24 June 2021

Ms Maria Kelo
Director
European Association for Quality Assurance in Higher Education (ENQA)
Rue de l'Industrie 10
1000 Brussels
BELGIUM

Dear Maria

Following the decision of the ENQA Board to renew the membership of Quality and
Qualifications Ireland (QQI) in August 2019, QQI was requested to submit a follow-up report
on progress with the recommendations in the external panel report to the ENQA Board
after a two-year period. Please find this follow-up report enclosed.

Yours sincerely

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Dr Padraig Walsh
Chief Executive

ENQA Review

Progress Report (June 2021)

Contents

Progress Report

1. Introduction

Quality and Qualifications Ireland (QQI) is the single agency in Ireland that spans both higher and further education and training, giving it QQI a unique and central position in the tertiary education system. In this progress report QQI presents to the Board of ENQA the progress with regards to the recommendations made in the ENQA agency review report of QQI, 20 June 2019. This progress report also addresses the specific suggestion of the review panel and provides a short update on some key developments and changes that have taken place since the completion of the review.

2. Addressing the Review Panel Recommendations

The review panel made formal recommendations to QQI in the following **two** areas:

1. *Continue to work with the Department of Education and Skills to improve the **funding model** so that the agency can take a longer-term approach to planning and not be so vulnerable to the fluctuations in on-demand income* [ESG 3.5].

2. *Accelerate and complete **reengagement** and **institutional review** with independent providers* [ESG 2.3].

Recommendation 1 [ESG 3.5]

As noted in the panel's report, at the time of the review, an amendment to the legislation underpinning QQI's functions was progressing through the Oireachtas (Irish Parliament). The **Qualifications and Quality Assurance (Education and Training) Amendment Act 2019** creates new functions and powers for the agency. These include, but are not limited to, empowering QQI to examine the corporate fitness of independent providers, establishing a national learner protection scheme, giving QQI powers to prosecute essay mills and other forms of academic integrity, and authority to implement a new International Education Mark. The 2019 Act also allows QQI to list awarding bodies, such as professional bodies or international awarding bodies, and HEIs to include their qualifications on the NFQ. Over the period since the review, QQI has made significant progress in two key strands of work referred to in the panel report, to ensure the agency's capacity to meet both its existing and these new statutory functions, namely a **workforce planning process**, and a **costs and income review.**

A **Workforce Plan Report**, which assessed the future staff resource requirements of QQI was completed by in 2019. A subsequent business case was submitted by the QQI to its line department (ministry) seeking sanction for several additional staff posts. Following ongoing engagement with the Department since this time, QQI is pleased to report to the Board that the agency has recently received (April 2021) **sanction for all additional posts sought**, at junior, middle and senior management levels. The recruitment process for these posts is now underway. This additional staff compliment will significantly strengthen QQI's capacity to fulfil all its statutory functions.

In 2020, QQI completed a **review its income streams and cost base**, to improve the predictability and stability of its income. The terms of reference were to review QQI's income streams, fee rates and structures, and cost base, and to consider the scope (if any) for greater efficiencies in the delivery of QQI's services. The report proposed a number of funding options for QQI, some of which would require legislative changes. A joint working group was established with the Department, and this group prepared a 5-year budget projection for QQI for the period 2021 – 2025. The working group concluded its work in July 2020 and the subsequent report was submitted to the Department for consideration.

The **COVID-19 pandemic** led to work on a revised funding model being suspended, and in August of 2020 QQI's reporting line was moved to the newly established Department of Further and Higher Education, Research, Innovation and Science (DFHERIS). The establishment of the new department and changes in staffing resulted in further delays in progressing work on a new funding model. QQI is pleased to report that work with the new Department on the funding model recommenced earlier this year, and significant progress is being made. At the time of writing, a draft document is being finalised for submission to DFHERIS with proposals for changes to QQI's fee structure to reflect the full cost of services and new charges. The changes, once agreed, will stabilise QQI's income base, be more transparent and will reflect the full cost of services provided.

Outcome Panel Recommendation 1

Significant progress has been made in fully addressing the panel recommendation. Recruitment for new staff posts requested has commenced and significant developments are progressing in relation to the establishment of a long-term sustainable funding model.

Recommendation 2 [ESG 2.3]

Reengagement with Independent and Private Higher Education Institutions (HEIs)

As of the end of June 2021, **all 26** independent/private HE providers that migrated into QQI from the antecedent agency, the former Higher Education Awards Council (HETAC), will have successfully had their QA procedures evaluated and approved by QQI (i.e. will have reengaged with QQI). This includes some providers with mixed higher education and further education provision. **All higher education providers have thus completed the QA approval process**. The Reengagement reports are published on the QQI website. Reengagement consists of a peer review process, whereby providers' QA procedures are evaluated by an independent panel of experts, the process incorporates a site visit (this latter element has taken place virtually since the onset of the Covid 19 pandemic). QQI decisions on QA approval are informed by the panel recommendation and the formal response to same from the provider. Further information on the reengagement process is available on QQI website at, Reengagement process for independent and private providers.

In addition, a **thematic analysis** of the **reengagement process** and its outcomes to date (September 2018 – to February 2020) has been completed. The purpose of the analysis was to review and reflect on the reengagement process, and to identify enhancements, to improve its efficiency and effectiveness. QQI acknowledges there was much to be learnt from the experience of providers and panel members which related not just to the process, but, more importantly, to what quality issues providers are facing. The report is available here. QQI's response to the thematic analysis report is available here.

Annual Quality Reporting and Institutional Review for Independent and Private HEIs

The annual quality report (AQR) is a key element of QQI''s monitoring and review cycle, and an important evidence base for institutional review teams. The AQR provides information and updates on institutions' internal quality assurance systems. QQI's AQR template has been revised since this review and the new report template is now explicitly mapped both to the ESG 2015 and to QQI's Core Statutory Quality Assurance Guidelines. The Annual Quality Assurance Reports are published on QQI's website. The AQR submissions for 2021, include for the first time, the reports from **15 independent HEIs.** The AQRs are the basis for QQI's Annual Quality in Higher Education synthesis reports. Two QA in HE synthesis reports will be published in 2021, once for publicly regulated HEIs and one for the independent HEIs. In addition, QQI is an awarding body for private and independent HEI. Programmes leading to QQI awards, are subject to QQI validation and revalidation processes, and regular programme level approval, monitoring, and review.

The institutional review of independent HEIs, to include **review for delegated authority,** is included as an objective in QQI's new draft statement of strategy 2022-2024. The new staff posts sanctioned will enable staff resources to be allocated to this project.

Outcome Panel Recommendation 2

Significant progress has been made in fully addressing the panel recommendation. The reengagement process has been completed, private independent HEIs are included within the annual quality reporting and monitoring process, and resources are committed to implementing institutional review process for independent HEIs in the next strategic planning period.

Suggestion for Further Development

QQI acknowledges the feedback the panel received from providers and their representatives in expressing their understandable desire to minimise any duplication in reporting between QQI and its affiliated agency, the Higher Education Authority (HEA). Much progress has been made and continues to be made in strengthening and enhancing the relationship between our two agencies. Though outside the remit of the ESG, QQI notes the acknowledgement of the panel of this progress and the encouragement of the panel to continue to strengthen and develop this collaboration.

Both organisations are currently working on the third Memorandum of Understanding (MOU). Working through the development and agreement of the MOUs has promoted a closer working relationship between the two agencies, and has also enabled each agency to analyse and clarify the units of information requested from the HEIs, in order to avoid unnecessary duplication and burden on the institutions. QQI is pleased to report that no direct duplication has been found to date, following two such reviews of data exchange.

In addition, the new HEA legislation, draft Higher Education Authority Bill which was launched in 6 May 2021, proposes to put the MOU between QQI and the HEA on a more formal legal footing. The new legislation will provide more transparency and clarity for providers on the individual roles, responsibilities and reporting requirements of both QQI and the HEA.

3. Other Updates and Developments

QQI would like to take this opportunity to update the Board on other developments since the ENQA review.

Response to Covid-19

As with all QA Agencies and institutions across Europe, QQI's processes and work practices were abruptly and significantly impacted by the onset of COVID-19 pandemic in March 2020. This led to the immediate postponement of scheduled CINNTE institutional review visits, and on-site QA approval, reengagement, and programme validation panels. In response, QQI very quickly adapted its processes, piloting and then establishing new virtual processes and operating procedures, completing the first virtual review visit in June 2020[1]. Evaluations have been conducted on all virtual external QA processes, with institutional, external stakeholders and institutions consistently confirming their confidence in the efficacy and robustness of the processes. QQI will, at the time of submission of this progress report, have completed 8 virtual external reviews

In addition, QQI worked in collaboration with education and training providers, students, social partners and other stakeholders, in mitigating the impact of COVID-19 and ensuring the integrity and quality for learners. This included the development and publication of a range of guidance and resource material, see COVID-19 Resources (qqi.ie).

QQI also undertook a detailed analysis of the impact of COVID-19 modifications to teaching and learning, resulting in the publication of a sector wide report, The Impact of COVID-19 Modifications to Teaching, Learning and Assessment in Irish Further Education. The main objective of the report was to provide an early, authoritative account of the impact of the modified teaching, learning and assessment arrangement, to support confidence in qualifications awarded in 2020 and help protect the reputation of Irish qualifications, nationally and internationally. The report achieved national and international recognition and citation.

Thematic Analysis

CINNTE Institutional Review

As noted by the review panel, QQI has been developing and enhancing its capacity and approach to thematic analysis. At the time of this review, QQI's CINNTE Institutional Review Cycle (2017-2023) was in the early stages of the review cycle, with a small number of institutional reviews completed and review reports published. QQI has since conducted a number of thematic analysis, including a mid-cycle analysis of the first seven CINNTE review reports. The CINNTE Mid Cycle Analysis published in January 2021, identified the main themes arising across these seven institutional review reports, and outcomes and findings from this analysis will inform both internal QA at institutional level and enhancements to QQI external review process.

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[1] See ENQA Report External-QA-in-times-of-COVID-19-case-examples_final-version.pdf (enqa.eu)

Other Thematic Analysis

Four Thematic Analysis Reports have also been conducted on the programme validation and programme review processes of public and private higher education institutions, these reports are being finalised and due to be imminently.

Enhancement of the National Framework of Qualifications (NFQ)

QQI is the custodian of the NFQ and in late 2020, following consultation with our key stakeholders, the Framework was updated to reflect changes across the education and training landscape and a new version of the NFQ has been published. Also, in 2020 the agency successfully re-referenced the NFQ to the European Qualifications Frameworks. The exercise which resulted in the NFQ Referencing Report 2020 was commended as being exemplary by international experts.

Since the completion of the review QQI has established the Irish Register of Qualifications an authoritative database of quality assured qualifications in the NFQ. QQI has also instigated a national discussion on the qualifications system through the publication of and engagement with stakeholders on its Green Paper on the Qualifications System; this includes the demand for and use of micro-credentials. QQI Qualifications Directorate is currently working on a paper, utilising QQI certification data, to explore of the supply and uptake of HE micro-credentials in Ireland 2014-2020. Plans are also in progress for the establishment of a national forum for quality and qualifications to keep strategic matters on quality at the centre of qualifications developments.

Academic Integrity

There has been significant development with regards to academic integrity. Under QQI's leadership, the National Academic Integrity Network (NAIN) was established as a voluntary and highly productive network of public and private higher education institutions coming together to raise awareness[2] and devise prevention guidelines and student engagement strategies in relation to academic integrity[3].

Collaborations and Partnerships

The review panel commended and noted as a strength of QQI's work, the agency's comprehensive collaborations and partnerships with providers and other stakeholders. The establishment of strong working relationships with core stakeholders was evidenced by a QQI-conducted survey in 2020. Since the review, QQI has further developed avenues for and supported student engagement through the National Student Engagement Programme (NStEP). The agency has developed a very successful collaboration with professional statutory regulatory bodies (PSRBs), including the establishment of a PSRB forum and the publication in December 2020 of the outcomes of a consultation process on

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[2] *#MyOwnWork* campaign is an initiative of the National Academic Integrity Network supported by QQI.
[3] QQI is now issuing 'alerts' to all providers identifying websites and issues of concern; the most recent *Academic Integrity* alert circulated to providers on 4 May 2020.

4. Conclusion

QQI is currently in the process of developing of its Statement of Strategy 2022-2024, with a public consultation process underway until early June 2021. This new statement of strategy will build on and further strengthen QQI's work in continuing to develop a culture of quality within our diverse set of education and training providers across the tertiary education and training system. In addition, it will identify actions to address the new statutory responsibilities of the agency, and the ongoing consequences and impact of the COVID-19 pandemic.

Over the next strategic planning period, QQI aims to ensure better information, opportunities, and protection for learners, and further enhance providers' capacities and capabilities, affecting systems enhancement and change, through strengthening the agency's impact analysis and strategic partnerships.

QQI thanks Board of ENQA for the opportunity to submit this progress report.