

Approval of the Application by Quality and Qualifications Ireland (QQI) for Renewal of Inclusion on the Register

Register Committee
4/5 November 2019

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Ver. 1.0
Date 8/11/2019
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Application of:	25/07/2018
Agency registered since:	05/06/2015
External review report of:	20/06/2019
Review coordinated by:	European Association for Quality Assurance of Higher Education (ENQA)
Review panel members:	Jean-Marc Rapp (chair, academic), Dan Derricott (secretary), Doris Herrmann, Marija Vasilevska (student)
Decision of:	05/11/2019
Registration until:	30/06/2024
Absented themselves from decision-making:	none
Attachments:	1. Confirmation of eligibility, 27/08/2018 2. External Review Report, 20/06/2019

1. The application of 25/07/2018 adhered to the requirements of the EQAR Procedures for Applications.
2. The Register Committee confirmed eligibility of the application on 27/08/2018 having considered clarification received from QQI on 9/8/2018.
3. The Register Committee considered the external review report of 20/06/2019 on the compliance of QQI with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015 version).

Analysis:

4. In considering QQI's compliance with the ESG, the Register Committee took into account the following activities:
 - Institutional quality review
 - Focused reviews
 - Programme validation
 - Programme re-validation (programmatic review)
 - Delegated authority to make awards
 - New provider approval

- Re-engagement process for non-public providers

5. QQI's work related to the recognition of qualifications, the Europass Office, the National Framework of Qualifications, in further education and training, and the International Education Mark are not external quality assurance activities within the scope of the ESG. They are thus not pertinent to and covered by QQI's registration on EQAR.

6. The Register Committee found that the report provides sufficient evidence and analysis on QQI's level of compliance with the ESG.

7. With regard to the specific European Standards and Guidelines, the Register Committee considered the following:

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ESG 2.3 – Implementing processes

8. In its 2016 decision on QQI's Substantive Change Report, the Register Committee flagged for attention the use of site visits.

9. The Committee noted that site visits are not used in some processes, but that this was adequately explained by a "lighter touch in recognition of the greater responsibility held by those providers" (p. 27). The Register Committee concurred with the panel that the alternative approach used is effective and robust in the light of the process' objectives.

10. The Register Committee noted that QQI has finalised its external quality assurance processes and moved to full implementation of most processes since the last review.

11. The external review report, however, noted that for independent private providers "no cyclical institutional reviews have taken place as a result of the delay in approving those providers' Quality Assurance Procedures through Re-engagement" (p. 28).

12. While the report cited a combination of reasons for that and underlined that it was not the result of poor intentions on the part of the agency, the report noted that some providers may actually go up to 12 years without an institutional review. The panel further noted that the "risk of concerns about quality going unnoticed in these providers" was partly, but not wholly, mitigated by QQI having more intensive engagement with them through their programme validation relationship (p. 28).

13. In light of the incomplete implementation of reviews for independent private providers the Register Committee was unable to concur with the panel's conclusion of compliance, but considered that QQI only partially complies with the standard.

ESG 2.4 – Peer-review experts

14. In its 2016 decision on QQI's Substantive Change Report, the Register Committee flagged for attention the composition of QQI expert panels.

15. The Register Committee noted that some specific QQI processes do not use traditional expert panels, but are based on desk assessments or dialogues by QQI staff, followed by subsequent decisions where applicable.

The Committee noted that the decision-making bodies include all perspectives that are otherwise required to be on a panel.

16. The Committee further noted that wherever panels are deployed their composition complies with the standard.

17. The Register Committee therefore concluded that the flag was addressed and concurred with the panel's conclusion that QQI complies with the standard.

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ESG 2.7 – Complaints and appeals

18. The Register Committee noted the panel's remark that the outcomes of cyclical institutional reviews can currently not be appealed, while noting that a provider “may still wish to challenge the findings in a way that would be better suited to an appeals process rather than a complaints process” (p. 33).

19. The Register Committee has generally understood the standard to require that all results of external quality assurance processes be open to appeal, hence including reports that do not include “categorical decisions”.

20. The Committee therefore underlined that QQI should consider widening the scope of its appeal system in monitoring the fitness for purpose of the current arrangements, per the panel's remarks.

ESG 3.4 – Thematic analysis

21. In its decision of 2015 to admit QQI to the Register, the Register Committee flagged for attention the production of thematic analyses by QQI.

22. The Register Committee understood from the panel's report that QQI has been proactive and effective in producing a range of thematic analysis reports, which are considered useful in the sector for improving quality and quality assurance, even though not having completed full cycles in all external quality assurance activities.

23. The Register Committee therefore considered that the flag has been addressed and concurred with the panel's conclusion that QQI complies with the standard.

ESG 3.6 – Internal quality assurance and professional conduct

24. The development of QQI's internal quality assurance system was flagged for attention when QQI was admitted to the Register in 2015.

25. The Register Committee noted that the panel described QQI's internal quality assurance instruments as effective. They cover all its external quality assurance processes and thus respond to the recommendation made in the last external review of QQI.

26. While the panel noted that some future adjustments might be necessary once further external QA processes are rolled out, the Register Committee considered that the flag has clearly been addressed.

27. The Register Committee therefore concurred with the panel's conclusion that QQI complies with the standard.

28. For the remaining standards, the Register Committee was able to concur with the review panel's analysis and conclusion without further comments.

Conclusion:

29. Based on the external review report and the considerations above, the Register Committee concluded that QQI demonstrated compliance with the ESG (Parts 2 and 3) as follows:

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Standard	Review panel conclusion	Register Committee conclusion
2.1	Full compliance	Compliance
2.2	Full compliance	Compliance
2.3	Substantial compliance	Partial compliance
2.4	Full compliance	Compliance
2.5	Full compliance	Compliance
2.6	Full compliance	Compliance
2.7	Full compliance	Compliance
3.1	Full compliance	Compliance
3.2	Full compliance	Compliance
3.3	Full compliance	Compliance
3.4	Full compliance	Compliance
3.5	Substantial compliance	Compliance
3.6	Full compliance	Compliance
3.7	(not expected)	Compliance (by virtue of applying)

30. The Register Committee considered that QQI only achieved partial compliance with standard 2.3. In its holistic judgement, the Register Committee concluded that this was a specific and limited issue, which does not weigh heavily given QQI's engagement with independent private providers through their programme validation relationship. The Committee therefore concluded that QQI continues to comply substantially with the ESG as a whole.

31. The Register Committee thus renewed QQI's inclusion on the Register. QQI's renewed inclusion shall be valid until 30/06/2024¹.

32. The Register Committee further underlined that QQI is expected to address the issue mentioned appropriately and to resolve it at the earliest opportunity.

¹ Inclusion is valid for five years from the date of the external review report, see §4.1 of the EQAR Procedures for Applications.

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Quality and Qualifications Ireland (QQI)

26/27 Denzille Lane

Padraig Walsh, Chief Executive

2 Dublin

Ireland

Brussels, 30 August 2018

Confirmation of Eligibility: Application for Inclusion on the Register

Application no. A77 of 25/07/2018

Dear Padraig,

We hereby confirm that the application by QQI for renewal of registration is eligible.

Based on the information and draft terms of reference provided, the external review coordinated by ENQA - European Association for Quality Assurance of Higher Education fulfils the requirements of the EQAR Procedures for Applications. EQAR contacted QQI on 09/08/2018 to clarify some of the agency's portfolio of activities.

Following QQI's clarification (of 17/08/2018) we confirm that the following activities of QQI are within the scope of the ESG:

- *Institutional quality review*
- *Focused reviews*
- *Programme validation*
- *Programme re-validation (programmatic review)*
- *Delegated authority to make awards*
- *New provider approval*
- *Re-engagement process for non-public providers*

Please ensure that QQI's self-evaluation report covers all the aforementioned activities, including any changes brought to QQI's external quality assurance activities. The review should cover all activities carried out by QQI in principle, even if a certain type of activity was not carried out in practice yet; this also includes activities offered abroad.

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The self-evaluation report and the external review report should also address the following issues that were flagged when QQI was admitted to the Register:

ESG 3.4: Thematic analysis [ESG 2005: standard 2.6]

It should receive attention whether QQI has produced further system-wide analyses as required by the standard.

ESG 3.6: Internal quality assurance and professional conduct [ESG 2005: standard 3.8]

It should be addressed whether QQI has completed the development of its internal quality assurance system.

In addition, the external review of QQI should give particular attention to both QQI's regulations and practice as regards the use of site visits (ESG 2.3) and the composition of groups of evaluators (ESG 2.4), as noted in the change report of QQI (of December 2016)¹.

We note that following a legislative change, the agency will award the *International Education Mark (IEM)*. While we confirm that the activity, as it stands, is outside the scope of the ESG, we note that if a review/evaluation activity is introduced in the context of the IEM, QQI is expected to submit a change report². Furthermore, considering the role of IEM in strengthening the processes for approval of quality assurance procedures and programme validation, the activity is nonetheless pertinent to the external review of QQI in particular considering ESG 2.2, ESG 2.5 and ESG 3.1.

We further confirm that the following activities are not within the scope of the ESG:

- *Recognition of qualifications*
- *Europass Office*
- *National Framework of Qualifications*
- *Further education and training validation and apprenticeship programmes.*

While these activities are not relevant to your application, it is QQI's choice – in agreement with the review coordinator – whether those activities should be commented upon by the review panel.

We will forward this letter to ENQA in its capacity of the coordinator of the external review. At the same time we underline that it is QQI's responsibility to ensure that the coordinator and review panel take

¹ See QQI Change Report: https://backend.deqar.eu/reports/EQAR/2016-12_C16_SubstantiveChangeReport_QQI.pdf

² See our procedure and online form for Change Reports: <https://www.eqar.eu/register/substantive-change-report/>

account of the present confirmation, so as to ensure that all activities mentioned are analysed by the panel.

This confirmation is made according to the relevant provisions of the EQAR Procedures for Applications. QQI has the right to appeal this decision in accordance with the Appeals Procedure; any appeal must reach EQAR within 90 days from receipt of this decision.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Colin Tück".

Colin Tück
(Director)

Cc: ENQA (coordinator)