The Irish Universities Quality Board (IUQB) very much welcomes the opportunity to contribute to the establishment of an amalgamated qualifications and quality assurance body, which is intended to incorporate the work of the IUQB.

The Board welcomes the Minister’s recognition in the Foreword to the consultation paper that the issue of quality assurance is widely accepted as being at the cornerstone of education and training and the acknowledgement that considerable practice and expertise exists within the university sector and the IUQB executive. This response will place emphasis on the need to ensure that the longstanding autonomy, commitment and expertise that exists in relation to quality assurance across the university sector and the IUQB is identified, enhanced and utilised to best effect within the new organisation.

IUQB appreciates that the Department is seeking the views of the organisations involved (in addition to the providers/institutions availing of our services and other stakeholders involved in our work) on the implementation issues arising from the Government’s announcement on qualifications and quality assurance bodies.

National Context

Since the passage of the Universities Act (1997), Irish universities (with the support of IUQB) have made significant progress in relation to the development of an internal culture of quality. This has included:

- The development of an agreed Framework for Quality in Irish Universities\(^1\) incorporating a balance of internal and external quality assurance measures
- The evaluation (on two occasions, in some cases) of academic disciplinary units (departments/schools), interdisciplinary/faculty-wide programmes and support services in the seven Irish universities by national/international panels and the publication of the outcomes of these evaluations
- The development of National Guidelines of Good Practice in key areas such as the organisation of:
  - PhD programmes
  - Student Support Services
  - Institutional Research
  - Strategic Planning in Academic Units

• An increased emphasis on quality improvement and enhancement arising from the outcomes of internally and externally organised evaluations
• The participation by students at all levels of university governance related to quality assurance
• The establishment of centres to support the development of excellence in teaching and learning
• The systematic evaluation by students of the quality of study programmes
• The use of teaching portfolios/evidence-based attestations of teaching excellence for promotions
• The development of presidential awards for teaching excellence
• The closer alignment of quality assurance and strategic planning processes
• The emerging development of data management and institutional research capacities

In 2004, the sectoral report\textsuperscript{2} arising from the \textit{Review of Quality Assurance in Irish Universities} conducted by the Institutional Evaluation Programme of the European University Association (EUA) on behalf of IUQB and the Higher Education Authority concluded that the “systematic organisation and promotion of quality assurance at the initiative of the universities themselves was, in the opinion of the EUA teams, unparalleled in any other country in Europe, or indeed in the United States and Canada”.

Following a review by national/international experts in 2008, the Irish Universities Quality Board (the body established by the seven Irish universities in 2002 to oversee external quality assurance arrangements), was accepted for full membership of the European Association for Quality Assurance in Higher Education (ENQA) thereby fulfilling the requirements for an independent external quality assurance agency. This was a very important step for IUQB as it confirms the organisation’s standing alongside the statutory bodies responsible for quality assurance of Irish Higher Education. It is also an international validation that IUQB’s governance, processes and procedures are operating in line with the European Standards and Guidelines. In 2009, IUQB ratified a timetable for the 2\textsuperscript{nd} cycle of reviews which will operate from 2009-12 termed \textit{Institutional Review of Irish Universities}\textsuperscript{3} (IRIU). The first review of a university under this new process will take place later this year.

We trust that this response will demonstrate the commitment of the Board and the Executive to continuing to work with the Department and other key partners in developing and implementing efficiencies in this area. IUQB very much wishes to see that its success can be built upon and continued within Qualifications Ireland.

\textbf{International Context}

As the consultation document indicates, Ireland has played and continues to play a key role in quality assurance developments internationally, particularly in the Bologna Process through ENQA – the European Association for Quality Assurance in Higher Education. It is therefore timely that following the external review commissioned by the HEA in 2008, IUQB


was granted full membership of ENQA on 2 June last, joining our colleagues HETAC and NQAI as full members who have successfully undergone external review.

The amalgamation of the bodies responsible for qualifications and quality assurance in further and higher education in Ireland should reflect the context of current international developments. The consultation document comes at an opportune time, soon after the Ministers responsible for Higher Education in the European Higher Education Area (EHEA) met in Leuven and Louvain-la-Neuve on 28-29 April 2009, as part of the Bologna Process.

It is worth reflecting specifically on the ENQA Position Paper on Quality Assurance in the EHEA\(^4\) submitted to the ministers in advance of the recent Leuven and Louvain-la-Neuve meetings. A number of extracts from this position paper are reproduced below so that the proposed structure, processes and modus operandi of Qualifications Ireland are reflective of current international thinking and developments in the quality assurance of higher education.

“The diversity of European higher education as a major cultural heritage and strength of the emerging European Higher Education Area (EHEA), together with the diversity of quality assurance and enhancement approaches and measures, is of paramount importance and must be maintained. It is of crucial importance that differing national contexts be taken into account, both as far as higher education in general, and quality assurance and enhancement in particular are concerned. The diversity of the EHEA makes a single and prescriptive approach to quality, standards and quality assurance in higher education inappropriate and impracticable."

“National quality assurance systems, while embedded in the national context, should be organised and operated with special regard to the European and international contexts, developments and best practice. ENQA does not promote the creating of a unified, pan-European quality assurance regime. However, while respecting diversity, it does promote the harmonisation and convergence of quality assurance processes, based on common principles.”

“The Standards and Guidelines for Quality Assurance in the European Higher Education Area\(^5\) (ESG) form the overarching framework of quality assurance in the EHEA. The ESG recognise the primacy of national systems of higher education and the importance of institutional and agency autonomy within these national systems. The autonomy of quality assurance agencies within national HE systems is a necessary condition to the full exercise of their responsibilities, notably with regard to the provision of accurate and consistent information to the general public”

“The fundamental responsibility for quality rests with the world of academia. Internal quality assurance is a duty of the HE institutions and a clear link can be seen between the development of an effective quality culture inside institutions and the degree of operational autonomy they enjoy. External quality assurance fulfils a different need: at its best it combines both accountability for the reassurance of

---

the public and an objective and developmental role for enhancing quality in institutions.”

“One of the major lessons of the implementation of ESG has been that a sound balance has to be maintained between internal and external quality assurance processes, which should mutually support each other and contribute to the development of a quality culture within the higher education institutions and to the construction and operation of coherent and integrated national quality assurance systems.”

“All activities related to quality assurance in higher education or production of information about the quality of higher education should respect the fitness for purpose principle that is at the core of the European dimension of quality assurance.”

“The enhancement of quality in higher education results largely from the interactions and relationship of various actors and stakeholders, With regard to external quality assurance, the relationship in any national arrangements of higher education institutions, quality assurance agencies, and governments should be based on a clear distribution of roles and responsibilities, respecting institutional autonomy and the independence of quality assurance agencies.”

IUQB is gratified to note that many aspects of the consultation paper are consistent with the principles outlined above and with the European Standards and Guidelines (ESG).

What follows are IUQB comments on the Department’s consultation paper with reference to specific paragraphs in the paper.

IUQB Response

1 Introduction

1.3 Timetable
While appreciating the importance of Qualifications Ireland being established in a timely manner, the Board wishes to reinforce the need for diligence and prudence to ensure the amalgamation is not pushed through to the detriment of the quality and standard of the ongoing activities being undertaken by the respective organisations. The proposed impact analysis and the ongoing work of the implementation task group will be vitally important in this exercise for ensuring that the transition process is undertaken smoothly and effectively.

2. Background

2.2 Existing Functions
The Board welcomes acknowledgement of the diversity of functions in each of the respective organisations and in particular appreciates confirmation that the three main functions of the IUQB (as outlined in our Corporate Plan: 2009-11⁶), (i) evaluating the

---

effectiveness of the quality assurance activities of Irish universities (ii) supporting the enhancement of quality in Irish universities and (iii) communicating the outcomes of quality assurance and enhancement activities in Irish universities; are seen as essential elements of the new body.

3 Core Objects, Context and Rationale for Amalgamation

3.4 Key Considerations

3.4.2 Related Functions

The paper indicates “that the universities have also recognised that external review is an essential element of their quality assurance activities and have delegated some of their statutory responsibilities in this area to the IUQB, to supplement the statutory role of the HEA”. In case this phrasing could be misconstrued, it is important to note that in establishing IUQB in 2002 (and incorporating it in 2006) the (individual governing bodies of the seven) universities passed over all of their external quality assurance activities to IUQB.

4 Qualifications Ireland – A Functional View

4.1 Overarching Issues

While qualifications and quality assurance will come under a single body, IUQB concurs with the recognition in the paper that the broader education and training system will continue to be organised as before and that the new organisation will be dealing with an enormous diversity of provision and will need to tailor its services to take account of each of the sectors.

In relation to the title of the new organisation, the use of Qualifications Ireland could only serve to downplay the quality assurance remit of the organisation. Of more concern to the Board is that the universities, as autonomous bodies, are responsible for the standards of and the making of their own awards and the use of the title Qualifications Ireland could convey the wrong impression to the general public as to the locus of responsibility. The Board would therefore urge that the new body be referred to as QAI (Qualifications and Quality Assurance: Ireland) in all formal and informal documents to avoid any subsequent confusion or misunderstanding. Experience shows that, in all likelihood, it is the acronym that will pass into general parlance. [Notwithstanding the above, for simplicity, the new body will be referred to as Qualifications Ireland throughout this document].

The Board is pleased to note that Qualifications Ireland will not be established solely as a regulatory body and that the positive value that IUQB has put on matters such as keeping abreast of international developments, the development of high-level guidelines and codes of practice and the dissemination of information to customers and providers will be continued.

4.2 Functions Currently Performed by the Sector

4.2.2 Quality Assurance

The Board has fundamental concerns regarding the overly simplistic account of the two existing models of quality assurance operating across the sector.
The fundamental difference between the two models is not the focus of providers’ own quality assurance arrangements (with the Universities Act dealing with faculties and departments and the Qualifications Act dealing with programmes of education and training). In practice (through not in legislation) both sectors of higher education have developed a mix of departmental and programme reviews.

A more fundamental difference between the two legislative models is the extent to which certain providers have to agree their internal quality assurance procedures with an external quality assurance agency. The paper suggests that there will be consideration, in drafting the new legislation, of the extent to which a common approach to agreeing procedures will be put in place.

While noting the acknowledgement in the document that the quality assurance policies, processes and procedures of Qualifications Ireland would most likely set out an appropriate approach and mix for different sectors, the paper is insufficiently robust to give assurances that the importance of institutional autonomy and institutional responsibility for quality assurance that lies currently and appropriately with Irish universities will be respected and retained by new legislation or the new body.

The Board is pleased to note that the consultation paper recognises the inappropriateness of a ‘one size fits all’ approach to quality assurance in the various sectors and that Qualifications Ireland will have to develop a “fit for purpose” approach in its processes and procedures, with degrees of variation that address sectoral needs. The international competitiveness and respect that the Irish university sector currently enjoys should not be jeopardised by restrictions on institutional autonomy in crucial areas such as degree awarding powers, curriculum design and development, and programme validation. Institutional autonomy in internal quality assurance procedures must lie with individual universities based on a commonly agreed framework. It would be inappropriate, ineffective and costly for this function to be held by an external agency.

The Board wishes to reinforce the importance of any new legislation and the establishment of any new body being consistent with the Standards and Guidelines for Quality Assurance in the European Higher Education Area which states that:

- The primary responsibility for quality rests with providers and they must adopt a policy and associated procedures for the assurance of the quality and standards at institutional level of their programmes and awards,
- The application of this policy and procedures must be reviewed by an external quality assurance agency, and
- The external quality assurance agency must itself be subject to external review.

These principles must continue to underpin the work of Qualifications Ireland. Irish universities must retain primary responsibility for their programmes and awards.

In relation to the recognised and linked colleges of universities, the Board welcomes the requirement to make explicit the responsibility of all parties and the quality assurance relationships that exist between them. However, it is important that, in framing the legislation for Qualifications Ireland, account is taken of the distinction between ‘recognised colleges’ of the NUI, ‘colleges of a constituent university’ of the NUI, ‘linked colleges’ of
non-NUI universities and higher education institutions where awards are made by a university.

The Board also welcomes the recognition of the importance of the role played by IUQB (through, for instance, its series of National Guidelines of Good Practice) and the other 3 organisations in the enhancement of the quality of education and training and that the new body will continue to have a function in promoting quality enhancement.

The Board notes that the quality enhancement work of the IUQB has had an extremely positive influence on developments across the university sector over the last number of years and the fact that this work has been undertaken by a national body lends credibility and authority to the National Guidelines of Good Practice in terms of their adoption by universities and their constituent units. The shared approach by higher education institutions (including those outside the university sector) and IUQB has been essential to the credibility of such guidelines and the Board would wish this partnership approach to continue in terms of the development of any National Guidelines or Codes of Practice by Qualifications Ireland. The Board notes the emphasis that the HEA currently places in the collaborative approach to quality improvement across the entire higher education sector. The Board considers it important that the key role that IUQB has played in quality enhancement should not be diluted, following its incorporation into Qualifications Ireland. It is therefore important that the role of quality enhancement is separately catered for in the organisational structure of Qualifications Ireland.

The Board believes that it is appropriate that the provision of information relating to quality assurance in universities currently provided by IUQB to the HEA will continue in respect of the new body for all higher education institutions funded by the HEA.

In the development of its programme of reviews of the effectiveness of quality assurance procedures in Irish universities (jointly with the HEA in 2004 and) from 2009 in its second cycle process *Institutional Review of Irish Universities*) IUQB has recognised the importance of ensuring adequate follow-up on the published outcomes of these reviews. Through its National Guidelines of Good Practice series and the publication of its student quality handbook, IUQB has stressed the importance of disseminating information on quality assurance to stakeholders and the general public and to the promotion of quality in higher education. IUQB is therefore pleased that these activities are recognised as important functions of the new body.

### 4.2.3 Programme Validation

The Board wishes to express some concern with the drafting of this section of the paper. While it may be implicit throughout the text that this sections does not apply to the seven Irish universities, this needs to be explicitly stated so as to avoid any confusion. It would be misleading if it was inferred throughout the document and subsequent legislation that Qualifications Ireland would have responsibility for quality assuring programmes of education and training leading to its own awards as well as reviewing the effectiveness of the quality assurance processes put in place by other awarding bodies/providers (e.g. universities). This statement is misleading and should be qualified or amended. It is not appropriate that Qualifications Ireland should have responsibility for quality assuring programmes or making awards at a university level.
4.2.4 Standards, Learner Assessment and Awarding Making (including Delegation of Authority)
The Board notes that Qualifications Ireland (as a successor body to HETAC and FETAC) will have the power to make its own awards. The Board notes the significant positive impact of the delegation of awarding powers to the Institutes of Technology and welcomes the suggestions that this could be extended to certain other providers, should they satisfy appropriate criteria.

Since Qualifications Ireland will have responsibility for quality assuring programmes of education and training leading to its own awards, it is essential to strongly separate the functions of award-making and quality assurance and this separation must be taken into account in the organisational structure of Qualifications Ireland.

4.2.5 International Aspects
The Board wishes to ensure that the strength and experience of the IUQB Executive and IUQB’s activities in the international arena are sufficiently recognised and supported within the new body.

4.2.6 Information for Learners
While noting the importance of Qualifax and the NQAI in the dissemination of information to learners, Qualifications Ireland cannot underestimate the leading approach the IUQB has taken to making quality assurance and enhancement information accessible to the widest audience of external stakeholders. The IUQB’s *Student Handbook on ‘Quality’ within Irish Universities* has been acknowledged at a European level as being unique in its approach. In June 2009, the IUQB launched a Quality Reviews portal linked off its main website which provides a unique access point nationally and internationally to institutional and national level quality outcomes. The importance of accessibility to external audiences cannot be underestimated and this innovative approach should be embraced and supported within Qualifications Ireland.

4.3 Potential New Functions

4.3.2 Award Titles
The Board does not support the proposal of providing a statutory basis for Qualifications Ireland to deal with the regulation of the use of award titles. This function should remain the responsibility of the awarding bodies, i.e. the universities themselves. If it is not the intention to regulate the titles of university awards, the documentation should clarify this.

4.4 National University of Ireland
The Board would welcome the opportunity to discuss further the intention of the NUI whereby IUQB would take on the role of reviewing the effectiveness of the quality assurance arrangements of the recognised colleges.

---

http://www.iuqb.ie/GetAttachment.aspx?id=f4de6f62-efff-4ae5-baa5-ae0353bc0529
8 *Quality Reviews Catalogue* http://reviews.iuqb.net/
5. Qualifications Ireland – An Institutional View

5.1 The Board
The Board wished to express its concerns that the strategic and decision making responsibilities of the Board would be restricted to a maximum of 6 members. The benefits of such a minimal approach are unclear.

The participation of learners and international experts in the governance of Quality Assurance Agencies has been assessed in the three Stocktaking exercises (2005, 2007 and 2009) conducted by the Bologna Follow-up Group. The existing higher education quality assurance agencies (IUQB, HETAC and NQAI) have all practised this model and it is important that this is continued in respect of the new agency.

In relation to governance, the matters in the ENQA position paper referred to at the beginning of this response are worth restating.

"With regard to external quality assurance, the relationship in any national arrangements of higher education institutions, quality assurance agencies, and governments should be based on a clear distribution of roles and responsibilities, respecting institutional autonomy and the independence of quality assurance agencies."

Recognising the necessity to undergo 5-yearly review as required by part 3 of the European Standards and Guidelines, it is essential that the operational independence from higher education institutions and government is guaranteed in the legislation establishing Qualifications Ireland.

5.5 Staffing
The Board has been advised by the Irish Universities Association (IUA) that as all of the primary functions of IUQB (quality assurance, quality enhancement and provision of information about quality) have been identified as function of the new body, it is the intention of the university sector that the IUQB will cease to operate when the functions are transferred into the new body.

As it is not identified in the consultation paper, IUQB wishes to state that it currently employs 6 staff members. The Board believes that the expertise of the IUQB Executive would be a tremendous asset to the new body. The Executive has collectively over 40 years experience of working within the university sector in Ireland, Scotland, England and Wales, with an additional 40 years experience in the private sector nationally and internationally, including one staff member being a qualified careers guidance counsellor. The Board recognises the IUQB staff as the company’s most valuable asset and consequently should be considered vital to ensuring the ongoing efficiency, effectiveness and reputation of the external quality assurance and enhancement activities of the Irish university sector within the new body.

The admission of IUQB to full membership of ENQA following an external review commissioned by the HEA has conferred further international recognition of the quality of IUQB’s governance, staff, procedures, processes and outputs.