is very grateful to all those it met for taking the time to discuss their experiences and thoughts on the institutional review processes.

### **Structure of the report**

8. The report is in two parts. The first part is a comparative description and analysis of the legacy institutional review processes, highlighting their common and disparate elements, and their strengths, weaknesses, limitations and impacts. The second part offers a set of scenarios for possible future institutional reviews, based on various options relating to their purpose, intensity, desired outcomes and available resources and drawing on the experience of the legacy processes.
9. The review team has assumed that the primary audiences for the report will be QQI, as the commissioning agent; all Irish higher education institutions; and other organisations and individuals involved in the planning, development and funding of Irish HE. It hopes, however, that it may also be of interest to a wider audience with a concern for quality and standards in higher education.

### **Acknowledgement**

10. The team could not have undertaken its task without the excellent and unstinting support provided to it by the staff of QQI, in particular Orla Lynch, Karena Maguire, Carmel Kelly, Wendy Mathews and Janet Cawley, for which it is very grateful.

# The Review Team

## Chairperson:

**Mr Peter Williams** is a graduate in English from the University of Exeter. Following a brief spell as a management trainee with the British Printing Corporation, and three years in the Registry of the University of Surrey, he moved in 1974 to the University of Leicester, where he was in charge of the Higher Degrees Office. In 1978 he was promoted to Assistant Registrar in the Medical School, becoming Secretary of the School in 1982. From 1984 until 1990, he was the Deputy Secretary of the British Academy. In 1990, Peter was appointed as the first (and only) Director of the CVCP Academic Audit Unit (AAU), one of the first quality assurance agencies, and between 1992 and 1997 was the Director of the Quality Assurance Group of the Higher Education Quality Council (HEQC), which took over the responsibilities of the AAU. In August 1997, Peter became the Director of Institutional Review in the Quality Assurance Agency for Higher Education (QAA), which was formed by a merger of HEQC and the quality assessment divisions of the UK's higher education funding councils. In August 2001, he additionally took on the role of Acting Chief Executive. In March 2002 he was appointed Chief Executive of QAA. Peter retired as Chief Executive at the end of September 2009.



In addition to his work in the UK, Peter has made presentations and participated in a number of international quality assurance projects in Albania, Argentina, Australia, Azerbaijan, Belgium, Bulgaria, Canada, China, Cyprus, Denmark, Egypt, Finland, France, Germany, Greece, Hong Kong, India, Ireland, Italy, Japan, Korea, Lithuania, The Netherlands, New Zealand, Norway, Poland, Portugal, Qatar, Romania, Saudi Arabia, South Africa, Spain, Sweden, Switzerland and the USA. In 2004-2005 Peter was a Vice-President, and between 2005 and 2008 served as the President, of the European Association for Quality Assurance in Higher Education (ENQA) and represented ENQA on the Bologna Process Follow-Up Group (BFUG). During his time with ENQA, he was one of the principal authors of the European Standards and Guidelines for Quality Assurance in Higher Education.

Peter is currently Chair of the British Accreditation Council for Independent Further and Higher Education, Vice-Chair of the Board of Governors of Cardiff Metropolitan University and Chair of the Board of Academic Advisers and a Trustee of Richmond The American International University in London; he is also a member of the Education Honours Committee. In December 2011, he was appointed Chair of the Accreditation Review Committee of the National Council for Academic Accreditation and Assessment (NCAAA) of the Kingdom of Saudi Arabia. In addition, Peter acts as an independent consultant and undertakes reviews of higher education institutions and quality assurance agencies.

Peter holds honorary Doctorates of Laws from the University of Leicester and HETAC, an honorary PhD from the University of Gloucestershire and is a Fellow of the University of Worcester and an honorary Fellow of the College of Teachers. He is also a Fellow of the Royal Society of Arts, and currently the Upper Warden of the Company of Educators. In June 2009, he was appointed as a Commander of the Order of the British Empire (CBE) in the Queen's Birthday honours list in recognition of his services to higher education.

**Dr Judith S. Eaton** is President of the Council for Higher Education Accreditation (CHEA), the largest institutional higher education membership organization in the United States. A national advocate and institutional voice for self-regulation of academic quality through accreditation, CHEA is an association of 3,000 degree-granting colleges and universities.



CHEA works with the presidents and chief academic officers of colleges and universities, accreditors, policy makers and higher education leaders around the world, providing authoritative information and leadership on issues related to accreditation and quality assurance, the federal government-accreditation relationship and enhancing public confidence in accreditation. CHEA is the only private sector body in the United States that “recognizes” U.S. institutional and programmatic accreditors for quality, scrutinizing these organizations and affirming that they meet CHEA’s quality standards. At present, 60 accreditors are CHEA-recognized.

Prior to her work at CHEA, Judith served as chancellor of the Minnesota State Colleges and Universities, where she was responsible for leadership and co-ordination of 32 institutions serving more than 162,000 students statewide. Previously, she was President of the Council for Aid to Education, Community College of Philadelphia and the Community College of Southern Nevada, and served as Vice-President of the American Council on Education. She also has held full- and part-time teaching positions at Columbia University, the University of Michigan and Wayne State University. A sought-after speaker on higher education issues both in the United States and internationally, Judith currently serves on a range of boards and has authored numerous books and articles on higher education and accreditation topics.

### Co-ordinating Reviewer:

**Dr Pedro Teixeira** is Associate Professor at the Department of Economics (University of Porto) and Director of CIPES (Centre of Research on Higher Education Policy). He holds a PhD in Economics (Exeter University, UK), a Masters in the Economics of Higher Education at CHEPS (University of Twente, The Netherlands), and a BA in Economics (University of Porto, Portugal).



His research interests focus on the economics of higher education, notably on markets and privatisation, and the development of human capital as a research program. Pedro is the author of “Jacob Mincer - A Founding Father of Modern Labour Economics” (Oxford UP, 2007), which was awarded two prizes, including the Best Book Prize by the European Society of History of Economic Thought. He has also co-edited the following volumes: “Markets in Higher Education - Reality or Rhetoric?” (Kluwer, 2004), “Cost-Sharing and Accessibility in Higher Education - A Fairer Deal?” (Springer, 2006), “Public Vices, Private Virtues? Assessing the Effects of Marketization in Higher Education” (Sense, 2011), and “Reforming Higher Education: Public Policy Design and Implementation” (Springer, 2013). He has also published several articles and book chapters on the history of economic thought and on the economics of higher education.

Pedro is a member of the Panel of Experts of the Institutional Evaluation Program (EUA) since 2005 and has participated in institutional and program evaluations in Italy, Spain, Colombia, Portugal and Romania. He is a member of the panel of experts appointed by the Ministry of Education (Portugal) to the external assessment of schools. He holds several editorial responsibilities, including being a member of the Editorial Board of Higher Education, the European Journal of Higher Education, and the Journal of the European Higher Education Area. Pedro is a member of the Board of CHER – The Consortium of Higher Education Researchers (since 2007) and of RESUP – The French Network of Higher Education Researchers (since 2007). He is an IZA Research Fellow (since 2003) and a PROPHE Associated Researcher (since 2004). He was Visiting Researcher at Centre for Higher Education Studies of UC-Berkeley (2005), Visiting Professor at SUNY- Albany (2006) and Visiting Fellow at Oxford University (2011-2013).



# Part 1

## The Legacy Reviews

# The University Sector

### The 2004-2005 IUQB/EUA institutional evaluations

11. While the historic autonomy of the universities for the quality and standards of their own awards has always been recognised and generally respected in Ireland, Section 35 of the Universities Act 1997 imposed upon the universities a new, formal, responsibility to undertake independent evaluations of the effectiveness of their quality processes. After a gap of five years, the universities established in 2002 the Irish Universities Quality Board (IUQB) to 'support and promote a culture of quality in Irish higher education and independently evaluate the effectiveness of quality processes in Irish universities'.
12. In 2003 the Conference of Heads of Irish Universities (CHIU) published a Framework for Quality in Irish Universities<sup>1</sup> which included detailed proposals for the establishment of a common approach to the independent evaluations, together with a brief acknowledgement of the need to co-operate with the Higher Education Authority (HEA)<sup>2</sup> in establishing an external review process. After a further year, the IUQB, jointly with the HEA, commissioned the European Universities Association (EUA) to undertake a series of institutional reviews of all the Irish universities, using a version of EUA's well-established Institutional Evaluation Process (IEP). At the same time the HEA established a 'high level reference panel' comprised of persons from outside the university sector, which was tasked with producing a 'reflections document' on quality assurance in the Irish universities.
13. The IEP was originally envisaged as a developmental audit process, designed to give university leaders a candid and objective view of the strengths and weaknesses of their institutions. It focused on high-level strategic objectives, and while it did examine management structures and mechanisms, it was not intended to assess specifically or in detail the quality assurance arrangements operating at all levels or to offer a judgement on the comparative standards of awards amongst the universities. The reviews were undertaken by international panels of senior institutional leaders, typically rectors or vice-rectors of universities.
14. For the IUQB's evaluations, EUA used a tailored version of the IEP, which looked at the following aspects:
  - Design and planning of existing internal quality processes,
  - Effectiveness of internal quality processes,
  - Relevance of internal quality processes and degree to which their outcomes are used in decision-making and strategic planning,
  - Perceived gaps in the internal mechanisms processes and frameworks and recommendations for enhancing them.

<sup>1</sup> [http://www.iheqn.ie/\\_fileupload/Publications/Report\\_6\\_50190423.pdf](http://www.iheqn.ie/_fileupload/Publications/Report_6_50190423.pdf)

<sup>2</sup> The HEA is the statutory planning and development body for higher education and research in Ireland. The HEA has wide advisory powers throughout the whole of the third-level education sector. In addition, it is the funding authority for the universities, institutes of technology and a number of designated higher education institutions. [www.heai.ie](http://www.heai.ie)

These key elements were placed within an institutional analysis that examined decision-making processes and allowed the review panels to comment on institutional obstacles and success factors for effective internal quality management.

15. The EUA IEP was asked to assess whether each university had met its legal obligation for quality assurance under the Universities Act and, more importantly in the eyes of IUQB, whether the quality assurance procedures it had put in place were effective in promoting and improving quality across the institution. However, it is not clear what definitions of quality or quality assurance were being used for this purpose and what the ultimate outcome was intended to be, other than compliance with statutory requirements. IUQB saw itself as essentially a quality enhancement-focused organisation, but this principal review activity was, in practice, a hybrid of accountability and enhancement objectives, with the ambivalence (was it an inspection, or a conversation amongst peers, or both?) frequently seen in such arrangements.
16. The individual university reports tended to be descriptive and supportive in their tone, rather than sharp-edged and robustly critical, and to confirm the institution's own view of itself and the world in which it was working (including recommendations on resourcing levels addressed to the Irish Government). The overview report, in contrast, was a lot more analytical, critical and hard-hitting, presumably because individual universities were not being named and there was no need to implicate specific targets of criticism.
17. IUQB followed up the recommendations, presumably with the strong encouragement of the HEA, which was the co-commissioner of the whole 2004 review process. In three subsequent publications<sup>3</sup>, IUQB reported over a period of two years on the progress in implementing the findings of the EUA overview report. At the same time, the universities were engaging with the recommendations in their own individual reports.
18. A further short report, *Review of Quality Assurance Procedures in Irish Universities: Reflections Document Prepared by the High Level Reference Panel*<sup>4</sup>, published by the HEA, largely reinforced the findings of the HEA sectoral report but, in addition, commented on the closeness of the relationship between IUQB and the universities, and asked it to establish a greater distance between itself and them. This is important because it implied that IUQB should move away from its collegial, developmental, formative, quality-enhancement focused stance towards a more independent, judgemental, accountability-driven role.

### **Outcomes of the EUA evaluations**

19. The EUA evaluations undoubtedly had a profound effect on the Irish universities, requiring them to approach their quality assurance arrangements in a more systematic way than before, giving them an opportunity for increasing their self-knowledge, and providing collective information about the condition of the quality and quality assurance of their sector. Perhaps the most significant outcome, though, was the effect the exercise had on the IUQB itself, which was reconstituted along the lines requested by the HEA.

<sup>3</sup> Publications available at [www.QQI.ie](http://www.QQI.ie)

<sup>4</sup> <http://hea.ie/files/files/file/archive/corporate/2005/Quality%20Assurance%20Reflections%20Document.pdf>

20. In terms of the process used by EUA, its strengths, as reportedly perceived by the universities, were its collegiality, the relatively hands-off role of IUQB itself, its use of (mostly retired) eminent university leaders, and its focus on institutional quality strategies, organisation, policies and procedures rather than the details of their implementation. It might be argued that the limitations of the process were mainly the obverse of these strengths: the generality of the scope of the enquiry, the restricted time available to the reviewing panels, and the absence of hard data or reference points to back up the judgements. The universities were also concerned about the time and effort required to produce their self-evaluation reports; this is a common complaint when formalised quality assurance systems are introduced and tends to diminish (though rarely to disappear) as a result both of experience, recognition of the usefulness of the exercise for institutional management purposes, the increased sophistication of the review process, and the increasing familiarity of formal quality-related functions within institutions.

### The 2009-2012 IUQB reviews (the IRIU)

21. In 2006, IUQB was formally constituted as an independent, non-profit-making company and between 2009 and 2012 undertook institutional reviews of all seven universities.<sup>5</sup> The method used, known as Institutional Review of Irish Universities (IRIU), was substantially different from that employed for the EUA sequence. By then, the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) had been adopted by ministers at the 2005 Bologna Process ministerial meeting and were forming the basis for external reviews of most European quality assurance agencies. In Ireland, a revised Framework for Quality in Irish Universities was published in 2007 (this time jointly by the Irish Universities Association [formerly CHIU] and the IUQB). In its Reviewers Briefing Notes of 2010 the IUQB recognised these European developments and stated the IRIU's aims and objectives as being:
- 'to operate an external review process consistent with The Act, and the Part 2 Standards outlined in the ESG,
  - to support each university in meeting its responsibility for the operation of internal quality assurance procedures and reviews that are clear and transparent to all their stakeholders, and which provide for the continuing evaluation of all academic, research and service departments and their activities, as outlined in The Act, incorporating the Part 1 ESG Standards,
  - to provide evidence that each university continues to engage with national, European and international guidelines and standards, particularly in accordance with the Bologna process,
  - to support institutional strategic planning and ownership of quality assurance and enhancement – a vital condition for the development and maintenance of internal quality cultures across Irish universities,
  - to operate as part of the Framework for Quality in Irish Universities,
  - to support the availability of consistent, robust, and timely information on the effectiveness of quality assurance and enhancement processes operating within Irish universities,
  - to provide accountability to external stakeholders in relation to the overall quality of the system and thereby instil confidence in the robustness of the IRIU process.'<sup>6</sup>

<sup>5</sup> Although the review team from the seventh university, University College Cork, was selected by IUQB and the IRIU methodology was used, the training session for the team and the preliminary and main visits all took place after QQI's formal establishment and the review was branded as a QQI review.

<sup>6</sup> IRIU Reviewer Briefing Notes

In short, the IRIU was designed to ensure compliance with the law and the ESG, provide reassurance and information for the public, and support the development of a culture of quality within Irish universities, manifested, in part, by a particular and specified approach to internal quality assurance.

22. IUQB also maintained that ‘The Irish approach to quality is based on a holistic view of quality in an institution’ and ‘the goal of quality assurance in Irish HE is quality improvement including the enhancement of the student experience’. It is not easy to find, however, any clear working definition in its documentation of what was meant by ‘quality’, ‘a holistic view of quality’, ‘quality improvement’, or ‘the student experience’. Without clear definitions of these key words and phrases it is difficult to assess whether the stated goals were achieved by IRIU, since in the absence of illustrations of what these concepts might look like if realised, there is an obvious danger that mere activity will be mistaken for success. In other words, what did ‘quality improvement’ and ‘enhancement of the student experience’ actually mean in terms of intended changes to the day-to-day lives of the staff and students of a university? While strong on procedures and mechanisms, IRIU’s documentation appears silent on these very basic questions, and has little to say about its theoretical underpinnings.
23. In terms of the details of the process, the arrangements for panel composition, recruitment and training followed good, common, European practice. Panels were formed of six members<sup>7</sup>:
- two international reviewers – current or former senior university leaders, one of whom had direct experience of quality assurance processes. The Chair was appointed in advance by the IUQB Board from the two international reviewers,
  - one Irish reviewer – a former Irish university senior manager,
  - one student representative - current or former – national or international (all of the student representatives were, in fact, international),
  - one stakeholder representative – national or international (five of the seven who participated in the reviews were international) – an employer, employer representative, quality assurance or enhancement expert/consultant,
  - one co-ordinating reviewer (all of the co-ordinating reviewers were international) – with experience of national and international university administration or quality assurance processes.

The co-ordinating reviewer acted as the keeper of the record, providing the notes from which the report would be drafted and drafting the report itself. This team structure offered a creditably broad combination of experience, expertise and standing, remarked upon favourably by many people whom the review team met.

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<sup>7</sup> Although based on the theoretical composition described, the panels could have been populated by many Irish reviewers; in reality 33 of the 42 reviewers used were from outside Ireland.

24. The IRIU process itself conformed closely to the ‘four-stage process’ as recommended by the ESG, and the ‘rules of engagement’ with the universities were much more extensive and detailed than those used by the EUA. In addition to a handbook<sup>8</sup>, there were long briefing documents for universities (42 pages) and review panels (39 pages)<sup>9</sup>. The increased guidance and instruction to universities and review panels suggested a wish to exert greater control over the operation of the review process, with little opportunity for review panels to diverge from the authorised template-driven model<sup>10</sup>. They also implied a degree of organisational complexity which required a high level of administrative capability to manage successfully.
25. A good example of the degree to which an IRIU event was ‘orchestrated’ is the formidable list of suggested questions to be addressed by a review panel to specific groups being interviewed (Reviewer Briefing Notes, pp 14-15). While the questions are in themselves unexceptionable, they undoubtedly gave a clear steer as to what panels should be asking. Similarly the ‘indicative timetables’ for visits contained in the Briefing Notes for Universities Undertaking IRIU (pp 13 and 17-19) were comprehensive in their guidance. Further, their existence in publicly-available documents, directly addressed to, or readily accessed by, the universities, gave advance notice of the likely content of meetings to all parties and therefore allowed a level of preparation and rehearsal that could easily ensure that satisfactory answers were given. A likely consequence of this was the ‘ritualisation’ of the visits, a point made by some of the review team’s respondents.
26. Despite this, the process retained the characteristics of a peer review, with comparatively little direct intervention by IUQB staff, who were present at the opening and closing meetings of the Planning Visit and at three meetings on the final day of the main visit (‘to ensure the robustness of the IRIU process and gain confirmation that the panel’s conduct was in line with published criteria’), but otherwise left the review panel to its own devices.
27. The IRIU method ensured a high degree of consistency in the execution of the reviews, since there was little opportunity for deviation from the approved procedures. The template-driven approach made comparisons between institutions easier, and the organisational arrangements were very thorough, even down to stipulating the required breakfast arrangements in hotels<sup>11</sup>.
28. In the current review team’s discussions with participants in the IRIU, the following features were noted as being particularly valuable:
  - the strong emphasis on self-assessment,
  - the opportunity for reflection given by the process,
  - the good balance between commendations and recommendations in the reports (though the review team does not believe that commendations or recommendations should be made simply to ensure equal numbers of each),
  - the quality of the review panels and the experience of the reviewers,
  - the opportunity given for feedback by students,
  - the attention given to the special features of individual institutions,
  - the production of a separate two-page summary of the report, designed for a general audience,

<sup>8</sup> Institutional Review of Irish Universities (IRIU) Handbook

<sup>9</sup> Briefing Notes for Universities Undertaking IRIU and Reviewer Briefing Notes

<sup>10</sup> IRIU Handbook, passim

<sup>11</sup> Briefing Notes for Universities Undertaking IRIU, p15.

but these positive aspects were balanced by the following perceived shortcomings:

- the scope of the exercise was too broad,
- the site-visit was too short,
- IUQB's guidance, though detailed, was often ambiguous,
- too much emphasis was placed on procedural correctness, rather than effectiveness,
- the public impact of the reports and their findings was very limited,
- very limited attention was devoted to research.

29. None of these commendations or criticisms are such as to indicate that the IRIU did not achieve its aims and objectives, but they do suggest in some cases that the expectations of the participants may have been different from those of IUQB itself.

### **Impact of IRIU**

30. The impact of quality assurance reviews is notoriously difficult to assess. On the one hand, the process itself has an effect on the institution under review simply by virtue of its taking place; this may be positive or negative, or both. Individual members of staff may resent the intrusion into their daily lives, or may welcome the chance to explain what they are doing, if the reviewers are knowledgeable and open to ideas. Typically, institutional leaders will say that they found the threat of external scrutiny both a unifying bond within the community and an opportunity to refashion aspects of university life in a more efficient and effective manner. They will also complain about the burden that reviews place upon them and their colleagues. Few reliable in-depth studies have been carried out to determine what long-term beneficial changes to staff or student behaviours or organisational structures can be directly attributed to particular external quality assurance activities, although that does not, of course, imply that they do not take place.
31. In the case of the IRIU, the participants with whom the review team discussed the impacts, identified the following benefits from the process:
- better self-knowledge for institutions
  - greater awareness of institutional strengths and limitations
  - development of some institutional thinking about culture
  - provision of public accountability
  - encouragement for reform and change.
32. It is interesting to note that there is in this list only limited recognition of the benefits of the aims and objectives of the IRIU process as identified at the outset by IUQB itself and that most of the impacts are seen as being institutional or personal. There was, for example, little awareness of

the significance of the ESG for the general ordering of quality and standards in higher education institutions. This suggests to the review team that future review processes should be clearer and more explicit in their intended impacts, both for the higher education community and for external stakeholders, and should emphasise better communications with both groups to a greater extent than before. General and possibly vague concepts of quality enhancement and improvement need to be backed up by much more focused ideas about exactly what changes good practice in action should be able to demonstrate and why they are desirable.

33. Despite the heavily prescriptive tone of the documentation, the management of the IRIU appears to have been well-handled, and not unduly intrusive. Those to whom the review team spoke acknowledged that although the collegial style of the early days of IUQB had largely become a thing of the past because of HEA's wish to see a more accountability-driven approach by IUQB, there nonetheless remained some vestiges of the enhancement-focused and developmental values of the earlier regime.

### **Lessons to be learnt from the IUQB reviews**

34. In seeking to learn from the IUQB institutional reviews, QQI might wish to consider the need for:
  - clear purposes and definitions for its evaluation processes, ensuring that they are specifically designed to meet their purposes,
  - a careful examination of the strengths and limitations of template-driven enquiries, in order to optimise consistency of process while not constraining the review panel's capacity to understand the particular circumstances and priorities of individual institutions and pursue interesting lines of enquiry that emerge adventitiously,
  - the importance of clear, succinct and unambiguous advice and guidance on the nature and conduct of the reviews,
  - the formation of review panels that have the confidence of the institutions, while not limiting them to representatives solely from the institution's own sector,
  - consideration of the desirability or otherwise of trying to control every aspect of the review process in very great detail,
  - ensuring that the tasks entrusted to the review panel can actually be achieved in the time and with the resources available, either by extending the time and increasing the resources or by limiting the scope of the review's enquiries,
  - development of a communications strategy to provide useful information in an accessible form to the various audiences that are intended to benefit from the institutional reviews.

## The Non-University Sector

### HETAC's reviews 2008-2012

35. The Higher Education Training and Awards Council (HETAC) was established in 2001 as a direct result of the enactment of the Qualifications (Education and Training) Act, 1999; it succeeded the National Council for Educational Awards (NCEA). HETAC's responsibilities were primarily as the statutory national awarding body for non-university higher education and, as such, it naturally had more far-reaching and authoritative powers than did IUQB. In 2006 it described its functions as follows:
- 'recognising awards,
  - making awards on completion of programmes,
  - making awards directly to learners outside of programmes,
  - establishing policies and criteria for making awards and validating programmes,
  - delegating authority to make awards,
  - determining standards of knowledge, skill and competence,
  - monitoring and evaluating the quality of programmes,
  - ensuring that providers have fair and consistent procedures for assessment of learners'<sup>12</sup>.
36. HETAC awarded the qualifications (at levels 6-10 in the Irish National Framework of Qualifications) and validated the programmes (or delegated the powers to do so) of more than 50 higher education institutions (HEIs), including 13 public Institutes of Technology (ITs) and 39 independent institutions (private HE providers, not-for-profit organisations with charitable status, and private training entities).
37. In the performance of its various duties, HETAC developed a comprehensive structure of standards setting, programme accreditation, quality assurance guidance, delegation of authority to ITs to make awards, and associated monitoring and evaluation procedures. Chief among these last was the institutional review, of which 32 were undertaken between December 2008 and November 2012, the legacy process that is the subject of this review.

### Context for HETAC's institutional review

38. It is important to bear in mind that the relationship of HETAC to the institutions for which it was responsible was very different from that between IUQB and the universities. HETAC stood in a statutory relationship to its institutions and exercised legal powers over key parts of their activities. IUQB, although increasingly able to require the universities to heed its words, was nonetheless not a statutory body in its own right and could only exercise its authority because the universities had voluntarily decided to work with and through it.



39. One consequence of HETAC's statutory role was that it was by nature prescriptive, which was important when dealing with inexperienced new or small institutions, but which the longer-established and increasingly mature ITs seem to have found ever more irksome as time went by. Although the granting of delegated powers to the ITs to make awards went some way towards freeing them from what they perceived to be unnecessary centralised control, there were enough remaining instances where HETAC exercised direct authority over them (for example in approving an institution's quality assurance procedures or in respect of awards where delegated powers had not been granted) for them to express resentment at the level of supervision exercised over their academic activities.
40. The number and the diversity of institutions covered by HETAC meant that the type of engagement in each review could vary. In general, the ITs had a greater level of autonomy than other institutions, though they were still dependent on HETAC for the agreement of quality assurance procedures and for the granting of delegated authority. The private providers were more dependent on HETAC for quality assurance, programme validation and award-making.
41. The main objectives of the HETAC institutional reviews were stated as being:
- to enhance public confidence in the quality of education and training provided by the institution and the standards of the awards made,
  - to assess the effectiveness of the quality assurance arrangements operated by the institution,
  - to confirm the extent that the institution has implemented the National Framework of Qualifications (NFQ) and procedures for access, transfer and progression,
  - to evaluate the operation and management of delegated authority where it has been granted,
  - to provide recommendations for the enhancement of the education and training provided by the institution,
  - to contribute to coherent strategic planning and governance in the institution.<sup>13</sup>
42. Although HETAC's institutional reviews were governed by standard terms of reference which included the requirements of Irish legislation and part 1 of the ESG, there were also 'add-ons' to reflect the specific nature of each of the institutions being reviewed. So, the terms of reference also examined the implementation of the institution's procedures for access, transfer and progression, its research activity, if any, and, in the case of recognised institutions, the operation of delegated authority by the institution. The review also addressed the coherence of institutional mission, vision and values and overall institutional strategic planning.
43. Other considerations or objectives could be added to meet the needs of an institution or of HETAC in particular circumstances. Examples of such circumstances included significant organisational change, such as merger; accommodating joint review with other statutory or non-statutory bodies from Ireland or overseas; and integrating institutional review and review of programmes in the case of small, specialised institutions that had only a single (or few related) programmes.

<sup>13</sup> HETAC Handbook for Institutional Review of Providers of Higher Education and Training incorporating the Policy on Institutional Review of Providers of Higher Education and Training, 2007 and Supplementary Guidelines for Institutional Review, July 2009

44. HETAC's reviews followed a process that included the following steps:
- creation of a schedule (agreed between HETAC and the institution to be reviewed),
  - workshops and planning of the review,
  - definition of the terms of reference,
  - self-evaluation by the institution,
  - appointment of the panel and planning of the site visit,
  - site visit,
  - report and response,
  - feedback,
  - follow-up.

This model conformed closely to the 'four-stage' process advocated by the ESG. Unlike the IRIU, however, self-evaluation reports were published by HETAC.

45. The documentation associated with the institutional review process was comprehensive and detailed. A Handbook for Institutional Review of Providers of Higher Education and Training incorporating the Policy on Institutional Review of Providers of Higher Education and Training, 2007 and Supplementary Guidelines for Institutional Review, July 2009 provided a complete guide to the whole process at a level of detail that appeared to leave no stone unturned. It included, for example, a full account of the induction procedure for every panel member, though in practice the induction offered was not always as thorough as described. Unlike the IRIU, there were no extensive additional briefing materials for institutions or reviewers, everything being covered in the Handbook.
46. The 'core and extras' approach to institutional review required an adaptation of the review process to meet the specifics of each institution, which was negotiated between HETAC and each institution prior to the start of the exercise. One of the aspects that could be adjusted was the visit duration, which was important given the wide range of institution types covered by the agency, in terms of both size and the breadth of the programmes delivered. HETAC also undertook preparatory events and a desk review of the self-evaluation report.
47. On one level, the HETAC institutional reviews appear to have been more of a co-operative or partnership activity between the Council and the institutions than the IRIU was with the universities. The degree of negotiation as to what would be looked at was greater; this may to some extent have been because the staff of HETAC had frequent and regular interactions with the institutions (e.g. through the various programme accreditation processes) and knew them better, so that the starting point for a review could be an assumed familiarity, at least on the part of HETAC staff, if not of the reviewing panel, with many of the strengths and weaknesses that might profitably be examined. At another level, however, HETAC was very much in control of the review process, to the extent that many people whom the review team met felt that it was in essence a 'top-down' inspection exercise.

48. The HETAC review panels were formed on a different basis from those of the IRIU. The membership of each panel normally consisted of '5-8 members, 8 is the optimum where specialist objective is required. The membership of each panel will include persons reflecting the perspective of learners and of the world of work and persons with senior management experience of higher education and training provision. At least one of the members will be from outside Ireland, bringing an international perspective to the review'<sup>14</sup>. One of the members also served as Secretary to the panel, and drafted the report and another member acted as its Chair.
49. The management of the HETAC reviews differed in other significant ways from that of the IRIU. Most importantly, HETAC staff were very much more directly involved in the operation of the process at all stages. This is not surprising, since the reviews had potentially serious legal consequences for institutions (and, theoretically at least, for HETAC). One of the outcomes of a HETAC institutional review for an IT with delegated authority could be the imposition of conditions on the continuation of that authority, which raised the stakes and demanded a level of procedural integrity that could probably only be achieved by close, direct, scrutiny of the exercise to ensure compliance with the published process. Equally, the high stakes ensured that there was also a greater involvement by the institution's senior management in the reviews, sometimes, it was reported to the review team, to the extent of trying to manipulate the process to their institution's advantage.
50. In the light of the current review team's enquiries, including the information and feedback received from participants in the HETAC institutional reviews, the following strengths in the process have emerged:
- the tailor-made structure of the reviews, recognising the specificities of each institution,
  - strong engagement between the agency and the institutions,
  - the excellent organisation and support provided by HETAC,
  - HETAC's transparent and honest approach to the reviews,
  - the extent and seriousness of student participation,
  - the strong focus on accountability.
51. As with the IRIU, the review team received a number of less positive responses to the HETAC reviews and believes that QQI should particularly bear the following in mind when formulating its new approach:
- the limited focus on enhancement
  - the formalistic approach, focused on compliance
  - the dominant role of HETAC staff in the whole process, limiting its peer review character
  - the dangers of review fatigue - overlapping and multiple review processes
  - the burdensome nature of the process, especially for smaller institutions
  - the limited engagement of external stakeholders
  - the limited evidence-base used to come to judgements
  - the possibly excessive influence of the institutions in the determination of the terms of reference
  - limited public awareness of the reviews or their outcomes.

<sup>14</sup> HETAC Handbook for Institutional Review of Providers of Higher Education and Training

### **Impacts of the HETAC institutional reviews**

52. The earlier comments about the impact of the IRIU (see paragraph 30 above) generally also hold true for HETAC's institutional reviews, but there is one major difference between the two approaches: HETAC had a specific statutory role to discharge and this meant that its reviews were to a considerable extent inevitably about compliance with the law. This of course limited their scope to be developmental, and may even have encouraged institutions to view the exercise as a game that had to be won. Nevertheless the reviews were clearly of great importance to the institutions and caused them to operate in the knowledge that they would in due course be called to account for the way they were managing the education they were providing for their students and the awards for which many of them had an enhanced responsibility. The review team considers this to be a major impact.
53. Finally, among the other main impacts that the review team believes to be worthy of note, the following stand out:
- the better self-knowledge of institutions that was generated by the reviews,
  - the 'wake-up call' that the reviews gave to the HEIs, especially their leadership,
  - the greater awareness of the institutions' strengths and limitations that the process engendered,
  - the encouragement given by the reviews to the development of institutional thinking about the culture of quality,
  - the public accountability which an open process like the HETAC institutional reviews provides,
  - the reinforcement of sectoral differentiation or integration by the use of external quality assurance processes.

### **Lessons to be learnt from the HETAC institutional reviews**

54. Perhaps the major lesson to be learnt from the series of institutional reviews undertaken by HETAC is the need to develop a new modus vivendi with the institutions that recognises the consequences of their increasing maturity and capacity for self-regulation. While acknowledging the statutory basis for QQI's activities, the review team believes that it might wish to consider reviewing the burden of bureaucracy that institutions said they had experienced at HETAC's hands. One of the major criticisms the team heard from participants in this review was the heavy-handedness of some of HETAC's engagements, which emphasised its regulatory function, when a more equal and trusting attitude might, in fact, have led to a more constructive and productive outcome. This, in turn, would encourage a more developmental outlook on quality and quality assurance, removing it from a compliance-based imposition to a professionalism-enhancing element in the provision of good education. The review team is not in a position to verify these assertions, but it does believe that the information it has had about the HETAC reviews suggests to it that QQI should evaluate for itself whether an approach that builds on the shared interests of QQI and the institutions can be found.

## The NQAI reviews

55. Because of their unusual constitutional positions as Designated (Degree) Awarding Bodies, two of Ireland's higher education providers, the Dublin Institute of Technology (DIT) and the Royal College of Surgeons in Ireland (RCSI) stood outside the jurisdictions of IUQB and HETAC and were reviewed by the National Qualifications Authority of Ireland (NQAI). NQAI was established in 2003 and was primarily responsible for developing and managing the 10-level National Framework of Qualifications (NFQ) and for the accreditation of English Language Schools (ACELS). The NFQ covers not only higher and professional education (levels 6-10), but also general (school) education (levels 3-5) and further (vocational) education (levels 1-6).
56. Section 39(4) of the Qualifications (Education and Training) Act of 1999 required NQAI, in consultation with the DIT, to review the effectiveness of the Institute's quality assurance procedures 'not more than once in every three years and not less than once in every seven years'. In RCSI's case, the institution requested the Minister for Education and Skills to approve bye-laws to commence their statutory degree-awarding powers, which was followed by a Ministerial request (in January 2010) to the HEA and NQAI jointly to review the RCSI in relation to the commencement of its degree-awarding powers and to advise the Minister on the matter.
57. In contrast with IUQB and HETAC, which covered larger numbers of institutions, the activities and the objectives of NQAI were far more specific and adjusted to the two higher education institutions it covered. Hence, the main objectives of NQAI regarding the DIT were to ensure the effectiveness of existing quality assurance procedures and to assess the extent to which the ESG were being met by the Institute<sup>15</sup>. For the RCSI, the main objectives of NQAI included an assessment of the quality of education, training and research and an assessment of the standards of the awards. It also included an assessment of the contribution to national objectives for collaborative higher education and research and a review of the management and organisational capacity of the RCSI<sup>16</sup>.
58. DIT was reviewed by the EUA in 2005-6 and by NQAI in 2011; RCSI was reviewed by NQAI in 2010. The process used in the NQAI reviews was similar in many ways to those of IUQB and HETAC described above. An initial planning meeting led to the establishment of an Advisory Group (including representatives from both IUQB and HETAC) and the definition of the Terms of Reference. This was followed by the self-evaluation phase (the self-evaluation reports produced by the institutions were not published). The appointment of the review panel and the planning of the visit were followed by the site visit, a report was produced with the option of a response by the institution. This was followed by feedback from NQAI and a follow-up procedure.

<sup>15</sup> Report available at [www.QQI.ie](http://www.QQI.ie)

<sup>16</sup> Report available at [www.QQI.ie](http://www.QQI.ie)

59. The reference documents used by NQAI were the ESG (Part 1) and the IHEQN Principles for Reviewing the Effectiveness of Quality Assurance in Irish Higher Education and Training<sup>17</sup>. IUQB's Handbook and Guidelines and HETAC's institutional review policy and procedures were also used. Finally, it made reference to UNESCO's and OECD's guidelines on quality reviews and quality assurance.
60. With only two NQAI reviews to consider, it is difficult to draw any general conclusions about the review process. However, the review team believes that the following positive features are worthy of note:
- the tailor-made design of the reviews,
  - the quality of the review panels,
  - The European focus,
  - The constructive approach of NQAI in managing the reviews,
  - The multidimensional aspects of the reviews.

The review team also suggests that the following limiting characteristics of the two NQAI reviews might be borne in mind:

- the limited impact of the review for the two organisations,
- the unequal degrees of public dissemination of the reports,
- difficulty in distinguishing between quality assurance and accreditation,
- the desirability of more specific guidance and feedback.

### **System findings from legacy reviews**

61. The terms of reference of this Review required the review team to provide a higher education system-wide analysis of the outcomes and findings of the institutional/ quality assurance reviews. In the course of its examination of the legacy processes the team found itself with restricted time to undertake an in-depth analysis. It therefore took the view that as the source material for an analysis was readily available in the public domain, there would be limited value in providing on this occasion listings of the findings, commendations and recommendations from all the reports published since 2004. As a result it decided that it would be more useful to provide a brief overview signalling the themes that were common to the reports of both main legacy systems (IRIU and HETAC), focusing on recommendations covering areas requiring improvement.

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<sup>17</sup> [http://www.iheqn.ie/\\_fileupload/File/IHEQN\\_Principles\\_of\\_Good\\_Practice\\_in\\_QA\\_May\\_2005\\_27729059.pdf](http://www.iheqn.ie/_fileupload/File/IHEQN_Principles_of_Good_Practice_in_QA_May_2005_27729059.pdf) The IHEQN (Irish Higher education Quality Network) is a formal cross-sectoral network whose role is 'to provide a forum for discussion of quality assurance issues amongst the principal national stakeholders involved in the quality assurance of higher education and training in Ireland and to stimulate wider debate; provide a forum for the dissemination of good practice in quality assurance amongst practitioners and policy makers involved in the Irish higher education and training sector; and endeavour, where appropriate, to develop common national principles and approaches to quality assurance in Irish higher education and training'. This document was also embraced by IUQB and HETAC.

62. A summary of this sort should be useful to QQI as it develops its quality assurance Guidelines for higher education since it should help to identify areas where the institutions collectively were in need of improvement at the time of their reviews. Of course, it is earnestly to be hoped that they will all have taken such remedial or enhancement action as may have been appropriate since the publication of the reports. Nevertheless it is likely to be in these areas, some of them difficult to manage, that more help will be needed and the Guidelines will be most useful. They will help to establish a shared agenda for the enhancement of quality assurance between QQI and the higher education institutions.
63. The following list synthesises the main areas of recommendation to be found in the reports of IRIU and HETAC. It is interesting to note that they are nearly all matters related to effective institutional management, which suggests to the review team that institutions would be well advised to consider to what extent they should be looking to strengthen their professional expertise in this area. The reports emphasised the need to:
- i. Improve the integration of strategic planning, governance, decision making and quality assurance processes
  - ii. Sharpen top level governance and leadership processes
  - iii. Decrease the size, range and complexity of governance structures
  - iv. Reconfigure the relationship between management and academic decision making structures
  - v. Embed the use of student feedback and student representation in deliberative and decision making functions
  - vi. Give greater attention to the quality assurance of partnerships, collaborations and transnational provision
  - vii. Improve staff performance management
  - viii. Improve the form, use and integration of management information systems
  - ix. Extend communications and engagement with external stakeholders and external perspectives.
64. The above list shows only those groups of recommendations that were common to both universities and HETAC institutions; other themes can be found in the reports that are essentially sector-specific, such as the reliance of higher education institutions' quality assurance processes on the external examiner system. It is also noteworthy that none of the nine groups are in any way unique to Irish higher education institutions: a similar outcome would almost certainly be observed were a comparable exercise to be carried out in many other countries.
65. Although in this report the review team can offer no more than pointers to common areas of recommendation to be found in the legacy reviews, it does believe that QQI would be well-advised to undertake a detailed analysis of those review reports in order to ensure that its future developments are fully informed by the findings contained in them, even though the relevance of some of them may have diminished with the passage of time.

## Summary and Conclusions

66. A comparison of the activity and procedures of the different reviewing bodies shows many similarities between them, but also some important differences. On the one hand, the reviews had similar basic structures and documentary reference points. On the other hand, there were clear differences in the extent to which the reviews were tailored to reflect the specific character of individual institutions. Whereas HETAC and NQAI favoured that approach, IUQB emphasised the importance of a single uniform process applied equally to all the universities. There were also differences regarding the involvement of institutional managers and leaders in the reviews. Another differentiating aspect referred to the degree of dissemination and transparency of the process, which was generally good, but with some reviews being more fully transparent than others.
67. Some of these differences had to do with differences embedded in the system, notably the degree of institutional autonomy enjoyed by different sub-sectors. This was clearly higher in the case of the Universities, the RCSI and DIT, less in the case of the other Institutes of Technology, and even less in the case of the independent providers. In the first group, quality assurance was clearly regarded as primarily the responsibility of the institutions themselves, with the respective agencies playing a validating or auditing role for external accountability purposes. In the second and third group, HETAC had a more extensive remit and that tended to be reflected in a regulatory framework that differentiated the various sub-sectors by virtue of their different degrees of autonomy.
68. The general opinion that the review team consistently heard from the various stakeholders it met or who submitted written responses was that, irrespective of the body undertaking them, the reviews were challenging but rewarding. This had been a new experience for many of them, and had helped institutions to develop a much greater knowledge of themselves through the gathering and analysis of considerable and integrated amounts of data. It was also a good opportunity for institutions to reflect on themselves, notably during the preparatory and self-evaluation stages of the reviews, which were universally regarded as very valuable. In addition, it offered an important occasion for the institutional community to come together and reflect not only on quality issues, but also about important strategic and mission-related concerns.
69. Other important aspects mentioned in the consultation process referred to the quality and usefulness of the feedback and recommendations in the review reports. This was thought to be particularly the case when they were the result of careful analysis by experienced panellists who were aware of the individual characteristics of certain institutions and of the distinctions in structure and function between ITs and universities.
70. The terms of reference and the associated documentation were in general regarded as adequate and useful in assisting and framing the reviews. The consultation also highlighted the fact that the review methods had developed through open discussions between the three agencies and the institutions and this could be conducive to the development of enhancement-focused approaches.



71. Other positive aspects referred to the important role that reviews have played in promoting public accountability, although this does not seem to have been particularly obvious from the limited amount of media coverage given to the reviews. Also relevant in this respect was the involvement of students and representatives from industry in the process, which was regarded very positively. This external feedback was seen to strengthen the value of the reviews by providing an independent view and by allowing comparisons to be made with other organisations.
72. Often mentioned among the more negative aspects of the past reviews was the problem of 'review fatigue' due to the fact that some institutions, particularly in the HETAC sector, had undergone multiple review processes within a short time span. This created some doubts about the actual value added by each review, especially when the number of reviews started to accumulate. Moreover, several respondents referred to the overlap of demands from the legacy agencies and the HEA, especially regarding data, which created an excessive and unnecessary burden which might be avoided if there was some co-ordination between different regulators. This is a sensitive matter, raising questions about perceptions of an increasingly invasive interest by HEA in the management of higher education institutions in Ireland, and QQI will need to exercise considerable care in dealing with it.
73. Some of the criticisms referred also to procedural aspects of the reviews. It was suggested that on occasion they had a tendency to adopt a predictable and formulaic approach, with too much emphasis on compliance and conformity and only a limited contribution to the enhancement of the institutions. One point of view considered that it was important to take the particular characteristics of the different sub-sectors more into account. On the other hand, others would argue that this would limit the possibility of comparability among and between institutions and sub-sectors. This, in turn, led some to question the effectiveness of the reviews in being an instrument of change that could help institutions to improve their quality practices. There was thought to exist an emphasis on quality assurance processes rather than an assessment of their effectiveness in contributing to learning and institutional development.
74. This concern was also expressed in respect of the limited relevance given to follow-up activities and the lack of dialogue in that part of the process between the institutions and the agencies. These limitations were also linked to the external report and feedback, with some actors considering that this should be more systematically pursued in the period following a review, in order to ensure that the institution was capable of addressing any fragilities detected in its strategic planning.
75. A number of comments were made about the panels and their effectiveness. Some participants felt that the external review panels produced limited evidence to support their judgements. On the other hand, it was also argued that the institutions had some capacity to steer the outcome of the review by being able to influence the terms of reference. These doubts about the degree of independence of the panel were also considered as posing the risk of inducing skewed reporting of findings. It should be said, though, that the opposite view was also reported, with plaudits being given to the expertise and competence of the review panels.

76. Some stakeholders expressed their scepticism about the actual effectiveness of the dissemination of the outcomes of the reviews. They were particularly doubtful, in this respect, about the dissemination beyond the higher education sector, which seriously reduced the value of the reviews for public accountability purposes and their contribution in building public confidence in the higher education sector. One aspect related to this was the limited degree of systemic overviews and meta-analysis that the reviews produced, which could have been helpfully used to identify patterns across the higher education sector or within sub-sectors.
77. To sum-up, the general view among the various stakeholders was that the legacy agencies had performed a very valuable role in emphasising the importance of external and internal quality assessment in Irish higher education. Nevertheless, they also pointed out the need for improvement and that QQI could benefit from learning from the achievements and shortcomings of those earlier experiences. A major question underlying many of the concerns expressed in the consultation process referred to the need by both review teams and institutions to place more emphasis on the effectiveness of the quality assurance processes and structures in place within institutions, rather than simply asserting or demonstrating their existence. This would suggest that the successor reviews should focus more on analysis and evidenced judgements and recommendations and commendations, than on description.
78. Furthermore, in developing the model for its forthcoming reviews, QQI should take care to balance carefully the amount of effort required both from itself and from the HEIs, and identify more clearly the intended benefits of the reviews for both parties. A common complaint related to the limited return that institutions thought they had received for the considerable effort spent on the reviews. Finally, we have also identified a major concern regarding the potential tension between quality assurance's role as a regulatory force and its equal (some might say greater) importance as an agent for improving and developing academic activities. An equilibrium needs to be established which will hold both roles in a more stable relationship.

## Part 2

# Future Institutional Reviews

### Update on the HE policy context

79. Irish higher education finds itself today in a very testing time, reflecting in part the difficult financial situation of the country, in part new and heightened demands and expectations resulting from changing Government policies.
80. This challenging context is echoed in the Government's National Strategy for Higher Education to 2030<sup>18</sup>, as expounded in the HEA's June 2013 report<sup>19</sup>. The Strategy aims to bring a more coherent and co-ordinated approach to development of the higher education sector; and although a major role will be played by the HEA, QQI is also involved to large extent in its implementation. The Strategy presents four key strands: Excellence in Teaching, Learning, Research and Engagement; System Development; Sustainability and Funding; Governance and Human Resources.
81. One of the major proposals of the HE Strategy is the development of regional clusters. The proposal includes five major clusters that will consist of a combination of Universities, Institutes of Technology and smaller independent HE institutions. The aim of these clusters is to encourage a process by which the institutions participating in a regional cluster will develop some degree of shared academic planning and provision of education and training. The regional clusters are also expected to make joint awards and to promote greater regional engagement of the various higher education institutions.
82. In the context of this Review of Reviews there are also other questions regarding the quality of the Irish higher education sector that need to be considered. Perhaps the most important of them is the impact of the financial retrenchment in the higher education sector and the extent to which it has been affecting the quality of provision. This concern is particularly significant in the case of those providers with a less diversified funding basis and/or which tend to be more sensitive to financial fluctuations. The economic and financial crisis has also had a major impact on the level of unemployment in Ireland and this has given rise to concerns about the employability of current and future graduating cohorts. Thus, the issues of relevance and quality of learning outcomes have gained greater visibility.
83. Finally, these various changes in Irish higher education have highlighted the question of the desirability of greater cross-sectoral engagement and coherence in regulation and assessment. The university sector and what, for want of a better phrase, we call the 'HETAC sector', operate for the most part in entirely separate domains, with very limited interaction between them. This strong binary divide is both historical and cultural, though both sides of it are equally subject to the principles and guidance of the ESG. Although there are some cross-sectoral bodies, such as the IHEQN, which provide fora for more general discussion of principles and good practice, their presence does not appear to be very influential in the more formal quality assurance structures.

<sup>18</sup> <http://www.education.ie/en/Publications/Policy-Reports/National-Strategy-for-Higher-Education-2030.pdf>

<sup>19</sup> <http://www.education.ie/en/Publications/Policy-Reports/HEA-Report-to-the-Minister-for-Education-and-Skills-on-Irish-higher-education.pdf>

There is therefore a lack of cross-sectoral reflection and the consolidation of the legacy agencies into QQI provides a significant opportunity to correct that. This is a matter of even greater consequence given the strengthening of cross-sectoral collaboration envisaged by the proposed regional clusters. It is hard to see how the continuation of sectoral silos can benefit either students or institutions.

### **The role of QQI**

84. The effects on Irish higher education caused by the recent changes and proposals for change have also had ramifications for quality assurance and the underpinning legal framework. In July 2012 the Qualifications and Quality Assurance (Education and Training) Act was introduced, bringing with it some major modifications, one of the most important of these being the introduction of QQI itself and the transfer to QQI of responsibility for the external quality assurance of the Irish university sector.
85. According to the 2012 Act, the role of QQI is focused on the two areas of Quality Assurance Services and Qualifications Services. In the first of these, QQI has been given responsibility for the registration of programmes and institutions, monitoring of educational provision, reviewing that provision, validating educational programmes, and making awards to learners. QQI's remit extends across all areas of post-secondary education, being responsible for external quality reviews of the universities and their linked colleges. In the area of Qualifications Services, QQI became the custodian of the National Framework of Qualifications (NFQ). Thus, QQI has responsibilities in granting access to NFQ accreditation for new providers and programmes and in agreeing quality assurance and access transfer and progression procedures. QQI also took over the issuing of subject guidelines, standards, recognition, and development of a database of programmes and providers. Further, QQI is also responsible for developing a code of practice and the International Education Mark (IEM) for institutions enrolling international students.
86. So far as quality assurance is concerned, the 2012 Act sets out a range of functions for QQI. Sections 34 and 35 of the legislation define the regulatory position with respect to the review of effectiveness of quality assurance procedures. Notably, these include consulting with HEIs on the development of Quality Assurance Guidelines and Quality Assurance and the assessment of the effectiveness of existing Quality Assurance (QA) Procedures. QQI is expected to publish the resulting guidelines and to review the effectiveness of providers' quality assurance procedures on a seven-year cycle. The outcomes of these reviews are to be published in the form of reports and accompanied by follow-up activities.
87. The QA guidelines to be published by QQI, following widespread consultation among the higher education sector, will play a major role in shaping the nature and form of the looked-for quality culture and the relationship between QQI and the various types of higher education institutions. They will also inform the QA effectiveness review procedures established by QQI.

88. The changes being implemented in the framework of quality assurance are also being influenced by wider changes in the public sector and a debate about ways to improve the efficiency and effectiveness of higher education and the quality of its provision. So an important consideration for the development of any QOI approach is the effective use of its own resources, to ensure that its engagements with the higher education sector are appropriate and constructive. Finally, QOI is expected to promote the provision of information to the public and to stakeholders that is based on reliable and robust data, presented in a timely and accessible fashion. This will require careful assessment of the type and presentation of information that will be most useful to this lay audience.

### The future

89. In recent years it has become an accepted principle in most developed higher education systems that institutions have primary responsibility for the assurance of the quality of their own programmes, awards and research. To discharge this they are expected to develop, implement, monitor and continuously improve their own strategies and mechanisms for the quality assurance of their provision. For full dependability there needs to be an independent external element in the review of these systems. The review by external agencies of the effectiveness of these arrangements aims, in part, to ensure that institutions are accountable to stakeholders for what they do, and that their quality assurance activities are effective and reliable, when viewed against recognised European and other international standards. The effectiveness of the review model established by an external agency can also contribute significantly to the future enhancement of institutional and national systems of quality. The review team's observations and suggestions for the future development of QOI's institutional review model take these principles as their starting point as well as the requirements of Irish legislation, which is compatible with them.

### The purposes of QOI institutional reviews

90. The review team believes that any future institutional review process must be developed on the basis that its form reflects its functions and its functions are clearly and unambiguously stated. In addition, the functions of the review must be directly related to its purposes. In other words, before any attempt is made to define and develop a review method, the following questions must be asked and answered:
- What is the review intended to achieve and why, in general?
    - What impacts are sought?
  - What are the specific desired outcomes?
    - What systemic changes to Irish HE is it hoped that the institutional review (IR) will encourage and why?
    - What systemic improvements to Irish HEIs are being sought through IR?
  - What parameters must be included within the design in order to meet the basic compliance requirements?
  - What audiences are intended to be reached?
    - What outputs are required for them?
  - What input resources are available and required (both within and outside the institutions) to undertake the reviews?
  - What will a successful institutional review process look like?

91. The answers to these questions have not yet been systematically addressed. There are formal compliance requirements established in the Irish law and these must, of course, be met. However, the review team considers that QQI reviews should also be focused on achieving some other fundamental purposes. Paramount among these should, in the team's view, be:
  - the sustenance and enhancement of successful student learning as the central and compelling purpose of higher education (i.e. to help students to do the best they can in their studies),
  - the sustenance and enhancement of effective institutional performance (i.e. to help institutions set and meet their academic objectives by using, as adeptly as possible, the full range of their professional resources),
  - the generation of public confidence in Irish higher education and in the quality and effectiveness of its provision (i.e. to generate useful and reliable public information, especially about what students learn and can do, for the various stakeholders interested in higher education).
  
92. There are several important aspects that the review team also believes should have a strong bearing on the development and implementation of QQI reviews. A major distinction to be recognised is between quality assurance and accreditation and that the reviews should have a much greater focus on quality enhancement and effectiveness of provision rather than simply assessing compliance with specific rules and regulations. This will be also relevant if an effective partnership between the higher education sector and QQI is to be built which will allow the development of institutions' internal capacity to monitor their own quality. Another important need is to reduce or avoid review fatigue and the multiplication of initiatives that may undermine the effectiveness of these processes and of QQI as the major regulatory force in the higher education sector.
  
93. A further question to be considered in the development of the review framework is the relationship between QQI and the HEA. Although it is necessary that these two bodies work closely together, to avoid duplication of effort or conflicts of policy, it is equally important to stress the distinctiveness of their missions and of their regulatory approaches. Hence, any potential link between QQI's reviews and the funding of institutions and programmes by the HEA should be approached with great care, notably because any such link would inevitably raise the stakes for the higher education institutions, and would almost certainly lead to the adoption by them of tactical behaviour in order to maximise the potential benefits to be derived from the HEA as a result of a 'good' review report from QQI. This behaviour would not necessarily lead to an improvement in a culture of quality so much as an ability to demonstrate a culture of passive compliance.

### Desirable characteristics of a future institutional review

94. In order to achieve successfully the aims described above, there are certain principles that the review team considers should underpin the design of future institutional reviews. These principles also reflect the overall feedback received during the consultation process. The chief of these are:
- **Clarity** – QQI should be explicit about both the reviews' purposes and how these will be achieved through the procedures used; the nature of the judgements they will make; and the status of the conditions and recommendations contained in the reports.
  - **Economy** – Care should be taken to ensure that time and money are always used to good effect by the review procedures adopted.
  - **Efficiency** – Irish higher education is subject to significant resource constraints. It is therefore important that the review process should include nothing in the process that cannot be shown to be necessary for the achievement of its purposes and objectives. It should also seek to use as little time and resources as are compatible with a useful and defensible outcome.
  - **Effectiveness** – Quality assurance procedures at the system and institutional levels are means to an end and not ends in themselves; the review process should be designed to meet its stated aims and objectives, and should contain ways of verifying that this is, in practice, happening.
  - **Consistency** – Despite the differences that exist between the sub-sectors covered by QQI regulatory competence, there remains much that is common to all institutions; it will be important that the reviews enable as much comparability as possible and that all HEIs are subject to reliable and coherent procedures that are carried out to a common high standard.
  - **Diversity** – The range of HEIs under QQI's supervision is very large and diverse; reviews should, therefore, be capable of accommodating that diversity and should not impede the enhancement of mission diversity and effectiveness.
  - **Depth** – The reviews should contribute to a better understanding and valuing of quality culture at all levels and go beyond a superficial overview of the existence of quality procedures.
  - **International perspective** – The reviews should encourage and promote a continuation of the active participation of Irish higher education in an increasingly integrated higher education reality at the European level and beyond.
  - **Inclusivity** – Quality assurance matters to everyone with a stake in Irish higher education; QQI reviews should therefore engage all relevant participants in the process, including students, academics, and representatives of relevant business, professional, and societal groups.
  - **Professionalism** – Quality assurance is a complex matter that requires particular professional knowledge, skills, continuous reflection and updating; the reviews should be supported by wide opportunities for training for both the pool of reviewers, the institutions taking part in the reviews, and the QQI staff managing them.
  - **Multi-dimensions** – Ideally, the potential of the review process should not be limited to audit or inspectorial approaches, but should be explored using other techniques, such as disciplinary or thematic reviews and by the development of meta-analyses of the outcomes at the sub-sector and system levels.
  - **Performance-focus** – The reviews should examine the overall performance of institutions and their success in meeting their mission statements and objectives.

### Undesirable characteristics of institutional reviews

95. The review team's experience of quality assurance reviews from around the world has identified a number of commonly-encountered characteristics which can inadvertently reduce the value of those reviews and create undesirable consequences. Many of the characteristics are mirror-images of the positive features mentioned in the previous section. So, among the main pitfalls that QQI should strive to avoid in the review process, the review team would like to highlight the following:
- **Duplication** – QQI's role should be complementary to the primary responsibility of HEIs in the daily improvement of the quality of educational provision; it will be important to avoid the duplication of internal responsibilities in external procedures.
  - **Opacity** – One of the most frequent criticisms of quality assurance is its perceived use of impenetrable jargon, inaccessible to those outside the circles of quality offices and QA procedures. This problem should be avoided in respect of both procedures and outcomes, by the careful editing of the vocabulary and rhetoric used, so that the reviews have meaning for both participants and audiences.
  - **Lack of effective follow-up action** – The follow-up of review reports and recommendations is an important way of ensuring that the exercise is not ignored and forgotten once the final report is received. The absence of good follow-up activities is often pointed out as a weakness of external review processes. This was also noted by several of the stakeholders consulted by the review team in respect of QQI's legacy processes. If the future reviews are to make a useful contribution towards continuous improvement, then the development of follow-up activities should be given a high priority.
  - **Bureaucratisation** – It can be tempting for quality assurance reviews to focus on compliance and formalities, not least because these elements are usually part of the administrative culture of the public sector and of many regulators. Notwithstanding the need to meet the legislative requirements and formalities, a 'tick-box' approach will only capture superficially and incompletely the key aspects of good quality higher education and how well institutions are fulfilling their missions.
  - **Standardisation** – Although it is important to recognise the factors that are common to all higher education institutions, regardless of sub sector, QQI should be alert to the risk that the structure and the approach of both reviews and reports could contribute (whether intentionally or inadvertently) to a standardisation of practice among the higher education sector. Since the Irish HE sector is a diverse one and that diversity is regarded as an important feature of the system, the review processes should be developed in a way that will not undermine the diversity of missions and institutional profiles, by unintentionally promoting a standard and narrow quality assurance model.
  - **Confusion of recommendations and conditions** – QQI's effectiveness and acceptance by the HEIs will depend on the way that it respects the degree of autonomy that is granted to each institution and acknowledges each institution's discretion in taking its own strategic and management decisions, within the Irish legal framework. QQI's reviews of the non-university sector should be clear in separating conditions (by which an HEI must abide) from recommendations (that a specific review may consider relevant to the quality enhancement of a particular institution or programme, but which carry no mandatory force).



## Future institutional reviews - possible options

96. In the light of the principles and the desirable and undesirable characteristics discussed in the preceding paragraphs, the review team has developed a set of possible models that may be considered by QQI for its future institutional reviews. The differences in the models are determined by two principal variables: the purposes QQI requires them to fulfil and the resources (time and people) that they will need. In all four models it is taken as a given that the specific requirements of the law must be included. The following chart summarises the four models.

	First model Accountability Review	Second model Extended Accountability Review	Third model Enhancement Review	Fourth model Comprehensive Review
<b>Coverage</b>	<ul style="list-style-type: none"> <li>ESG;</li> </ul>	<ul style="list-style-type: none"> <li>ESG;</li> </ul>	<ul style="list-style-type: none"> <li>ESG;</li> </ul>	<ul style="list-style-type: none"> <li>ESG;</li> </ul>
	<ul style="list-style-type: none"> <li>Legislative accountability requirements;</li> </ul>	<ul style="list-style-type: none"> <li>Legislative accountability requirements;</li> </ul>	<ul style="list-style-type: none"> <li>Legislative accountability requirements;</li> </ul>	<ul style="list-style-type: none"> <li>Legislative accountability requirements;</li> </ul>
	<ul style="list-style-type: none"> <li>QQI's formal requirements.</li> </ul>	<ul style="list-style-type: none"> <li>QQI's formal requirements;</li> </ul>	<ul style="list-style-type: none"> <li>QQI's formal requirements;</li> </ul>	<ul style="list-style-type: none"> <li>QQI's formal requirements;</li> </ul>
		<ul style="list-style-type: none"> <li>QA processes in place and operational.</li> </ul>	<ul style="list-style-type: none"> <li>Internal enhancement strategies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>QA processes in place and operational;</li> <li>Internal enhancement strategies and procedures.</li> </ul>
<b>Features</b>	<ul style="list-style-type: none"> <li>Accountability compliance;</li> <li>Mainly desk-based;</li> <li>Reduced inputs;</li> <li>No enhancement review;</li> <li>No special focus;</li> <li>Compliance documentation (only);</li> <li>Short report;</li> <li>Limited usefulness;</li> <li>Confined to basic requirements;</li> <li>Evidence derived from other internal/external reviews where possible.</li> </ul>	<ul style="list-style-type: none"> <li>Accountability compliance;</li> <li>Review of QA processes (including relationship to programme reviews);</li> <li>Additional inputs;</li> <li>More detailed report;</li> <li>Additional documentation;</li> <li>Data intensive;</li> <li>Evidence derived from other internal/external reviews where possible;</li> <li>Requires some QA expertise.</li> </ul>	<ul style="list-style-type: none"> <li>Accountability compliance;</li> <li>Review of enhancement strategies and procedures (including evidence of impact of programme reviews);</li> <li>Additional inputs;</li> <li>Longer site-visit;</li> <li>Extended report;</li> <li>Additional documentation;</li> <li>Evidence derived from other internal/external reviews where possible;</li> <li>Requires extensive specialist team knowledge.</li> </ul>	<ul style="list-style-type: none"> <li>Accountability compliance;</li> <li>Review of QA processes (including relationship with programme reviews);</li> <li>Review of enhancement strategies and procedures (including evidence of impact of programme reviews);</li> <li>Additional inputs;</li> <li>Additional documentation;</li> <li>Longer site-visit;</li> <li>Extended report;</li> <li>Resource intensive;</li> <li>Requires extensive specialist team knowledge.</li> </ul>
<b>Judgements</b>	<ul style="list-style-type: none"> <li>Compliance with legislation and QQI regulations.</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with legislation and QQI regulations;</li> <li>Effectiveness of quality assurance processes and outcomes/impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with legislation and QQI regulations;</li> <li>Effectiveness of quality enhancement processes and outcomes/impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with legislation and QQI regulations;</li> <li>Effectiveness of quality assurance and quality enhancement processes and outcomes/impacts.</li> </ul>

The four review models - summary chart

**First model: basic accountability review**

97. The main features of this model are that it is designed to meet only QQI's minimum accountability obligations, is mainly desk-based and will require limited inputs and documentation from the institutions. This approach gives no (or only very limited) attention to enhancement and focuses on compliance, as verified mainly through documentation. This type of evaluation is concise and the site-visit is short. The visit is used to verify compliance with basic requirements. It does not attempt to gather information through extensive discussions with a broad range of institutional staff at all levels. It may also use secondary evidence derived from other internal/external reviews, where this is available. This type of review is unlikely to have any special focus on thematic or sectoral issues. It is in essence a formalised analysis of a limited range of procedures to ensure they exist and produce outputs in the required manner. The outcomes of the first model would be a statement of the extent to which the external requirements of Irish law and the QQI have been met.
98. The main advantage of this model is its economy, since it is largely based on desk-based assessment and requires reduced inputs from the organisations involved. The burden placed upon QQI and HEIs is limited in the time and human resources required to manage it. Moreover, it is a model in which it is simpler to achieve consistency in the way it is applied to all HEIs. It is also an effective model in attaining its purpose of providing strict public accountability.
99. This model also has some disadvantages, again mainly related to its economy. It does not need much involvement from stakeholders, and so offers relatively little opportunity for stakeholders to contribute to, or benefit from, the process. The model makes no (or very limited) contribution to enhancement, given its focus on accountability. It is also a model that faces a significant risk of becoming a ritualistic process that standardises the views and processes of quality assurance across the Irish higher education system. This model has difficulty in reflecting the multifaceted and diverse nature of the higher education system and its various sub-sectors. The lack of any special or thematic focus and of substantial follow-up activities limits its usefulness. It is essentially a 'show us how you comply with requirements' model.

**Second model: extended accountability review**

100. The second model is an extended version of the first model. It combines a check on the general accountability features described for the first model, but also includes a more detailed review of institutional quality assurance strategies and processes and their relationship to internal programme reviews. It requires some additional inputs, additional documentation, a longer and more intensive site visit and a more extended report. This type of review is more data-intensive and it requires greater expertise in the technicalities of quality assurance on the part of reviewers than the first model. Its main purpose is both to verify the existence of required quality assurance procedures and to check their effectiveness through an examination of primary evidence and discussion with those responsible for them.
101. The main advantages of this second model are similar to the first model, though offering additional value, particularly to the institutions. Although it is principally concerned with accountability rather than enhancement and therefore shares the first model's simplicity and relatively limited requirements for resources, inputs, and data, its greater attention to QA processes provides possibilities for a richer and more reliable analysis of the assurance of quality and standards. The judgements and recommendations can be more detailed, nuanced and useful to the institutions themselves. Moreover, as it also requires a greater degree of expertise in quality

assessment on the part of the reviewers, it is likely to be more reliable. Hence, while it is still a model characterised by a reasonable degree of economy, it offers greater breadth and scope.

102. This second model also has some disadvantages, most of which are common to the first model. Because it is focused on accountability it has difficulty in capturing the multifaceted and diverse nature of the higher education system and its various sub-sectors. Its concern for enhancement is small and indirect, because it only covers the review of QA processes, which does not allow much probing into the effectiveness of the relationship of QA to learning and institutional improvement. It needs more resources than the first model and the limited attention to follow-up activities restricts its usefulness. In essence it is a 'show and tell us how you assure your quality' approach, commonly seen in academic audits.

### **Third model: enhancement review**

103. Alternatively, the first model can be extended by giving a greater role to enhancement. The main features of this third model cover the general accountability features of the previous two, but also include a review of internal enhancement processes. This model also provides information about the impact of programme reviews. In order to do this, the model requires additional inputs and documentation and the reports will tend to be longer. This type of evaluation requires specialist team knowledge, which in turn demands greater attention being given to the training and updating of the participants involved in the reviews.
104. The main advantage of this third model is that it is much more comprehensive than the first two, notably in capturing the complexity of QA processes and their impacts on learning and the organisation of the institution. It more effectively accommodates the diversity and multidimensionality of HEIs by the greater depth of its analysis. It is also better equipped to assess the value of the programme reviews and the quality assurance processes, not least because it gives greater attention to follow-up activities and their contribution to a continuous process of quality improvement. Because it has a particular focus on enhancement, the model creates greater opportunities for participation by all stakeholders, notably students and those from outside the institution, which will help to ensure a greater degree of confidence in the review.
105. The possible disadvantages of this third model reflect its increased scope and intensity. It is more demanding, not only in the resources required, but also in the degree of expertise about quality assurance needed to ensure it is undertaken successfully. It will make more organisational demands on QQI and also poses greater challenges to the institutions involved, requiring from them a much greater engagement with QQI and a more developed awareness of quality assurance, beyond formal compliance and basic procedures.

### **Fourth model: comprehensive review**

106. Finally, we envisage a fourth, comprehensive, model. This encompasses all the features of the previous three models, incorporating not only the general accountability requirements, but also an in-depth review of quality assurance processes, covering programme reviews and their impact, together with an analytical review of internal enhancement strategies. This approach is the most time and resource intensive of all four models, requiring additional documentation, longer site-visits and possibly larger review teams to cover the additional areas of enquiry. The reports, as well as the overall review process, will be longer.

107. The main advantage of this fourth model is that it provides a much more complete and developed analysis of an institution’s strategic and operational approach to quality and quality assurance. If carried out with professional expertise, the reviews and their reports will offer a mature critique of institutions in respect of quality, avoiding the risks of superficiality or a lack of credibility and usefulness. It is also less likely to generate a defensive attitude within institutions, since the reviews can better reflect the specific circumstances of individual institutions and have a greater emphasis on improvement. Finally, this model lends itself better to thematic enquiries and the collection of information for use in system-based meta-analyses.
108. The disadvantages of the fourth model are the greater time and resource demands it makes on QQI, reviewers and participants in the institutions; the difficulty in producing succinct reports for a public audience that fairly reflect the complexity of the organisation being reviewed; and the possibility of criticism that this kind of review is essentially a closed dialogue between the reviewers and the reviewed.

**Internationalisation**

109. The four models presented do not specifically address the question of internationalisation, though it can be included in any of them as a topic for examination. This dimension may, though, be less relevant and more difficult to operationalize in a model more focused on accountability (as the first two presented). In contrast, a more inclusive or comprehensive model with greater depth and breadth may benefit more significantly from that international perspective on quality assurance.

**The structure of institutional reviews – possible scenarios**

110. In addition to the consideration of possible review models, with different purposes, scope, outcomes and resource requirements, we have also developed a set of three review forms, each of which could use any of the four models previously described. These forms vary in terms of the group of institutions each would cover, the composition of the review teams and the nature of the reviews’ outcomes. The following chart summarises the three forms:

	Whole-Sector Form (‘One size fits all’)	Whole-Sector Form Core + sub-sector elements	Sub-Sector Form Distinct processes - no shared elements
<b>Approach</b>	<ul style="list-style-type: none"> <li>• Generic only</li> </ul>	<ul style="list-style-type: none"> <li>• Generic and specific</li> </ul>	<ul style="list-style-type: none"> <li>• Bespoke/specific by sub-sector</li> </ul>
<b>Teams’ composition</b>	<ul style="list-style-type: none"> <li>• Sector affiliation ignored</li> </ul>	<ul style="list-style-type: none"> <li>• Limited participants from other sectors</li> </ul>	<ul style="list-style-type: none"> <li>• Specific by sector</li> </ul>
<b>Comparability across whole HE sector</b>	<ul style="list-style-type: none"> <li>• High</li> </ul>	<ul style="list-style-type: none"> <li>• Medium</li> </ul>	<ul style="list-style-type: none"> <li>• Low</li> </ul>
<b>Reports</b>	<ul style="list-style-type: none"> <li>• General and susceptible to single standardised format across all institutions</li> </ul>	<ul style="list-style-type: none"> <li>• General and focused, reflecting both system and sub-sectoral elements</li> </ul>	<ul style="list-style-type: none"> <li>• Sub-sector focused, with little reference to the overall HE context</li> </ul>
<b>Features</b>	<ul style="list-style-type: none"> <li>• Allows only system comparability</li> <li>• Inclusivity</li> <li>• Limited detail</li> <li>• Limited depth</li> <li>• Sub-sector sensitivities</li> <li>• Relative simplicity of management</li> </ul>	<ul style="list-style-type: none"> <li>• More informative</li> <li>• Efficient</li> <li>• Allows differentiation</li> <li>• Allows for comparability</li> <li>• Sensitive to diversity</li> <li>• Recognises mission’s diversity</li> <li>• Balances similarities and differences</li> <li>• Complex management</li> </ul>	<ul style="list-style-type: none"> <li>• Detailed information</li> <li>• Responsive to mission</li> <li>• Allows only sub-sector comparability</li> <li>• Maintains sub-sector identity</li> <li>• Maintains sub-sector divisions</li> <li>• Resource-intensive</li> <li>• Easier for QQI to exercise control</li> </ul>

111. The first review form would be applied to the whole of the Irish higher education system, and would take no account of the sub-sectors within it. This form emphasises the common features and similarities existing across the higher education system. It ignores sectoral differences by adopting a generic approach and assumes that the differences between the sub-sectors are of secondary importance and of less significance than the basic shared requirements of any quality assurance system. The participants in the review teams could come from any sub-sector, since sector-specific knowledge would be of little importance in comparison with experience and expertise in the field of quality assurance more generally.
112. This form has the advantage of using a single set of criteria and quality standards, thereby allowing comparisons among institutions to be made in a relatively straightforward way. This might make it more effective in providing public confidence in the reviews themselves, as all institutions would undergo a similar process. It could also be managed with a light touch, since the process would always be the same and once review team members had acquired some experience of it they could manage it with minimal intervention by QQI's staff.
113. Nevertheless, it is a form which has several drawbacks. It would be difficult to create a single procedure that would adequately fit both large and comprehensive institutions and smaller and more specialised ones. Its 'one size fits all' approach tends to reflect poorly the specific issues affecting each sub-sector or cluster of HEIs, because it focuses on that which is common rather than the differing realities of individual institutions. It is more likely to promote standardisation of processes and structures, regardless of whether these are appropriate for all institutions. This form would also limit the opportunities for institutions to have some influence in the process and to engage more actively with it, except in the initial design, as the model would be standardised and permit little local variation in execution.
114. The second form combines those aspects of quality and quality assurance that are common to any institution with those that are type-specific. It would be composed of two parts, a core part common to all institutions and a second part of specific sub-sector elements. The reports and the recommendations of this type of review would combine generic and specific elements, which would allow some comparability across sub-sectors (for the common part) and within each sub-sector (for the specific part). In this form the participants in the review teams would mostly come from the same sector as the institution being reviewed, although there would always be at least one member from a different sub-sector. In this form there is also a greater opportunity for institutions to ensure that the process is appropriate for their needs (as well as QQI's requirements) and to have some say in the way the reviews are carried out, to make sure they are fit for their purpose.
115. This form is more complex than the first one and more demanding, requiring a more structured and closer management of the review process by QQI staff, since it is only standardised to a certain degree. It still allows for some comparability, though this is limited by its attempt to allow for some differentiation in the review process.

116. Finally, institutional reviews might be based entirely on a structure that would be specific and distinctive to each sub-sector. This form would preserve the pre-existing divisions of the legacy agencies, though in this case under the single organisational umbrella of QQI (which would facilitate cross-sectoral analyses and shared experience). The reviews would be tailor-made for each sub-sector, which would have implications for both the scope of the process, the outcomes, and for the composition of the review teams. It would have to be decided whether the sub-sector divisions should be the same as before or whether there should be fewer or more sub-divisions, to reflect (for example) the needs of the private institutions or institutions with closely similar missions or other characteristics.
117. This third form would place a much greater emphasis on the differences among the sub-sectors but would also give greater opportunities for the introduction of elements more valued by institutions from a specific sub-sector. This is a form which makes it simpler to address adequately the diversity of size and scope of the higher education system and reflect that in the demands placed upon the institution regarding documentation, the site visit and the report. This model allows the greatest degree of flexibility and would correspond to the view of some that in order to be effective an institutional review should accommodate the particularities of an institution and of a sub-sector. In this form there is considerable room for institutions to participate in the design of their own reviews, as each one will have to take into account local circumstances.
118. This form would offer a limited degree of comparability amongst institutions, mainly restricted to comparisons within each sub-sector, and pay only limited attention to the overall higher education system. There would also be few opportunities to identify and disseminate good practice. It is a form that would help maintain sub-sector divisions and identities and overlook shared interests and interactions across the system. This form would also need more resources, as it allows for limited standardisation.
119. Any of the above forms could be combined with thematic reviews as a way of including a non-judgemental enhancement element, especially if the formal reviews were to be reduced in intensity.

## Concluding Remarks

120. As this Review of Reviews has shown, the legacy processes inherited by QQI provide much useful information and experience on which to build a new institutional review system. But the design of that system must start from the purposes and objectives it is intended to achieve, not from detailed consideration of past procedures. The operational technicalities that so preoccupy quality assurance agencies - matters such as team selection and induction, criteria for judgements, specifications of self-evaluation reports, report compilation procedures, visit schedules etc. - while of course vital for the success of a review programme, should only be considered after the fundamentals have been decided. In addition to the basic purposes of the reviews, these fundamentals include the nature and reliability of the required outcomes, the effort that it is reasonable to expect the institutions to devote to the reviews, the resources available to QQI to undertake them, and a realistic appraisal of what can and cannot be achieved through a review process.
121. The combination of these variables that will meet QQI's requirements most closely should determine in large measure the most appropriate process to be developed and implemented. Each of the four models described earlier in this report reflects a specific combination and QQI may wish to create its own versions of these, to reflect the level of compliance and conformity it requires on the part of institutions; the number and seniority of staff it can commit to the management of individual reviews; the availability of trained and experienced reviewers; its commitment to minimise unnecessary bureaucracy; and the extent to which it wishes to promote self-sufficiency in institutions' quality assurance and quality enhancement strategies. Overlaying these factors will be the political imperatives of Government policy, the need to respect institutions' autonomy (and a clear understanding of what that autonomy comprises), and the relationships among different parts of the higher education sector. It is those aspects of the Irish higher education quality assurance landscape, rather than the inheritance from the legacy bodies, that will define and shape the detailed nature of the future QQI institutional review process.

# Appendix

## Review of Reviews: List of People Met by the Review Team 11–14 November 2013

NAME	ORGANISATION
Aideen Long	Trinity College Dublin (TCD)
Aine Neeson	Clanwilliam Institute
Ann Campbell	Dundalk Institute of Technology (DKIT)
Anna Murphy	QQI
Annie Doona	Institute of Art, Design and Technology (IADT)
Attracta Halpin	National University of Ireland (NUI)
Barry O'Connor	Cork Institute of Technology (CIT)
Billy Bennett	Letterkenny Institute of Technology (LYIT)
Brendan McCormack	Institute of Technology Sligo (IT Sligo)
Bryan Maguire	QQI
Cat O'Driscoll	Union of Students Ireland (USI)
David Denieffe	Institute of Technology Carlow (IT Carlow)
David O'Sullivan	National University of Ireland Galway (NUIG)
Deirdre Keyes	Dún Laoghaire, Education and Training Board (ETB)
Denis Ryan	Irish College of Humanities and Applied Sciences (ICHAS)
Dermot Douglas	Legacy Reviewer
Ed Riordan	Legacy Reviewer
Eithne Guilfoyle	Dublin City University (DCU)
Eva Juhl	Legacy Reviewer
Evan Buckley	City of Dublin, Education and Training Board (ETB)
Fiona Crozier	University College Cork (UCC)
Gerry Muldowney	Dublin Business School (DBS)
Hugh Sullivan	Legacy Reviewer
Ian McKenna	St Nicholas Montessori College, Ireland
Jim Murray	System Perspective (Institutes of Technology, Ireland)
Jim Walsh	NUI Maynooth
Joe Carthy	University College Dublin (UCD)
Joe Gorey	Setanta College
John Fitzgibbons	Cork, Education and Training Board (ETB)
John McGarrigle	National College of Ireland (NCI)
John Vickery	Institute of Technology Tallaght (ITT)
Joseph Ryan	Athlone Institute of Technology (AIT)
Karen Finnerty	Open Training College
Karena Maguire	QQI



NAME	ORGANISATION
Lewis Purser	System Perspective (Universities)
Liz Donnellan	Trinity College Dublin (TCD)
Marian O'Sullivan	Institute of Art, Design and Technology (IADT)
Mark Rogers	University College Dublin (UCD)
Mary Kerr	Higher Education Authority (HEA)
Michael Carmody	Galway-Mayo Institute of Technology (GMIT)
Michael Hall	Institute of Technology Tralee (IT Tralee)
Michael Hannon	Galway/Mayo Institute of Technology (GMIT)
Michael Mulvey	Dublin Institute of Technology (DIT)
Muiris O'Connor	Higher Education Authority (HEA)
Nicole O'Neill	Dublin Institute of Technology (DIT)
Nigel Flegg	Newpark Music Centre
Norma Ryan	Legacy Reviewer
Padraig Walsh	QQI
Pat Phelan	University of Limerick (UL)
Patricia Callaghan	Trinity College Dublin (TCD)
Patrick Prendergast	Trinity College Dublin (TCD)
Paul Giller	University College Cork (UCC)
Phillip Nolan	National University of Ireland Maynooth (NUIM)
Richard Arnett	Royal College of Surgeons in Ireland (RCSI)
Richard Thorn	Educational Consultant
Rory McEntegart	American College Dublin (AMCD)
Roy Ferguson	University College Dublin (UCD)
Sara McDonnell	Legacy Reviewer
Sarah Ingle	Dublin City University (DCU)
Shane Dempsey	St Patrick's College, Thurles
Shane Ormsby	IBAT College
Shira Mehlman	SOLAS (Further Education and Training Authority in Ireland)
Stephen McManus	Formerly of Dundalk Institute of Technology (DKIT)
Terry Twomey	Limerick Institute of Technology (LIT)
Tim Creedon	Legacy Reviewer
Tony Donohoe	IBEC







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