1. **BACKGROUND**

1.1 **Government Decision**

The following Government decision on organisational changes in the area of Qualifications and Quality Assurance across the further and higher education and training sectors, was announced in the October 2008 Exchequer Budget:

"Amalgamation of the National Qualifications Authority of Ireland, the Higher Education and Training Awards Council and the Further Education and Training Awards Council. The new organisation will also take responsibility for the external quality assurance review of the universities, a function which is currently performed by the Irish Universities Quality Board and the Higher Education Authority. In seeking to ensure a coherent approach to qualifications and quality assurance, there will also be discussions with the National University of Ireland around the possibility of including some of the related functions of the NUI in the new organisation."

1.2 **Department of Education Science Consultation Paper**

The DES established an Advisory Group, which included NQAI, HETAC, FETAC, IUA, IUQB and HEA representation, to advise on the implementation of the Government decision. Subsequently, the DES published a consultation paper on the amalgamation of the qualifications and quality assurance bodies. This document sets out the HEA’s response to this consultation paper.
2. **INTRODUCTION**

The HEA welcomes the opportunity to respond to this important consultation paper. Quality teaching, learning and research, at both undergraduate and postgraduate levels, are at the core of the mission of higher education institutions. Quality is the underpinning factor in the HEA’s vision for higher education\(^1\). Therefore, any developments in the infrastructure of our qualifications and quality assurance systems are extremely important. It is imperative that any changes lead to enhanced processes and a superior student experience.

The HEA regards the establishment of the proposed new body as an important and progressive development. It will represent a significant milestone in the development of qualifications and quality assurance systems in Ireland. At the time of the establishment of NQAI, HETAC, FETAC and the IUQB, we were starting out on a new path in the development of formalised/documentated quality assurance systems in the higher education and further education sectors. That we are now in a position to merge these organisations is testament to their significant achievements over a short period of time and that the higher education sector is now ready to move to a new phase of development in qualifications and quality assurance.

The consultation paper rightly recognises the key role that higher education and training must play in repositioning the Irish economy in supporting national competitiveness. It equally emphasises the importance of lifelong learning in tackling poverty and social marginalisation. In order to maximise our impact in these areas it is essential that we have a structured and transparent approach to the provision of qualifications coupled with effective quality assurance systems which can be benchmarked against best practice internationally. In this regard, the existing quality assurance and qualifications bodies have served the Irish system well to date and our systems are well respected internationally. The establishment of one national entity tasked with over-seeing the development of strong qualifications and quality assurance systems across higher and further education has the potential to bring even greater strength and coherence to the Irish education and training system generally.

\(^1\) HEA Strategic Plan, 2008 - 2013
3. **Specific Comments**

### 3.1 Diversity of Educational Provision

One of the strengths of the Irish system currently is the diversity of provision on offer. It will be important to maintain and nurture this diversity. In this context it is noted that the consultation paper does not envisage a “one size fits all” approach to quality assurance in the various sectors. This is appropriate and welcome.

### 3.2 Stakeholder Consultation

In developing its systems and processes it will be essential that the new body consults widely with all the relevant stakeholders. Balancing the needs of external stakeholders with the need for institutional ownership of internal quality assurance process will be essential if quality assurance processes are to provide meaningful data on the performance of the system, while at the same time developing, and enhancing existing levels of provisions. The development of national policy on quality assurance and enhancement accordingly needs to recognise and take account of the respective roles and responsibilities of both the higher education institutions (HEIs) and the new body.

### 3.3 Independence of Awarding and Quality Assurance Functions

The new body will be an awards making body while at the same time providing external quality assurance for those awards. It will be important that the new body deals separately with both processes so that each is seen as independent of the other. This will be essential to maintain the confidence of all stakeholders in the integrity of the processes.

### 3.4 Recognised and Linked Colleges of Universities

The proposal in the consultation document to bring greater clarity to the quality assurance relationships in the recognised and linked colleges of the universities is to be welcomed. The HEA through its funding instruments has made some progress in achieving this. Setting out in legislation the specific role and responsibilities of the various linked institutions will serve to further strengthen the higher education system.

### 3.5 Role of National University of Ireland, (NUI)

The need to address the future role of the National University of Ireland, (NUI) in quality assurance is accepted. It would seem logical that the external quality assurance role of the NUI should be subsumed by the proposed new statutory
body. In relation to the current award-making role of the NUI in relation to recognised and linked colleges, it would seem equally logical that this role should revert to the appropriate university colleges, as should the setting of matriculation requirements for these institutions. The option should be left open, however, for these institutions to seek accreditation from the new body if they so desire.

Assuming that the quality assurance functions of the NUI will transfer to the new body, the ongoing role of the NUI would then need to be considered by the universities as they are the main funders of the organisation.

3.6 Transition to new Award Titles

HETAC and the NUI are well regarded “brand” names both nationally and internationally. Any proposal to move to new award titles should take due cognisance of the impact on graduates, students and employers.

3.7 Programmes eligible for tax relief

HETAC and the HEA currently evaluate, on behalf of the DES, applications for programmes to be eligible for tax relief on fees. It is strongly recommended that this function be now transferred to the new body.

3.8 International Education Role

The proposed role for the new body in relation to international education is also welcome. This function should be appropriately highlighted to give visibility to this important role internationally. The maintenance of the International Register, the introduction of the Quality Mark and a Code of Practice for international education are all important developments in the context of strengthening Ireland’s role and participation in international education generally. Considerable work has already been done by the Irish Higher Education Quality Network (IHEQN) on the development of a code of practice for international education. The new body should build on the work already done in this area.

3.9 Size of Board

The consultation paper envisages that the new body would have a very small governing body, i.e. max 6 members, which it is recommended should include members with a business background, learners perspective and international expertise. It might be more practical, even from the point of achieving the required quorum for meetings, that this be increased to 8-10.

It is critical that the Board is seen as independent from the state, HEIs and other stakeholders. This is necessary to ensure external stakeholder confidence both
nationally and internationally in the Irish further and higher education system. It is also a requirement for compliance with the European Association for quality assurance in Higher Education (ENQA) Standards and Guidelines. Given the size of the Board and its proposed non representational nature, it is essential that wide-ranging consultation and clear communication with stakeholders underpins the work of the new body. This will be equally important in the development of the legislation for the new body. In order to gain the confidence of all concerned, it will be important that the new body adopts a structured approach to stakeholder involvement. This could build, for example, on the strong relationships already developed through the IHEQN.

3.10 Title of Proposed New Body

It is important that the title of the new organisation reflects fully the balance of functions with which it will be tasked. Accordingly it is strongly recommended that the title should equally reflect its quality assurance and qualifications’ role. We would propose the following title, “Quality and Qualifications Authority, Ireland”. If there is to be a shorthand version of the title we would recommend that this should emphasise the new body’s quality assurance role.

4. Relationship of HEA to New Body

The HEA currently has general functions under the HEA Act, of

- furthering the development of higher education
- promoting an appreciation of the value of higher education and research and
- promoting the attainment and maintenance of excellence in learning, teaching and research in higher education.

The HEA has in addition specific statutory functions to assist universities in achieving their objectives across a range of activities - including quality assurance and a review and reporting role in relation to university strategic development plans, equality policies and quality assurance procedures. The HEA has similar statutory roles in relation to strategic development plans and equality policies in respect of the Institutes of Technology. The government decision will remove the HEA statutory function in relation to reviewing and reporting on quality assurance procedures. All other statutory functions will remain.

There is potential for significant overlap between reviews to be undertaken by the new body in respect of quality assurance processes and the HEA reviews of strategic plans and equality policies. Accordingly, there will be a need for a coherent approach between the
HEA and the new body in relation to the development and roll-out of review processes.

In order to ensure that unnecessary duplication of effort is avoided and that the HEA and new body work together to achieve common aims, the HEA is proposing the following:

(i) It is strongly recommended that the proposed legislation should specifically refer to the need for the new statutory body to consult with the HEA in the development of external quality assurance processes. Such a provision would be required given the general statutory functions of the HEA in relation to furthering and promoting the development of higher education. In addition, it would give the HEA the opportunity to ensure that any particular issues which it might have in relation to higher education provision, could be addressed in the external review processes. It is important that any unnecessary duplication of effort and the placing of undue administrative burdens on the HEIs be avoided.

(ii) It is proposed that the legislation implementing the Government decision should make reference to the need for either the new body and/or HEIs to annually provide information to the HEA on quality assurance processes and outcomes. This is important as the HEA - as the funding body for the universities, IoTs and other HEIs – must concern itself with the overall accountability of the sector. Accountability is required in terms of cost-effectiveness and value for money, but also in terms of the overall quality of provision across the sector. The proposed Performance funding element of the HEA funding model is designed specifically to provide greater accountability in respect of the sector. Funding will thereby be linked to the overall performance of the sector in meeting national strategic objectives. Outcomes from external quality assurance processes would be one input to this process. There will therefore be a need for the HEA to establish appropriate reporting arrangements with the HEIs and the new body in relation to outcomes from external quality assurance review processes.

(iii) There is a strong rationale for the HEA and the new statutory body to work closely together for the overall benefit of the higher education system and it is suggested that this objective is underpinned in legislation. The new statutory body will externally review and validate quality assurance/quality improvement processes in the HEIs and oversee the implementation and further development of the National Framework of Qualifications (NFQ) and associated Access, Transfer and Progression pathways. Working closely with the new body the HEA, through its funding models and through the work of
the National Office for Equity in Access to Higher Education, can play an important role in steering and enabling the sector to respond to issues arising from the further development of the NFQ and from outcomes of external quality assurance reviews, etc. The funding priorities identified and funded through the Strategic Innovation Fund (SIF) process are an example of how the HEA through its funding models can support the achievement of such national objectives.

5. **Conclusion**

The HEA reiterates its support for the establishment of the proposed new statutory body. It considers that this body will bring greater coherence to, and further strengthen, the Irish further and higher education sectors.

The HEA would be happy to provide any further input or assistance requested by the DES in the establishment of the new body, and subsequently looks forward to working closely with the new body in achieving national objectives for our higher education sector.

**Higher Education Authority**

**June 2009**