SECTION 4.8

Green Paper on Monitoring and Dialogue

FOR CONSULTATION

QQI welcomes your views.

If you have suggestions regarding any aspect of the content of this proposed Policy Document please use the *Questions and Comments* area which appears immediately after it.

PLEASE NOTE:

13 SEPTEMBER 2013

CLOSING DATE FOR SUBMISSONS

SECTION   4.8

Green Paper on Monitoring and Dialogue

4.8.1   Introduction

This paper is concerned with the approach QQI may adopt with respect to monitoring and dialogue with providers; including those that are relevant providers for the purposes of accessing the International Education Mark (IEM). As part of the Provider Lifecycle of Engagements the QQI approach to monitoring can inform and underpin other key policy areas such as programme validation, review, and protection for enrolled learners. If QQI is to adopt a risk and proportionality approach to its activities, as discussed in Green Paper 4.11 this will also influence the design of its monitoring and dialogue policies and procedures.

4.8.2   Rationale

4.8.2.1 Legislative Context

The functions of QQI set out in the 2012 Act indicate under general functions in Section 9 that QQI shall 'review and monitor' the effectiveness of provider's quality assurance procedures. Monitoring of implementation of procedures of access, transfer and progression are also a general function stated in the Act in Part 2, Section 9.

Further relevant sub-sections in the legislation relate to the review function as set out in Sections 34 and 35 and withdrawal of approval of quality assurance procedures set out in Section 36. This is where following review (Sections 34 and 35) the provider has not complied with directions or where there are serious deficiencies in the implementation of quality assurance procedures by the provider.

4.8.2.2 Public Policy Context

Current public sector reforms emphasise the need for greater accountability in public expenditure and the monitoring of activities associated with that spending. This is reflected in the changed landscape for both FET and HET provision. There is a greater emphasis on

transparency for end-users of public services and the wider public regarding the nature and quality of provision.

4.8.3 Monitoring and dialogue activities in legacy organisations

The monitoring and dialogue activities of the legacy organisations served different purposes, and spanned a range of models from auditing and inspection to annual dialogue meetings with institutions.

Further Education and Training
The FET Awards Council monitoring policy, introduced in 2008, comprised an evaluation of the effectiveness of a provider's quality assurance. This was undertaken through site visits and desk reviews with formal reporting on the outcomes. Follow-up, sampling by provider type, and risk analysis were also features of the FET Awards Council's monitoring policy.

Higher Education and Training
HET Awards Council monitoring policy, last revised in 2010, included site visits to recently registered providers, review of external examiner reports, regular and follow-up meetings with providers, attendance at providers' examination board meetings, noting changes to schedules of the awards of institutes with delegated authority, and follow-up on providers' implementation of recommendations from published reviews, including withdrawal of validation and de-registration of providers. Monitoring informed the terms of reference of HET Awards Council institutional reviews.

Universities, DIT and RCSI
Dialogue with the universities, Dublin Institute of Technology (DIT), and the Royal College of Surgeons in Ireland (RCSI) was undertaken by the IUQB (with respect to the universities) and the NQAI (for the DIT and the RCSI). Annual meetings were held with these institutions and based on a report prepared by the institution on certain activities undertaken in the previous year; these included progress against recommendations identified in the most recent institutional review.

English Language
ACELS monitoring was undertaken by scheduled and unscheduled inspections of providers using a standard process. Moderation was also undertaken for assessment of the Certificate in English Language Teaching (CELT) programme by NQAI.

4.8.4 Rationale for developing policy on Monitoring and Dialogue

Prior to examining the range of options for undertaking monitoring and dialogue, it is important to consider what benefits this activity may bring to providers, QQI and the education and training environment as a whole. This Green Paper proposes that monitoring and dialogue, as part of the Provider Lifecycle of Engagements, can provide an important link between all QQI policies. Its role could incorporate the following elements as it interacts with the range of providers and institutions with which QQI engages, including:

- tracking progress on the implementation of quality assurance procedures agreed between providers and QQI;
- following up with providers as they deliver programmes validated by QQI;
- providing a basis for supportive engagement with providers outside of the quinquennial review cycle;
- feeding into institutional reviews;
- following up with providers on issues identified either through monitoring and review or on an *ad-hoc* basis;
- identifying common matters that are arising across providers or types of providers and considering what enhancement activities this may indicate.

In doing so, monitoring and dialogue activities have the capacity to:

- Provide assurances to QQI and to the public regarding the on-gong capacity of providers to, continue delivering programmes that QQI is awarding / continue to hold the award of the IEM
- Support and promote self-reflection on the part of providers and institutions
- Contribute to the overall review and continuous improvement of the education and training environment.

Any QQI policy approach to monitoring and dialogue will be informed by the overall approach it takes to risk and proportionality in its quality assurance activities as discussed in Green Paper 4.11.

4.8.5 Options for monitoring and dialogue

A number of approaches to monitoring and dialogue are proposed below. These options are

not intended to be mutually exclusive; indeed, the range or providers that QQI interacts with is likely to necessitate a mixed-model approach in order to deliver on the potential benefits of carrying out this activity which are identified above.

The approaches proposed are as follows:

1. Using key indicators and metrics to underpin monitoring and dialogue activities
2. Undertaking audits of the effectiveness of quality assurance of the provider
3. Devolving auditing of the effectiveness of quality assurance of the provider
4. Employing review type approaches for monitoring and dialogue
5. Employing monitoring and dialogue approaches on the basis of risk and proportionality
6. Using QQI's legislative capacity to conduct quality reviews (Section 42) as a monitoring and dialogue tool
7. Developing a combination of the above approaches of monitoring and dialogue.

Option 1   Using key indicators and metrics to underpin monitoring and dialogue activities

This would entail benchmarking of providers using high-level indicators and metrics agreed with the provider, based on QQI's Quality Assurance Guidelines (see Green paper 4.10). The provider would periodically report to QQI against these indicators and metrics. Quality indicators could be based upon the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (ESG) and the European Quality Assurance Framework for Vocational Education and Training Quality (EQAVET) and include analysis of, for instance, completion rates by learners, outcomes of assessment, outcomes of internal reviews, staff development opportunities, transfer and progression, and activity/investment.

The potential advantages of such an approach include:
- The provider is given responsibility for reporting on its activities against a standard series of indicators and metrics
- There is clarity on QQI's expectations for the on-going quality assurance activities of providers
- In this approach, monitoring and dialogue incorporate a strong element of data analysis, strengthening the evidence base for the findings arising.

The potential disadvantages include:

- It is dependent on good quality data analysis systems being available to both the provider and to QQI
- The indictors and metrics chosen may be too prescribed and standard to engage with the provider on the more unique elements of its quality assurance activities
- This could be a resource intensive approach for providers and for QQI given the diversity and scale of provision and providers.

Option 2   Undertaking audits of the effectiveness of quality assurance of the provider

Auditing of quality assurance could be undertaken systematically and periodically by a site visit of auditors/experts employed by QQI. If a risk and proportionality approach to engagement with providers is adopted by QQI, the resulting profile of providers would strongly influence the frequency of monitoring and dialogue activities.

The potential advantages of such an approach include:

- It has the potential to look at a wide-range of quality issues and to be more tailored to the individual provider in this regard
- If auditing activities are based on a risk and proportionality basis, it can reduce the burden of compliance on low-risk providers and the accompanying resource burden on QQI
- The engagement of external auditors by QQI, particularly for providers offering programmes for which QQI is the awarding body, would result in an impartial account of the effectiveness of the provider's quality assurance activities post the validation of a given programme/s

The potential disadvantages of such an approach include:

- This is a costly and resource intensive approach to monitoring and dialogue
- It places an emphasis on auditing of activities rather than on more high level engagement on quality assurance matters
- Substantial training and development of auditors would be required in order to ensure that they carried out their activities consistently.

Option 3   Devolving audit of the effectiveness of quality assurance of the provider

In the application of this approach, providers would undertake their own auditing using internal and external experts with reference to QQI guidelines, and report back to QQI on the outcome. QQI would review and make recommendations/ take actions as appropriate.

The potential advantages of such an approach include:
- The responsibility for carrying out auditing of activities rests with the provider
- The basis for carrying out this activity is identified in guidelines provided by QQI which should safeguard consistency
- If self-auditing activities are based on a risk and proportionality basis, it can reduce the burden of compliance on what are considered low-risk providers
- The engagement of external auditors, potentially approved by QQI, should provide an impartial account of the effectiveness of the provider's quality assurance activities.

The potential disadvantages of such an approach include:
- This is a costly and resource intensive approach to monitoring and dialogue from the provider's perspective
- It places an emphasis on auditing of activities rather than more high level engagement on quality assurance matters
- It would be difficult to ensure that auditors employed carry out their activities consistently without some form of centrally organised training and development.

Option 4   Employing review type approaches for monitoring and dialogue

Monitoring and dialogue could be used as a proxy for Institutional Review (see Green Paper 4.9) to determine the effectiveness of certain providers; particularly those of a smaller scale. This type of approach could also be employed when significant issues arise with a provider outside of the institutional review cycle:

The potential advantages of such an approach include:
- The review of certain providers, particularly smaller providers, could be designed in a manner that is proportionate, via monitoring and dialogue, rather than applying large scale institutional review approaches

- It provides a means of formally and substantively engaging with providers when significant issues have been identified outside of the regular review cycle.

The potential disadvantages of such an approach include:

- The employment of essentially review approaches via QQI's monitoring and dialogue function may be considered to be inconsistent and inequitable.

Option 5   Carrying out monitoring and dialogue activities on the basis of risk and proportionality

A more narrow approach to monitoring and dialogue involves a risk and proportionality analysis of providers and basing monitoring and dialogue activities on those with a high risk rating.

The potential advantages of such an approach include:

- Monitoring and dialogue activities are responsive and linked to the outcomes of a risk and proportionality analysis
- Attention is placed on those providers with a higher risk analysis which can potentially lead to a lower level of risk being associated with this provider over a period of engagement
- Those providers associated with a lower risk can assign fewer resources to responding to monitoring by QQI and place a greater emphasis on the dialogue approach to interaction.

The potential disadvantages of such an approach include:

- This option places a great deal of weight on the outcomes arising from QQI's risk and proportionality approach
- A lower level of engagement with providers with a low-risk analysis may not necessarily be in the interests of the provider and may lead to a loss of opportunity to pre-empt issues that may result with a provider; to share the good practice that the provider is employing; and to capture the on-going status of the provider as it continues its relationship with QQI.

Option 6   Using QQI's legislative capacity to conduct quality reviews (Section 42) as a monitoring and dialogue tool

QQI has a legal capacity to carry out quality reviews (Section 42), which might consider particular areas across more than one provider. Potentially this approach could be used most effectively as part of a monitoring and dialogue function, rather than as part of QQI's review function.

The potential advantages of such an approach include:

- An overview of the status of a range of providers regarding a particular theme or themes could be established e.g., the implementation of access, transfer and progression policies in a given region
- The application of this approach could lead to a particular type of providers engaging with each other on a particular theme or themes
- The application of this approach could encourage cross-sector engagement between providers on a particular theme or themes
- The outcomes of such an approach could result in recommendations and enhancement activities that could have relevance for the education and training environment as a whole.

The potential disadvantages of such an approach include:
- A high level of coordination and resources would be required to organise engagement with providers of this kind. This in turn may lead to fewer resources being available for other types of monitoring and dialogue of a more routine nature
- This approach might necessitate quite a narrow engagement with providers on a particular theme or themes.
- QQI cannot charge any fees for reviews carried out under Section 42.

Option 7   Combinations of the above approaches to monitoring and dialogue

It may be possible for QQI to adopt a combination of monitoring and dialogue activities, which may incorporate a range of the approaches identified above, and potentially other approaches that have not yet been identified.

The potential advantages of such an approach include:

- A differentiated approach to monitoring and dialogue can be adopted which is suited to a type or types of providers and is based on the achievement of the potential benefits of this function as articulated above
- Differentiation would result in the necessity to identify a continuum of monitoring and dialogue which would span from the notions of 'auditing' and 'inspection' to a dialogue approach between QQI and a provider.

The potential disadvantages of such an approach include:

- A differentiated approach may result in some providers considering that they are being treated in an inequitable manner which favours one type of provider or sector over another e.g., larger providers over smaller providers; public providers over private providers.

Questions and Comments

GENERAL CONSULTATION QUESTIONS

Q4.8.5.A Are there other options that have not been considered in this Green Paper?

Q4.8.5.B Are there advantages and disadvantages that have not been identified for the options described?

Q4.8.5.C Do you have any preferences among the options?
(Please refer to the option numbers above in your response)

Q4.8.5.D Do you have any comments on the issues raised in the Green Paper?

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to QQI at: consultation@qqi.ie

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