University College Dublin response to the Consultation Paper on *Amalgamation of Qualifications and Quality Assurance Bodies* (May 2009: Department of Education and Science)

Introduction

1. University College Dublin (UCD) welcomes the opportunity to comment on the Consultation Paper on the *Amalgamation of Qualifications and Quality Assurance Bodies* (May 2009). It is understood that views received during the consultation process will inform the content of the legislation and the process of administrative planning required to establish the new organisation.

2. UCD has contributed to and endorses the Irish Universities Association (IUA) response to the Consultation paper.

3. The proposal to amalgamate the qualification and quality assurance agencies presents an opportunity to develop further, the robust quality assurance/enhancement processes that are currently in place in the university sector in Ireland. The effectiveness of these internal university quality processes has been endorsed by the European Universities Association (EUA) Sectoral Report (Review of Quality Assurance in Irish Universities (2005), jointly commissioned by the IUQB/HEA. The EUA Review Teams, for example, stated that:

   ....the......systematic organisation and promotion of quality assurance at the initiative of the universities themselves is, in the opinion of the EUA teams, unparalleled in other countries in Europe, or indeed the United States and Canada. The system would appear to strike the right tone and combination of public interest, accountability and university autonomy....(para 43)

While UCD is proud of its contribution to the development of quality assurance in the Irish university sector, and believes that institutional quality systems are highly developed and effective by international standards, UCD, is committed to the ongoing development and enhancement of the Quality Assurance/Enhancement Framework within the Irish university sector.

Quality assurance/enhancement in the university sector

4. The rapidly changing landscape in the higher education sector means that it is no longer helpful to think about quality merely in terms of compliance and the maintenance of standards. Universities in Ireland, in accord with best international practice, have put in place a developmental quality assurance/enhancement framework, which emphasizes continuous improvement. For example, the International Network for Quality Assurance
Agencies in Higher Education (INQAAHE) – Guidelines of Good Practice (2007) - emphasize the importance of any quality assurance agency contributing to both the quality improvement and accountability of institutions. In Europe, approaches to quality (for example, the EUA Quality Cultures Project – see http://www.eua.be/index) have tended to move away from earlier guiding principles of ‘audit’ and ‘value for money’ approaches, towards a model which supports enhancement and excellence, particularly through the demonstration of shared practice.

5. When the new organisation assumes responsibility for the development of a quality assurance framework for universities, the strengths of the current system should be borne in mind, thus avoiding a drift towards a rigid quality audit/compliance culture, which raises a perceived danger of masking the need for real change and improvement.

The EUA Sectoral Report (2005) stated that

*The EUA teams were unanimously impressed by the well organised systems in place, by the seriousness of the approach in each university to the quality assurance process….the….focus on quality improvement is particularly to be commended* (para 41)

**Scope of the new organisation**

6. It is proposed that the new organisation will have responsibility for a significant diversity of provision, reflecting very different cultures, missions and student expectations and needs. UCD believes that the new organisation will face a very difficult challenge adjusting to all the prevailing sectoral and institutional cultures and learner needs. In particular, UCD is concerned with the statement that “it is now necessary to build greater coherence and co-ordination of procedure” (p13). While it is acknowledged that it may be the case that common underpinning principles may apply, it might also be anticipated that different systems and processes may be necessary for different providers. Presumably the Consultation Paper recognises this when it states “…..this is not to say that the provision of a single unified legislative model will entail a ‘one size fits all’ approach to quality assurance in the various sectors” (p 21). UCD would support this statement as a guiding principle for the development of a flexible model, which focuses on what should be done rather than on how.

7. This guiding principle would also more readily accommodate a model that focussed more on diversity and fitness for purpose than on a perceived need for conformity and standardisation. This approach would also be consistent with the European standards and guidelines for quality assurance which
emphasizes the importance of institutional autonomy within national quality assurance systems (ESG:10)

8. Although the Consultation Paper acknowledges that whatever system is put in place would “continue to address sectoral needs” (P.21), if the new organisation is organised along functional rather than sectoral lines as proposed, UCD would have concerns that there would be a risk of losing helpful sector specific understanding and representation.

**Internal and External quality assurance**

9. The consultation paper proposes to blend the two quality review 'models' (p.21) reflected in the Universities Act (review focusing on college and school/unit review) and the Qualifications Act (review covering programmes of education) – the differentiation between unit and programme review has not been substantially addressed in the Consultation Paper and is therefore difficult to comment on. UCD is also concerned that the consultation paper suggests that a more common approach may be desirable insofar that providers will have to agree their internal quality assurance procedures with the new organisation (p.21). This appears to be at odds with the Standards and Guidelines for Quality Assurance in the European HE Area.

10. The distinction between external quality and internal quality assurance is important. External quality assurance would be the responsibility of the new organisation while universities would have responsibility for internal processes, reflecting the autonomy and accountability of individual institutions. Amongst the principles underpinning the Standards and Guidelines for Quality Assurance in the European Higher Education Area (European Association for Quality Assurance in Higher Education; 2005) (ESG) is the “central importance of institutional autonomy, tempered by the recognition that this brings with it heavy responsibilities (ESG:10). The standards and guidelines also place an emphasis on the importance of institutional autonomy within national quality assurance systems. Further, they reflect the statement of Education Ministers in the Berlin Communique (2003) that ‘consistent with the principle of institutional autonomy, the primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality assurance framework’ (ESG:12).

   It is worth noting that the ESG basic principles include;
   - Providers of higher education have the primary responsibility for the quality of their provision and its assurance (p.13)
   - Processes used should not stifle diversity and innovation (p.13)

UCD would welcome a clear statement that the new organisation will be guided by the European Standards and Guidelines when establishing systems for the external quality assurance of universities.
11. UCD sees benefit in establishing one body to promote developments and policy in the domains of the National Framework of Qualifications (NFQ), Access, Transfer and Progression. However, there are occasions when the consultation paper suggests that the new organisation would itself determine issues which are the responsibility of universities, such as admission requirements or award titles. A clear statement of principle is recommended making clear that these and related issues will remain the responsibility of the universities.

12. UCD would, in principle, endorse the summary of the proposed quality assurance and enhancement functions of the new organisation as set out on page 23 of the consultation document.

13. In relation to the Universities Act, UCD recognises that a review cycle of 15 years is too long to be effective. Consequently, we suggest that section 35 (4) should be redrafted to reflect a more helpful review cycle, of for example, 7 years. In the opinion of UCD, the other sections of the Act continue to remain relevant to support a progressive quality assurance/enhancement framework.

14. UCD supports the idea that a university is responsible for quality assurance of linked and recognised entities, and furthermore is responsible for quality assurance of any activity which leads to an award of the university.

15. UCD supports a role for the new body in assuring the quality of international education provided that, for higher education at least, it is based on (i) existing quality assurance procedures (internal and external) not a separate process and (ii) the National Framework of Qualifications.

16. UCD supports and has fully adopted the National Framework of Qualifications, and sees it as an extremely valuable construct, and will work with the new body to further its development. However, UCD would not support a role for the new body in regulating award titles.

17. UCD is concerned in regard to a somewhat confused analysis in regard to the National University of Ireland (NUI). The NUI is the guardian of a rich and common heritage that is far greater than the limited formal functions it retains since the Universities Act, 1997. UCD has the following observations:

(i) The Government decision does not suggest that NUI would cease to be a university and an awarding body, so it is not clear why the consultation paper suggests that the new organisation might “have the awarding-making and quality assurance role of the NUI in relation to Recognised Colleges”; presumably NUI may continue to act as a university, with validating courses and making awards, with their internal quality assurance procedures reviewed by the new organisation. This creates four alternatives for Recognised Colleges (rather than the three presented in p 31): validation and award by the NUI, validation and award by another university, validation and award by the new organisation, and legislation (existing or new) to give degree awarding powers to the Recognised College.
(ii) The UCD position in regard to the NUI is that it has an ongoing significant contribution to make to the national higher education environment.

(iii) The Consultation Paper is silent on the ongoing role of the NUI in the appointment of external examiners and suggests that matriculation requirements might become a matter for each individual university. These are complex issues and the Implementation Group should agree a definitive position with the NUI and its constituent universities in advance of developing the relevant legislation.

(iv) While the new body will clearly have a central and valuable role in articulating national policy and objectives for access, transfer and progression, the Consultation Paper, and in particular the section on the NUI (p 31 para 3) suggests that the new body might be involved in setting entry requirements or admission and transfer procedures. This would be out of line with normal practice in the university sector, where admission and transfer are matters for autonomous determination by the academic governance structures of the institution.

18. The composition and size of the Board of the new organisation is small given the diversity of the stakeholder interests. The proposal that the new organisation will consult with the sector, as a substitute for representation on the Board, will in our view, inhibit the effectiveness of the Board. UCD does not believe that the ‘independence’ of the board would be diminished if the various sectors had representation on it. Indeed, we would anticipate that such sectoral representation would enhance the board, particularly in matters relating to, for example, understanding particular aspects of each sector, developing national policy and understanding its implications and impact on the various sectors and facilitating good practice and disseminating information on quality assurance to stakeholders. It is notable that the ESG guidance suggests that the process for appointing the Board should be, within reason, independent from both Government and institutions.

**Research and innovation**

19. UCD notes that there is almost no reference in the consultation document to research and innovation activities undertaken by the university sector. One of the key reasons why universities undertake school/unit review rather than focus primarily on programme review, is in order that both the quality of research and educational programmes can be covered and the inter-relationship between these activities enhanced.

**Recommendations**

20. UCD offers the following recommendations in regard to the objectives and operations of the new Qualifications and Quality body in relation to the university sector.
**Recommendation 1:** The proposed objectives of the new body in relation to quality assurance and enhancement are appropriate; for clarity, there should be clear statements of principle that:

(i) the design of the internal quality assurance processes of the universities are a matter for the academic governance structures of the universities, with the new body having a distinct role to externally review, assure and enhance these internal processes;

(ii) the objectives of internal and external quality assurance relate to the quality of research and scholarship as well as teaching and learning;

(iii) the new body should in its strategy and operations be guided by the Standards and Guidelines for Quality Assurance in the European Higher Education Area;

(iv) Cross-sectoral thematic reviews conducted by the new body should relate to thematic issues in quality assurance and enhancement.

**Recommendation 2:** The Implementation Group should establish a clear statement of principle in regard to the relationship between unit and programme review in a university. We have articulated above the rationale for unit review: research and teaching are inextricably linked, so that programme review will fail to review research, but unit review covers both the research activities of the unit and the educational programmes to which that unit contributes. UCD is of the view that unit review should remain at the core of university quality assurance, but would propose that this be articulated in the following way: “that the university should evaluate at regular intervals each academic unit and service provided by the university, to include any academic body or service linked to or recognised by the university, and such evaluation must be adequate to assure the quality of education and research and any programme leading to an award of the university”.

**Recommendation 3:** It should be made clear that, in relation to the universities, the role of the new body involves (i) external review of the internal quality assurance processes of the university (ii) articulating national objectives and policy of in relation to access, transfer and progression and (iii) promoting and developing the National Framework of Qualifications. Equally, it should be made clear that admission of students, establishment of the curriculum, assessment, validation of programmes, conferring of awards, titles of awards and their placement on the National Framework of Qualifications remain matters for the university itself, through its academic governance structures in accordance with the provisions of the Universities Act, 1997.

**Concluding remarks**

21. In conclusion, University College Dublin would welcome the opportunity to continue to engage in dialogue with the Department as the proposals to establish the new organisation evolve, particularly in respect to the drafting of the revised legislative framework.