

Report of the External Review of Quality and Qualifications Ireland (QQI)

July 2014

ENQA Panel

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1. Glossary of acronyms

DA: Delegated Authority

DAB: Designated Awarding Bodies

DIT: Dublin Institute of Technology

EHEA: European Higher Education Area

ENQA: European Association for Quality Assurance in Higher Education

EQAR: European Quality Assurance Register for Higher Education

ESG: Standards and Guidelines for Quality Assurance in the European Higher Education Area

ESU: European Students Union

FETAC: Further Education and Training Awards Council

HEA: Higher Education Authority

HECA: Higher Education Colleges Association

HEI: Higher Education Institution

HETAC: Higher Education and Training Awards Council

IEM: International Education Mark IUA: Irish Universities Association

IOT: Institute of Technology

IUQB: Irish Universities Quality Board

PAEC: Programmes and Awards Executive Committee

QQI: Quality and Qualifications Ireland

NFQ: National Framework of Qualifications

NQAI: National Qualifications Authority of Ireland

RCSI Royal College of Surgeons in Ireland

SER: Self-evaluation report

SWOT: Strengths-Weaknesses-Opportunities -Threats

ToR: Terms of Reference

USI: Union of Students in Ireland

2. Executive Summary

QQI is a new agency emerging from the merger of 4 older, specialised agencies dealing with quality assurance in different sectors of the educational system of Ireland ("legacy agencies"). The Law setting up QQI entrusted the new agency a number of other tasks transferred from a legacy agency (such as the NARIC functions transferred from NQAI) and added a few new ones, such as the maintenance, development and review of the National Qualification Framework, the recognition of English language schools and the establishment of the Code of Practice and associated International Education Mark (IEM). From the Panel's viewpoint, the evaluation of such a big and diverse agency in the middle of a long and profound process of change has meant some special difficulties, e.g. because:

- Some of the procedures used are not really QQI policies (most were developed by one of the predecessor agencies and are still identified with that agency);
- The majority of new QQI policies are still at various stages of the preparation (Green Paper, White Paper, Draft Regulation, adopted rules not yet implemented or genuinely new activities with still limited accumulated experience, e.g. the International Education Mark, the Provider Lifecycle of Engagement or the extension of the Annual Dialogue meetings to more HEIs;
- QQI has hardly completed evaluation procedures of its own (the vast majority of procedures completed until now were started by one of the legacy agencies and then taken over by QQI applying the criteria and procedures of the forerunner agency);
- The new agency could not be evaluated against the recommendations made by previous evaluation panels when reviewing the legacy agencies (the configuration of the Agency has changed drastically and the recommendations have become obsolete).

Under these circumstances, QQI's structures and policies are currently in constant flux and it is really not easy to make out what is genuinely QQI and what was taken over (with little or significant change) from its legacy agencies. Hence, the Panel was faced with some uncertainty about what was actually under review and to what extent the observations made in the SER actually referred to QQI or to its predecessors. The Panel found the Self-Evaluation Report not very helpful in clarifying the picture, which only became clear during the interviews with the various groups involved in the site visit.

From this viewpoint the Panel wonders whether ENQA's rule that new agencies formed from predecessor agencies should undergo an evaluation in their own name within two years of their setting-up is a fair and realistic requirement. Panel members believe that the evaluation should be carried out when the new agency has settled in and has taken over the legacy from its predecessors – not

when most policies are still under development and very few evaluation processes have been completed. From the Panel's viewpoint, there is no doubt that the evaluation of QQI would have been an easier exercise one year later.

Against this background, the Panel could nonetheless carry out its evaluation mission under good circumstances during the site visit and came to clear conclusions on each of the criteria governing the admission to ENQA membership. QQI's main strengths are the strong links with stakeholders developed by predecessor organisations, its acceptance in the higher education community, the extensive experience of its staff and evaluators (carried over from the legacy agencies), its involvement in networking and European linkages, its marked functional independence and its highly qualified and motivated staff. Its main weaknesses are related to its complex role (QQI acts simultaneously as a degree-awarding agency and an evaluation body), the weight of its ongoing merger process on the conduct of "normal" activities, the lack of firm QQI policies in some crucial areas and the limited development of its own internal quality assurance system (with a good deal of quality efforts being invested in guaranteeing the quality of the merger process itself).

The Panel met relatively easily a consensus in its assessment of QQI's compliance with the ESGs and the ENQA criteria:

- With respect to Part 2 of the ESGs (Quality assurance processes) the Panel finds that QQI complies fully with 3 of them (2.1, 2.2 and 2.7), substantially with 4 (2.3, 2.4, 2.5 and 2.6) and only partly with 1 (2.8, system-wide analysis).
- With respect to the ENQA criteria (which coincide for the most part with Part 3 of the ESGs), QQI complies fully with 4 of them (Criteria 2, 4, 5 and 8), substantially with 3 (Criterion 1 as a result of ESG 3.1. that is substantially complied and ESG 3.3. that is fully complied, and Criteria 3 and 6) and only partly with 1 (Criterion 7 – Accountability).

The Panel also agreed on a number of recommendations for QQI's consideration.

- The most important of them concerns the completion of the merger process as soon as possible, including the development of the still incomplete policy and evaluation documents, the effective merger of the websites and the development of a comprehensive, QQI-wide internal quality system.
- Other recommendations concern the following areas: Memorandum of Understanding with the HEA; QQI's dual role as evaluating body and awarding body; system-wide analyses; development of the International Education Mark; periodic strategic dialogue with HEIs; development of QQI-wide tools for the Agency's own accountability; and further strengthening of the internationalisation of the agency and its evaluation procedures.

3. Introduction

This is the report of the type A review of the Quality and Qualifications Ireland (QQI) undertaken in May 2014 in Dublin for the purpose of determining the way in which and to what extent QQI fulfils the membership criteria for the European Association for Quality Assurance in Higher Education (ENQA) and thus the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

Background and outline of the review process

ENQA's regulations require all full member agencies to undergo an external cyclical review, at least once every five years, in order to verify that they fulfil the membership provisions.

In November 2004, the General Assembly of ENQA agreed that the third part of the proposed Standards and Guidelines for Quality Assurance in the European Higher Education Area should be incorporated into the membership provisions of its regulations. Substantial compliance with the ESG thus became the principal criterion for full membership of ENQA. The ESG were subsequently adopted at the Bergen ministerial meeting of the Bologna Process in 2005.

The external review of QQI was conducted in line with the process described in the Guidelines for External Reviews of Quality Assurance Agencies in the European Higher Education Area and in accordance with the timeline set out in the Terms of Reference.

The review Panel

The Review Panel for the external review of QQI was composed of the following members:

- Guy Haug, Independent Expert in the evaluation, development and internationalisation of higher education policies, institutions and programmes and Advisor on institutional and international development to the Rector of the Valencia University of Technology (Chairman).
- Núria Comet, Responsible for Internal Quality Assurance and Project Coordinator at AQU Catalunya, Spain (Secretary).
- Vincent Wertz, Vice-rector for teaching and international relations at the Catholic University of Louvain, Belgium.
- Dionyssis Kladis, Professor Emeritus in Higher Education Policy at the University of Peloponnese, Greece –EUA nomination.

- Daniel Derricott, Master of Arts (MA), Public Policy and Management at the University of York, UK–ESU nomination.

ENQA provided the Panel with ENQA's Terms of Reference (ToR), including a suggested timeline and a short presentation of the Panel members. The relevant dates before the site visit were:

Agreement on the composition of the Panel members / ENQA sends the Terms of

Reference: 18 February 2014

Agreement on the site visit: 27 February 2014

ENQA sends the SER: 11 March 2014

Panel request more evidence: 28 April 2014

QQI sends the schedule for the site visit with the participants: 1 May 2014

QQI sends more documentation: 6 May 2014

Telephone briefing of the Review Panel with ENQA representatives: 7 May 2014

Panel preparatory meeting: 21 May 2014

Site visit: 22-23 May 2014

The process

QQI produced a self-evaluation report (SER) which provided a substantial portion of the evidence that the Panel used to form its conclusions. Nevertheless the Panel found the SER repetitive and confusing in some sections, and not always as reflective as the Panel expected.

Two weeks before the site visit the Panel review had the opportunity to solve some doubts about the process through a telephone briefing organised by ENQA.

The Panel met for a preparatory meeting the day before the site visit to discuss the self-evaluation report and share first impressions regarding compliance with the ESG. The members also discussed the programme of the visit and initial lines of questioning were distributed among Panel members. Before the start of the meeting, Ms Karena Maguire and Ms Laura Carrigan (QQI) had attended to resolve some comments about the programme and other questions from the Chair and the Secretary.

At the end of the first day of the site visit, the Panel met to gather all the information provided during the site visit and to discuss the programme for the second day.

The Panel conducted the site-visit to validate fully the self-evaluation report and clarify any points at issue.

The sessions went according to the scheduled program; all participants showed an active and positive attitude towards the process.

At the end of the site visit, the Panel had a session with the Chief Executive of QQI to share the preliminary conclusions related to the level of compliance of QQI in relation to each of the ESG.

Finally, the review Panel produced the present final report on the basis of the self- evaluation report, the site-visit and its findings.

The Review Panel submitted on July 2014 the draft report to QQI for verification and comments on any factual inaccuracies.

In doing so it provided an opportunity for QQI to comment on the factual accuracy of the draft report.

4. The Context of the Review

Quality and Qualifications Ireland (QQI) is responsible for the external quality assurance of further and higher education and training (including English language provision) in Ireland and validates programmes and makes awards to certain providers in these sectors.

The mission of QQI is to promote the enhancement of quality in Ireland's further and higher education and training system, and to support and promote a qualifications system that benefits learners and other stakeholders.

QQI is also responsible for the maintenance, development and review of the National Framework of Qualifications (NFQ); it also acts as the Irish NARIC.

QQI was established in November 2012 by the amalgamation of the functions of four bodies that between them had awarding and quality assurance responsibilities: the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the Irish Universities Quality Board (IUQB) and the National Qualifications Authority of Ireland (NQAI).

Three of these legacy agencies were previously reviewed against the ESG on the dates indicated and held full membership of ENQA: HETAC (granted 2000, renewed 2006), NQAI (2008) and IUQB (2009).

The full membership of HETAC and NQAI was transferred to QQI as their legal successor on its legal establishment, in accordance with the decision of the ENQA Board on 14 September 2012.

Unlike HETAC, NQAI and FETAC, the Irish Universities Quality Board (IUQB) was not a statutory body established by law but was a company limited by guarantee governed by its Memorandum and Articles of Association. IUQB kept its ENQA membership until the end of December 2012.

The ENQA policy on amalgamation of agencies requires that the newly established agency undergoes an external ENQA coordinated review within two years of the amalgamation being completed.

Higher Education in Ireland

There are approximately 175,000 students in full-time and part-time higher education in Ireland.

The higher education system in Ireland comprises different types of higher education institutions:

- Providers with self-awarding powers;
- Providers with awarding powers delegated by QQI;
- Independent providers, whose programmes are accredited by QQI.

Providers with self-awarding powers:

Universities: there are eight universities recognised under the Universities Act, 1997. The Universities validate and award their own qualifications, as well as those of linked providers, recognised by them.

Dublin Institute of Technology

There are 14 public Institutes of Technology. Only, the Dublin Institute of Technology (DIT) awards its own qualifications. The DIT is identified as a designated awarding body under the 2012 Act.

Royal College of Surgeons in Ireland (RCSI): RCSI is a not-for profit, independent academic institution with charitable status. It is both an independent degree-awarding institution and a surgical Royal College. The RCSI is identified as a designated awarding body under the 2012 Act.

Providers with awarding powers delegated by QQI:

The other 13 Institutes of Technology (apart from DIT) have delegated authority (initially from HETAC and now from QQI) to make their own awards

up to various levels in the NFQ, including seven institutions making awards at doctoral level.

Independent providers:

There are currently 41 independent private higher education providers that provide programmes leading to awards that are recognised on the NFQ and are validated by QQI.

The National Framework of Qualifications

The Irish National Framework of Qualifications (NFQ) was introduced in 2003.

It is a single reference point for the awards of all Irish national awarding bodies (i.e., of the designated awarding bodies, the Institutes of Technology and QQI) and recognises a number of professional and international awards.

National Legislation

The Universities Act, 1997 sets out the objects and functions of a university and the structure and role of governing authorities. The governing authorities are required to see that strategic development plans are in place. The Higher Education Authority (HEA) has an oversight role on such plans.

The legislative framework preserves the academic freedom of the universities and respects the diverse traditions and institutional autonomy of each university.

The Institutes of Technology Act, 2006, created a similar relationship between the institutes and the HEA as that between the HEA and the universities.

The Qualifications Act (1999) permitted the delegation of authority to make awards to the Institutes of Technology and the Quality Assurance and Qualifications Act (2012) permits the extension of delegated authority to make awards to private higher education institutions subject to Ministerial regulations.

The National Strategy for Higher Education to 2030, (the 'National Strategy') which was launched in January 2011, aims to oversee the transformation of Ireland's higher education sector over the next two decades. Following subsequent recommendations made by the HEA, the Minister for Education and Skills announced a major re- organisation of the country's higher education sector in May 2013. The Minister has put in place a new system performance framework, based on key system objectives and indicators.

As a further step in implementing the National Strategy, in January 2014, the Minister for Education and Skills announced the publication of the Heads of a Bill which will allow for the future establishment of Technological Universities through the merger of some of the Institutes of Technology. It is anticipated that the Technological Universities will be self-awarding bodies and that QQI will act as an external quality assurance body to these institutions.

QQI

Organization

QQI employs 78 full time equivalent staff and its activity is divided across seven sections led by an Executive Officer:

- Quality Assurance Services
- Qualifications Services
- Provider Relations
- Industry and External Partnerships
- Corporate Affairs and Communications
- Audit and Procurement
- Strategic Analysis

QQI is governed by a Board which consists of ten members, including the Chief Executive; all members are non-representatives except with respect to the inclusion of one representative nominated by the Union of Students in Ireland (USI).

The members of the Board, other than the Chief Executive, are appointed by the Minister for Education and Skills.

A sub-board committee structure for QQI was developed by an internal Governance Working Group. The following sub-board committee structure for academic governance has been agreed and most of the Committees have been operational since October 2013:

- Programmes and Awards Executive Committee (PAEC): ensures that the programmes and the awards which are recognised within the National Framework of Qualifications are appropriate and consistent.
- Programmes and Awards Oversight Committee: reviews and analyses the activities of the PAEC and provide advice and make recommendations to it.

- Policies and Standards Committee: considers QQI draft policy and makes recommendations to the Board regarding policies, standards for education and training awards, guidelines concerning knowledge, skill and competence.
- Approvals and Reviews Committee (planned end 2014): will ensure that providers have met and continue to meet, the associated criteria.

Finally, QQI has just established a Consultative Forum, which consists of representatives from the further and higher education and training qualifications system and from the wider community of QQI stakeholders. The first meeting of QQI's Consultative Forum was held on April 2014. A total of 46 delegates from a wide range of stakeholder organisations, representatives from the QQI Board and QQI executives attended the Forum.

Funding

QQI receives state funding from the Department of Education and Skills in the form of a grant-in-aid. In 2013 it was €7.4m and for 2014 has been provisionally advised at €7.2m.

QQI is also funded through a range of fees and charges for various activities including the validation of programmes and certification of awards, estimated to be €4m in 2014. In 2014, QQI will also receive €1.1m in relationship fees for services to the Institutes of Technology and the designated awarding bodies.

Roles

QQI's roles derive from the statutory functions set out in the Qualifications and Quality Assurance (Education and Training) Act 2012.

These roles are to:

- Quality assure providers of further and higher education and training and their research and related services
- Promote, develop and maintain the National Framework of Qualifications
- Validate programmes and make awards (for providers without their own awarding powers)
- Inform the public about the quality of education and training programmes and qualifications

- Advise the Minister for Education and Skills in relation to national policy on quality assurance and enhancement in education and training.

5. Compliance of QQI with the Standards and Guidelines for Quality Assurance in the European Higher Education Area

ESG Part 2: EXTERNAL QUALITY ASSURANCE PROCESSES

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis. The external quality assurance of agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines. The external quality assurance activities may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency.

ESG 2.1 Use of internal quality assurance procedures

Standard

External quality assurance procedures should take into account the effectiveness of the internal quality assurance processes described in Part 1 of the European Standards and Guidelines.

Guidelines: The standards for internal quality assurance contained in Part 1 provide a valuable basis for the external quality assessment process. It is important that the institutions' own internal policies and procedures are carefully evaluated in the course of external procedures, to determine the extent to which the standards are being met. If higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise.

Evidence

Until now, QQI has mainly completed reviews commenced by their predecessors (IUQB, HETAC, and NQAI). The frameworks for these assessments contain explicit references to the ESG.

QQI is legislatively required to issue quality assurance (QA) guidelines to relevant providers (universities, institutes of technology and independent higher education institutions) following consultation with such providers. Once the QA guidelines have been issued, QQI is required to develop processes for the review of the effectiveness of providers' internal quality assurance procedures which will be based on lessons learned from the legacy review systems and the Part 1 of the ESG.

The providers with self-awarding powers are also autonomous bodies responsible for the development of their own academic programmes, recruiting

their own staff and making their own awards. Under the 2012 Act, they are required to develop their own internal quality assurance procedures, operate them, evaluate them and report on them. They are required to develop these procedures based on QQI guidelines and submit these procedures to QQI. In the case of DIT and RCSI, QQI must approve the procedures. In the case of the universities, it is sufficient for QQI to receive a copy of the procedures.

Analysis

The external review of HEIs, done on the basis of the policy and criteria of QQI legacy agencies, always includes an analysis of the effectiveness of its internal quality assurance system.

Although some of the new methodologies are about to be implemented, the experience of the HEIs in Ireland and the processes carried out by the predecessor agencies indicate that the level of development of providers' internal quality assurance systems is quite high. Both institutional reviews and programme validations are taking into account not only the existence of internal QA processes (ESG part 1) but also their effectiveness.

The effectiveness of the focus on internal quality assurance of HEIs was confirmed at interviews by the fact that representatives from the Ministry and from HEIs are of opinion that one of the main achievements of the system for external quality assurance is that it contributes to the improvement of the internal quality assurance within institutions. In all the interviews the role of QQI in this process was clearly understood and appreciated.

Conclusion

QQI fully complies with ESG 2.1

ESG 2.2 Development of external quality assurance processes

Standard

The aims and objectives of quality assurance processes should be determined before the processes themselves are developed, by all those responsible (including higher education institutions) and should be published with a description of the procedures to be used.

Guidelines: In order to ensure clarity of purpose and transparency of procedures, external quality assurance methods should be designed and developed through a process involving key stakeholders, including higher education institutions. The procedures that are finally agreed should be published and should contain explicit statements of the aims and objectives of the processes as well as a description of the procedures to be used. As external quality assurance makes demands on the institutions involved, a preliminary impact assessment should be undertaken to ensure that the procedures to be adopted are appropriate and do not interfere more than necessary with the normal work of higher education institutions

Evidence

According to the SER presented by QQI and additional information gathered thanks to the interviews during the site visit, the Panel appreciated that QQI has been operating a Comprehensive Policy Development Programme since March 2013. QQI has published the different stages of this policy development, which always includes a consultation process with providers and other stakeholders. These consultations are undertaken in accordance with QQI's Consultation Framework (QQI, 2013).

QQI has published a document called Snapshot 2013 that sets out the progress achieved of the various steps leading from Green Papers to White Papers and ultimately to Policy Documents. All Green and White Paper documents are published for consultation. QQI also publishes the submissions of the stakeholders and the synthesis of their contributions.

QQI Green Papers are tentative consultation documents of policy proposals for debate and discussion, without any definitive commitment to action.

QQI White Papers are a means of presenting QQI draft policy preferences prior to the introduction of approved policy and procedures. The introduction of a White Paper serves to test the climate of stakeholder opinion on an issue. QQI White Papers will always involve the subsequent approval of a policy.

Analysis

The Panel had convincing evidence that new frameworks and policies to be used by QQI are being designed in consultation with representatives of institutions and relevant stakeholders. QQI is developing an open and transparent process, which allows the effective participation of all key stakeholders.

Conclusion

QQI fully complies with ESG 2.2

ESG 2.3 Criteria for decisions

Standard

Any formal decisions made as a result of an external quality assurance activity should be based on explicit published criteria that are applied consistently.

Guidelines: Formal decisions made by quality assurance agencies have a significant impact on the institutions and programmes that are judged. In the interests of equity and reliability, decisions should be based on published criteria and interpreted in a consistent manner. Conclusions should be based on recorded evidence and agencies should have in place ways of moderating conclusions, if necessary.

Evidence

QQI is developing its new framework taking into consideration all the knowledge and experience accumulated in the versions developed by its

predecessors. At this moment, QQI is assessing programmes and institutions using the various criteria developed by its predecessors. This is the case, for example, of QQI managed institutional reviews that were commenced under IUQB, HETAC and NQAI.

The aim of QQI is to review and publish all the criteria it uses, but at this moment it is not clear enough from QQI's website which criteria are being applied in each assessment. QQI continues referring to e.g. the HETAC criteria and procedure, even though they are now being employed under the exclusive responsibility of QQI.

The consistency of the panels is achieved through panel training, the previous experience of external panels, the use of handbooks and guidelines, and the assistance from QQI staff.

QQI has established a project to develop further infrastructures to enhance the consistency of decision making for programme and research validation.

Analysis

The Panel was faced with a complex situation because the process of fusion has not yet been completed; as a consequence, at this time various methodologies and staff cultures inherited from the legacy agencies still coexist within QQI in the respective areas of its predecessors. Not all procedures have formally been made QQI procedures and are still viewed instead as HETAC or NQAI procedures.

It is also worth mentioning that all external experts who met with the panel previously participated in processes established by one of QQI's legacy agencies. From this they have without any doubt acquired very useful experience with the processes of evaluation, but it is not possible to guarantee that the various training processes ensure the same level of consistency QQI-wide.

On the other hand, the Panel considers that due to the different nature of QQI's relationship with HEIs enjoying very different levels of awarding powers it is more difficult (and at the same time less necessary) to ensure full consistency across the various types of procedures, since they apply to various types of Irish institutions.

The Panel nonetheless recommends QQI to continue developing new proposals aimed at enhancing the consistency of its decisions within each category.

Conclusion

QQI substantially complies with ESG 2.3

ESG 2.4 Processes fit for purpose

Standard

All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Guidelines: Quality assurance agencies within the EHEA undertake different external processes for different purposes and in different ways. It is of the first importance that agencies should operate procedures which are fit for their own defined and published purposes. Experience has shown, however, that there are some widely-used elements of external review processes which not only help to ensure their validity, reliability and usefulness, but also provide a basis for the European dimension to quality assurance.

- insistence that the experts undertaking the external quality assurance activity have appropriate skills and are competent to perform their task
- the exercise of care in the selection of experts
- the provision of appropriate briefing or training for experts
- the use of international experts
- participation of students
- ensuring that the review procedures used are sufficient to provide adequate evidence to support the findings and conclusions reached
- the use of the self-evaluation/site visit/draft report/published report/follow-up model of review
- recognition of the importance of institutional improvement and enhancement policies as a fundamental element in the assurance of quality

Evidence

Selection of experts:

QQI is using the criteria of its predecessors.

In the case of HETAC and IUQB (IRIU) reviews, the detailed procedures for the selection of experts are taken from the HETAC/IRIU Institutional Review Handbooks. The procedures describe how the panel is composed, who may be involved as panel members, the expertise required by the panel and the induction process for panel members.

A register of panel members was established by QQI (inherited from the legacy agencies) on the basis of nominations received from a number of organisations, including Irish higher education institutions, but the final composition of panels is always determined by QQI.

All panels include students (except for the ex-ante Initial Validation Program) and international experts. Even though statistical data provided by QQI seems not to support it, the panel's impression gathered from the series of interviews held during the site visit was that a high proportion of international experts come from the United Kingdom. The panel therefore recommends that QQI should continue its effort to strengthen and diversify the internationalisation of its procedures and its evaluation panels.

From the interviews, it was clearly established that all the experts are engaged in all the phases of the process.

Training of experts:

QQI has in place processes to train experts and experts themselves consider it an important factor ensuring the consistency of the reviews and the quality of the reports. Nevertheless when interviewing the review experts the Panel learned that experts had received different types of training before undertaking the review; while some attended full two-day training sessions, others only took part in a short preparatory meeting or underwent a telephone briefing.

Framework for reviews

QQI's quality assurance procedures for institutional reviews and for programme validation include all usual stages, i.e. self-evaluation report, site visit, draft report, published report and follow-up. All procedures are focused on supporting the improvement and enhancement of quality.

Analysis

QQI external quality assurance processes are being designed specifically to ensure their fitness to achieve the aims and objectives set for them.

Nevertheless, with respect to the composition of the external QQI expert teams, the Panel recommends the Agency to work more actively to recruit international experts from a wider range of European countries.

As regards the training, the Panel recommends QQI to strengthen the training programmes and to train again all experts for the new procedures and policies that will be published soon by QQI.

Conclusion

QQI substantially complies with ESG 2.4

ESG 2.5 Reporting

Standard

Reports should be published and should be written in a style which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

Guidelines: In order to ensure maximum benefit from external quality assurance processes, it is important that reports should meet the identified needs of the intended readership. Reports are

sometimes intended for different readership groups and this will require careful attention to structure, content, style and tone.

In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations and recommendations. There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers. Reports should be published in a readily accessible form and there should be opportunities for readers and users of the reports (both within the relevant institution and outside it) to comment on their usefulness.

Evidence

All the evaluations done by QQI require review and reporting. At the time of the site visit, QQI had produced only one full institutional review of its own: that of the Royal College of Surgeons in Ireland (RCSI). The remainder of procedures already completed at that time were all started by one of QQI's predecessors and conducted according to that agency's procedure.

In the case of the review of universities, two reports are produced and published, the main report which is designed to be read by a more specialist audience and a two page summary report which is meant for non-specialist external audiences and reflects an effort to make it easy to read and understand. The Panel commends QQI for this initiative aimed at improving the readability of QA reports for stakeholders that are not QA experts or higher education professionals.

QQI delivered to the Panel a hard and a soft copy of the Institutional review of the Royal College of Surgeons in Ireland that was published in April 2014, a few weeks before the site visit). This report (90 pages) is well structured in seven sections and appendices. It includes: Introduction and Context, Institutional Self-evaluation Report, Follow-up to the 2010 Review, Quality Assurance and Accountability, Quality Enhancement, Review objectives and Conclusions. The recommendations are easy to find and understand. The summary report includes a two-page summary highlighting the review team's commendations and recommendations.

During the site visit QQI also delivered two examples of Programme review reports. Both reports are well structured and contain a summary, the findings of the panel, the conditions underlying the decision and the recommendations.

QQI requires that all review assessment reports be published on QQI's website

The Reviewer Briefing Notes prepared by QQI for the RCSI Institutional Review include also criteria about the reporting process.

Analysis

The Panel was positively impressed by institutional reports, the main and the summary report; each of them is intended for a different readership group. In

particular the summary report is a good practice in order to spread out to a wide audience. Reports for the Programme Validation are also well structured.

All reports have a predetermined and structured format, which contributes to assuring a higher degree of consistency between them.

Yet, even though QQI publishes all reports on its website, the actual structure of QQI's website is not clear and easy enough for users to find the information. The Panel is of the opinion that while QQI generates informative and understandable reports, there is still an unsolved issue about public access to this information. QQI informed the Panel of its intention to improve its website in this respect and to effectively merge in the near future the information and databases from the websites of its four predecessor agencies.

The Panel recommends prioritizing the development of QQI's own website, as a common platform of information.

Conclusion

QQI substantially complies with ESG 2.5

ESG 2.6 Follow-up procedures

Standard

Quality assurance processes which contain recommendations for action or which require a subsequent action plan, should have a predetermined follow-up procedure which is implemented consistently.

Guidelines: Quality assurance is not principally about individual external scrutiny events: it should be about continuously trying to do a better job. External quality assurance does not end with the publication of the report and should include a structured follow-up procedure to ensure that recommendations are dealt with appropriately and any required action plans drawn up and implemented. This may involve further meetings with institutional or programme representatives. The objective is to ensure that areas identified for improvement are dealt with speedily and that further enhancement is encouraged.

Evidence

QQI is still implementing the different follow-up strategies and procedures established by its predecessors. The monitoring process is different depending on the type of evaluation:

As regards institutional reviews:

For institutions that passed an institutional assessment with the legacy agencies, the monitoring takes place one year after the evaluation – unless more urgent attention is required. Hence, several institutions whose

institutional review was conducted by HETAC or NQAI must submit their progress reports to QQI.

QQI undertakes an annual “engagement” of institutions through Annual Dialogue Meetings (ADMs) with each Designated Awarding Body (Universities, RSCI and DIT). These meetings are seen by QQI as really important, since the Agency does not make the awards of these bodies. In the absence of these ADMs, the main formal engagement of Designated Awarding Bodies would be restricted to a periodic review every seven years.

In the words of QQI, the discussion of the Annual Institutional Reports (AIR) constitutes an important part of such annual meetings. The AIRs submitted by the institutions provide information on the main activities undertaken during the previous year, including on progress achieved against the recommendations made in the most recent institutional review. These annual meetings take place between the senior management of QQI (including the CEO) and each institution (including the President, the Vice-President for Academic Affairs and the Quality Officer). This confers them with a high level of strategic significance.

The Panel appreciates that QQI announced its intention to roll out this process to the 13 Institutes of Technology, which have delegated authority to make their own awards, but not to the private HE institutions; the latter have much more frequent contact with QQI, since QQI directly validates their programmes, makes their awards and certifies their learners and therefore needs to be constantly informed on developments in these areas.

As regards providers’ access to the Initial Validation of Programmes leading to a QQI award, QQI has introduced a new mechanism to track and communicate all follow-up commitments taken by the provider. This mechanism is referred to as the “Provider Lifecycle of Engagements”. Applicants approved to offer a programme leading to a QQI award will be committed to the lifecycle of engagements with QQI as a substantial requirement of the programme validation. This includes the provision of information for learners as well as review and monitoring measures.

As regards Programme Validation:

According to the HETAC methodology, after the validation a monitoring process is defined in proportion to the perceived risk involved in the new programme; the monitoring process ensures that the conditions set and the recommendations made to providers are duly taken into account.

In the case of Programme Validation, the validation is only valid once QQI is satisfied that all conditions are being met.

Analysis

The Panel considers that the experience of QQI and its predecessor agencies with the Annual Institutional Reporting and Annual Dialogue Meetings is very

valuable for quality monitoring, management and enhancement, not least because it is based on a two-way exchange with HEIs. It seems nonetheless that there is a lack of momentum in the action planning at some providers. The Panel therefore recommends QQI to strengthen its follow-up procedures on the basis of all information available to it.

The Panel is aware that the high number of institutions that have dealings with QQI entails the risk that this follow-up procedure cannot really be done individually, on a case-by-case basis, with the Agency's current human resources. This means a substantial limitation to the agency's ability to follow-up on its decisions and recommendations.

The Panel noted that the Higher Education Authority (HEA) also intends conducting interviews annually with providers. Although the purpose of these meetings is not identical to those organised by QQI, it seems indispensable and urgent that QQI and HEA reach an agreement to avoid overlapping and to establish a framework for data collection and strategic discussions that is understandable to HEIs. The Panel recommends QQI to make certain that synergies are being exploited and responsibilities are clearly defined.

As regards the access of providers to the Initial Validation of Programmes leading to a QQI Award, the Panel found out that although the providers' obligations are set out in the relevant documents, private providers are still not fully clear about what follow-up obligations may be imposed upon them as part of the Providers Lifecycle of Engagements.

The Panel gathered the impression that the follow-up activity may actually be rather limited and may have little impact, at least until procedures inherited from HETAC are further developed and implemented.

Conclusion

QQI substantially complies with ESG 2.6

ESG 2.7 Periodic reviews

Standard

External quality assurance of institutions and/or programmes should be undertaken on a cyclical basis. The length of the cycle and the review procedures to be used should be clearly defined and published in advance.

Guidelines: Quality assurance is not a static but a dynamic process. It should be continuous and not 'once in a lifetime'. It does not end with the first review or with the completion of the formal follow-up procedure. It has to be periodically renewed. Subsequent external reviews should take into account progress that has been made since the previous event. The process to be used in all external reviews should be clearly defined by the external quality assurance agency and its demands on institutions should not be greater than are necessary for the achievement of its objectives.

Evidence

At QQI the cyclical basis of evaluations is different depending on the type of evaluation:

Institutional reviews:

The 2012 Act provides for a cycle of reviews of the effectiveness of a provider's quality assurance procedures no more than seven years after the provider issues its own QA guidelines.

Provider Access to Initial Validation of Programme leading QQI Awards: the initial validation of a programme is for 5 years; the programme must then be re-validated.

The institutional review process will among other things consider the effectiveness of the programme re-validation process carried out by the provider as part of its internal quality assurance procedures.

The QQI policy on Provider Access to Initial Validation of Programmes leading to QQI Awards was launched in October 2013. This policy is the first point in the cycle for new providers and they will also be subject to periodic institutional reviews of the effectiveness of their quality assurance procedures.

Programme Validation:

Periodic review (revalidation/programmatic review) of programmes is compulsory for all providers before the period of previous validation expires.

Analysis

Although a complete cycle of reviews has not yet been undertaken by QQI itself due to the transition process from its legacy agencies the Panel considers that the review of external quality assurance processes is indeed effectively defined on a cyclical basis.

Conclusion

QQI fully complies with ESG 2.7

ESG 2.8 System-wide analyses

Standard

Quality assurance agencies should produce from time to time summary reports describing and analysing the general findings of their reviews, evaluations, assessments etc.

Guidelines: All external quality assurance agencies collect a wealth of information about individual

programmes and/or institutions and this provides material for structured analyses across whole higher education systems. Such analyses can provide very useful information about developments, trends, emerging good practice and areas of persistent difficulty or weakness and can become useful tools for policy development and quality enhancement. Agencies should consider including a research and development function within their activities, to help them extract maximum benefit from their work

Evidence

As an important part of the amalgamation process, QQI has just published the document “Review of Reviews”, prepared by an independent review team. This report is in two parts. The first part is a comparative description and analysis of the legacy institutional review processes, highlighting their common and different elements, and assessing their respective 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. The feedback from this reflective document will be very useful to design the planned new QQI methodologies.

Analysis

Although the review “Review of Reviews” is of interest to a wider audience with a concern for quality and standards in higher education, its main use will be as a tool for their QQI’s own planning.

Due to the merging process in progress the current priorities of QQI are focused on establishing its new methodologies. Hence, the Panel acknowledges that system wide analysis is not currently a priority of the agency. Yet, the Panel recommends that QQI should invest more in thematic and disciplinary analyses as soon as possible.

Conclusion

QQI partially complies with ESG 2.8

ESG Part 3: EXTERNAL QUALITY ASSURANCE AGENCIES

ENQA criterion 1 / ESG 3.1 Use of external quality assurance procedures

Standard

The external quality assurance agencies should take into account the presence and effectiveness of the external quality assurance processes described in Part 2 of the European Standards and Guidelines.

Guidelines: The standards for external quality assurance contained in Part 2 provide a valuable basis for the external quality assessment process. The standards reflect best practices and experiences gained through the development of external quality assurance in Europe since the early 1990s. It is therefore important that these standards are integrated into the processes applied by external quality assurance agencies towards the higher education institutions. The standards for external quality assurance should together with the standards for external quality assurance agencies constitute the basis for professional and credible external quality assurance of higher education institutions.

Evidence

Standard 3.1 includes the whole part 2 of ESG

Analysis

QQI fully complies with ESG 2.1; ESG 2.2; ESG 2.7.

QQI substantially complies with ESG 2.3, ESG 2.4; ESG 2.5; ESG 2.6

QQI partially complies with ESG 2.8

Conclusion

Overall, the Review Panel concludes that QQI substantially complies with ESG 3.1.

ENQA criterion 2 / ESG 3.2: Official status

Standard

Agencies should be formally recognised by competent public authorities in the European Higher Education Area as agencies with responsibilities for external quality assurance and should have an established legal basis. They should comply with any requirements of the legislative jurisdictions within which they operate.

Evidence

QQI was established in November 2012 with the commencement of the Qualifications and Quality Assurance (Education and Training) Act, 2012. This Act dissolved two statutory quality assurance bodies that previously had

responsibility for quality assurance in higher education; the Higher Education and Training Awards Council (HETAC) and the National Qualifications Authority of Ireland (NQAI). Also, the 2012

Act made external quality assurance of the Irish university sector (that was formerly under NQAI) the responsibility of QQI

QQI is thus the legal successor to HETAC, IUQB and NQAI.

QQI is also responsible for the maintenance, development and review of the Irish National Framework of Qualifications.

Analysis

From the description provided in the SER and the legal documents it refers to, the Panel is satisfied that QQI has an established legal basis and is formally recognised after the merging process by public authorities as the Irish national agency with responsibilities for external quality assurance in the various sectors of education it covers, including in particular higher and further education.

During the site visit all of the groups interviewed recognised without reservations that QQI has a strong basis and legitimacy, even though the merging process is still not fully completed.

Conclusion

QQI fully complies with ESG 3.2

ENQA criterion 1 /ESG 3.3 Activities

Standard

Agencies should undertake external quality assurance activities (at institutional or programme level) on a regular basis.

Guidelines: These may involve evaluation, review, audit, assessment, accreditation or other similar activities and should be part of the core functions of the agency

Evidence

QQI is responsible for the external quality assurance of higher and further education and training and validates programmes and awards degrees itself to certain providers in these sectors. As described in the SER the main activities in relation of Quality Assurance carried out by QQI are divided in two levels:

- Institutional Quality Assurance, to which all QQI providers – both public and private - are subjected;

- Programme Quality Assurance, in those cases where QQI itself awards the degrees.

Since the merging process QQI has mainly completed review procedures undertaken by its predecessors, taking over their policies, criteria and guidelines with no or little changes. Yet, in the near future, QQI will substitute these policies with its own that are currently in various stages of development on the basis of a sequence of Green Papers, White Papers and formal adoption.

Analysis

QQI's activities related to external quality assurance are defined within the national legislation and are well described in the SER. During the interviews with staff and stakeholders the Panel could easily find the confirmation that these activities are taking place on a regular basis.

Conclusion

QQI fully complies with ESG 3.3

ENQA criterion 3 / ESG 3.4: Resources

Standard

Agencies should have adequate and proportional resources, both human and financial, to enable them to organise and run their external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of their processes, procedures and staff.

Evidence

Financial resources

QQI is mainly funded from an annual grant from government (€7.4m in 2013), from relationship fees from public providers (€1.1m in 2014) and from fees charged for demand-based statutory quality assurance services provided to independent (private) providers, such as programme validation, certification, programmatic reviews and institutional reviews (€3,1m in 2013).

Human resources

QQI employs 78 full time equivalent staff and its activities are divided across seven management sections, each led by an Executive Officer:

- Quality Assurance Services (with 27 FTE persons);
- Qualifications Services (with 17 FTE persons);

- Provider Relations (with 9 FTE persons);
- Industry and External Partnerships (with 1 FTE person);
- Corporate Affairs and Communications (with 20 FTE persons);
- Audit and Procurement (with 3 FTE persons);
- Strategic Analysis (with 1 FTE person).

These figures need to be compared to the total staff employed in 2010 by the four legacy agencies (104 FTE persons). While some part of this staff reduction might be related to synergies resulting from the merger, there is no doubt that QQI has seen its human resources affected by the moratorium on staff recruitment in Irish public services initiated in 2009. The moratorium was still in force at the time of the site visit in 2014.

Analysis

The human resources available to QQI seem to be adequately qualified to organise and carry out their external quality assurance functions, not least since all of them were previously employed by one of the predecessor bodies.

Nevertheless, due to the significant staff reduction some interviews showed that QQI might encounter some difficulties in the future in working as effectively as before. The HEIs' representatives interviewed during the site visit voiced their concern about this reduction in QQI's human resources, all the more that at the same time some new activities are gradually being introduced (e.g. the International Education Mark), and this may weaken the agency's efficiency in its normal, established activities.

The staff interviewed by the Panel seemed satisfied with the way in which the amalgamation process has been performed. They value in particular that the process was carried out very transparently, after extensive consultations and communication at all levels. There is also clear support from staff for the transition to a single, unified QQI team where the efficiency gains resulting from the merger would offset the recent reduction in staff numbers.

Conclusion

QQI substantially complies with ESG 3.4

ENQA criterion 4 / ESG 3.5: Mission statement

Standard

Agencies should have clear and explicit goals and objectives for their work, contained in a publicly available statement.

Guidelines: These statements should describe the goals and objectives of agencies' quality assurance processes, the division of labour with relevant stakeholders in higher education, especially the higher education institutions, and the cultural and historical context of their work. The statements should make clear that the external quality assurance process is a major activity of the agency and that there exists a systematic approach to achieving its goals and objectives. There should also be documentation to demonstrate how the statements are translated into a clear policy and management plan.

Evidence

In the SER QQI has defined its mission as:

"QQI's mission is to promote the enhancement of quality in Ireland's further and higher education and training and quality assures providers. QQI supports and promotes a qualifications system that benefits learners and other stakeholders".

And its vision as:

"QQI's vision is to seek extensive high quality education and training opportunities with qualifications that are widely valued nationally and internationally".

QQI has developed six explicit goals aimed at guaranteeing that the organisation fulfils its mission.

As evidence for this, QQI presented the Panel with its first "Strategy Statement" published in November 2013. This strategic document provides direction and guidance to QQI's staff and stakeholders. This first Strategic Statement covers a three year period (from 2014 to 2016).

The objectives, actions and outputs to be achieved each year by QQI are presented in a "Corporate Plan" and the Panel had access to the Corporate Plan 2014.

Analysis

QQI has a Strategic Statement which is fine-tuned in an annual operating plan and its performance is reviewed against its mission on a yearly basis.

In the Corporate Plan 2014, the strategic goals are clearly linked to operational goals and an activity plan. Both strategic documents show that external quality assurance is a major activity of the agency, even though its purview also includes other activities, such as its functions referring to the NQF or the NARIC.

All documents referred to in the previous sentences are published on QQI's website. As was already mentioned, the Agency website is expected to undergo major revisions in the near future, in order to make the information more readily accessible.

The Panel found in its discussions and meetings with various groups that the activities of QQI reflect its mission and actively contribute to the development and improvement of quality in Higher and Further Education Institutions.

Conclusion

QQI fully complies with ESG 3.5

ENQA criterion 5 / ESG 3.6: Independence

Standard

Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders.

Guidelines: An agency will need to demonstrate its independence through measures, such as:

- its operational independence from higher education institutions and governments is guaranteed in official documentation (e.g. instrument of governance or legislative acts)
- the definition and operation of its procedures and methods, the nomination and appointment of external experts and the determination of the outcomes of its quality assurance processes are undertaken autonomously and independently from governments, higher education institutions, and organs of political influence
- while relevant stakeholders in higher education, particularly students/learners, are consulted in the course of quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Evidence

QQI is responsible for tasks that are clearly defined in the Qualifications and Quality Assurance Act (2012). The Board is meant to be truly independent, i.e. it is not designed to be representative - except for the student member, who is nominated by the Union of Students and is formally expected to represent students' interests.

The members of the Board are formally appointed by the government. The appointment process is extensively described on the Ministry's website. A remarkable feature is that three of the seven non-learners, non-executive members of the Board were appointed through the open Public Appointments Service (PAS) procedure rather than on the basis of recommendations by stakeholders' bodies.

The Chief Executive is appointed by the Board with the consent of the Minister. The mechanism of appointing Chief Executives of State Agencies in Ireland is also subject to the PAS. The current Chief Executive was appointed following a procedure of public advertisement and open competition.

QQI is fully responsible for appointing all its external experts and evaluators and there are mechanisms in place to avoid potential conflicts of interest.

QQI works within the broad framework of Irish governmental policy, i.e. the Agency is operationally independent in the performance of its functions and in its decision- making.

QQI follows extensive consultation procedures in developing its criteria and methodologies, but is formally and strictly responsible for its own decisions.

Institutions always have an opportunity to correct factual errors in the draft reports and can even make formal comments to QQI before the reports are published, but the final reports are fully and exclusively the responsibility of QQI.

Analysis

According to the law, QQI is independent in the performance of its functions.

Although the members of the Board are appointed by the Minister, the procedure of the Public Appointments Service guarantees an open process for the selection of members.

The Board members interviewed during the site visit expressed their full independence in a clear way and insisted on their non-representative status and non-executive role. This is of particular importance since the Board addresses all QQI's strategic issues, reaching from the steering of the merger process to the adoption of policies, criteria and procedures.

None of the interviewed representatives of HEIs questioned the full independence of QQI. The external experts also showed their satisfaction that the evaluation committees act in complete independence and are expected to do so.

Conclusion

QQI fully complies with ESG 3.6

4.6 ENQA criterion 6 / ESG 3.7 External quality assurance criteria and processes used by the members

Standard

The processes, criteria and procedures used by agencies should be pre-defined and publicly available.

These processes will normally be expected to include:

- a self-assessment or equivalent procedure by the subject of the quality assurance process;
- an external assessment by a group of experts, including, as appropriate, (a) student member(s), and site visits as decided by the agency;
- publication of a report, including any decisions, recommendations or other formal outcomes;
- a follow-up procedure to review actions taken by the subject of the quality assurance process in the light of any recommendations contained in the report.

Guidelines: Agencies may develop and use other processes and procedures for particular purposes.

Agencies should pay careful attention to their declared principles at all times, and ensure both that their requirements and processes are managed professionally and that their conclusions and decisions are reached in a consistent manner, even though the decisions are formed by groups of different people.

Agencies that make formal quality assurance decisions, or conclusions which have formal consequences, should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of each agency.

Evidence

QQI has in place various well run-in procedures for its different evaluation processes. The Panel was provided with the following documents as evidence:

- Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards (QQI, 2013);
- Assessments and Standards: Implementing the National Framework of Qualifications and applying the ESG (HETAC, 2009);
- Good practices for the approval, monitoring and periodic review of programmes and awards in Irish universities (IUQB, 2012);
- Institutional Review Handbook (HETAC, 2009);
- Institutional review Handbook (IUQB, 2009).

In these documents the steps of each assessment procedure are clearly established.

Analysis Processes, criteria and procedures used by QQI are predefined and publicly available. Nevertheless, as explained before, in this period of uncompleted amalgamation of 4 previous agencies into a single one, it is not always easy to find the documents on the website.

In May 2013, QQI introduced a Comprehensive Policy Development Programme, building on the policy legacy of its predecessors and adapting policies to the new requirements laid down in the new legislation on Quality and Qualifications. As part of its Comprehensive Policy Development Programme, QQI has undertaken in 2014 to publish a series of White Papers and to conduct

public consultations. In this way QQI is setting new quality assurance guidelines for higher education institutions and new procedures for their implementation and control (Institutional Reviews).

As a consequence, it was not possible for the Panel to assess all new policies at the time of the site visit, since some of them are still in the making.

The Panel reviewed the report of QQI's Institutional Review of the Royal College of Surgeons of Ireland. This review involved all required stages in the process: a self- assessment phase, an external assessment by a group of experts including a student member and a site visit; the group of experts prepared a summary report and a full report which are published on QQI's website.

QQI has taken over from its predecessor the main follow-up procedure, based on the submission of annual institutional reports and annual dialogue meetings with DABs and is about to extend this procedure (from 2014) to the Institutes of Technology.

With respect to the ex-ante evaluation of private providers' programmes ("Initial Programme Validation") QQI has completed the evaluations begun by HETAC but not completed before its dissolution. The process always includes a self- evaluation report and a procedure of external assessment.

The appeals procedure is described in the SER, but during the interviews the Panel could find out that HEIs have only an approximate notion of the appeals procedures and their possible outcomes.

QQI assures the consistency of its decisions through a variety of mechanism, including expert training, clear criteria, structured templates, the experience of the experts who typically participate in different types of assessments and the participation of a QQI member in some site visits. The Panel could check that external experts welcome the support received from members of QQI during the evaluation missions.

Conclusion

QQI substantially complies with ESG 3.7

4.7 ENQA criterion 7 / ESG 3.8: Accountability procedures

Standard

Agencies should have in place *procedures for their own accountability*.

Guidelines: These procedures are expected to include the following:

1. A published policy for the assurance of the quality of the agency itself, made available on its website.
2. Documentation which demonstrates that:
 - the agency's processes and results reflect its mission and goals of quality assurance

- the agency has in place, and enforces, a no-conflict-of-interest mechanism in the work of its external experts
 - the agency has reliable mechanisms that ensure the quality of any activities and material produced by subcontractors, if some or all of the elements in its quality assurance procedure are subcontracted to other parties
 - the agency has in place internal quality assurance procedures which include an internal feedback mechanism (i.e. means to collect feedback from its own staff and council/Board); an internal reflection mechanism (i.e. means to react to internal and external recommendations for improvement); and an external feedback mechanism (i.e. means to collect feedback from experts and reviewed institutions for future development) in order to inform and underpin its own development and improvement.
3. A mandatory cyclical external review of the agency's activities at least once every five years.

Evidence

As regards QQI own accountability:

- A published policy for the internal assurance of quality at QQI was not included in the SER and could not be found on the website.
- QQI is developing a new Internal Quality Assurance manual. At this moment, only a draft version is available. Internal Quality Assurance at QQI reflects a cross-organisational approach and as such it is not assigned to any particular unit and therefore it is not formalised in the organogram. Rather, the coordination of Internal Quality Assurance is the responsibility of the planning unit, which belongs to the Corporate Affairs and Communications section and is steered by the QA officer.
- QQI has in place a procedure aimed at identifying and avoiding possible conflicts of interest.

In May 2014, QQI published the document called "Review of Reviews" that was compiled by three independent experts on the basis of a series of interviews with different groups of stakeholders. The document provides a complete overview and an assessment of the different types of reviews carried out by QQI's predecessors.

Analysis

The procedures described in the SER as internal QA processes are not really sufficiently developed to serve QQI's information needs (feedback mechanisms). At this moment, QQI's Internal Quality Assurance System is still incompletely developed. Although QQI conducts internal audits through its Audit and Procurement section; these audits are not of the type required for Internal Quality Assurance.

The Panel appreciates that the document "Review of Reviews" provides an interesting and reflective feedback on the work done by its predecessors. But, it is not clear that QQI uses external mechanism feedback from experts and reviewed institutions in their daily activity.

The Panel recommends that QQI should complete the development of its Internal Quality Assurance System taking into account the experience and knowledge of the previous IQA Systems.

Conclusion

QQI partially complies with ENQA ESG 3.8

4.8 ENQA criterion 8: Miscellaneous

i. The Agency pays careful attention to its declared principles at all times, and ensures both that its requirements and processes are managed professionally and that its judgements are reached in a consistent manner, even if the judgements are formed by different groups.

ii. If the Agency makes formal quality assurance decisions, or conclusions which have formal consequences, it should have an appeals procedure. The nature and form of the appeals procedure should be determined in the light of the constitution of the Agency.

iii. The Agency is willing to contribute actively to the aims of ENQA.

Evidence

Consistency of Judgements: As explained before, the judgements reached by the external evaluation panels offer sufficient guarantees for their consistency and professionalism thanks mainly to the training of experts, the solid and diversified experience of most of them and the availability of a series of guidelines and templates prepared by QQI.

Appeals Procedure: QQI has in place an Appeals procedure, but it is not well known by higher education providers.

Contribution to the aims of ENQA: QQI has been very actively engaged in the European QA arena and has been working actively for the development of QA in European Higher Education. There is no doubt that its work has actively contributed to the aims of ENQA. Suffice it to mention that in October 2013 Dr Pdraig Walsh, Chief Executive of QQI, was elected as President of ENQA. QQI staff regularly attends ENQA conferences and workshops and actively participates in ENQA projects (e.g. the EQAREP project on the value of information generated by QA agencies).

Analysis

In tune with the analysis of QQI activities provided in the previous paragraph the

Panel came to the following conclusions:

- With respect to the consistency of decisions (ESG 2.3): QQI substantially complies.
- With respect to the appeals procedure (ESG 3.7): QQI partially complies.
- QQI significantly contributes to the aims of ENQA (fully compliant)

Conclusion

QQI substantially complies with criterion 8.

6. Conclusion and recommendations

6.1 Conclusion

In spite of the special circumstances due to the ongoing merging process that entails constant change at QQI (both in its internal organisation and processes and in its interaction with HEIs and other key stakeholders such as the HEA), the Panel could gather enough information (from the SER, but even more during the site visit) and gain a good understanding of QQI's structures and activities.

The Panel came relatively easily to a consensus about the assessment of QQI's compliance with the various ENQA criteria and hence with Parts 2 and 3 of the ESGs.

With respect to QQI's compliance with Part 2 of the ESGs (Quality Assurance processes) the Panel came to the following conclusions:

- Full compliance with 3 ESGs: 2.1. (use of internal quality assurance of HEIs), 2.2. (development of external QA processes) and 2.7. (periodic reviews);
- Substantial compliance with 4 ESGs: 2.3 (criteria for decisions), 2.4 (processes fit for purpose), 2.5 (reporting) and 2.6 follow-up procedures); and
- Partial compliance with 1 ESG: 2.8 (system-wide analyses).

With respect to the ENQA criteria (which coincide for the most part with Part 3 of the ESGs) the Panel came to the following conclusions:

- Full compliance with 4 ENQA criteria: criteria 2 (status), 4 (mission), 5 (independence) and 8 (consistency, appeals and contribution to ENQA);
- Substantial compliance with 3 ENQA criteria: criterion 1 (Activities), as a result of ESG 3.1. that is substantially complied and ESG 3.3. that is fully complied, Criterion 3 (resources) and criterion 6 (external QA criteria and processes used by the agency); and
- Partial compliance with 1 ENQA criterion: criterion 7 (accountability).

6.2 Recommendations

The Panel's main recommendation to QQI is to complete the merger as soon as possible and in the meanwhile to minimise the impact of the merging process on the functioning and image-building of the new Agency. The Panel appreciates that integrating four agencies with differing QA responsibilities into a single one while at the same time adding new tasks is a formidable challenge; it also appreciates that QQI has chosen to take the move following extensive

consultation and communication, in order not to lose the experience and goodwill accumulated by its predecessor agencies. Yet, the long transition process also brings with it delays and frustrations and has a bearing on the development of QQI's own, new policies and tools.

As part of the process of completion of the merger, the Panel recommends QQI to address the following aspects as priorities:

- Development of the missing policy documents emerging from the Green Papers and White Papers and the consultations in progress; in the Panel's view, within a matter of months (not years) there should no longer be "HETAC procedures" or "NQAI procedures", but only fully-fledged QQI procedures in the activities and internal culture of QQI; QQI might wish to consider "upgrading" immediately the status of all policy documents and evaluation guides, making them QQI policies and procedures instead of HETAC or NQAI documents – even though most of these documents may be changed in the course of the revision process in progress;
- Development of QQI's own website, as a common platform of information substituting the websites of the legacy agencies and showing all policy documents, criteria/procedures and decisions of QQI, irrespective of the legacy agency from which some of these procedures and decisions may have been taken over; users seeking e.g. institutional evaluation reports should not be referred much longer to the HETAC website, but should find it handily on the QQI site;
- Development of a comprehensive formalised system of internal quality covering all the various educational sectors under the purview of QQI, substituting this unified, homogeneous system to the current fragmentation of internal quality control – however solid these partial approaches may be in their respective areas.

The Panel expects also that the implementation of this recommendation would allow QQI to revert to a more "normal" situation, where the bulk of attention and energy is dedicated to the activities – not any longer to the merger process.

In addition to this main recommendation, the Panel also suggests that QQI should pay special attention to the following areas:

- Signature of a Memorandum of Understanding with the Higher Education Authority (HEA) in order to clearly establish the sharing of tasks between the two bodies and coordinate their interaction with HEIs, in particular with respect to data collection by both agencies and to the Annual Dialogue Meeting (with QQI) and the Strategic Dialogue Meeting (with the HEA) meetings;
- Reduction of the area of potential conflict of interest between QQI as evaluating body and QQI as awarding body; the Panel encourages QQI to

devolve as much awarding power as possible to mature institutions, in order to limit the risks that the agency may be faced with cases where its dual role may undermine its credibility in the higher education community;

- Development of system-wide analyses, in particular through disciplinary benchmarking and overall trends and issues in Irish higher education (in line with the national agenda for higher education and research set out by the Government);
- Cautious development of the International Education Mark (IEM), in order to focus it on the most relevant quality indicators and avoid the IEM becoming a quality standard of its own (alongside institutional review and programme validation/accreditation), which might create some confusion in the projection of Irish quality seals towards the external world;
- Extend the periodic dialogue with HEIs – that may not have to be annual but must be coordinated with the HEA – with a view to building up institutional strategies in line with quality enhancement, institutional profiles and national priorities;
- Strengthen its follow-up procedures on the basis of all information available to it;
- Develop a formalised, comprehensive system of data gathering and reporting in order to improve QQI's accountability;
- Strengthen the training programmes and retrain all experts for the new procedures and policies that will be published soon by QQI;
- Strengthen and diversify the internationalisation of QQI's structure and evaluation procedures.

Annexes

Annex 1 Terms of Reference

Annex 2-Schedule of the Site Visit, May 2014

Annex 1: Terms of Reference (ToR)

External review of Quality and Qualifications Ireland (QQI) by the European Association for Quality Assurance in Higher Education (ENQA)

Annex I: TERMS OF REFERENCE

September 2013

1. Background and Context

Quality and Qualifications Ireland (QQI) is responsible for the external quality assurance of further and higher education and training (including English language provision) in Ireland and validates programmes and makes awards to certain providers in these sectors.

QQI is also responsible for the maintenance, development and review of the National Framework of Qualifications (NFQ).

QQI was established in November 2012 by the amalgamation of the functions of four bodies that had both awarding and quality assurance responsibilities: the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the Irish Universities Quality Board (IUQB) and the National Qualifications Authority of Ireland (NQAI).

Three of these legacy agencies were previously reviewed against the ESG on the dates indicated and held full membership of ENQA, HETAC (granted 2000, renewed 2006), NQAI (2008) and IUQB (2009). Full membership of HETAC and NQAI was transferred to QQI as their legal successor on its legal establishment, in accordance with the decision of the ENQA Board on 14 September 2012.

Unlike HETAC, NQAI and FETAC, the Irish Universities Quality Board (IUQB) was not a statutory body established by law but was a company limited by guarantee governed by its Memorandum and Articles of Association. IUQB kept its membership until the end of December 2012.

The ENQA policy on amalgamation of agencies requires that the newly established agency undergoes an external ENQA coordinated review within two years of the amalgamation being completed.

2. Purpose and Scope of the Evaluation

This is a type A review, as defined in the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*. It will evaluate the way in which and to what extent QQI fulfils the criteria for the ENQA membership and thus the *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. Consequently, the review will also provide information to the ENQA Board to aid its consideration of whether QQI should be accepted as a Full Member of ENQA.

The review panel is not expected, however, to make any judgements as regards granting Full Membership.

3. The Review Process

The process is designed in the light of the *Guidelines for external reviews of quality assurance agencies in the European Higher Education Area*.

The evaluation procedure consists of the following steps:

- Formulation of the Terms of Reference and protocol for the review;
- Nomination and appointment of the review panel;
- Self-evaluation by QQI including the preparation of a self-evaluation report;
- A site visit by the review panel to QQI;
- Preparation and completion of the final evaluation report by the review panel;
- Scrutiny of the final evaluation report by the Review Committee of the ENQA Board;

Analysis of the scrutiny by the ENQA Board and their decision regarding ENQA membership; Follow-up of the panel's and/or ENQA Board's recommendations by the agency.

3.1 Nomination and appointment of the review team members

The review panel consists of five members: four external reviewers (one or two quality assurance experts, representative(s) of higher education institutions, student member) and a review secretary. Three of the reviewers (including the review secretary) are nominated by the ENQA Board on the basis of proposals submitted to ENQA by the national agencies, and are drawn from senior serving members of Board/Council or staff of ENQA member agencies. The fourth external reviewer is drawn from a nomination provided by the European University Association (EUA). The nomination of the student member is asked from the European Students' Union (ESU). One of the panel members serves as the chair of the review.

Current members of the ENQA Board are not eligible to serve as reviewers.

ENQA will provide QQI with the list of suggested experts with their respective curriculum vitae to establish that there are no known conflicts of interest. The experts will have to sign a non-conflict of interest statement as regards the QQI review.

3.2 Self-evaluation by QQI, including the preparation of a self-evaluation report

QQI is responsible for the execution and organisation of its own self-evaluation process and shall take into account the following guidance:

Self-evaluation is organised as a project with a clearly defined schedule and includes all relevant internal and external stakeholders;

The self-evaluation report is broken down by the topics of the evaluation and is expected to contain, among others: a background description of the current situation of the Agency; an analysis and appraisal of the current situation; proposals for improvement and measures already planned; a SWOT analysis;

The report is well-structured, concise and comprehensively prepared. It clearly demonstrates the extent to which QQI fulfils its tasks of external quality assurance and meets the criteria for the ENQA membership and thus the ESG. The report is submitted to the review panel a minimum of eight weeks prior to the site visit.

3.3 A Site Visit by the Review Panel

QQI will draw up a draft proposal of the schedule for the site visit to be submitted to the review panel two months before the planned dates of the visit. The schedule includes an indicative timetable of the meetings and other exercises to be undertaken by the review panel during the site visit, the duration of which is 2 days. The approved schedule shall be given to QQI one month before the site visit, in order to properly organise the requested interviews.

The review panel will be assisted by QQI in arriving in Dublin, Ireland.

The site visit will close with an oral presentation and discussion of the major issues of the evaluation between the review panel and QQI.

3.4 Preparation and completion of the final evaluation report

On the basis of the review panel's findings, the review secretary will draft the report in consultation with the review panel. The report will take into account the purpose and scope of the evaluation as defined under article 2. It will also provide a clear rationale for its findings with regards to each ENQA membership criteria. A draft will be submitted for comment to QQI within two months of the site visit for comment on factual accuracy. If QQI chooses to provide a statement in reference to the draft report it will be submitted to the chair of the review panel within two weeks after the receipt of the draft report. Thereafter the review panel will take into account the statement by QQI, finalise the document and submit it to QQI and ENQA.

The report is to be finalised within three months of the site visit and will not exceed 40 pages in

length.

4. Follow-up Process and Publication of the Report

QQI will consider the expert panel's report and will published it on its website. The report will also be published on the ENQA website, regardless of the review outcome and decision by the ENQA Board. QQI commits to preparing a follow-up plan in which it addresses the recommendations of the review panel and to submitting, if requested, a progress report to the ENQA Board within two years of the decision by the ENQA Board.

5. Use of the report

ENQA shall retain ownership of the report. The intellectual property of all works created by the expert panel in connection with the review contract, including specifically any written reports, shall be vested in ENQA.

The review report is to be used by the Board of ENQA for the purpose of reaching a conclusion on whether QQI has met the membership criteria/ESG.

The review report is to be considered as property of ENQA only after being approved by the ENQA Board. Once submitted to QQI and ENQA and until the decision by the Board is made, the report may not be used or relied upon by QQI, the panel and any third party and may not be disclosed without the prior written consent of ENQA. QQI may use the report at its discretion only after the Board decision has been made.

Should the review report be used for applying to the European Quality Assurance Register for Higher Education (EQAR), the Chair of the panel shall remain available to respond to questions of clarification or further information from the EQAR Register Committee provided that the ENQA Secretariat is copied in all such requests.

6. Budget

QQI shall pay the following review related fees:

Fee of the Chair 4,750 EUR

Fee of the Secretary 4,750 EUR

Fee of the 3 other panel members 8,250 EUR (2,750 EUR each)

Administrative overhead for ENQA Secretariat 5,000 EUR

Experts Training fund 1,250 EUR

Travel and subsistence expenses (approximate) 6,000 EUR

This gives a total indicative cost of 30,000.00 EUR for a review team of 5 members. In the case that the allowance for travel and subsistence expenses is exceeded, QQI will cover any additional costs after the completion of the review. However, the ENQA Secretariat will endeavour to keep the travel and subsistence expenses in the limits of the planned budget, and will refund the difference to QQI if the travel and subsistence expenses go under budget.

In the event of a second site visit required by the Board and aiming at completing the assessment of compliance, and should the agency accept a second visit, an additional fee of 500 EUR per expert, as well as travel and subsistence costs are recoverable from the agency.

7. Indicative Schedule of the Review

Agreement on terms of reference and protocol for review	September 2013
Appointment of review panel members	October 2013
Self-evaluation completed	Beg March 2014
Preparation of site visit schedule and indicative timetable	February-March 2014
Briefing of review panel members	March 2014
Review panel site visit	May 2014
Draft of evaluation report to QQI	Beg July 2014
Statement of QQI to review panel if necessary	Mid-July 2014

Submission of final report to ENQA
Consideration of the report by ENQA and response of QQI
Publication of report

End July 2014
September 2014
September 2014

Annex 2. Schedule

Thursday 22nd May 2014

Time	Meeting	Person/Profile of Person proposed for Interview with panel
8.30 – 9.00	Review Panel Private Meeting	
9.00 – 9.30	Meeting 1: Meeting with team responsible for SER	<ul style="list-style-type: none"> • Ms Karena Maguire, Head of Quality Assurance Services (QAS) • Ms Kathy Lantry, QAS
9.30- 9.40	Panel discussion	
9.40 – 10.10	Meeting 2: Meeting with QQI CEO and Chair of QQI Board	<ul style="list-style-type: none"> • Dr Pdraig Walsh, QQI CEO • Mr Gordon Clark , Chair of QQI Board
10.10- 10.20	Panel discussion	
10.20- 10.50	Meeting 3: Representatives from QQI Senior Management Team	<ul style="list-style-type: none"> • Dr Bryan Maguire, Head of Qualification Services • Ms Karena Maguire, Head of QAS • Ms Trish O’Brien, Head of Provider Relations • Ms Barbara Kelly, Head of Industry and External Partnerships
10.50- 11.00	Panel discussion	
11.00- 11.20	Refreshments for Panel	
11.20 - 11.50	Meeting 4: Meet with the Department of Education & Skills	<ul style="list-style-type: none"> • Mr Brian Power, Head of Student Support and Equity of Access to Higher Education • Mr Hugh Geoghegan, Higher Executive Officer
11.50- 12.00	Panel Discussion	
12.00- 12.30	Meeting 5: <i>Senior Corporate and Audit Staff</i>	<ul style="list-style-type: none"> • Ms Claire Byrne (Head of Corporate Affairs and Communications) • Mr Eamonn Collins (Manager of Finance and HR) • Mr Ultan Tuite (Head of Audit and Procurement) • Mr. Ray O’Neill (Manager of IT)
12.30– 13.10	Meeting 6: <i>Meet with representatives from QQI Board</i>	<ul style="list-style-type: none"> • Mr Gordon Clark • Dr Margaret Cullen • Ms Mary Danagher • Dr Ann Louise Gilligan • Ms Joanne Harmon • Ms Una Buckley • Ms Cat O’Driscoll • Mr. Jim Moore (telephone conference)
13.10- 13.20	Panel discussion	

13.20-14.00	Lunch	
14.00-15.00	Meeting 7: QAS and other Managers <ul style="list-style-type: none"> • Review and Enhancement • Monitoring and Dialogue • Awards and Certification • Programme Accreditation • Provider Relations 	<ul style="list-style-type: none"> • Ms Orla Lynch (Review and Enhancement) • Ms Angela Lambkin (Monitoring and Dialogue) • Mr Walter Balfe (Awards and Certification) • Ms Roisin Sweeney (Programme Accreditation) • Dr Deirdre Stritch (Provider Relations Manager) • Ms Mary Sheridan (Provider Relations Manager)
15.00-15.10	Panel discussion	
15.10-16.30	Meeting 8: HEI Quality Staff (Quality Assurance Officers in Universities (RCSI/DIT); Registrars of Institutes of Technology (responsible for QA); Senior QA representatives from the Private Institutions)	<ul style="list-style-type: none"> • Ms Naomi Jackson, Hibernia College • Mr. Thomas MacEochagain, Griffith College • Dr Sarah Ingle, Dublin City University • Prof David Croke, Royal College of Surgeons in Ireland • Dr Michael Mulvey, Dublin Institute of Technology • Ms Sinead Sullivan, National College of Ireland • Prof Jim Walsh, National University of Ireland Maynooth • Ms Fiona Crozier, University College Cork • Dr Brendan McCormack, Sligo Institute of Technology
16.30-19.00	Panel discussion	

Friday, 23rd May 2014:

Time	Meeting	Person for Interview
8.00	Panel may require to meet earlier for private meeting	
8.30 – 9.00	Meeting 9: QAS administrative/resource staff	<ul style="list-style-type: none"> • Ms Andrea Boland (Monitoring Unit) • Mr Paul Brady (Monitoring Unit) • Ms Lorna Conway (Provider Relations) • Ms Paula Gaffney (Awards and Certification Unit) • Mr Kevin Henry (Initial Access to Validation Unit) • Ms Wendy Mathews (Review and Enhancement Unit)
9.00-9.10	Panel discussion	
9.10-9.40	Meeting 10: Meet with Higher Education Authority	<ul style="list-style-type: none"> • Mr Muiris O'Connor (Head of Policy and Strategic Planning) • Mr Fergal Costello (Head of Systems Governance and Performance Management)

9.40-9.50	Panel Discussion	
9.50-10.20	Meeting 11: Student reviewers	<ul style="list-style-type: none"> • Mr Leon Cremonini (The Netherlands) • Mr Christian Bjerke (via Skype) (Norway) • Mr Daniel McGarrigle (Ireland) • Mr Joe O'Connor (USI President)
10.20-10.35	Panel discussion & Refreshments	
10.35-11.20	Meeting 12: Panel Reviewers (Programme Validation)	<ul style="list-style-type: none"> • Mr Danny Brennan, Former Registrar, Letterkenny Institute of Technology • Dr Annie Doona, President, Dun Laoghaire Institute of Art, Design and Technology <ul style="list-style-type: none"> • Ms Grace O'Malley, Lecturer, NCI • Dr Carmel Smith, Assistant Registrar, Carlow College • Dr Dermot Douglas, former Director, Institutes of Technology Ireland • Dr Hilary Tierney, Lecturer in Applied Social Studies, National University of Ireland, Maynooth • Prof Richard O'Kennedy, Professor of Biological Sciences Dublin City University
11.20-12.05	Meeting 13: Panel Reviewers (Institutional Review)	<ul style="list-style-type: none"> • Dr Don Thornhill, Consultant • Ms Sara McDonnell, Executive Vice-President, Hibernia College • Dr Danny O'Hare, former President, Dublin City University • Dr Kevin Marshall, Education Lead, Microsoft • Prof Gerry Wrixon, former President, University College Cork • Mr Terry Twomey, Limerick Institute of Technology • Mr Nigel Flegg, Newpark music Center • Ms Eva Juhl, Cork Institute of Technology
12.05-12.10	Panel discussion	
12.10-12.55	Meeting 14: Meet with members of HEI representative bodies	<ul style="list-style-type: none"> • Dr Jim Murray, Director of Academic Affairs, Institute of Technology Ireland (IOTI), • Mr Donal Quill, Chair, Higher Education Colleges Association (HECA) • Mr Vincent Barry, Director, ICD Business
12.55-13.20	Lunch	

13.20-14.05	Meeting 15: HEI Heads	<ul style="list-style-type: none"> • Dr Diarmuid Hegarty, President, Griffith College Dublin • Prof Cathal Kelly, Chief Executive, RCSI • Mr Paul Hannigan, President, Letterkenny IT • Dr Patricia Mulcahy, President, IT Carlow • Prof Brian Norton, President, DIT • Ms Anne Mangan, Director, IPTAS • Prof. Philip Nolan, President, National University of Ireland, Maynooth
14.05-14.35	Meeting 16: Meet with employer representatives	<ul style="list-style-type: none"> • Mr Tony Donohue, Irish Business and Employers' Confederation (IBEC) • Mr Gerard Walker, Senior Policy Advisor, FORFAS • Ms Kathleen Quinlan, Senior Development Executive, Enterprise Ireland • Ms. Miriam O'Keeffe, Programmes Director, American Chambers of Commerce, Ireland
14.35-15.00	Private Panel Meeting to review evidence collated from the site visit and draft skeleton report	
15.00-15.30	Meeting 17: Final meeting is with Pdraig to inform of preliminary findings	Dr Pdraig Walsh, Chief Executive, QQI