



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

A THEMATIC ANALYSIS OF REPORTS ON THE ACCREDITATION/APPROVAL/REVIEW OF PROGRAMMES OF HIGHER EDUCATION, STAGE 1: QQI VALIDATION AND REVALIDATION

Submitted to Quality and Qualifications Ireland
Prepared by Stephen McManus and John Vickery



QQI
Insights



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The views expressed in this document are those of the authors and do not necessarily reflect the views of Quality and Qualifications Ireland.

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A thematic analysis of reports on the Accreditation/Approval/Review of Programmes of Higher Education, Stage 1: QOI Validation and Revalidation

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EXECUTIVE
SUMMARY

BACKGROUND

Quality and Qualifications Ireland (QQI) is an independent State agency responsible for promoting quality and accountability in education and training services in Ireland. It was established in 2012 by the Qualifications and Quality Assurance (Education and Training) Act 2012. QQI commissioned, by way of public tender, a thematic analysis of reports on the accreditation/approval/review of programmes of higher education. This project involved the thematic analysis of reports related to:

- i. The approval (e.g. academic validation, professional accreditation) of new programmes of higher education (programmes); and
- ii. The re-approval following review and modification of previously approved programmes.

The analysis undertaken covers evaluation reports for initial evaluation, programme review and revalidation published on the QQI website between June 2015 and July 2018. The validation of programmes of education and training by QQI is consistent with the quality assurance process promoted by the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) which are considered the benchmark for quality assurance in Europe.

The analysis was limited to higher education programmes excluding research degree programmes where QQI is the awarding body. Approximately six percent of Honours Bachelor's Degree programmes are validated by QQI in Ireland. This analysis does not deal with higher education programmes in the university sector or in the institute of technology sector.

PURPOSE OF THE THEMATIC ANALYSIS

One purpose of the thematic analysis is to help improve the quality of programmes in higher education and training provided by independent providers by identifying recurring strengths, opportunities for improvement and weaknesses in programmes. Another is to help enhance the effectiveness of the validation of new programmes, the revalidation of programmes following programme review and modification of previously approved programmes.

The information gained from a thematic analysis can be useful beyond the scope of a single process such as a programme validation, providing material that can be used across the higher education system.

The findings of the analysis can also contribute to the reflection on and the enhancement of quality assurance policies and processes.

STAKEHOLDERS WHO WILL BE INTERESTED IN THIS THEMATIC ANALYSIS

The stakeholders who will find this thematic analysis useful are those who require, either directly or indirectly, objective information about the quality of programmes, for example:

- (a) The Programme and Awards Executive Committee in QQI who are responsible for approving programmes (e.g. information on recurring strengths, weakness and opportunities for improvements in programmes and in the reporting process including panel composition);
- (b) The management teams in independent providers; (e.g. information that will identify areas for improvement);
- (c) Programme development teams (e.g. information that will help enhance the programmes);
- (d) Independent evaluation panel members (e.g. information that will enhance independent panel reports);
- (e) Government and its agencies (e.g. concerning the quality of the programmes);
- (f) European quality assurance agencies (e.g. information on thematic analysis as required in ESG); and
- (g) Others such as students, graduates, parents, and employers (e.g. information on programmes, validation of programmes and revalidation of programmes following programme review).

Not all these groups typically read (re-) approval/accreditation reports. Evaluation reports for new programmes and reports for programmes for revalidation are normally addressed directly to (a), (b) and (c). Nevertheless, the thematic analysis is expected to be a source of objective evaluation that supports information about the programmes, initial validation and revalidation processes that might be provided to these groups.

SCOPE OF THE ANALYSIS

One hundred and thirty-four programme evaluation reports consisting of fifty-six for programmes for initial validation and seventy-eight for programmes for revalidation were analysed. The evaluation reports for revalidating programmes were part of nineteen programmatic reviews.

The analysis undertaken was for Higher Certificate, Ordinary Bachelor's Degree, Honours Bachelor's Degree, Higher Diplomas, Master's Degree and Postgraduate Diploma programmes. Research degree programmes were excluded from the analysis.

The focus of new programme validation reports is on proposed programmes and not on programmes that have been running.

E2 Validation of a programme

One of QQI's functions is the validation of programmes. All applications for validation are independently evaluated against published QQI validation criteria. This is aligned with ESG Standard 2.5 which states “Any outcomes or judgements made as a result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.”

A student who successfully completes a validated programme is eligible for the relevant award on the National Framework of Qualifications (NFQ). The student must demonstrate through assessment attainment of the relevant minimum intended programme learning outcomes (MIPLOs) which must be consistent with the relevant awards standards and the NFQ award type descriptors.

The concept of a validated programme used by QQI is provided in Figure E1. The process of validation is similar to the process of accreditation used in other jurisdictions.

A programme of education and training (a programme) is validated where QQI confirms under section 45 of the 2012 Act, that the provider of the programme has satisfied it that an enrolled learner of that provider who completes that programme will acquire, and where appropriate, be able to demonstrate, the necessary knowledge, skill or competence to justify an award of QQI being offered in respect of that programme. This implies that completion of a validated programme means that the learner has acquired, and where appropriate, is able to demonstrate, the necessary knowledge, skill or competence to justify the award(s) of QQI being offered in respect of that programme.

Figure E1 Concept of a validated programme. Extract from Section 2.3 “Policies and criteria for the validation of programmes of education and training. QQI November 2017.”

AWARDS STANDARDS

Currently there are ten standards for broad fields of learning published by QQI. These standards represent an elaboration of the generic descriptors of the NFQ. Programmes submitted for validation to QQI must be consistent with the appropriate award standard. These are thresholds and describe standards of knowledge, skill or competence to be acquired, and where appropriate, demonstrated, by a learner before an award may be made. The least specific award standards are the (repurposed) NFQ award-type descriptors. These are the default awards standards for all QQI's education and training awards—they apply unless a more specific award standard has been determined by QQI.

VALIDATION POLICIES

During the period covered by this thematic review there were two validation policies in place. In 2013, QQI published a revised validation policy with revised validation criteria “HET Core Validation Policy and Criteria 2010, Revised 2013 (QQI, 2013a)”. This policy and criteria was in place in 2015 during the initial period covered by this review.

In April 2016, QQI published “Policies and criteria for the validation of programmes of education and training” which was updated with minor changes in November 2017. The later policy is referred to as the current policy in this report.

VALIDATION CRITERIA

Currently there are twelve validation criteria that must be met for a programme to be validated. These are provided in the current policy document. It is the provider’s responsibility to ensure that the twelve validation criteria are addressed in an application for validation. Nine validation criteria were specified in the 2013 policy and criteria document.

MINIMUM INTENDED PROGRAMME LEARNING OUTCOMES (MIPLOS)

The MIPOs define the minimum learning outcomes for a particular programme at the programme level. These must always be specified by the provider. If the programme allows substantial choice, there may need to be variant forms of the minimum intended programme learning outcomes — e.g. a programme might allow a person to choose from a number of specialisations. MIPOs must be consistent with the applicable award standard.

VALIDATION PROCESS

The validation of a programme is summarised below.

- The independent provider submits a programme submission document to QQI demonstrating how it complies with all of QQI’s policies and criteria.
- All applications for validation are evaluated against the twelve validation criteria by an independently appointed panel. The independent evaluation panel consists of experts appointed by QQI who are capable of determining whether the programme meets the validation criteria. The panel consists of a chairperson, subject matter experts and an industry/employer representative.
- Evaluators normally undertake a site visit as part of the evaluation. They may interview the provider’s leadership, academic staff who developed the programme, academic staff who will deliver the programme and other relevant stakeholders. They also assess the support services that will be available to students e.g. library and IT facilities.
- The independent evaluation report to QQI must address whether the programme meets the validation criteria. It must include one of the following overall conclusions: -Satisfactory; Satisfactory subject to specific

conditions; Not satisfactory. The report may also propose recommendations for enhancing the programme for consideration by the provider. The independent evaluation reports must provide a rationale for any proposed conditions and recommendations to the provider as well as the overall outcome.

- QQI considers the recommendations of the evaluation panel. It ensures any special pre-conditions proposed by the independent evaluation panel are met prior to validating the programme. QQI can also refuse to validate a programme based on the recommendation of the independent panel or for other appropriate reasons.
- Where QQI has taken a decision to validate a programme, it issues a certificate of validation which includes salient characteristics of the validated programme.
- The independent evaluation report as well as the certificate of validation are published on the QQI web site.

TEMPLATES

QQI has published templates to facilitate a consistent and systematic approach being adopted when submitting a programme for validation and revalidation. It also has developed a template for independent evaluation panels to assess a programme against the current validation criteria and make recommendations to QQI.

E3 Revalidation

The definition of revalidation as used by QQI is provided in Figure E2. Revalidation provides the opportunity to update and modify the original programme. Revalidation benefits from the availability of evidence from historic provision of the programme (on which the proposed programme is based). The revalidation of a programme follows a similar process to the initial validation process.

Revalidation is validation by QQI of a programme that has emerged or evolved from a programme that had been previously validated by QQI (the original programme may have reached a point where, for example, it needs to be substantially modified or updated such that the end result is a new programme). Revalidation is also required for any programme that is to continue to enrol learners following expiry of the duration of enrolment. It results in a validated programme, which is substantially based on the previously validated programme. QQI, therefore, does not require the provider to make a de novo validation application in respect of such programmes. The revalidation process is very similar to the validation process.

Figure E2 Revalidation. Extract from Section 13 “Policies and criteria for the validation of programmes of education and training. QQI November 2017.”

E4 Programme Review

Programme review is a provider-owned quality assurance procedure that addresses a single programme or group of related programmes. Providers whose programmes require revalidation by QQI to continue, need to design their programme review processes with a view to having the programme revalidated.

E5 Methodology

The independent evaluation reports for initial validation, revalidation and programme review published on the QQI website were analysed. All programme review reports were published on the QQI web site until 2016. Since then independent providers have been required to publish the programme review reports on their websites.

The thematic analysis required that recurring strengths, opportunities for improvement and weaknesses be identified as stated in independent evaluation reports for the period June 2015 to July 2018. Commendations made by independent evaluation panels were taken to indicate strengths in the programme submission. Any condition set by an independent evaluation panel was considered to indicate a weakness in the programme. Any recommendation made by an evaluation panel was seen as an opportunity for improvement of the programme.

The independent providers' programme submissions to QQI were not analysed. These are not available on the QQI website.

STATISTICS

- Eighty-four percent of the programmes submitted for validation were recommended by independent evaluation panels to QQI for validation and the remainder were recommended for refusal.
- The majority of programmes (83%) recommended by independent evaluation panels to QQI for validation had conditions attached.
- Seventy-one percent of the reports analysed were for programmes leading to Honours Bachelor's Degrees, Higher Diplomas, Postgraduate Diplomas or Master's Degrees.
- Sixty percent of the programmes submitted for validation lead to awards in Arts.
- The greatest share (48%) of the programmes in Arts lead to Honours Bachelor's Degrees. Eighty-seven percent of these were programmes with 180 ECTS credits (three-year full-time equivalent). The remainder were programmes with 60 credits or 240 ECTS credits, except for one programme with 210 ECTS credits.
- The majority (65%) of the awards at NFQ Level 8 in Science were Higher Diplomas.

STRENGTHS, OPPORTUNITIES FOR IMPROVEMENT AND WEAKNESSES IN PROGRAMMES AS IDENTIFIED BY INDEPENDENT EVALUATION PANELS

A wide range of individual strengths, opportunities for improvement and weaknesses were identified in independent evaluation reports for new programmes mainly in relation to the content of the programme, MIPLOs and assessment. Similar weaknesses were identified in independent evaluation reports for programmes for revalidation. Any commendations indicated by panels in evaluation reports were considered to be strengths of the programme. Similar, weaknesses were those mandatory conditions set by the evaluation panel. Where non-mandatory recommendations were made by evaluation panels these were considered to be opportunities for improvement.

Access

Good practices were identified in access initiatives, in particular for Higher Certificate and Ordinary Bachelor's Degree level programmes. Where weaknesses were identified at this level in relation to entry requirements, it was often in relation to English language requirements and the role of the admission interview. At Master's Degree level, the recurring issues were in relation to the minimum Honours Bachelor's Degree classification required for entry, and the expectations in relation to specific entry requirements, for example, in programming or in mathematics.

Engagement of staff

Independent evaluation panels commended the providers' staff on their willingness to engage with the validation process. This is an important indicator of the process as it shows the commitment of the providers' staff to engage with the quality assurance process of independent review.

Content of modules

The content of modules was identified in all Higher Certificate programmes as an area for improvement. In sixty-three percent of the programmes submitted at Honours Bachelor's Degree and Higher Diploma level, it was identified as a weakness and in eighty percent of the Master's Degree and Higher Diploma programmes.

Assessment

The assessment of learners featured strongly as both a weakness and an opportunity for improvement in reports. At both Higher Certificate and Ordinary Bachelor's Degree level it was mainly seen as an area for improvement. At Honours Bachelor's Degree and Higher Diploma level weaknesses were identified in thirty-three percent of the independent evaluation reports. At Master's Degree and Postgraduate Diploma level, it was identified as a weakness in twenty percent of the reports and in a further fifty percent of the reports it was identified as an area for improvement.

Minimum Intended Programme Learning Outcomes

Weaknesses were also identified with MIPLOs at all levels of programme provision and the trend was the same as above. Master's Degree and Postgraduate Diploma level programmes having weaknesses identified in sixty percent of independent evaluation reports compared to Higher Certificate programmes with twenty-nine percent, Honours Bachelor's Degree and Higher Diploma programmes with thirty-three percent.

The MIPLOs were not identified in any of the evaluation reports for Higher Certificate or Ordinary Bachelor's Degree programmes as either strengths, opportunities for improvement or weakness. At Honours Bachelor's Degree and Higher Diploma level, thirty percent of the evaluation reports identified MIPLOs as a weakness as well as in thirty percent at Master's Degree and Postgraduate Diploma programmes.

SUMMARY OF THE ANALYSIS OF PROGRAMMES

The trend is as the level of programme increases so do the weaknesses identified by independent evaluation panels. There are a number of possible reasons for this. As stated above, there were recurring weaknesses identified in the reports with MIPLOs, content of modules and assessment. Similar weaknesses were identified for programmes submitted to QQI for initial validation and for revalidation following programme review. The composition of independent evaluation panels was mainly composed of subject matter experts which may explain why weaknesses identified in programme submissions were in relation to content. This may be a factor particularly at Master's Degree and Postgraduate Diploma level where normally there is a greater specialisation in programmes.

PROGRAMMES LEADING TO HONOURS BACHELOR'S DEGREE IN ARTS

There is a lack of clarity in the independent evaluation reports leading to awards in Arts. It is not always stated whether programmes have been developed taking cognisance of the generic award type descriptors of the NFQ or the Arts and Design award standard. In programmes leading to Bachelor of Arts (Hons) in Business or business related areas, reference was made in the independent evaluation report to the award standard in Business. The evaluation reports did not state which learning outcomes of the standard were referenced in the programme. Independent evaluation reports did not provide information as to why a programme was recommended for validation

in Arts when it was in the discipline of Business. These programmes have 180 ECTS credits (3-year full-time programme). Programmes validated for the Honours Bachelor's Degree in Business normally have 240 ECTS credits (4-year full-time programme) and must be consistent with the business award standard.

None of the three Honours Bachelor's Degrees in Arts in Computing or computing related programmes were recommended to QQI for approval by independent panels.

PROGRAMMES LEADING TO MASTER'S DEGREE AND POSTGRADUATE DIPLOMA IN SCIENCE

Similarly, for Master's Degrees and Postgraduate Diploma level programmes in Science where the programme is in Business or a business related discipline, it is not clear in the independent evaluation reports how the design and content of the learning outcomes meets the requirements of the science award. No reference is made to which topics in the curriculum address the elements of the standard at NFQ Level 9 in terms of knowledge, skill and competence.

VALIDATION PROCESS

All applications for validation by QQI were independently evaluated against the published validation criteria. However, the information in independent evaluation reports in relation to MIPOs and the link to the appropriate award standard is minimal.

The current validation and revalidation processes deal adequately with the extent to which the programme prepares learners for careers. It does not address, directly, the preparation of learners for active citizenship which is one of the purposes of higher education as outlined in the forward to the ESG 2015.

The identification and promotion of good practice should be an outcome of the validation process. This was rarely commented on in independent evaluation reports. Where it is identified, good practice it is not described in such a way as to be of value to the wider higher education sector.

STRENGTHS, OPPORTUNITIES FOR IMPROVEMENT AND WEAKNESSES OF EVALUATION REPORTS

All evaluation reports for new programmes and programmes for revalidation were very clear in relation to the recommendations to QQI whether to validate the programme, recommend validation subject to conditions and/or recommendations or recommend refusal of validation.

The best reports gave clear decisions and provided evidence and context for those decisions. The current independent evaluation report encourages this. The evidential supports cited in support of conclusions was lacking in some cases. Independent evaluation reports do not contribute as effectively as they could to the development of quality programmes across the higher education sector. Programme development teams who develop the programmes can read the independent evaluation reports in the context of a fuller knowledge of the programme submission and from the experience of the engagement with the evaluation panel at the initial validation or

programme review event. This contextual knowledge is denied other stakeholders, including other programme development teams.

Weaknesses identified in independent evaluation reports are recurring across the different programmes and across the different providers. They can reappear in independent programme review and revalidation reports. Well written reports where weaknesses, opportunities for improvement and examples of good practice are described solidly would be a resource for the wider higher education sector.

ACADEMIC PROGRESSION

The academic progression routes are not adequately commented on in the independent evaluation reports. The reports should indicate whether in the view of the evaluation panel the successful graduate, with the appropriate grade of qualification, would be adequately prepared for further study. This statement should indicate the range of programmes that would be suitable.

MEMBERSHIP OF EVALUATION PANELS

- All members of the independent evaluation panels were external experts with a wide range of expertise provided by them. This contributed to the validation process through input from various perspectives, including those from academic institutions, employer and professional practitioners.
- All independent evaluation panels had at least one female member and at least one male member. Forty-four percent of panel members were female. Twenty-nine percent of the chairpersons were female as were thirty-seven percent of the subject matter experts.
- The majority of the academic panel members (58%) were from the Institutes of Technology, Dublin Institute of Technology, the National College for Arts and Design, Universities in Ireland (33%) and from universities outside the state (9%).
- Learners were represented on eighty-six percent of the panels formed under the current validation policy.
- Teaching and learning experts were indicated on sixteen percent of the independent evaluation panels and twenty-eight percent of programme review panels.

STRENGTHS AND WEAKNESSES OF INDEPENDENT REVALIDATION AND PROGRAMME REVIEW REPORTS

Recurring Strengths identified in programme review and revalidation reports

- Independent programme review panels commented favourably on the level of support provided to learners. Various supports were highlighted, examples were learner support for teaching and learning and innovative services provided by libraries.

- Teaching and learning initiatives were identified as a recurring strength. The initiatives were mainly different in each case.
- The quality of documentation provided by independent providers, engagement of staff in the review process, and the work involved in undertaking the programme review and revalidation process were commended in many cases.

RECURRING WEAKNESSES IDENTIFIED IN PROGRAMME REVIEW AND REVALIDATION REPORTS

The same weaknesses were identified in evaluation reports for programme reviews and revalidations as were identified in reports for initial validation of programmes. These were with learning outcomes, both MIPLOs and minimum intended module learning outcomes (MIMLOs), as well as weaknesses in the content of modules and assessment.

Revalidation and programme review reporting templates.

- The current template for the independent evaluation report for revalidation has improved the consistency of the reports.
- The analysis indicates that there was a recurring weakness in the reporting by independent programme review panels when using the legacy template. The reports were mainly written for the benefit of the programme development team and the provider in mind. In many cases some of the objectives of the programme review were not reported on at all.
- There is still very little qualitative or quantitative information provided in the independent programme review reports on the effectiveness of the programme, in terms of number of students entering a programme, success rate, progression to further programmes of study or to the labour market.
- There is also a weakness in evaluating the formal links which have been established by the independent provider with business and the wider community in order to maintain the relevance of the programme.
- There are inconsistencies in the level of detail provided in evaluation reports when using the current programme review and revalidation templates.

A more comprehensive list of findings is provided in the main body of this report.

The recommendations provided are the considered views of the authors of this report. They are provided to identify where independent providers' programmes need to improve and where QQI needs to enhance processes within its quality assurance and enhancement activities.

PROGRAMMES SUBMITTED FOR VALIDATION

The main areas of weaknesses in programme submissions to be addressed with independent providers is in relation MIPLOs, content of modules and assessment. Greater attention needs to be paid in demonstrating how the MIPLOs to qualify for the QQI award sought are consistent with the relevant award standard. Evaluation panels should document in their report how the MIPLOs are in their view consistent with the award standard based on the evidence submitted to them in the programme submission document.

HONOURS BACHELOR'S DEGREE IN ARTS

In the case of programmes leading to an Honours Bachelor's Degree in Arts where the programme is in Business or a business related discipline, the learning outcomes in the business award standard that are applicable should be specified. It is recommended that in such cases, the rationale as to why an Arts Award is justified and not a Business Award should be provided in the submission document.

QQI should develop guidelines in relation to the title of programmes which would help in distinguishing between Honours Bachelor of Arts in Business or business related areas and Bachelor of Business (Honours) Degrees.

The progression opportunities throughout the higher education sector for graduates of Bachelor of Arts (Honours) in Business programmes should be clearly identified in submissions.

MULTIDISCIPLINARY PROGRAMMES

In the case of multidisciplinary programmes where, for example, there are elements of Business and Science, the rationale for choosing a particular award needs to be justified. Programme submissions should clearly demonstrate why a particular award is justified.

In such cases the independent evaluation report should indicate which topics in the curriculum address the elements of the relevant standard in which the award will be made. This is particularly required when the award to be made is at Honours Bachelor's Degree, Higher Diploma, Postgraduate Diploma and Master's Degree.

In such cases the majority of the subject matter experts should be from the stem in which the award is to be made.

VALIDATION PROCESS

The identification and promotion of good practice should be an outcome of the validation process. Evaluation panels should be directed to take account of this where it is applicable. Where it is identified, good practice should be described in such a way as to be of value to the wider higher education sector and other relevant stakeholders.

Independent evaluation panels should pay more attention to the MIPLOs and ensure that they have been internalised by the programme development team and can be implemented by those delivering the programme. This would enhance the programme submission and programme delivery.

QQI should determine how best to address the preparation of learners for active citizenship in programmes. Active citizenship is one outcome of higher education envisaged by the European standards guidelines.

The evaluation panel should take account of benchmarking activities and how appropriate they are for the submitted programme.

VALIDATION REPORTS

The validation report template should be modified to include a section for the MIPLOs to be included. This would focus attention on this aspect of the validation criterion which is at the core of a number of weaknesses identified in the findings of the review.

MEMBERSHIP OF EVALUATION PANELS.

QQI should appoint a secretary to each panel and provide training for all panel members, in particular, chairpersons and secretaries, to ensure compliance with all policies and procedures for initial validations and revalidations of programmes.

The number of female members on evaluation panels needs to increase as well as the number in the role of chairpersons with a reduction in the number in the position of secretary.

A broader representation of academics and industry experts from outside the state would help to underpin the quality of the system and its comparability with other higher education systems within Europe. This is especially important with Master's Degree and Postgraduate Diploma programmes.

Qualifications and appropriate biographical details of evaluation panel members should be included in the independent evaluation report and programme review report.

The composition of both initial and revalidation panels for Master's Degree and Postgraduate Diploma programmes should have a high proportion of members with Doctorates. An increase in the number of subject matter experts from the university sector would also enhance the validation process.

REVALIDATION AND PROGRAMME REVIEW REPORTS.

Revalidation benefits from the availability of evidence from the historic provision of the programme (on which the proposed programme is based). The initial evaluation report should be provided to the programme review panel to ensure follow up conditions were acted upon and no weakness identified in the initial evaluation report were reoccurring.

The independent programme review report should always provide both qualitative and quantitative information on the effectiveness of the programme. QCI to determine what information should be provided to ensure a consistency in reporting.

The independent programme review report should evaluate the formal links which have been established by the independent provider with business and the wider community in order to maintain the relevance the programme. The programme review panel should meet with employers of the graduates of the programmes as well as with the graduates as part of the programme review process.

Further recommendations are made in the body of the report. They are provided with a view to improving programme submissions, the operation of the validation, revalidation, programme review processes and in the information provided in the evaluation reports which are made available to the public.



Overall Conclusion

This is the first time a thematic analysis has been undertaken by QQI or any of its predecessor bodies. The analysis covers higher education programmes submitted to QQI for validation or revalidation following programme review by independent providers. This accounts for approximately six percent of Honours Bachelor's Degrees validated in Ireland. Overall, the findings indicate that all programmes submitted for validation or revalidation following programme review were independently evaluated against published validation criteria. The majority of programmes submitted for validation were recommended by independent evaluation panels for validation. A wide range of individual strengths, opportunities for improvement and weaknesses were identified in independent evaluation reports for new programmes mainly in relation to the content of the programme, MIPOs and assessment. Similar weaknesses were identified in independent evaluation reports for programmes for revalidation following programme review. While acknowledging the achievements of QQI in ensuring an improved consistency in the independent evaluation of programmes for validation and revalidation against the current validation criteria, QQI should prioritise training for evaluation panels to ensure an enhancement in reports. The composition of evaluation panels should have greater female representation and an increase in the number of international panel members. Independent providers should place greater emphasis on ensuring that programmes have clearly stated MIPOs that are consistent with awards standards.

The authors of the report would like to acknowledge the co-operation of QQI and the independent providers in preparing this report

1 Introduction

1.2 PURPOSE OF THIS REVIEW

This review is part of a process by which Quality and Qualifications Ireland (QQI) critically reviews its own quality assurance procedures. It is written independently of QQI and will be available to the public from QQI. One of QQI's functions is to regularly review the quality assurance arrangements of higher education institutions. In the current process, it is turning the spotlight on its own procedures.

This review concentrates on three critical processes for the quality assurance of higher education programmes, the validation process, the programme review process and the revalidation process. The initial validation process must be completed before a provider can deliver a programme. It is a QQI directed process. Once programmes are running, the provider must review them periodically, usually every five years, and apply for revalidation of each programme.

It is important to note that, in the case of the initial validation, this thematic review is a review of reports made to QQI by external appointed panels. This is also the case for programme review reports and revalidation reports, where external programme review panels were appointed by the provider having agreed terms of reference with QQI.

During the period covered by the review, QQI instituted a change in its validation and periodic programme review policies. This review allows for a reflection on the reports produced under both policies.

The findings of this analysis can contribute to the enhancement of both the validation and the review processes. The detailed analysis of the information obtained showed developments, trends, and areas of good practice and identified areas where there were persistent weaknesses.

Recommendations based on the findings are made in relation to improving programmes, improving the relevant reports in terms of their clarity, the usefulness of the information they provide stakeholders about programmes and improving the evidential supports to be cited in reports in support of conclusions.

Recommendations are made in relation to expert panels, the programme revalidation process and to improving reports in terms of their use of evidence to back up assertions.

This review is a thematic analysis of the independent provider sector of the Irish higher education system. The "Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG 2015) specifies standards for quality assurance agencies in the European higher education area. One of the ESG standards refers to thematic analysis in para 3.40. (See Figure 1). A glossary of the terms used throughout this report is provided in Appendix 7.

3.4 Thematic analysis

Standard: Agencies should regularly publish reports that describe and analyse the general findings of their external quality assurance activities.

Guidelines: In the course of their work, agencies gain information on programmes and institutions that can be useful beyond the scope of a single process, providing material for structured analyses across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance policies and processes in institutional, national and international contexts. A thorough and careful analysis of this information will show developments, trends and areas of good practice or persistent difficulty.

Figure 1 Extract from ESG 2015 on Thematic analysis

This review of the independent sector reports is aimed at satisfying the requirements of ESG 3.4 in respect of this sector alone.

1.3 WHO IS THE REVIEW OF INTEREST TO

This review will be of interest to those with responsibility for quality assurance in higher education in Ireland. Senior management in the independent provider sector will benefit from its analysis of the recurring strengths, weaknesses and opportunities for improvement in programmes identified in reports.

The findings will interest programme development and programme review teams. The many quotations from the reports will give such teams an indication of the areas where validation and programme review panels find weaknesses, or strengths or opportunities for improvement.

Chairpersons, secretaries and members of panels will benefit from the comments on the reports. Guidance is provided in the review on the evidence required for decisions on programmes and suggestions are made in relation to the recording of good practice.

This review will be of interest to quality assurance personnel and Heads of School/ Deans of Faculties considering programme reviews.

As this review is undertaken, in part, to fulfil the requirement of ESG 3.4, it will be of interest to higher education quality assurance agencies outside the state. The relevant section of ESG 2015 is shown in Figure 1 above.

The findings and recommendations of this review will be of interest to those who fund and/or regulate higher education in Ireland.

1 Standards and Guidelines for Quality Assurance in the European Higher Education area. ESG 2015 pp23

1.4 THE QUALITY ASSURANCE CYCLE-VALIDATION TO PROGRAMME REVIEW TO REVALIDATION

The quality assurance cycle is outlined in Figure 4 below. There are three distinct phases. The initial phase is where the programme is independently evaluated to decide whether it should be validated by QQI. Following a successful validation the provider of a programme can enrol learners for a specified length of time or number of enrolments, usually five years and deliver the programme. After this period the programme must be reviewed and revalidated for a further period. This cycle of review and delivery then continues.

A brief outline of the major steps in the initial validation process is laid out in Figure 2. It is a process which has not changed over the period of this review. It is only available to those providers who have had their quality assurance procedures approved by QQI. However, the evaluation criteria and the documentation required for each step and the format of the report produced by the evaluation panel has changed. These steps and changes are described in detail in Section 3 below.

- *Provider submits a programme to QQI for evaluation.*
- *QQI appoints an independent evaluation panel.*
- *Evaluation panel assesses the programme submission and meets with the providers and providers programme development team to clarify any issues. It evaluates the programme submission against the QQI validation criteria.*
- *Evaluation panel produces a report which recommends that QQI validate the programme or that QQI should refuse to validate the programme.*
- *QQI decides to validate or to refuse to validate the programme.*
- *QQI publishes the evaluation report. It also publishes a Certificate of Validation, if the programme is validated.*

Figure 2 Initial validation process

The programme review and revalidation process is also included in Figure 4. This process changed during the period of the review. The process starts with the provider reflecting on the delivery of the programme since the initial validation and, based on that self-study, proposing amendments to the programmes. The adequacy of the self-study is evaluated by the independent evaluation panel and the proposed changes, if any, to the programmes are also evaluated. The independent evaluation panel makes a recommendation to QQI. QQI decides whether to revalidate or to refuse to validate.

Figure 4 outlines the process for programme review and revalidation. The legacy process consisted of addressing the objectives of the programme review and completing the legacy validation template. The provider appointed the evaluation panel having agreed terms of reference with QQI.

In the current version of the process, the evaluation panel appointed by the provider completes the template provided in the Programme Review Manual 2018. The panel reports to the provider on the programme review. The panel reports separately to QQI on the proposed revalidations of programmes. In both legacy and current processes QQI decides to revalidate or to refuse to revalidate the programme. The major steps involved in the programme review are in Figure 3 below.

Current programme review process from 2018	Legacy programme review process
<ul style="list-style-type: none"> • Provider produces a self-study report and proposals for the revalidation of programmes. • Provider appoints independent evaluation panel. • Panel considers the self-study report and the revalidation proposals. • Panel completes the template provided in the Programme Review Manual 2018 • Panel completes the revalidation template for each programme • Panel reports to provider on programme review. • Panel reports to QQI on revalidation reports. • QQI decides to revalidate the programmes or to refuse validation. • Provider considers the programme review report. • Provider publishes the programme review report. • QQI publishes the revalidation report and issues a certificate of revalidation, if the programme is validated. 	<ul style="list-style-type: none"> • Provider produces a self-study report and proposals for the revalidation of programmes. • Provider appointed an independent programme review panel. • Programme review panel reviewed the development of the programme against the objectives of the programme review. • Panel considers the self-study report and the revalidation proposals. • Panel reports to provider on programme review. • Panel reports to QQI on revalidation reports. • QQI decides to revalidate the programmes or to refuse validation. • QQI considers the programme review report. • QQI publishes the programme review report. • QQI publishes the revalidation report and issues a Certificate of Validation if necessary.

Figure 3 Major steps in current and legacy programme review process

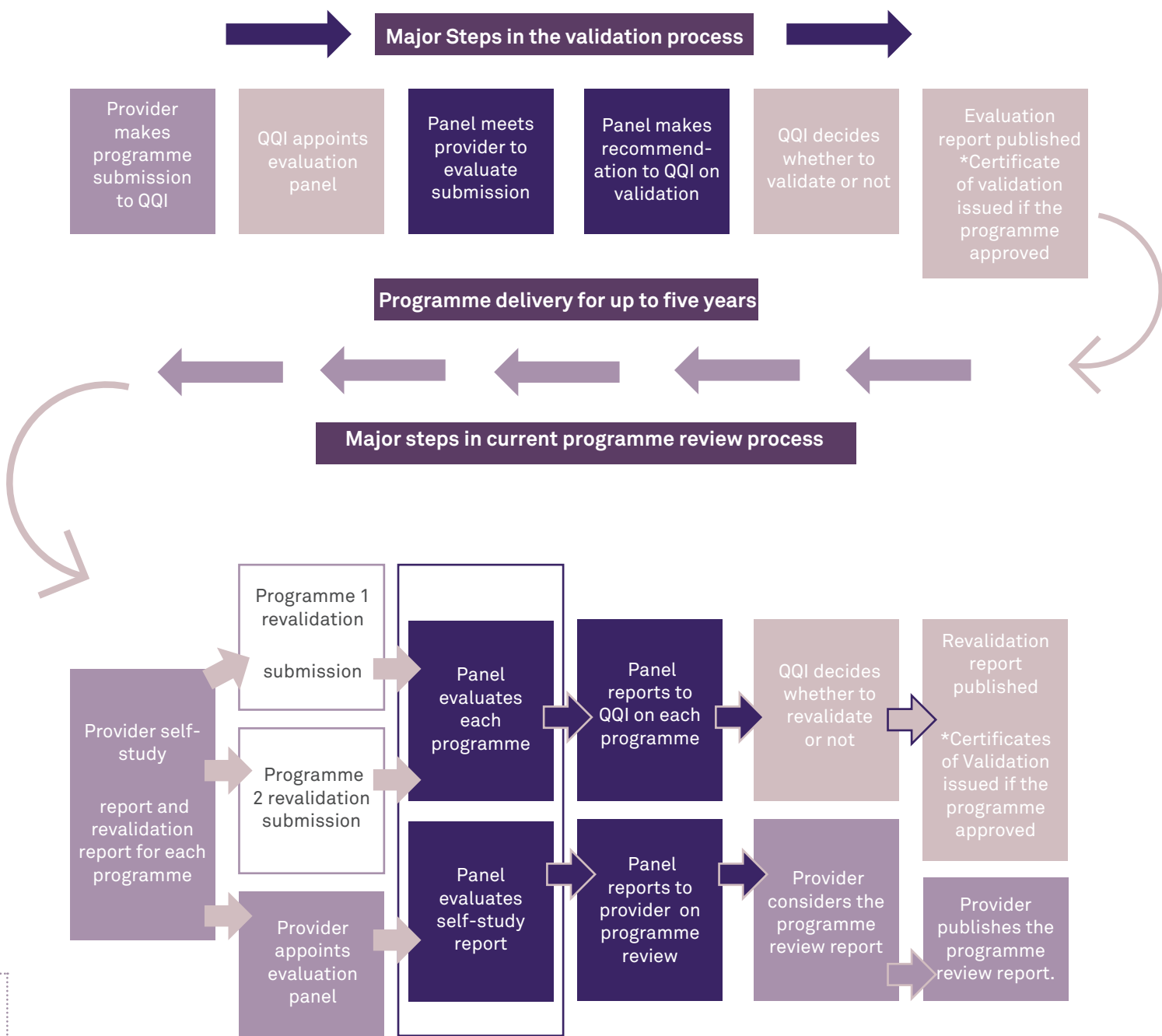


Figure 4 Initial validations with current and legacy programme review processes

1.5 BACKGROUND TO THIS REVIEW

In May 2018, Quality and Qualifications Ireland (QQI) published a request for tenders entitled “Thematic analysis of reports”. The specification required the review of reports produced by QQI and published during the period June 2015 to June 2018. These are reports from expert groups examining programmes for initial validation and also reports from the periodic review of programmes. While this review was being conducted, additional reports of reviews and revalidations published in July 2018 became available. These were included in the analysis. The tender specified the requirements of the RFT which is provided in Figure 5. The analysis required in the tender is included in appendix 6

Detailed Specification of Requirements. Section (4.1) of the RFT

The Contracting Authority is inviting tenders from competent suppliers to deliver a project involving the thematic analysis of reports related to

- i. *the approval (e.g. academic validation, professional accreditation) of new programmes of higher education (programmes) and*
- ii. *the re-approval following review and modification of previously approved programmes.*

*Such reports include, for example, programme validation reports published by the Contracting Authority. For convenience, we will sometimes refer to such reports as ‘**relevant reports**’ in the remainder.*

The project will have two stages with the second stage being contingent on the completion of the first stage. The first stage (Stage 1) will involve an analysis of relevant reports on programmes where the Contracting Authority is the awarding body, excluding professional accreditation reports. For the first stage, relevant reports will include programme validation reports published by the Contracting Authority and programme review related ‘independent panel’ reports. This stage must be completed no later than 12 October 2018.

Figure 5 Detailed specification of requirement of tender

QQI is a member agency of ENQA, the European Network of Quality Agencies. ENQA issues guidelines to members on good practice. These guidelines include the extract in Figure 1 above.

1.6 KEY DOCUMENTS

The key documents relevant to this thematic analysis are:

- The initial evaluation and revalidation reports which are published on the QQI website.
- Programme Review reports. These were published on the QQI website until 2016. Since then, independent Providers have been required to publish the programme review reports on their websites.
- Standards and guidelines for quality assurance in the European Higher Education Area 2015 (ESG).
- QQI Policies and criteria for the validation of programmes of education and training November (2017).
- Report and submission Templates issued by QQI.

1.7 OUTLINE OF THE CONTENTS OF THE REVIEW

Section 1 provides the background to the report and a detailed breakdown of the types of programmes reports analysed.

Section 2 analyses the composition of the evaluation panels, where they are based and the diversity within the groups. Recommendations for improvements in the composition and operation of the panels are made.

Section 3 outlines the policies for validations of new programmes and also the processes. An overview of the results of the review is also provided.

Section 4 deals with the recurring features in the programmes, areas of strength, of weakness and those areas where opportunities for improvement exist.

Section 5 examines the reports themselves and finds areas of strength and weakness. It also compares the current report template to the legacy templates.

Section 6 deals with programme reviews and the revalidation of programmes. QQI policies on programme reviews and revalidation that were in place during the period covered by the review are provided. The recurring strengths, weaknesses and opportunities for improvement are described. The programme review reports themselves and the extent to which they meet the objectives is dealt with.

Section 7 contains all of the major the findings of the review. In Section 8 all of the recommendations of the review are presented.

Section 9 outlines the methodology used in this review. There are appendices following Section 9.

1.8 EXTENT AND TYPE OF PROGRAMME REPORTS REVIEWED

All programme validation reports are published on the QQI website. They are available at <https://qsearch.qqi.ie/WebPart/Search?searchtype=validationreports>. The reports of interest for this review were those for major awards published between June 2015 and July 2018. These were the major awards at the National Qualifications Framework (NFQ) levels six to nine.

This included reports of initial validations of programmes and reports of revalidations subsequent to programme reviews. The major awards are, Higher Certificates (NFQ Level 6), Ordinary Bachelor's Degrees (NFQ Level 7), Honours Bachelor's Degrees and Higher Diplomas (NFQ Level 8), Master's Degrees and Postgraduate Diplomas (NFQ Level 9). Research degree programmes at NFQ Level 9 were excluded from the analysis.

Each report on a programme submitted for validation, whether validated or not, is given a unique reference code. This code is in the form of PGXXXX where X is a digit. In some cases, where there are embedded programmes, a single report may refer to a number of programmes. Each of these programmes will have a unique reference code. This reference code has been used through this document. It can be used to search for the reports on the website.

Where there are embedded programmes dealt with in the report, only one programme, usually the principal programme, was included in the analysis. Any other approach would involve double counting of aspects of programmes.

One hundred and thirty-six programme validation reports were analysed. The reports were either the initial validation report from the Independent Validation Panel or revalidation reports from an Independent Programme Review Panel. In the latter cases, the programme review report, which is separate to the revalidation report, was analysed as well.

Table 1 shows the number of validation reports analysed as provided on the QQI website for the period June 2015 to July 2018. The analysis shows that seventy-two percent of the validated programmes delivered by independent providers are at Honours Bachelor's Degree level or above and less than twenty eight percent were Higher Certificates or Ordinary Bachelor's Degrees.

Table 1 Number and breakdown of validation reports analysed by level of programme for the period June 2015 to June 2018 as provided on the QQI website

	Higher Certificate Level 6	Ordinary Bachelor's Degree Level 7	Honours Bachelor's Degree Higher Diploma Level 8	Master's Degree Postgraduate Diploma Level 9	Total
Validation reports	7	9	30	10	56
Revalidation (under programme review process)	7	15	28	28	78
Total	14	24	60	37	134

Table 2 below provides the breakdown of programme validation reports by awards stem. Programmes leading to awards in Arts account for sixty percent, Science accounts for twenty five percent, Business thirteen percent and others two percent.

Table 2 Analysis of validation reports by Award stem

Awards	Arts	Business	Science	Engineering	HC*	Total
Revalidations (under programme review process)	59	8	11			78
Validation reports	21	7	26	1	1	56
Total	80	15	37	1	1	134

*The HC is an apprentice programme. These programmes are un-denominated.

Table 3 below provides the breakdown of programme validation reports by awards stem and NFQ Level.

- Higher Certificate: Twenty-six percent of the validation reports analysed were for programmes leading to awards in Business, thirty-six percent led to awards in Arts and twenty-six percent of the validation reports analysed were for programmes leading to awards in Science.
- Ordinary Bachelor's Degree: Seventy-nine percent of the validation reports analysed were for programmes leading to awards in Arts, eight percent led to awards in Business, eight percent led to awards in Science and four percent to awards in Engineering.
- Honours Bachelor's Degree and Higher Diploma: sixty-four percent of validation reports analysed were for programmes leading to awards in Arts, twenty-nine percent led to Science awards and seven percent led to awards in business.
- Master's Degree and Postgraduate Diploma: fifty percent of validation reports analysed were for programmes leading to awards in Arts, forty-two percent led to Science awards and eight percent led to business.

Table 3 Analysis of validation reports by Awards stem and level of programme

	Arts	Business	Science	Engineering	HC	Total
Higher Certificate	5	4	4	0	1	14
Ordinary Bachelor's Degree	19	2	2	1		24
Honours Bachelor's Degree Higher Diploma	37	4	17	0		58
Master's Degree Post Graduate Diploma	19	3	16	0		38
Total	80	13	39	1	1	134

The award stem does not identify the subject when it is in arts or science.

The European Credit Transfer and Accumulation System (ECTS) credits provide a means of comparing the volume of learning based on the defined learning outcomes and their associated workload. One ECTS credit equates to a minimum of twenty-five hours learner effort for QQI validated programmes².

2 QQI Programme Validation Manual for programmes of HET and apprenticeship (Edition 3 2018). https://www.qqi.ie/Pages/searchresults.aspx?k=ECTS*

All validation reports analysed for Higher Certificate programmes had one hundred and twenty ECTS credits. All validation reports analysed for Master’s Degree programmes had ninety ECTS credits. All Postgraduate Diploma programme validation reports analysed had sixty credits, except for one, which had seventy-five ECTS credits. The breakdown for Honours Bachelor’s Degrees including Higher Diploma and Ordinary Bachelor’s Degrees are provided in Table 4.

The analysis shows that of the validation reports analysed:

- Ninety percent of the Honours Bachelor of Arts programmes had 180 ECTS credits.
- All Bachelor of Arts programmes had 180 ECTS credits.
- All of the Honours Bachelor of Business and Higher Diploma in Business programmes had sixty ECTS credits. Sixty credit Honours Bachelor’s Degrees and Higher Diplomas are normally for learners who have a minimum qualification of an Ordinary Bachelor’s Degree.
- All the Ordinary Bachelor of Business programmes had 180 ECTS credits.
- Except for one programme, the Honours Bachelor of Science programmes had 240 ECTS credits. One had sixty credits.
- The Higher Diplomas in Science had sixty credits except for one programme which had seventy five ECTS credits.
- All Bachelor of Science programmes were 180 ECTS credits.
- There was only one Ordinary Bachelor of Engineering programme with sixty credits. This programme had a Higher Certificate in Engineering as an entry requirement.

Table 4 Analysis of validation reports by ECTS credits and Award stem

	60 ECTS	180 ECTS	240 ECTS
Bachelor of Arts (Honours) (NFQ L8)*	2	32	2
Higher Diploma in Arts (NFQ L8)			
Bachelor of Business (Honours) (NFQ L8)	2	0	0
Higher Diploma in Business (NFQ L8)	2	0	0
Bachelor of Science (Honours) (NFQ L8)	1	0	5
Higher Diploma in Science (NFQ L8)**	10	0	0
Bachelor of Arts (NFQ L7)	0	19	0
Bachelor of Business	0	3	0
Bachelor of Science (NFQ L7)	0	2	0
Bachelor Engineering (NFQ L7)	1	0	0

*One Bachelor of Arts (Hons) programme had 210 ECTS credits.**One Higher Diploma in Science programme had 75 ECTS credits.

Table 5 provides a list of the independent providers against the number of validation and revalidation reports on programmes delivered by that provider. Four colleges accounted for seventy-three percent of the validation reports analysed: National College of Ireland (32%) Griffith College (15%) Irish College of Humanities and Applied Sciences Limited (15%) and Dublin Business School (11%).

Table 5 List of Independent Providers and the Validation Reports analysed

	Validation reports	Revalidations (under programme review process)	Total
Setanta College	0	2	2
Carlow College	0	7	7
CCT College Dublin	6	1	7
Children's Therapy Centre	0	2	2
Dorset College, Dublin	1	0	1
Dublin Business School	8	6	14
Gaelchultur Teoranta	0	1	1
Galway Business School	3	0	3
Griffith College	9	10	19
Hibernia College	1	0	1
IBAT College Dublin	3	0	3
IICP Education and Training Limited.	1	3	4
Independent Colleges	0	2	2
Irish College of Humanities and Applied Sciences Limited	0	20	20
National College of Ireland	24	19	43
The American College, Dublin	0	3	3
The Open Training College	0	2	2
Total	56	78	134

2 Evaluation Panels

2.1 INTRODUCTION

This section discusses the composition of evaluation panels. It examines the membership of panels. It looks at gender diversity evident in the panels and the diversity within each panel role. It examines the institutions the panel members are affiliated with and the qualifications of panel members.

Evaluation panels for initial validations are appointed by QQI. The current policy on programme review and on revalidation of programmes specifies that panels be appointed by the provider.

Panels are a group usually consisting of academics, industry representatives/employers and learners with a knowledge of the discipline covered by the programme to be evaluated. They would normally have experience of similar programmes or of employing graduates from similar programmes.

Panels vary in size but they normally have between three and seven members depending on the complexity of the programme and the range of the specialities covered. Panels are usually chaired by senior academics who have experience of quality assurance policy and processes.

Panels do not validate or revalidate programmes. They recommend to QQI as to whether a programme should be (re) validated or refused (re)validation. It is a statutory function of QQI to validate programmes. Recommendations from panels are considered by QQI before making a decision on validation.

2.1.1 QQI policy on evaluation panels

QQI validation policy specifies the role and composition of the independent evaluation panels:

“Evaluators will be objective and independent of the programme and its providers e.g. free of conflicting interests. Any related interests must be declared in the independent evaluation report and will be published. Independent evaluators must be competent to make a recommendation on whether or not the programme should be validated (see the introduction for unit (6)). Competence means the capacity to make judgements against the applicable QQI validation criteria. Specifically, an evaluator or an evaluation group will be selected to have the competence to justify their recommendation whatever it may be (see the introduction for unit (6)). Typically, evaluation groups (panels) will have expertise in the programme’s discipline area and in generic areas including pedagogy, assessment, quality assurance and all the other areas indicated by QQI’s validation criteria. Training will be provided to independent evaluators where QQI considers this necessary. “

This policy differs from its predecessor in that there is no requirement that panels should have representatives from industry or from potential employers.

QQI is a member agency of the European Association for Quality Assurance in Higher Education (ENQA). It publishes guidelines on quality assurance in higher education. ESG15 is its latest set of guidelines. In it are guidelines for the composition of evaluation panels as below:

“For the independent evaluation of applications for the validation of programmes leading to higher education and training awards, the groups of evaluators will include (a) student member(s) and will be composed in compliance with ESG standard 2.4.³

OVERALL ASSESSMENT OF PANELS

The composition and membership of the validation panels were judged against a number of criteria as outlined in **Figure 6**. These criteria were adopted for the purpose of this review.

Criteria	Comment
The members of the panel are actually independent of the provider and can be seen to be so.	The panel members were drawn from all public higher education institutions in Ireland, independent providers, employers, industry, professions, learners and universities from outside the state. Their independence would have been better established if more relevant biographical detail was supplied. Ninety-two percent of the academic members of panels were from the Irish higher education system.
There should be no conflicts of interest.	There were no recorded conflicts of interest.
They should be competent in the discipline areas of the programme and in the other areas of quality assurance, assessment, programme design and teaching and learning.	Subject matter experts were represented on panels by, at minimum, two persons and usually three. However other expertise especially in teaching and learning was not recorded as being present on most panels.
They should have, among their members, some who were conversant with the national qualification framework and with the criteria for validation.	The Chairpersons of the panels were usually drawn from registrars or retired registrars of Institutes of Technology. Registrars have responsibility for quality assurance within the national qualification framework and adherence to validation criteria.
They should include industry or community expertise as the programmes are expected to lead to employment opportunities for the graduates.	This criterion is met by inclusion of experts drawn from industry or from organisations that employ graduates of similar programmes.
Learners’ experience should be available to the panels.	This has not been the case often for initial validation panels in the past. The current validation policy requires learner inclusion on panels. Programmatic review panels have usually included a learner or a graduate.
Gender diversity.	Both males and females were members of all panels. Females were under-represented in Charing panels 33%, as industry representatives 32% and as subject experts 33%.

Figure 6 Desirable features of evaluation panels

These criteria are discussed in the following sections.

2.2 INFORMATION ON PANEL MEMBERSHIP

The composition of panels is important for the efficient and effective evaluation of new programmes and the review of existing programmes. The figures shown in this section indicate the overall membership of panels. Thus a male who chairs six panels is counted as six panel members. Details on the individuals on panels is given in the following section.

2.2.1 Conflicts of interest

The validation process has a procedure that allows for conflicts of interest to be noted. Where there are no conflicts of interest declared it is not stated in the independent evaluation report.

It would be better if the reports contained a positive statement that there are no conflicts of interest where this is the case. This would indicate to the reader that the issue had been dealt with.

2.3 PANEL MEMBERSHIP

There were four hundred and fifty-eight panel members on initial validations and revalidations. A total of three hundred and five people served on panels, many on more than one panel.

2.3.1 Subject Experts

Independent evaluation panel had subject matter experts from a wide range of public institutions in the state.

Table 6 indicates subject panel membership. If a person served on two panels they are counted twice.

- All public third level institutions were represented on evaluation panel.
- Eight Independent providers were represented.
- The Institute of Technology sector, Dublin Institute of Technology (DIT) and the National College of Art and Design (NCAD) accounted for fifty-three percent of panel members as well as a majority of the chairpersons of panels.
- Eight percent were from universities from outside the state. These were from universities in Northern Ireland, and Great Britain and one panel member was from a university in the United States.
- At Master's Degree and Postgraduate Degree level, forty-six percent were from IOT/DIT/NCAD and thirty-eight percent from the Irish university sector. Only one academic was from outside the state.
- At Honours Bachelor's Degree and Higher Diploma level (NFQ Level 8) forty-nine-percent were from IOT/DIT/NCAD, five percent were from independent providers, thirty percent from Irish universities and nine percent from universities from outside the state.
- At Higher Certificate and Ordinary Degree, sixty-one percent of panel members were from IOT/DIT/NCAD, twenty-nine percent from the Irish universities and seven percent from universities from outside the state.

Table 6 Panel membership - Subject experts on validation and programmatic reviews by type of Institutions

	LEVEL 6	LEVEL 7	LEVEL 8	LEVEL 9	Prog. Rev.	Total
DIT/IOT/NCAD	12	13	42	12	28	107
Not recorded	0	0	6	3	0	9
Independent providers	0	1	4	0	4	9
University	7	5	26	10	13	61
University, foreign	2	1	8	1	5	17
Grand Total	21	20	86	26	50	203
Number of Panels	7	9	30	10	18	74

2.3.2 Experts in teaching and learning, assessment and in programme design.

Three percent (fourteen out of four hundred and fifty-eight) were designated as teaching and learning specialists. This compares with forty-four percent (two hundred and three out of four hundred and fifty-eight) subject matter experts. These fourteen teaching and learning specialist participated in seven of the fifty-six initial validation panels and five of the eighteen programme review/revalidation panels. It is noticeable that on those panels where teaching and learning experts were present more attention was paid to matters of teaching, learning and assessment.

2.3.3 Industry/Employers

Industry or employer representatives were represented on all but two panels. The ninety - one industry/employer experts were from thirty-six different enterprises on the initial validation panels and nineteen different enterprises on the eighteen programme review panels. All these enterprises were based in Ireland, but some were Irish branches of global corporations. Intel, Microsoft and Hewlett Packard contributed on multiple occasions to initial validation panels and programme review /revalidation panels.

2.3.4 Learners/Graduates

Most panels did not have a learner representative as a panel member. Only thirteen of the fifty-six initial validation panels had a learner representative. This statistic should change as the current validation policy requires that learners are members of a panel. On programme review panels there were thirteen learners or graduates on the eighteen programme review panels. However, a graduate would not be considered as a learner for policy compliance purposes.

2.3.5 Chairpersons

The Chairpersons of the panels were all senior or retired academic managers. Sixty-two of the panels were chaired by Registrars or other senior academics with quality assurance responsibility. Only fourteen panels were chaired by academic Heads of Faculty, School or Department. Twenty-nine different individuals chaired the seventy-four panels. (Note: The eighteen programme review panels recommended seventy-eight programmes for revalidation. There were fifty-six initial validations).

This concentration of quality assurance personnel has obvious benefits but chairpersons from the discipline areas or from teaching and learning departments might change the focus of panels towards delivery and assessment processes.

2.3.6 Secretaries

The secretaries of the panels were indicated in forty two cases. There was no indication in the remaining thirty-six panels as to who drafted the report. Where secretaries were indicated, the reports were notably more detailed. This is the only function where there is a majority of females.

2.4 COMPOSITION OF PANELS BY LEVEL OF PROGRAMME

Table 7 shows the composition of panels by affiliation of panel members. There were nine Irish university members and one foreign university member on the ten Master’s Degree evaluation panels. This was from a total membership of fifty-nine. Given the need to maintain equivalence across sectors this is a surprisingly low figure.

Table 7 Composition of validation panels by level of programme

	Higher Certificate	Ordinary Bachelor’s Degree	Honours Bachelor’s Degree/HDip	Master’s Degree/ PGDip
DIT/IOT/NCAD	50%	45%	50%	50%
Industry	21%	24%	19%	28%
Independent provider	5%	10%	8%	3%
University	18%	20%	19%	15%
University, foreign	18%	1%	4%	2%

2.5 GENDER DIVERSITY IN PANELS

All panels had at least one female member and at least one male member. The detailed breakdown of panel membership shows that there were more male members. Table 8 provides a breakdown of the female/male representation for the various roles.

2.5.1 Breakdown by function and gender

A total of three hundred and five different individuals served on panels. Table 8 shows the percentage of female and male members in each category. A total of one hundred and thirty- four females were involved (44%) and one hundred and seventy-one males (56%). Eleven females and seventeen males were chairpersons. The majority of secretaries were female (56%).

Table 8 Gender breakdown of individuals for the various roles on panels

Function	Females		Males		All
	Number of individuals	% Female	Number of individuals	% Male	Number of individuals
Chair	11	39%	17	61%	28
Graduate		0%	1	100%	1
Industry/ employer	24	35%	45	65%	69
Learner	11	55%	9	45%	20
Observer	9	100%		0%	9
Secretary	13	57%	10	43%	23
Subject expert	59	41%	86	59%	145
Teaching and learning	5	83%	1	17%	6
Others/ not recorded	2	50%	2	50%	4
Totals	134	44%	171	56%	305

Table 9 below shows the panel membership by function and gender. There were four hundred and fifty-eight panel members. Some of them served on more than one panel. For example, there were fifty-four panels chaired by men. The previous **Table 8** shows that seventeen men chaired panels. Most of these chairpersons chaired more than one panel. Overall, twenty-nine percent of the panels were chaired by women and seventy-one percent by men. The overall panel membership was forty percent female and sixty percent male.

Table 9 Breakdown by function and gender of membership of panels

Function	Females		Males		Total number on panels
	Total number on panels	% Female	Total Number on panels	% Male	
Chair	22	29%	54	71%	76
Graduate		0%	1	100%	1
Industry/ Employer	36	40%	55	60%	91
Learner	11	44%	14	56%	25
QQI Observer	9	100%	0	0%	9
Secretary	21	58%	15	42%	36
Subject Expert	76	37%	127	63%	203
Teaching and Learning	7	86%	7	14%	14
Others/ not recorded	2	50%	2	50%	4
Totals	180	40%	272	60%	458

2.5.2 BREAKDOWN BY GENDER, TYPE OF INSTITUTION AND INSTITUTION

Table 10, Table 11, Table 12 and Table 13 provide a breakdown of the membership by gender and institution.

- Eight Independent providers were represented on panels with forty-five percent from the National College of Ireland.
- All public higher education institutes had representation on panels.
- The representation was reasonably well spread within the IOT/DIT/NCAD sector except for IT Sligo, IT Tralee and NCAD. It cannot be explained solely by location as Letterkenny IT is further away from the independent providers than is IT Sligo.
- Dublin City University (DCU) and Trinity College, Dublin (TCD) provided the highest representation within the university sector.
- Gender breakdown for independent providers was 49% female and 51% male.
- Gender breakdown for IOT/DIT/NCAD was 49% female and 51% male.
- Gender breakdown for university sector was 48% female and 52% male.

Table 10 Representation on panels from independent providers

Private provider	Female	% Female	Male	% Male	Total Number
The American College, Dublin	0	0%	1	100%	1
Sub total	22	49%	23	51%	45
Dublin Business School	0	0%	1	100%	1
Griffith College	7	78%	2	22%	9
Hibernia College	7	88%	1	13%	8
Irish College of Humanities and Applied Sciences (ICHAS)	0	0%	2	100%	2
Independent Colleges	1	50%	1	50%	2
National College of Ireland	7	33%	14	67%	21
St Nicholas' College	0	0%	1	100%	1

Table 11 Representation on panels from the DIT/IOT/NCAD sector

Institute	Female	% Female	Male	% Male	All
Dublin Institute of Technology	9	82%	2	18%	11
Institute of Art, Design and Technology, Dun Laoghaire	7	70%	3	30%	10
Athlone Institute of Technology	1	7%	15	93%	16
Blanchardstown Institute of Technology	2	20%	8	80%	10
Institute of Technology, Carlow	4	25%	12	75%	16
Cork Institute of technology	10	43%	13	57%	23
Dundalk Institute of Technology	5	33%	10	67%	15
Galway Mayo Institute of Technology	0	0%	13	100%	13
Letterkenny Institute of Technology	0	0%	13	100%	13
Limerick Institute of Technology	3	17%	15	83%	18
Institute of Technology, Sligo	3	38%	5	63%	8
Institute of Technology, Tallaght	3	27%	11	73%	13
Institute of Technology, Tralee	4	67%	2	33%	6
Waterford Institute of technology	3	22%	15	78%	18
National College of Art and Design	1	33%	2	67%	3
Total DIT/IOT/NCAD	54	28%	139	72%	193

Table 12 Representation on panels from Irish universities

Institute	Female	% Female	Male	% Male	All
National University of Ireland, Galway	0	0%	3	100%	3
National University of Ireland, Maynooth	1	50%	1	50%	2
Trinity College, Dublin	13	71%	6	29%	19
Dublin City University	3	14%	18	86%	21
University College, Cork	2	25%	6	75%	8
University College, Dublin	5	61%	3	39%	8
University of Limerick	10	100%	0	0%	10
Total Irish Universities	34	48%	37	52%	71

Table 13 Representation on panels from universities outside of the state

Institute	Female	% Female	Male	% Male	All
Duke University, USA	0	0%	2	100%	2
Open University	0	0%	1	100%	1
Queens University Belfast	0	0%	1	100%	1
University of Ulster	2	50%	2	50%	4
University of Edinburgh	3	100%	0	0%	3
University of Hertfordshire	0	0%	1	100%	1
University of South Wales	1	100%	0	0%	1
University of Surrey	0	0%	2	100%	2
University of Warwick	0	0%	1	100%	1
University of Wolverhampton	1	100%	0	0%	1
Total Foreign Universities	7	41%	10	59%	17

Table 14 and Table 15 provide information on representation from QQI, industry and employers.

Table 14 Representation on panels from QQI

	Female	% Female	Male	% Male	All
QQI*	17	100%	0	0%	17

*These were observers and recording secretaries

Table 15 Representation on panels from industry and employers and not recorded

	Female	% Female	Male	% Male	All
Industry/ employer	42	43%	57	57%	99
Not recorded	8	50%	8	50%	16
Grand Total of Tables 12,13,14,15	158	40%	273	60%	458

2.5.3 Findings on evaluation panels

- All public higher education institutions were represented on independent review panels. There were one hundred and ninety three from the DIT/IOT/NCAD sector and seventy one from the Irish university sector.
- Amongst subject experts, one hundred and seven were from the DIT/IOT/NCAD sector and sixty-one from the Irish university sector. A further seventeen were from Universities from outside of the state.
- On the validation panels for Honours Bachelor’s Degrees, Higher Diplomas, Master’s Degree and Postgraduate

Diplomas, nine of the one hundred and twelve subject experts (7%) were from Universities from outside the state.

- Teaching and learning experts were on nine of the fifty-eight independent evaluation panel and five of the eighteen programme review panels.
- Secretaries were assigned to five of the eighteen programme review panels and twenty eight of the fifty-six validation panels.
- Forty percent of the four hundred and fifty-eight panel members were female. Twenty nine percent of the chairpersons were female as were thirty seven percent of the subject experts.
- Learners were represented on twelve of the fourteen panels formed under the current validation policy.
- There were Industry representative on all but two of the validation panels and on all of the programme review panels.

2.5.4 Comments on evaluation panels

Evaluation panels are a key part of the validation process. The composition of panels and the quality of their membership is an important ingredient in maintaining the quality of the validation and review process.

The preponderance of panel membership from the Irish higher educational system is striking. Only eight percent (17 out of 203) of the academic members came from outside the state. This may hinder innovative approaches to the design and delivery of programmes. It also weakens critiques of current practice in Ireland. A broader representation of academics and industry experts from outside the state would help to underpin the quality of the system and its comparability with other educational qualifications systems within the EU. This is especially important at the higher levels of programmes, at Master's Degree and Postgraduate Diploma programmes.

It is surprising that the composition of panels dealing with specialist masters programmes do not have a greater number of members from the Irish and foreign universities. The proportion of this group on panels is less than that on panels at all other levels.

Panels would benefit from those with specific expertise in the processes for the development of programmes, programme delivery and assessment. Higher education, as a process, is becoming increasingly professionalised. The higher education system and institutional level policies, processes and procedures are increasingly the focus of research and of government attention. Most, if not all, of Irish HE institutions have departments dealing with teaching quality and with the development of pedagogic competences. Increasingly staff from these areas are represented at senior level in institutions.

Females are under represented on panels. They constitute thirty-three percent of subject experts and only twenty-five percent of the members drawn from the sector comprising Dublin Institute of Technology, the other Institutes of technology and the National College of Art and Design (DIT/IOT/NCAD). HEA figures for the public higher education system for 2016 indicate that forty-four percent of academic staff were female.

The information on panel membership provided in the reports is sparse. Stakeholder confidence in the ability of the panel to carry out the validation competently and independently would be enhanced if the information provided gave a fuller picture of the qualifications and experience of the members of the panel. Similarly, providers and

programme development teams should be confident that decisions made in relation to their programmes are well founded.

Much of this confidence will arise from the details of the panel membership, their position in their affiliated institution, and their academic experience. Industry experts should be seen as being capable of speaking authoritatively about the industry.

Qualifications are not recorded for panel members and their position in their organisations is often left unclear. The specialities of the subject experts are not recorded and their position in their organisations is rarely given.

This situation could be remedied if the biographical details of the panels included their relevant qualifications, their area of expertise and their position in their existing or relevant former organisation.

2.5.5 Recommendations

The representation of females on panels should be increased as well as the number in the role of chairpersons with a reduction in the number in the position of secretary.

A broader representation of academics and industry experts from outside the state would help to underpin the quality of the system and its comparability with other educational qualifications systems within the EU. This is especially important at the higher levels of programmes, in particular Master's Degree and Postgraduate Diploma programmes.

Qualifications and appropriate biographical details of panel members should be included in the independent evaluation report and programme review report.

The composition of both initial and revalidation panels for Master's Degree and Postgraduate Diplomas should have a high proportion of members with Doctorates.

An increase in the number of subject matter experts from the university sector should also be considered.

3 Validations of new programmes - policy, process and overview

3.1 INTRODUCTION

This section deals with the validation of new programmes. It describes what validation means in the Irish context and provides a formal definition of validation. The procedure through which a programme is validated is described. The validation policy is outlined and the criteria that must be met for a successful validation are provided.

The scope of this review of validations of new programmes is outlined and the major recurring strengths, weaknesses and opportunities for improvement are indicated. The occurrence of these characteristics at various programme levels is provided.

Validation is the process by which QQI ensures that a programme of learning is suitable and that it conforms to the requirements of the Irish higher educational system. Validation is a similar process to accreditation. When QQI validates a programme, e.g. a B.Sc. in Biology, it is confirming that the programme is of a standard expected of a Bachelor of Science degree in Biology. QQI policy on validation says of a validated programme:

“This implies that completion of a validated programme means that the learner has acquired, and where appropriate, is able to demonstrate, the necessary knowledge, skill or competence to justify the award(s) of QQI being offered in respect of that programme”⁴.

Therefore, the knowledge (breadth and depth) skill or competence should be appropriate for a programme leading to Bachelor of Science award and the content and assessment will ensure that successful learners will achieve the learning outcomes expected of a person with a bachelor’s degree in biology.

3.2 THE VALIDATION PROCEDURE

The validation of a programme involves an evaluation of the programme submission and of the providers staff requirements and facilities against criteria set by QQI. These criteria are stated in “*Policies and criteria for the validation of programmes of education and training QQI 2017*” There are currently twelve criteria all of which must be met before a programme is validated (See **Figure 9**).

QQI appoints an independent evaluation panel to examine the providers programme submission and to make recommendations, to QQI as to whether the programme should be validated or not. This panel normally comprises of a chairperson, subject experts, industry/ employer representatives and may also have pedagogic experts and learners (see Section 2).

The evaluation panel studies the programme document. It then meets at a site visit with the provider, the provider’s programme development team and the staff that are expected to deliver the programme. The evaluation panel discusses the programme submission with the programme development team. By examining the programme submission and discussing it with the programme team the evaluation panel comes to decision as to whether the criteria for validation have been met.

4 Policies and criteria for the validation of programmes of education and training, QQI 2016 pp 6

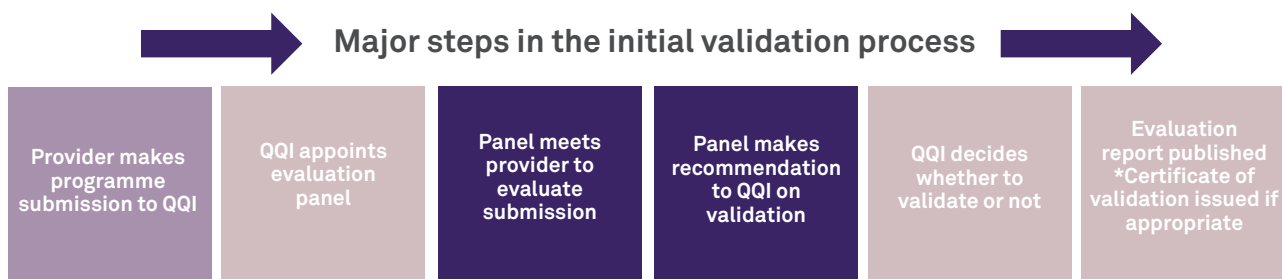
Under the current policy each of the criteria are considered separately. If a criterion has not been met, then the evaluation panel can set conditions that must be fulfilled before the programme can be successfully validated. It can also propose non-mandatory recommendations for improvements to the programme.

The conditions and recommendations are usually quite specific. They might deal with a deficiency in the entry requirements or with the assessment of learners or with the material covered in the programme. Where the panel feels that there are too many deficiencies or that the deficiencies are too serious, it will recommend to QQI that validation be refused and give reasons. It is a reserved function of QQI to validate or refuse validation of a programme.

The decisions of the evaluation panel are set out in a programme validation report. Under the current validation policy this report follows a template which deals with each criterion in turn. The validation report is the substantive product of the validation process. In making its report to QQI, the panel has to provide evidence to support its recommendation. The programme validation report is submitted to QQI with a recommendation that the programme is “Satisfactory”, “Satisfactory, but subject to conditions” or “Not satisfactory”.

QQI then decides to formally validate the programme or to refuse validation. If conditions are attached, QQI ensures that the conditions are met. QQI issues a Certificate of Validation which is published on its website. The report from the evaluation panel is also published whether or not the programme is validated. It is these reports that are the subject of this review.

Figure 7 below shows the six major steps in the validation of new programmes. Access to validation of programmes leading to QQI awards is dependent on the approval of provider quality assurance procedures by QQI. This must be obtained prior to the submission of any proposed programme for validation to QQI.



Step 1 The independent provider submits a programme submission document to QQI. The programme submission contains details of the provider such as staffing and learning resources. It must also provide the rationale for the programme, the aims, objectives and minimum intended programme learning outcomes.

Step 2 The independent evaluation panel consists of experts appointed by QQI who are capable of determining whether the programme meets the validation criteria. The panel consists of a chairperson, subject experts, an industry/employer representative, and a learner (under the current policies).

Step 3 The validation panel consider the submission to evaluate it against the validation criteria. They meet with the provider 's senior management and with those staff involved with the development and delivery of the programmes. Learning resources such as laboratories and library and IT facilities will also be viewed. The programme is discussed in depth with the staff.

Step 4 The panel produces a validation report which is submitted to QQI. The current independent report template requires panels to comment on the twelve criteria and to indicate whether in their view the each of the criterion are met. The panel can propose conditions that must be met if the programme is to be recommended to QQI for validation. The panel can make non-mandatory recommendations for improvement in the programme and it can also commend specific aspects of the programme. The panel can also recommend to QQI that the programme be refused validation. It is a reserved function of QQI to validate or refuse validation of a programme.

Step 5 QQI considers the recommendations of the evaluation panel. Where it intends to validate a programme, it ensures that those conditions, if any, that can be met prior to validation are met and formally validates the programme. It may also refuse to validate based on the recommendations of the evaluation panel or for other appropriate reason. Irrespective of the recommendation of the evaluation panel the validation report is published and is made available on the QQI website.

Step 6 Where QQI has taken the decision to validate a programme it issues a certificate of validation certificate (formerly Certificate of programme accreditation) to the provider. This certificate contains details of the provider, the programmes and human and physical resources necessary for delivery of the programme and also general and specialised conditions that the provider must comply with. It will also indicate the permitted start date, the number of students that can be enrolled on the programme and the expiry date for the programme after which no further enrolments on the programme can occur. The programme would have to be revalidated to allow further enrolments.

Figure 7 Six major steps in the initial validation of a programme

3.3 VALIDATION POLICIES – LEGACY POLICIES AND CURRENT POLICIES

Over the period covered by this review there were two validation policies in place. In 2013, QQI published a revised validation policy with revised validation criteria “*HET Core Validation Policy and Criteria 2010, Revised 2013*”⁵. These policies and criteria were in place in 2015 during the initial period covered by this review.

QQI also provided a format for the programme evaluation reports. These policies, criteria and report formats are referred to in this review as legacy policies, legacy criteria and legacy report format. This policy had nine criteria against which programme submissions were evaluated.

In April 2016 QQI published a new policy on validations with an updated version in November 2017. “*Policies and criteria for the validation of programmes of education and training*”⁶ This policy has the twelve current criteria that must be satisfied for a programme to be validated.

This policy was accompanied by a template for programme submissions. Independent providers must use the templates provided by QQI and complete all sections of the submission template. The template facilitates a consistent and systematic approach to programme submissions. It is the provider’s responsibility to ensure that the twelve validation criteria are addressed in the submission. The submission template contains all the sections that must be addressed in a programme submission.

QQI also introduced a new validation report format that independent evaluation panels must use. This report format also facilitates a consistent approach to validation and ensures that the panel considers the evidence provided in the independent provider’ programme submission in meeting the twelve validation criteria.

These policies, criteria and report templates are referred to in this review as the current criteria, current policy and current report format.

Figure 8 gives the formal definition of validation used by QQI.

*“Validation is a regulatory process that determines whether or not a particular QQI award can be offered in respect of a **provider’s programme of education and training**”*

“For the purposes of QQIs validation policies and criteria, completion of the validated programme means that the learner has been assessed to have acquired , and where appropriate demonstrated the necessary knowledge, skill or competence to justify the award being made.”

Figure 8 Extract from current QI policy on validation

5 https://www.qqi.ie/Publications/Publications/Initial_Validation_policy_7_10_13.pdf

6 https://www.qqi.ie/Publications/Publications/Initial_Validation_policy_7_10_13.pdf

7 Policies and procedures for the validation of programmes of education and training November 2017

3.3.1 Criteria under the current validation policy

Normally an application that fails to meet the criteria in any of its aspects will be considered by QQI as not satisfactory. The twelve validation criteria are described briefly in **Figure 9**

- i. *The provider is eligible to apply for validation of the programme.*
- ii. *The programme objectives and outcomes are clear and consistent with the QQI awards sought.*
- iii. *The programme concept, implementation strategy and its interpretation of QQI awards standards are well informed and soundly based.*
- iv. *The programme's access, transfer and progression arrangements are satisfactory.*
- v. *The programme's written curriculum is well structured and fit for purpose*
- vi. *There are sufficient qualified and capable programme staff available to implement the programmes as planned.*
- vii. *There are sufficient physical resources to implement the programme as planned.*
- viii. *The learning environment is consistent with the needs of the programme's learners.*
- ix. *There are sound teaching and learning strategies.*
- x. *There are sound assessment strategies.*
- xi. *Learners enrolled on the programme are well informed, guided and cared for*
- xii. *The programme is well managed.*

Figure 9 Headings of the current validation criteria

The first programmes validated under the new current criteria were approved in February 2017. Fourteen programme validation reports using the current format and addressing the twelve criteria of the current policy were included in this review.

3.3.2 Criteria under the legacy validation policy

Programmes submitted to QQI prior to the publication of the current policy and criteria had to provide evidence in nine areas to demonstrate how they met the criteria stated in the "HET Core Validation Policy and Criteria 2010, Revised 2013 (QQI, 2013a)".

- i. *The programme's content and learning environment must be appropriate to the programme's intended learning outcomes.*
- ii. *The programme should involve authentic learning opportunities to enable the achievement of the intended programme learning outcomes.*
- iii. *The programme should compare well against benchmarks (where appropriate).*
- iv. *The information about the programme as well as its procedures for access, transfer and progression should be consistent with the procedures described in national Policies, Actions and Procedures for Access, Transfer and Progression for Learners*
- v. *The programme should meet genuine education and training needs.*
- vi. *The programme should be viable.*
- vii. *All programmes should have procedures for assessment of learners which should be consistent with Assessment and Standards, Revised 2013. The provider should have, where required, suitable arrangements for protection for enrolled learners (see Section 6.1) in the event that it ceases to provide the programme.*
- viii. *The provider should have appropriate quality assurance arrangements for the proposed program.*

Figure 10 Headings of the nine legacy criteria

All programme reports published before February 2017 and some published between February 2017 and July 2018 used the template that followed the legacy format. Forty-two programme validation reports that used the legacy format and addressed the nine legacy criteria were included in this review

Figure 11 provides a brief description of the terminology used within the review in relation validation template formats.

Legacy validation report template	Evidence was required under nine criteria. (See Appendix 1). These were the criteria that are referred to in this document as the legacy validation criteria. A template for validation reports was used during this period. This was structured as a series of forty-eight questions and an additional four questions per module. The questions were not formulated to address the criteria directly. This format is referred to in the report as the legacy validation report format.
Current validation report template	Accompanying the new validation policy was a Programme Validation Manual. The template facilitates a consistent approach is adopted by evaluation panels and that the twelve criteria be addressed directly. This new format was a substantial change to the legacy format and is referred to as the current validation report format.

Figure 11 Terminology in relation to report templates

3.4 OVERVIEW OF ISSUES RAISED IN THE VALIDATION REPORTS

3.4.1 Recurring characteristics

One of the purposes of the review is an examination of the validation reports of the new programmes submitted for validation in the period June 2015 to June 2018. Any condition set by an independent evaluation panel was considered to indicate a weakness in the programme. Commendations in the report were taken as a strength. Any recommendation made by an evaluation panel was seen as an opportunity for improvement of the programme.

There were 738 separate conditions, recommendations and commendations made by evaluation panels in the fifty-six validation reports studied. These were placed into broad categories corresponding to aspects of programmes. Those that were recurring were examined in some depth. There were eleven of these recurring 'characteristics' **Figure 12** lists thee characteristics with an explanation of their meaning in the context of this review. The analysis looked at where these characteristics were evident, in which reports, in what types of programmes and the frequency of occurrence.

Access	<p>1. Access refers to the eligibility requirement for prospective participants in a programme. It normally consists of prior academic achievement. For programmes at the entry level to higher education, access is determined by the school Leaving Certificate or equivalent. At higher level programmes it refers to prior academic qualifications that prepare students for that programme.</p> <p>2. Access can also refer to processes to provide path ways for prospective learners without the formal qualifications. Recognition of prior learning (RPL) and 'bridging' modules fall into this category.</p> <p>3. Access can also refer to processes to facilitate the participation of those with disabilities or from disadvantaged background.</p>
Alignment consistency with the awards standards	A fundamental aspect of programme design is that the minimum intended programme learning outcomes (MIPLOs) are consistent with the awards standards. The minimum intended module learning outcomes (MIMLOs) must contribute to the programme learning outcomes.
Assessment	Assessment is the process by which learners demonstrate their achievement of the modules learning outcomes. Formative assessment is an aid to learning. Summative assessment measures the achievement of outcomes by a learner.
Curriculum	Curriculum is the set of modules that comprises the programme. It can also refer to the arrangement and sequencing of those modules in the programme.
Engagement	This refers to the extent to which the programme is linked to the world of work. It can arise as part of the consultation process with industry or employers in the design of the programme or as part of the curriculum where learner projects or periods in employment give learners experience of the work place.
Learner resources	This refers to the physical and virtual resources available to learners such as library facilities, recommended texts and web- resources, IT systems and laboratories.
MIMLOs	Minimum Intended Module learning outcomes (MIMLOs) are assessable learning outcomes that are specified with each module. Typically, a five credit module will have four to six outcomes that are assessed. Learners must demonstrate that they have achieved all module outcomes.
MIPLOs	Minimum Intended Programme Learning Outcomes (MIPLOs) are the broad outcomes that are achieved by learners if they successfully complete the programme. They are not assessed directly. MIPLOs must be consistent with the awards standards or in cases where there is no award standard the generic award type descriptors.
Modules	Modules are coherent units of learning. They are specified in terms of volume of learning (credits), the learning outcomes associated with that learning, the subject matter or content delivered to the learner, the learning resources necessary to support the learning and the assessments required to measure the achievement of the module outcomes.
Titles	Each module has a title that is indicative of the content and outcomes of the programme.
Topic	This refers to individual pieces of subject matter within modules.

Figure 12 Brief description of the characteristics recurring in the validation reports

3.4.2 Scope of the analysis

A total of fifty-six programme validation reports were studied. These programmes comprise all of the new programmes validated or refused validation in the period June 2015 to June 2018. Where there was an embedded programme, the principal programme was reviewed.

Table 16 shows the number of new programmes recommended for validation without conditions attached, with conditions and those recommended for refusal.

- Fifty-six reports were analysed. In some cases, the programmes submitted for validation included embedded programmes.
- Fourteen reports followed the current report format and forty-two followed the legacy format.
- All independent validation reports provided on the QQI web site for the period June 2015 to July 2018 were analysed.
- The reports analysed were usually those for the principal programme.
- Forty-seven of the fifty-six reports recommended validation (84%) with nine recommending refusal (16%).
- Thirty-nine of the validated programmes (83%) had conditions attached and only eight (17%) were recommended with no conditions attached.
- Forty-two programmes were evaluated for validation against the legacy criteria and fourteen were evaluated under the current validation criteria.
- Seven of forty-two legacy evaluations resulted in a refusal (17%). Three of the fourteen evaluations under the current criteria were refused (21%).

Table 16 Number of independent validation reports using legacy and current template.

Report format	Validated without condition	Validated with conditions	Refused validation	Total
Legacy format	7	29	6	42
Current format	1	10	3	14
Total	8	39	9	56

3.4.3 Strengths, weaknesses and opportunities of programmes identified in the validation reports

The frequencies of commendations, recommendations and conditions is shown in **Table 17**.

- The number of independent validation reports where no weaknesses (conditions) were stated was ten (number shown in the 2nd row and 2nd column).
- Eleven programmes (2nd row, 3rd column) had between one and three weaknesses (1st row, 3rd column).
- Seventeen programmes had between four and six weaknesses. Two of the programmes were recommended to QQI for refusal of validation (numbers shown in brackets).
- The number of reports where no opportunities for improvements were identified was eight and where no strengths were identified was thirty.

The median number of strengths identified in validation reports was zero, for both weaknesses and opportunities for improvement the median was five.

Table 17 Number of programmes with the range of conditions, recommendations and commendations

	0	1-3	4-6	7-9	10-12	>12	total	Median
Weaknesses (Conditions)	10	11	17(2)	9	3(4)	(2)	299 (94)	5
Opportunities for improvement (Recommendations)	8	8	22	10	6	4	350	5
Strengths (Commendations)	30	17	8	3	-	-	89	0

The total number of mentions of commendations, recommendations and conditions made by panels was 738. Twelve percent were commendations, forty-one percent were conditions and forty-seven percent were recommendations for improvement.

Excluding the programmes that were refused validation, fourteen percent were commendations, fifty-four percent were recommendations and thirty-two percent were conditions. Overall, for every commendation made on a validated programme there were over two identified weaknesses and nearly four recommendations.

Where programmes were recommended for refusal of validation, between four and sixteen reasons for refusal were quoted with a median of eleven weaknesses. It is surprising that so many weaknesses were noted in these programmes.

It is noticeable that the number of commendations made by validation panels is small compared to conditions and recommendations.

Table 18 analyses the number of conditions, recommendations and commendations by programme type (Higher Certificate, Ordinary Bachelor's Degree, Honours Bachelor's Degree/Higher Diploma and Master's Degree/Postgraduate Diploma). The number is shown for strengths, opportunities and weaknesses for each award type. The number in the bracket is the average number per programme. The results show:

- On average there are 1.6 strengths identified in independent validation reports compared to 6.2 opportunities for improvement and 5.3 weaknesses.
- As the level of award increases from Higher Certificate to Master's Degree the number of strengths decrease.
- Higher Certificates had the highest number of commendations and Master's Degrees including Postgraduate Diplomas the lowest.
- Higher Certificates had the highest number of recommendations for improvements and Honours Bachelor's Degree the lowest.
- The distribution of conditions was even with Ordinary Degree programmes having slightly larger numbers.

In summary, there was a significant number of more weaknesses and opportunities for improvement identified in the independent validation reports than there were strengths.

Taking account that ten percent of programme reports analysed were at Higher Certificate level and forty-four percent were at Honours Bachelor's Degree (See **Table 18**). The level of award does not appear to have a significant impact on the number of conditions. The number of recommendations for improvement is higher for Higher Certificates programmes more than double that for Honours Bachelor's Degree.

Table 18 Analysis of strengths, opportunities for improvement and weakness by award type. Figures in brackets is the average numbers per programme

	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diploma	Total
Weaknesses (Conditions)	38 (5.4)	36(4.0)	172(5.7)	53(5.3)	299 (5.3)
Opportunities for improvement (Recommendations)	83(11.9)	54(6.0)	149 (5.0)	64(6.4)	350(6.23)
Strengths (Commendations)	33 (4.7)	11 (1.2)	37(1.2)	8(0.8)	89(1.6)
Totals	121	90	321	117	738
Number of programmes	7	9	30	10	56

The 738 mentions of characteristics are provided in **Table 19**. Each of the eleven recurring characteristics are further analysed in terms of strengths, opportunities for improvement and weaknesses. This indicates which of the these recurring characteristics tend to appear as weaknesses or as opportunities for improvement or strengths.

- MIPOs and MIMLOs appear most often as weaknesses and rarely as strengths.
- Assessment, Curriculum, Learning Resources, and Modules appear most often as opportunities for improvement.
- Engagement appears in each category in equal number.
- Access and Engagement were prominent among the strengths identified.

Table 19 Number of mentions of recurring characteristics and their distribution between strengths weaknesses and opportunities for improvement.

Characteristic	Strengths		Opportunities		Weaknesses		Total	
	Number	%	Number	%	Number	%	Number	%
Access	7	22%	11	34%	14	44%	32	100%
Alignment	2	18%	3	27%	6	55%	11	100%
Assessment	5	7%	41	58%	25	35%	71	100%
Curriculum	5	24%	10	48%	6	29%	21	100%
Documentation	5	19%	14	54%	7	27%	26	100%
Engagement	6	33%	6	33%	6	33%	18	100%
Learner resources	0	0%	14	82%	3	18%	17	100%
MIMLOs	0	0%	6	32%	13	68%	19	100%
MIPLOs	0	0%	3	12%	22	88%	25	100%
Modules	2	1%	84	55%	67	44%	153	100%
Titles	2	10%	14	70%	6	30%	20	100%
Topics	2	6%	27	82%	6	18%	33	100%
Sub-Total	32	7%	233	52%	181	41%	446	100%
Others	57	20%	117	40%	118	40%	292	100%
Total	89	12%	350	47%	299	41%	738	100%

3.5 Comments on validation policies, processes and overview

All reports on new programmes, whether validated or refused validation, in the period of the review were analysed. There were fifty-six programmes included in the review. Some of these programmes included embedded programmes. Fourteen programme reports used the current report format and addressed the twelve current validation criteria. Forty-two reports used the legacy format and addressed the nine legacy criteria.

Nine of the fifty-six programmes were refused validation. This is fifteen percent of the total submitted for validation. Thirty-nine of the forty seven programmes validated (83%) had conditions attached.

There were 738 conditions, recommendations or commendations in the fifty-six reports. Twelve percent were commendations, forty-one percent were conditions and forty-seven percent were recommendations for improvement to programmes.

Eleven characteristics were identified as recurring. These eleven characteristics accounted for 446 (60%) of the conditions, recommendations and commendations. The content of modules was the most frequent condition and most frequent recommendation. Access and engagement were the area most likely to receive commendations.

4 Validations of new programmes - recurring characteristics in the programmes with quotations from evaluation panels

4.1 RECURRING CHARACTERISTICS IN PROGRAMMES

4.1.1 Introduction

This section details the recurring weaknesses, opportunities and strengths identified in the independent evaluation reports. The Sections 4.1.2 to Section 4.1.13 below examine the eleven most frequently re-occurring features and indicates in how many programmes and at what level of programme the characteristics occur. Examples of the quotations from the independent panel reports are provided. In some cases, these are illustrative of the range of conditions or recommendations panels made in reports. In some cases, they represent a recurring theme of comments within the broader characteristic.

Section 4.2 analyses the frequency of mentions of particular characteristics. In many cases an aspect of a programme may attract a number of conditions and/or recommendations. This section also deals with the distribution of mentions of characteristics between different levels of programmes.

4.1.2 Modules

Table 20 shows the number of validation reports where modules were identified as strength, opportunities for improvement or weaknesses.

Modules were mentioned 153 times in the fifty -six reports. This is close to three mentions per report.

- In all the Higher Certificate validation reports opportunities for improvement in modules were identified.
- In Ordinary Degree validation reports, weaknesses were identified in three of the reports (33%).
- There were weaknesses identified in nineteen of the Honours Bachelor's Degrees and Higher Diplomas (63%) which is significant. A further sixteen validation reports identified opportunities for improvement (53%) and in only two cases were strengths identified in modules (7%). Between opportunities for improvement and weakness identified there were eighty-three (See **Table 36**) suggested changes to modules in programmes.
- Weaknesses were identified in eight out of ten programmes (80%) and opportunities for improvement were seen in five out of ten programmes (50%) at Master's Degree and Postgraduate Degree level.

Table 20 Number of validation reports where strengths, opportunities for improvement and weaknesses were identified in modules by level of programme

	Modules			
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	3	1	19	8
Opportunities	7	3	16	5
Strengths		0	2	0
Total number of programmes	7	9	30	10

The coherence of programmes and the links between modules were identified as a concern. Panels also recommended that case studies be shared across modules, and that the interdisciplinary aspects should be exploited to ensure efficient use of resources. In some cases, panels wanted certain themes to be evident across the modules e.g.,

“the panel requires that throughout the set of module descriptors the context of ECE is clearly highlighted and explicit and that the language used is sympathetic to the sector.”

Level 8 Condition PG21317

Panels also encouraged integration between modules by using shared learning resources and assessments as in these recommendations:

“Consideration should be given to the use of shared case studies across multiple modules, thereby enhancing module links with one another, while allowing for distinctive insights and perspectives to be generated and employed, as well as opportunities for cross-assessment.”

Level 8 Recommendation PG22712

“It is recommended that the provider review and exploit the rich interdisciplinarity potential across all programmes to ensure most efficient use of modules and to reduce workload where relevant.”

Level 8 Recommendation PG23975

Major changes were required in some programmes involving the development of complete new modules. In one case, a programme was recommended for validation where a total of four new modules were required:

“The panel is of the view that that Stage 1 of the programme requires modules on the following areas:

- o Introduction to Child Health & Wellbeing*
- o Social Policy*
- o Introduction to Legislation and Regulation*
- o Play and Creativity”*

Level 8 Condition PG23217, level 7 Condition PG21786, Level 6 Condition PG21784

In some cases, the advice from the panel was less explicit and more general. In one Master’s Degree validation report the programme team was given general directions on how to improve the programme:

“If one of the target audiences of the programme is aspiring entrepreneurs, Business Modelling could be addressed more explicitly with business model canvas and a review of different existing business models for Fintech businesses could be undertaken. Content related to establishing a business, business planning, and IP management could be included more explicitly in addition to pitching.”

Level 9 Recommendation PG22517

4.1.3 Assessment

Assessment was a concern for many panels. It featured strongly in both the weaknesses identified and the opportunities for improvement.

Table 21 shows the number of validation reports where assessment was identified as a strength, an opportunity for improvement or a weakness. There were seventy-one mentions of assessment in the fifty-six reports. Twenty-one of these were weaknesses recorded in sixteen programmes. Forty-one were recommendations of improvement in twenty-six programmes.

- Assessment was identified in four of the seven (57%) validation reports as an area for improvement in Higher Certificates.
- At Ordinary Degree level six of the nine (67%) validation reports identified opportunities for improvement in assessment.
- Ten of the thirty validation reports (33%) identified weaknesses in assessment at Honours Bachelor’s Degree and Higher Diploma and a further eleven out of thirty (37%) validation reports identified opportunities for improvement. Only three (10%) validation reports identified assessment as a strength in programmes.
- Two out of ten (20%) validation reports identified weakness in assessment in Master’s Degrees and Postgraduate Diplomas. Five out of ten (50%) validation reports identified opportunities for improvement in assessment. No strengths in assessment were identified at this programme level.

Table 21 Number of validation reports where strengths, opportunities for improvement and weaknesses in assessment were identified by level of programme

	Assessment			
	Higher Certificates	Ordinary Bachelor’s Degrees	Honours Bachelor’s Degrees and Higher Diplomas	Master’s Degree and Postgraduate Diplomas
Weaknesses	2	2	10	2
Opportunities	4	6	11	5
Strengths	0		3	0
Total number of programmes	7	9	30	10

Panels encouraged innovation and variety in assessment. Varied methods or instruments of assessment came in for praise as did assessments that were integrated across modules. Innovation in assessment and team-based assessment were encouraged. e.g.,

“The PRG commends DBS on the appropriate diversity of assessment strategies and the quality and quantity of feedback.”

Level 8 Commendation PG21861

“it commends the innovative assessment methods outlined in the programme as a whole, but encourages staff to keep these methods, as well as student performance, under review.”

Level 8 Commendation PG22721

Validation panels for Higher Certificate programmes encouraged independent providers to increase the variety of assessments and in some cases to avoid over-assessment by reducing the numbers of assessments. The following quotations illustrate the concerns of the panels in this area:

“Reconsider the assessment methodologies whereby the number of summative assessments are limited.”

Level 6 Recommendations PG23383

“The panel recommends further review for opportunities to assess across modules as well as reducing the number of assessments. In addition, the panel recommends the introduction of “in class’ time constrained assessment and examination’ where appropriate in modules. Opportunities for formative or staged assessment should be considered where a single assessment is being proposed at 100%.”

Level 6 Recommendations PG22386

Ordinary Bachelor’s Degree, Honours Bachelor’s Degree and Higher Diploma validation panels encouraged more integrated assessments e.g.,

“Consideration should also be given to the use of more examinations across the programme in lieu of multiple summative assessments, i.e. as an alternative means of ensuring that module learning outcomes are being met, as a means to reduce over-assessment, etc.”

Level 8 Recommendation PG22547

“It is recommended that the programme team consider greater opportunities for alternative assessment methodologies and integrated assessment across a semester where suitable.”

Level 8 Recommendation PG23343

Where assessment was seen as a weakness to be addressed, the conditions were general rather than specific. Panels were unhappy with the overall assessment strategy. This theme appeared both as a weakness and as an opportunity for improvement.

One panel required a strategy that addressed the issue of contradictory outcomes from over assessment:

“The College needs to articulate a clear assessment strategy that indicates how it will ensure that learners achieve the module and programme learning outcomes and that acknowledges its obligations under the QQI ‘Assessment and Standards’ (2013) Document. The strategy must indicate how the College will ensure that contradictory assessment findings will not arise if their strategy permits the same learning outcomes to be assessed by a variety of continuous assessment deliverables and a final written examination. This needs to be clearly described to ensure that contradictions is foreseen and avoided. This must be provided for in the programme and module assessment strategies. The strategy should also identify formative and summative assessment opportunities for learner.”

Level 6 Condition PG21963

Assessment strategies was a continuing concern. For example:

“Review and develop the programme assessment strategy so that it reflects the approach to and practice of assessment, including all the assessment methods e.g. presentations. Review the length of the proposed exams.”

Level 9 Condition PG22921

“In turn, there needs to be real alignment and clarity on the one hand regarding how module learning outcomes are assessed and, on the other, that there is appropriately detailed and varied assessment (and reassessment) strategies at module level (as well as across programmes as a whole).”

Level 8 Condition PG22537

“Each module descriptor must have a clear assessment strategy, including reassessment detail; these parameters are missing from Domain Skills, but they are required. Greater clarity is also important in terms of the terminal examination for a number of modules; an assessment description to the effect of ‘n/a’ is unacceptable, as students should have more guidance regarding the nature of a terminal examination. Where past examination papers do not exist for a module, a sample paper should be furnished to, and discussed with, the students. Samples should be included with the programme documentation.”

Level 8 Condition PG22547

The workload for learners on Master’s Degrees and Postgraduate Diplomas was a concern and panels sought to limit it to acceptable levels:

“The student workload implied through the assessment schedule is too high. Thus, the number of summative assessments needs to be reduced significantly, particularly but not only in Semester 2. Greater consideration could be given to the use of examinations across the programme as an alternative means of ensuring that module learning outcomes are being met.”

Level 9 Condition PG22517

4.1.4 Access

Table 22 shows the number of validation reports where access was identified as a strength, an opportunity for improvement or a weakness.

- Access was identified in four of the seven (57%) validation reports as a strength in Higher Certificate programmes.
- Validation reports for Honours Bachelor’s Degrees and Higher Diplomas identified access as a weakness in

seven out of thirty reports (23%).

- It was identified as a weakness and opportunity for improvements in three out of ten (30%) validation reports in Master’s and Postgraduate Diploma programmes.

Table 22 Number of validation reports where access was identified as a strength, an opportunity for improvement or as a weakness by level of programme

	Access			
	Higher Certificates	Ordinary Bachelor’s Degrees	Honours Bachelor’s Degrees and Higher Diplomas	Master’s Degree and Postgraduate Diplomas
Weaknesses	0	3	7	3
Opportunities	1	2	2	3
Strengths	4	1	1	1
Total number of programmes	7	9	30	10

Where access issues were seen as a strength it was typically in relation to Higher Certificate programmes. The commendation below is an example.

“The institution’s access agenda is typified by student entry and progression on this programme, a distinguishing feature of NCI more generally that continues to be commended.”

Level 6 Commendations PG22720

Difficulties at this level were concerned mostly about the entry requirements. Higher Certificate programmes were required to specify the English language requirements. e.g.,

“The entry requirements of the programme should be articulated particularly in respect of equivalence to level 5, English Language competency and the role of the admission interview and further interview for continuance after the 1st 20 credits.”

Level 6 Condition PG22386

Master’s Degree and Postgraduate Diploma panels were often specific with regard to entry requirements. They also required clarification of access processes as indicated below:

“The entry requirements to be updated to clearly state that a 2nd class honours degree in a cognate discipline (e.g. science, engineering, quality) is required for entry to the programme.”

Level 9 Condition

“Clearly articulate entry requirements and process for same including clarification of the work experience requirement.”

Level 8 Condition G21802

“The entry requirements of the programme should clearly set expectations with respect to mathematical and programming ability.”

Level 9 Condition PG22518

4.1.5 Minimum Intended Programme Learning Outcomes (MIPOs)

Table 23 shows the number of validation reports where MIPOs were identified as strength, opportunities for improvement or weaknesses.

- At Higher Certificate level two reports out of seven (29%) identified weakness in MIPOs. No strengths or opportunities for improvement were identified.
- At Honours Bachelor's Degree and Higher Diploma level ten out of thirty reports (33%) identified weakness in MIPOs.
- Six out of ten reports on Master's Degree and Postgraduate Diplomas (60%) identified weakness in MIPOs.

Table 23 Number of validation reports where MIPOs were identified as strengths, opportunities for improvement or as weaknesses by level of programme

MIPOs				
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	2	1	10	6
Opportunities	0	0	1	1
Strengths	0	0	0	0
Total number of programmes	7	9	30	10

Examples of the weakness as provided in validation reports are shown below for Honours Bachelor and Master's Degree programmes, e.g.,

“Module learning outcomes need to be written using a suitable taxonomy (i.e. the verbs employed must be appropriate to their level).”

Level 8 Condition PG22537

“Programme and module learning outcomes should be reviewed to ensure that the taxonomy used consistently represents level 9 on the National Framework of Qualifications.”

Level 9 Condition PG22518

Some panels were specific in their requirements, e.g.,

“The Minimum Intended Programme Learning Outcomes (MIPOs) require thorough rationalisation, i.e. so that they are more generic and less specific in nature, as well as being considerably less numerous (a maximum of 12-15). MIPOs should be expressed at a level of generality that readily allow module learning outcomes to contribute to their realisation, while also mapping to and from the Science Award standards.”

Level 9 Conditions PG22517

4.1.6 Minimum Intended Module Learning Outcomes (MIMLOs)

Table 24 shows the number of validation reports where MIMLOs were identified as strengths, opportunities for improvement or weaknesses.

- The MIMLOs were not identified in any of the validation reports for Higher Certificate or Ordinary Bachelor's Degree programmes as either strengths, opportunities for improvement or weakness.
- In Honours Bachelor's Degree and Higher Diplomas, nine reports out thirty (30%) identified weaknesses in MIMLOs.
- At Master's Degree and Postgraduate Diplomas three reports out of ten (30%) identified opportunities for improvement in MIMLOs.

Table 24 Number of validation reports where MIMLOs were identified as strengths, opportunities for improvement and as weaknesses by level of programme

	MIMLO			
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	0	1	9	1
Opportunities	0	0	1	3
Strengths	0	0	0	0
Total number of programmes	7	9	30	10

Examples of the weakness in MIMLOs as provided in validation reports are shown below for Honours Bachelor and Master's Degree. Language used in module outcomes was noted to be weak and required strengthening e.g.,

"Module learning outcomes need to be written using a suitable taxonomy (i.e. the verbs employed must be appropriate to their level)."

Level 8 Condition PG22548

Specific directions on writing of outcomes were given to one programme team as below,

"Before the programme is validated QQI must be furnished with (and approve) revised Minimum Intended Module Learning Outcome statements that are precise, measurable and congruent with the module content and assessment arrangements."

Level 8 Condition PG23195

4.1.7 Alignment

Table 25 shows the number of validation reports where alignment was identified as a strength, an opportunity for improvement or a weakness.

- Alignment was identified in initial validations as a weakness in two reports out of seven (29%).

Table 25 Number of validation reports where alignment was identified as a strength, an opportunity for improvement or as a weakness by level of programme.

	Alignment			
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	2	1	2	0
Opportunities	1	1	1	0
Strengths	0	0	0	0
Total number of programmes	7	9	30	10

Examples of weaknesses in alignment as identified in validation reports:

“Transferrable skills, as de facto GBS Graduate attributes, should be clearly mapped to Programme Outcomes and thence mapped to Assessments.”

Level 7 Condition PG20493 and also level 6 Condition PG22948

“In turn, there needs to be real alignment and clarity on the one hand regarding how module learning outcomes are assessed and, on the other, that there is appropriately detailed and varied assessment (and reassessment) strategies at module level (as well as across programmes as a whole).”

Level 8 Condition PG22523

“The alignment of the learning outcomes and assessment and the mapping of same should be strengthened.”

Level 7 Recommendation PG22124

4.1.8 Curriculum

Table 26 shows the number of validation reports where curriculum was identified as a strength, an opportunity for improvement or a weaknesses.

- The curriculum was identified as a strength in two out of the seven (29%) validation reports for Higher Certificate programmes.
- Three out of thirty (10%) validation reports identified weaknesses in the curriculum for Honours Bachelor's Degree and Higher Diploma programmes.
- One out of ten reports (10%) identified weaknesses in the curriculum for Master's Degree and Postgraduate Diploma programmes.

Table 26 Number of validation reports where the curriculum was identified as a strength, an opportunity for improvement or a weakness by level of programme.

Curriculum				
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	0	1	3	1
Opportunities	0	1	2	2
Strengths	2	0	1	1
Total number of programmes	7	9	30	10

The curriculum was an issue at Honours Bachelor and Higher Diploma level.

Examples of comments on the curriculum:

“The curriculum for the programme be reviewed to ensure the flow of modules from one stage to the next stage (e.g. streams) serves to ensure the development of the student’s knowledge, skills and competences in discipline areas.”

Level 8 Condition PG23765

“The curriculum as a whole need to be rebalanced so that there is more explicit emphasis on financial dimension in FinTech. This will mean, for instance, reworking the curriculum offered in Financial Markets, Financial Analytics, and Financial and Quantitative Modelling to avoid overlap and maximize complementarity among these modules.”

Level 9 Condition PG2251

4.1.9 Learning Resources

Table 27 shows the number of validation reports where Learning Resources were identified as strengths, opportunities for improvement or weaknesses.

Three out of nine (33%) validation reports identified opportunities for improvement in learning resources for Ordinary Bachelor’s Degree programmes.

Three out of thirty (10%) validation reports identified weakness and five out of thirty (17%) reports identified opportunities for improvement in learning resources for Honours Bachelor’s Degree and Higher Diploma programmes.

Table 27 Number of validation reports where learning resources were identified as strengths, opportunities for improvement or weaknesses by level of programme.

Learner Resources				
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	0	1	3	1
Opportunities	1	3	5	2
Strengths	0	0	0	1
Total number of programmes	7	9	30	10

Learning resources consisted of text books for libraries, on-line subscriptions and other learning resources. Sometimes the panels could be very direct as below:

“GBS should consider the purchase of an online subscription to the Financial Times. The FT subscription is an excellent resource that reports issues from a global perspective and could be a valuable resource for level 8 student.”

Level 8 Recommendation PG22948

The currency of reading lists and web-based resources were a recurring feature in independent validation reports. One example of this was:

“Reading lists for all modules should be reviewed to ensure currency and that sufficient supplementary reading is cited.”

Level 8 Recommendation PG22548

4.1.10 Documentation

Table 28 shows the number of validation reports where documentation was identified as having strengths, opportunities for improvement or weaknesses by level of programme.

Issues with documentation usually arose as an opportunity for improvement. This occurred in four out of ten Master's Degree programmes. In some cases, panels required typographical errors to be corrected. In others formatting and content of module descriptors was a recommendation for improvement.

Table 28 Number of validation reports where documentation was identified as a strength, an opportunity for improvement or a weaknesses by level of programme.

Documentation				
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	0	1	3	0
Opportunities	2	1	4	4
Strengths	2	0	3	0
Total number of programmes	7	9	30	10

Consistency on the presentation of modules was a concern, e.g.

“Ensure that modules are written using a standard template/format, and all reading lists and resources are reviewed and updated accordingly.”

Level 9 Recommendation PG22715

4.1.11 Engagement

Table 29 shows the number of validation reports where engagement was identified as a strength, an opportunity for improvement or a weakness by level of programme.

Engagement of panels was commended in many programmes. Engagement with industry was identified in validation reports as an opportunity for improvement in Master's Degree programmes. Lack of engagement with industry was one of the reasons provided for recommending refusal in four of the nine cases where validation was refused.

Table 29 Number of validation reports where engagement was identified as a strength, an opportunity for improvement or a weakness by level of programme

Engagement				
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	0	1	3	1
Opportunities	0	3	2	2
Strengths	3	0	2	0
Total number of programmes	7	9	30	10

Examples of comments by panels on engagement as both a strength and a weakness:

“The level of stakeholder engagement as evidenced in the programme submission was not satisfactory.”

Level 8 Reason for refusal PG22770

“The level of support for the programme as evidenced in the programme submission was not sufficient to justify the programme.”

Level 8 Reason for refusal PG22779

“The provider has organised a consortium with strong and credible industry partners. The existing partners represent a significant proportion of the leading companies in the financial services sector.”

Level 6 Commendation PG22805

“An advisory board with industry representation should be developed to inform the delivery and future development of this programme.”

Level 9 Recommendation PG22538

4.1.12 Titles

Table 30 shows the number of validation reports where titles were identified as strengths, opportunities for improvement or weaknesses by level of programme.

The titles of modules were seen as an opportunity for improvement and panels requested that programme teams review the module titles to indicate the module content or outcomes.

Table 30 Number of validation reports where Titles were identified as a strength, an opportunity for improvement or a weakness by level of programme.

	Titles			
	Higher Certificates	Ordinary Bachelor's Degrees	Honours Bachelor's Degrees and Higher Diplomas	Master's Degree and Postgraduate Diplomas
Weaknesses	2	0	1	1
Opportunities	4	4	3	2
Strengths	0	0	0	0
Total number of programmes	7	9	30	10

In one case a change in titles was recommended to improve the clarity of the learner transcript:

“In all ‘practice’ modules, the title should be amended to ‘placement’ so that learner transcripts can communicate to employers that a placement activity has taken place.”

Level 8 Recommendation PG21796

4.1.13 Topics

Table 31 Shows the number of validation reports where Topics were identified as strengths, opportunities for improvement or weaknesses by level of programme.

Panels suggested additional topics to be included in programmes. Four out of ten master’s degree programmes had recommendations made in relation to this topic. In many cases there were multiple suggestions for addition topics especially at Master’s Degree level. There were eleven mentions of additional topics between the four programmes.

Table 31 The number of validation reports where Topics were identified as a strength, an opportunity for improvement or a weakness by level of programme

	Topics			
	Higher Certificates	Ordinary Bachelor’s Degrees	Honours Bachelor’s Degrees and Higher Diplomas	Master’s Degree and Postgraduate Diplomas
Weaknesses	0	0	2	
Opportunities	0	5	1	4
Strengths	0	0	0	0
Total number of programmes	7	9	30	10

“Social media and digital marketing are linked, and consideration could be made to addressing them more explicitly in one of the modules. They can be related to the growth of Fintech platforms.”

“The inclusion of topics such as Incumbent Market Disruption, non-banks, new business modules/markets, intermediation-disintermediation-re-intermediation should be considered.”

“The role of Regulatory Technology (Reg-Tech) should be addressed explicitly within the programme.”
Level 9 Recommendations PG22517

4.2 RECURRING CHARACTERISTICS ANALYSED BY PROGRAMME TYPE AND LEVEL

Overall there were 738 strengths, opportunities for improvement and weaknesses identified in the fifty-six programmes. **Table 32** shows the recurring characteristics identified in independent validation reports as a strength, opportunity for improvement and weakness. The figures in brackets indicate the relative frequency of the occurrence. It is important to note that 738 is the total number of strengths, opportunities for improvement and weaknesses mentioned in reports. In a substantial number of cases there was multiple mentions of the same characteristic in the same report. A more detailed analysis of the numbers of programmes where these arise under each heading is presented in Section 4.1 above.

Table 32 The occurrences and relative frequency of characteristics provided in the validation reports.

Characteristic	Strengths		Opportunities		Weaknesses		Total	
	Number	%	Number	%	Number	%	Number	%
Access	7	8.0%	11	3.1%	14	4.6%	32	4.3%
Alignment	2	2.2%	3	1.0%	6	2.0%	11	1.4%
Assessment	5	5.6%	41	11.7%	25	8.3%	71	9.6%
Curriculum	5	5.6%	10	2.9%	6	2.0%	21	2.8%
Documentation	5	5.6%	14	4.0%	7	2.3%	26	3.5%
Engagement	6	6.7%	6	1.7%	6	2.0%	18	2.4%
Learner resources	0	0%	14	4.0%	3	1.0%	17	2.3%
MIMLOs	0	0%	6	1.7%	13	4.3%	19	2.6%
MIPLOs	0	0%	3	0.9%	22	7.3%	25	3.4%
Modules	2	2.2%	84	24.0%	67	22.41%	153	2.1%
Titles	2	0%	14	4.0%	6	2.0%	20	2.7%
Topics	2	0%	27	7.7%	6	2.0%	33	4.4%
Sub-Total	32	36%	233	66.6%	181	60.6%	446	60.4%
Others	57	63%	117	33.3%	118	39.4%	292	39.6%
Total	89	100%	350	100%	299	100%	738	100%

Caution must be exercised in interpreting these figures as the numbers in many cases are low.

The most frequent weakness noted were in modules (22%), followed by assessment (8.3%) MIPLOs (7.3%), and access (4.6%).

The most frequent opportunities for improvement were in modules (24%), assessment (11.7%), topics (7.7%) and the group including learner resources, documentation and titles.

The strengths identified were more dispersed than either opportunities for improvement or weaknesses.

In many cases a particular characteristic was mentioned a number of times in an independent validation report. For example, there were often multiple mentions of modules. Also, occasionally a characteristic would be indicated as a strength and an opportunity for improvement within the validation report for the same programme.

Table 33 shows how the mentions of a characteristic are distributed by level of award. The numbers indicate the mentions of a particular characteristic whether as a strength, weakness or opportunity for improvement as provided in the independent validation report. The numbers in the final row are the number of reports in each category. The numbers in italics are the mentions per programme in the particular category. For example, for the nine reports at Ordinary Bachelor's Degrees there were eleven mentions of assessment as a strength, weakness or opportunity for improvement. As the number of reports on Higher Certificates and Ordinary Bachelor's Degrees are low compared to

Honours Bachelor's Degree and Master's Degree, care has to be taken interpreting the results.

The characteristic that obtained the most mentions in the independent validation reports was modules (153 mentions in total) with 2.9 mentions per report. There are a number of possible reasons for this. There were issues or strengths identified with the modules or that the composition of the panels focused on the content of modules in particular in their evaluation of the programme. As can be seen in Section 4, the composition of evaluation panels has mainly subject matter experts on the panel. There were few teaching and learning experts recorded on panels.

Assessment was mentioned frequently. There were thirty-six mentions of assessment in thirty Honours Bachelor's Degree or Higher Diploma programmes out of sixty programmes and thirteen mentions of assessment in nine out of fourteen Higher Certificate programmes. There were eleven mentions of assessment in ten out of thirty-seven Master's Degree or Postgraduate Diploma programmes.

Learning outcomes becomes a more frequent issue as the level of the programme increases. Programme outcomes are mentioned nine times in the ten Master's Degree or Postgraduate Diploma programmes. This is a finding that indicates that programme outcomes are a particular concern of panels at this level.

Table 33 The occurrences and relative frequency of characteristics in the validation reports by level of programme

Characteristic	Higher Certificates		Ordinary Bachelor's Degrees		Honours Bachelor's Degrees and Higher Diplomas		Master's Degree and Postgraduate Diploma		Total
	No.	Per Prog	No.	Per Prog	No.	Per Prog	No.	Per Prog	
Access	8	1.1	7	0.8	10	0.3	7	0.7	32
Alignment	4	0.6	2	0.2	5	0.2			11
Assessment	13	1.9	11	1.2	36	1.2	11	1.1	71
Curriculum	4	0.6	2	0.2	9	0.3	6	0.6	21
Documentation	6	0.9	3	0.3	12	0.4	5	0.5	26
Engagement	4	0.6	3	0.3	7	0.2	4	0.4	18
Learner Resources	5	0.7	1	0.1	11	0.4			17
MIMLOs	1	0.1	1	0.1	13	0.4	4	0.4	19
MIPOs	4	0.6	2	0.2	10	0.3	9	0.9	25
Modules	33	4.7	17	1.9	85	2.8	18	1.8	153
Titles	5	0.7	5	0.6	8	0.3	2	0.2	20
Topics	2	0.3	10	1.1	10	0.3	11	1.1	33
Sub-Total	89	13	64	6.0	216	7.2	77	7.7	446
Others	65		37		142		48		292
Total	154		101	100%	358	100%	125	12.5	738
Number of programmes	7		9		30		10		56

4.2.1 Higher Certificate Programmes

Table 34 shows the mentions of the characteristics by strengths, opportunities for improvement and weaknesses as identified in validation reports for the seven validation reports for Higher Certificate programmes. The numbers shown are for the number of mentions and not the number of programmes. The number of programmes where validation reports indicated strengths, opportunities for improvement and weakness is provided in Section 4.1 above.

- Assessment was identified as an opportunity for improvement on nine occasions in four of the seven validation reports for Higher Certificate programmes. It was identified as a weakness on four occasions in two reports and no reports identified assessment as a strength.
- Access was identified as a strength on five occasions in four reports, an area for improvement on two occasions in two reports and a weakness in one programme.

A detailed analysis on each of the characteristics is provided in Section 3.4 where the number of programmes where strengths, opportunities for improvement and weaknesses are provided.

Table 34 Characteristics of the seven validation reports for Higher Certificate Programmes

	Opportunities	Strength	Weakness	Total	Opportunities per programme	Strengths per programme	Weakness per programme	Mentions per programme
Assessment	9		4	13	1.3	0.0	0.6	1.9
Access	2	5	1	8	0.3	0.7	0.1	1.1
Alignment	1	1	2	4	0.1	0.1	0.3	0.6
Curriculum		3	1	4	0.0	0.4	0.1	0.6
Documentation	3	2	1	6	0.4	0.3	0.1	0.9
Engagement	1	3		4	0.1	0.4	0.0	0.6
Learner resources	4	1		5	0.6	0.1	0.0	0.7
MIMLO			1	1	0.0	0.0	0.1	0.1
MIPLOs			3	3	0.0	0.1	0.4	0.6
Modules	20	1	13	34	2.9	0.0	1.9	4.7
Titles	3		2	5	0.4	0.0	0.3	0.7
Topics	2			2	0.3	0.0	0.0	0.0
Total	43	16	28	87	6.1	2.3	4.0	12.4

4.2.2 Ordinary Bachelor's Degree

Table 35 shows the mentions of the characteristics by strengths, opportunities for improvement and weaknesses as identified in validation reports for the nine validation reports for Ordinary Bachelor's Degree programmes. The numbers shown are for the number of mentions and not the number of programmes.

- Assessment was seen as an opportunity for improvement on eight occasions in six reports, a weakness on two occasions in two reports and as a strength in two programmes.
- Modules revision was identified as an opportunity for improvement on ten occasions in three programmes, a weakness on six occasions in one report. No strengths were identified. Panels also suggested new topics for inclusion in modules in five of nine validation reports.

A detailed analysis is provided on modules in Section 4.1.2 and on assessment in Section 4.1.3 above.

Table 35 Characteristics of the nine validation reports for Ordinary Bachelor's Degrees

	Opportunities	Strength	Weakness	Total	Opportunities per programme	Strengths per programme	Weakness per programme	Mentions per programme
Assessment	8	1	2	11	0.9	0.1	0.2	1.2
Access	2	1	4	7	0.2	0.1	0.4	0.8
Alignment	1		1	2	0.1	0.0	0.1	0.2
Curriculum	1		1	2	0.1	0.0	0.1	0.2
Documentation	1		2	3	0.1	0.0	0.2	0.3
Engagement	2	1	1	4	0.2	0.1	0.1	0.4
Learner resources	1			1	0.1	0.0	0.0	0.1
MIMLO			1	1	0.0	0.0	0.1	0.1
MIPLOs			2	2	0.0	0.0	0.2	0.2
Modules	10		6	16	1.1	0.0	0.7	1.8
Titles	5			5	0.6	0.0	0.0	0.6
Topics	10			10	1.1	0.0	0.0	1.1
Total	41	3	20	64				

4.2.3 Honours Bachelor's Degree and Higher Diploma reports.

Table 36 shows the mentions of the characteristics by strengths, opportunities for improvement and weaknesses as identified in independent validation reports for the thirty validation reports for Honours Bachelor's Degrees and Higher Diplomas. The numbers shown are for the number of mentions and not the number of programmes. The number of programmes were validation reports indicated strengths, opportunities for improvement and weakness is provided in Section 3.4 below.

There were thirty Honours Bachelor’s Degrees and Higher Diplomas validation reports analysed as stated above.

- Assessment was identified as a weakness on fifteen occasions in ten validation reports, as an opportunity for improvement on seventeen occasions in eleven validation reports and as a strength on four occasions in three validation reports.
- Modules were mentioned on eighty-five occasions, on average approximately three mentions per programme. It was identified as a weakness on forty-one occasions in nineteen validation reports, as an opportunity for improvement on forty-two occasions in sixteen validation reports and as a strength in two reports.

A detailed analysis of modules and assessment is provided in Section 4.1.2 and Section 4.1.3.

Table 36 Characteristics of the thirty validation reports for Honours Bachelor’s Degrees and Higher Diplomas

	Opportunities	Strength	Weakness	Total	Opportunities per programme	Strengths per programme	Weakness per programme	Mentions per programme
Assessment	17	4	15	36	0.6	0.1	0.5	1.2
Access	4	1	5	10	0.1	0.0	0.2	0.3
Alignment	1	1	3	5	0.0	0.0	0.1	0.2
Curriculum	5	1	3	9	0.2	0.0	0.1	0.3
Documentation	5	3	4	12	0.2	0.1	0.1	0.4
Engagement	2	2	3	7	0.1	0.1	0.1	0.2
Learner resources	10		1	11	0.3	0.0	0.0	0.4
MIMLO	4		9	13	0.1	0.0	0.3	0.4
MIPLOs	1		9	10	0.0	0.0	0.3	0.3
Modules	42	2	41	85	1.4	0.1	1.4	2.8
Titles	5		3	8	0.2	0.0	0.1	0.3
Topics	4		6	10	0.1	0.0	0.2	0.3
Total	100	14	102	216	3.3	0.5	3.4	7.2

4.2.4 Master’s Degree and Postgraduate Diplomas Reports

Table 37 shows the mentions of the characteristics by strengths, opportunities for improvement and weaknesses as identified in validation reports for the ten validation reports for Master’s Degree and Postgraduate Degree programmes. The numbers shown are for the number of mentions and not the number of programmes.

There was no mention in any of the reports of learner resources.

- Assessment was identified as a weakness on four occasions in two reports, as an opportunity for improvement on seven occasion in five validation reports (50%).
- Nine weaknesses were identified in eight reports in relation to modules, nine opportunities for improvement in five reports and no strengths were identified in any of the reports. This is a very significant number of both weaknesses and opportunities for this level of programme provision.

- MIPLOs were identified on eight occasions in six of the ten validation reports, no opportunities for improvement were identified and in one report it was identified as a strength.
- The MIPLOs in six of the ten programmes were seen as weak.
- Access was identified as a weakness on four occasions in three validation reports and as an opportunity for improvement on three occasions in three validation reports.

Table 37 Characteristics of the ten evaluation reports for Master's Degree and Postgraduate Diploma Programmes

	Opportunities	Strength	Weakness	Total	Opportunities per programme	Strengths per programme	Weakness per programme	Mentions per programme
Assessment	7	0	4	11	1.0	0.0	0.6	1.6
Access	3		4	7	0.4	0.0	0.6	1.0
Alignment	0		0	0	0.0	0.0	0.0	0.0
Curriculum	4	1	1	6	0.6	0.1	0.1	0.9
Documentation	5	0	0	5	0.7	0.0	0.0	0.7
Engagement	2		2	4	0.3	0.0	0.3	0.6
Learner resources				0	0.0	0.0	0.0	0.0
MIMLO	2		2	4	0.3	0.0	0.3	0.6
MIPLOs	1		8	9	0.1	0.0	1.1	1.3
Modules	9		9	18	1.3	0.0	1.3	2.6
Titles	1		1	2	0.1	0.0	0.1	0.3
Topics	11			11	1.6	0.0	0.0	1.6
Total	45	1	31	77	6.4	0.1	4.4	11.0

4.3 COVERAGE OF THE VALIDATION CRITERIA

4.3.1 Introduction

Evidence of meeting the criteria was examined in independent validation reports. This examination also provided information on which criteria generated the most commendations, recommendations and conditions. All criteria for all programmes were examined and allocated to one of the categories in the **Table 38** and below. The category “Satisfied with minimal comment” was used when the report showed a simple “Yes” against the criteria or a single sentence indicating agreement.

4.3.2 Analysis of the legacy validation criteria

The legacy criteria report template does not address the criteria directly. The forty-eight questions on this template were linked to various criteria. The criterion was categorised based on the answers to those questions and the conditions and recommendations in the report.

A brief outline of the nine legacy criteria is provided in **Figure 13**.

- (i) *The programme's content and learning environment must be appropriate to the programme's intended learning outcomes.*
- (ii) *The programme should involve authentic learning opportunities to enable the achievement of the intended programme learning outcomes.*
- (iii) *The programme should compare well against benchmarks (where appropriate).*
- (iv) *The information about the programme as well as its procedures for access, transfer and progression should be consistent with the procedures described in national Policies, Actions and Procedures for Access, Transfer and Progression for Learners*
- (v) *The programme should meet genuine education and training needs*
- (vi) *The programme should be viable*
- (vii) *All programmes should have procedures for assessment of learners which should be consistent with Assessment and Standards, Revised 2013*
- (viii) *The provider should have, where required, suitable arrangements for protection for enrolled learners (see Section 6.1) in the event that it ceases to provide the programme*
- (ix) *9 The provider should have appropriate quality assurance arrangements for the proposed program.*

Figure 13 Extract from HET Core Validation Policy and Criteria 2010, Revised 2013, QQI

As can be seen in **Table 38** the criteria that merited most attention were validation criteria 1, 2 and 7.

- Twenty-three out of forty-two programme reports imposed conditions related to criterion 1. These criteria cover the outcomes, staffing, learning resources, and curriculum.
- Twenty-one out of forty-two programme reports imposed conditions related to criterion 2.
- There were conditions in eighteen programmes and recommendations in twelve relating to criterion 7 which requires procedures for the assessment of learners.
- The requirement of benchmarking of programmes, criteria 3, was not dealt with comprehensively. Many panels may have interpreted this requirement as one requiring alignment of outcomes to appropriate award standards.
- Thirty-six percent of the decisions were with minimal comment (137 out of 378). This may be a reflection of the format of the template and may not reflect the actual deliberations of the panel.

A detailed analysis of the criteria is provided in Appendix 4 with a representative sample of comments made by panels in validation reports.

Table 38 provides an analysis of the information provided in validation reports in relation to meeting the criteria.

- Thirty-six percent of validation reports stated that the validation criteria were met with minimal comment.
- Twenty percent of validation reports stated that validation criteria were met subject to conditions.
- Twelve percent of validation reports stated that the validation criteria were met with comments attached.
- Fifteen percent of validation reports stated that validation criteria were met with recommendations.
- The criteria where most issues arose were criteria 1, 2, 4 and 7.

The “Not satisfied” label was used where it was recommended that validation be refused. It was also used, in some cases where conditions were imposed. This was a potential source of confusion.

Table 38 Analysis of information in relation to meeting the legacy validation criteria

Legacy Criteria Number	1	2	3	4	5	6	7	8	9	ALL	%
Satisfied with commendations	1	0	0	5	0	1	0	0	0	7	2%
Satisfied with comment	0	0	6	5	10	8	2	8	7	46	12%
Satisfied with minimal comment	2	3	21	12	11	25	6	28	29	137	36%
Satisfied with recommendations attached	10	12	1	6	13	2	12	0	2	58	15%
Not satisfied subject to conditions	23	21	0	9	1	0	18	0	2	74	20%
Not satisfied	6	6	6	5	6	4	4	2	2	41	11%
No mention	0	0	8	0		2	0	2	0	12	3%
Unclear					1			2		3	1%
Totals	42	42	42	42	42	42	42	42	42	378	100%

4.3.3 Analysis of the coverage of the current twelve validation criteria

Table 39 examines the coverage of the current twelve validation criteria in the fourteen programmes analysed.

The current report format allows for three possible entries under each criterion. With “Yes”, “No” or “Partially” as possible answers to the question as to whether the criterion was met satisfactorily. In some cases, criteria that were marked as partially satisfied did not have any conditions attached. In other cases, criteria marked as satisfactory had conditions attached. Panels made use of the format to comment on the criteria and determine if they had been met. This commentary is more directly relevant to the criteria and more useful to the independent providers.

- It can be seen that the coverage of the criteria is more evenly spread than in the legacy criteria. This is because the format of the reports requires explicit mention for each of the current twelve validation criteria.
- The criteria themselves are far more informative and allow conditions and recommendations to be determined more easily. There are not as many criteria with minimal comments except in the case of criterion 1. This is expected, as panels assume that the issue has been dealt with in advance of the validation event.
- The number of criteria that were ‘satisfied with comments’ has increased from twelve percent to twenty-eight percent for the current validation criteria. This is an indication that panels are including a commentary and evidence that the criteria were considered in some depth.
- The proportion of criteria with conditions attached at twenty-three percent is similar to the previous legacy format.
- The conditions attached and the recommendations are dispersed across the criteria to a greater extent than in the legacy format.

- The criterion where most conditions are proposed is validation criterion 5 (programmes' written curriculum is well structured and fit for purpose).
- The criterion where panels made most recommendations for improvement were criterion 10 (assessment strategies) and criterion 9 (teaching and learning).
- Independent evaluation panels proposed conditions on six of the fourteen programme submissions in relation to Criterion 4 (access, transfer and progression). There were a high number of Higher Diplomas, Postgraduate Diplomas and Master's Degree programmes in the fourteen validation reports analysed.

A detailed analysis of the criteria is provided in Appendix 5 with a representative sample of comments made by panels in validation reports.

Table 39 Analysis of coverage of the current validation criteria

Current Criteria number	1	2	3	4	5	6	7	8	9	10	11	12	All	%
Satisfied with commendations	0	2	2	0	0	2	1	0	1	0	1	0	9	5%
Satisfied with comments	3	4	5	4	2	7	4	6	2	3	3	4	47	28%
Satisfied with minimal comment	8	0	0	0	0	0	0	6	2	0	6	4	26	16%
Satisfied with recommendations	0	1	2	1	0	1	1	0	4	5	0	1	16	10%
Partially satisfied without conditions	0	0	2	1	0	1	1	1	0	1	3	2	12	7%
Not satisfied but conditions	3	4	2	6	9	0	5	0	3	3	1	2	38	23%
Not satisfied	0	3	1	2	3	2	1	0	2	2	0	1	17	10%
No mention	0	0	0	0	0	0	0	1	0	0	0	0	1	0%
Contradictory comments	0	0	0	0	0	1	1	0	0	0	0	0	2	1%
Total	14	14	14	14	14	14	14	14	14	14	14	14	168	100%

4.4 Comments on the detailed analysis of the evaluation reports

The areas that came in for most commendations were access and engagement. It was seen as a strength in five of the seven higher certificates programmes. Assessment was an issue at all levels. In five of the nine Ordinary Bachelor's Degree e programme reports it was seen as an area for improvement.

Modifications to modules were frequently identified for revision or where there were opportunities for improvement. This may reflect the preponderance of subject matter experts on the independent evaluation panels.

In the thirty honours bachelor programme reports modules were mentioned on eighty-five occasions, on average approximately three mentions per programme. It was identified as a weakness on forty-one occasions in nineteen validation reports, as an opportunity for improvement on forty-two occasions in sixteen validation reports and as a strength in two reports.

In Master's Degree and Postgraduate Diploma programmes the MIPOs were required to be revised in six of the ten programmes reports. Modules were to be revised in eight of the ten programmes and additional topics were suggested in four programmes. These percentages are significantly higher than the corresponding figures for Honours Bachelor's Degrees. It may indicate a weakness in the programme development process at this level.

5 Validation of new programmes – Overview of the reports

5.1 INTRODUCTION

This section of the review examines the quality of the reports themselves rather than the programmes. A set of desirable features for reports is suggested and the reports are measured against these. Recurring strengths, opportunities for improvement and weaknesses in the reports are identified. Major stakeholders and their concerns are explored. Recommendations for improvements in the reports are made.

5.2 CRITERIA FOR ANALYSING REPORTS

In analysing the reports certain aspects were examined and certain desirable features were sought. These features were determined with a view to the needs of the various stakeholders and audiences. The reports are publicly available, and many groups have legitimate interest in reading them. Besides the quality and independence of the panel, the format and content of reports should address the expectations of the various stakeholders.

The desirable features outlined in **Figure 14** were considered in the reports. These features were used purely for the purposes of analysis. In order to examine the reports in a consistent way, the decisions that were made were examined in detail. The extent to which they were accompanied by comments was noted.

Aspects of a Report	Desirable features
Comprehensive	Covers all the criteria for validation and other issues of relevance to the stakeholders.
Consistent	Decisions on validations, conditions and recommendations are consistent with body of report. Decisions should also be consistent between reports.
Decisions	Decisions of the panel are stated formally.
Decisions in context	Each decision should be supported by a narrative that gives the context and indicates the reason for the decision.
Conditions	Where conditions are imposed, the evidence for the deficiency should be stated. The deficiency and the condition should be in the body of the report and the conditions listed separately at the end of the report.
Recommendations	When recommendations are made it should be made clear what benefits they would bring. Where additional topics are suggested they should be accompanied by a statement of what could be removed unless it is identified that the modules within the semester are unduly light.

Figure 14 *Desirable features of an evaluation report*

The legacy format of reports did not explicitly require that the criteria for validation be addressed directly. The forty-eight questions on the legacy report covered the areas indicated by the nine legacy criteria.

The current format of reports requires panels to comment directly on the criteria. This allows for an analysis of the extent to which the criteria are met. Each of the current criteria have sub-criteria associated with them. These deal with different aspects within the broad area of the criterion. Comments on the criterion sometimes deal with some of the sub-criterion. This may mean that some other sub-criteria are neglected.

The decision of the panel to recommend a programme for validation implies that the panel were of the view that the criteria of validation were met, albeit, subject to the conditions being fulfilled.

In analysing the reports, the conditions and recommendations of the panel and their responses to the questions posed in the reports were compared to the criteria. This allowed a judgement to be made on the extent to which the original submission met the criteria and the consideration given by the panel to the issues.

It should be noted that this review is based on the written reports of the independent evaluation panel. Engagement with the programme team can clarify aspects of programmes. Where this engagement is not documented, a full picture of the decisions of the panels does not emerge.

5.3 COMMENTS ON THE EVALUATION REPORTS ON THE VALIDATION OF PROGRAMMES

5.3.1 Coverage of the criteria

The extent of coverage of the legacy criteria is examined in the Section 4.3.2 above. Coverage of the current criteria is provided in Section 4.3.3. A more detailed analysis is presented in appendices 4 and 5 with comments from panels.

The reports show that all validation criteria were addressed in the legacy template. In thirty-six percent of cases the criteria were addressed with minimal comment. A weakness of the legacy format was that the report did not directly reference the criteria.

The current independent validation report template has addressed this problem to a great extent. Independent validation reports analysed using the current template show that sixteen percent of the criteria are accepted with minimal comment. Many of these relate to current criterion 1 which is understandable as a programme cannot be submitted for validation until the independent provider has their quality assurance policies and procedures approved by QQI.

5.3.2 Consistency

Good practice was provided in reports where evidence was given in the body of the report to support the evaluation panel findings in relation to strengths, opportunities for improvement and weaknesses. The discussion of a weakness or an opportunity for improvement appears in the body of the report. The format of the reports requires that any conditions or recommendations be listed following the detailed discussion of the criteria.

There were occasions when the reasons for imposing conditions were not included in the body of the report and did not have evidence to support them. This could cause some confusion to the independent provider or other readers of the validation report. In other cases, concerns expressed in the body of the report did not appear as conditions or recommendation. For example:

“The panel noted that there were a large number of programme learning outcomes and heard that the rationale for this was that each learning outcome was mapped more closely to the QQI award standards, but that that programme team agreed that these could be condensed to a fewer number.”

Level 9 Comment PG21863

Inconsistencies between reports was difficult to determine. An area where possible inconsistency can occur is in

relation to decisions relating to conditions and recommendations. Similar issues arise and appear as conditions in one report and recommendations in another. Reports using the current template are comparable as similar templates are used by all validation panels. Improving the guidelines and training panel members, in particular chairpersons and secretaries, will improve the comparability of reports.

5.3.3 Decision and decisions in context

Table 38 and **Table 39** show the extent of decisions and the level of evidence attached to them. Some decisions of panels were unaccompanied by comment or by minimal comment that did not convey any additional information beyond the decision. This was the case in 180 of the 572 recorded decisions. This finding was more prevalent under the legacy report format (148 out of 392) than under the current format (32 out of 180 decision).

5.4 RECURRING STRENGTHS, WEAKNESSES AND OPPORTUNITIES FOR IMPROVEMENT OF THE VALIDATION REPORTS.

5.4.1 Introduction

This section of the thematic analysis deals with the general issues involved in the reports of the evaluation panels. Although the various formats of evaluation reports are dealt with, the current format is the most relevant. Accordingly, the analysis of the needs of stakeholders is focused on that format of report.

5.4.2 Strengths of the current validation report format

The current validation report format has a number of strengths in comparison to the previous Legacy report format.

- The current evaluation report format allows for the provision of relevant information in the evaluation of the programme against the validation criteria and the sub-criteria. When written well they include evidence to support exemplary practice, recommendations for improvement and conditions associated with eliminating weaknesses. They also include an outline of the discussions that took place between the independent evaluation panel and those that participated in the site visit including management, programme team and other stakeholders.
- Decisions on validations are clear and unambiguous and based on evidence.
- The current independent validation report format allows for a measured and predictable approach to the evaluation of the programme by independent evaluation panels. It allows for some flexibility in the areas that it comments upon in detail. This prevents a mechanical “tick-box” approach that was evident in the previous legacy report format. Used properly the current format allows for a considered approach with decisions based on evidence.
- Independent evaluation panels often comment favourably on the quality of the engagement with the programme team. This is an important aspect of the validation process and should be encouraged.

5.4.3 Weaknesses of the current validation report format

- The current format allows for flexibility in the approach and style of report. In most cases this allows panels to comment fully on criterion. In some cases the reports have little description of the discussions and lack documented evidence to support conditions and recommendations.
- Many reports are too focused on content. Where outcomes are mentioned they may not be analysed. Where they are required to be revised examples of weaknesses may not be given. Little attention is paid to delivery of content or the learning experience of learners. Each of these areas should be discussed and commented upon.
- QQI validations policy states that:

“Collateral outcomes of the validation process include the identification of good practice and opportunities for improvement.”⁸

- Examples of good practice quoted by panels are rare. This may lead to the qualities of many programmes being underestimated. It also reduces the possibility of the development of good practice across the sector.
- Independent evaluation panel reports do not contribute as effectively as they could to the development of quality programmes across the higher education system. Programme teams can read the reports in the context of a fuller knowledge of the programme submission and from engagement with the panel at the validation event. This contextual knowledge is denied other stakeholders including other programme development teams. Weaknesses identified in validation reports are recurring and can reappear at revalidation events. More precise expositions of deficiencies would contribute to the improvement of later programmes as would a fuller exposition of the opportunities for improvement.
- Award standards are not referred to directly in many reports. Many reports do not state which standards were used to justify the level and type of award. Neither are the minimum intended programme outcomes recorded in the reports. This deficiency is particularly acute when the BA(Hons) award title is used in a programme that is actually a specialised programme e.g. Business or Computing. This problem is most evident in the earlier legacy reports.
- The amount of evidence provided in some cases is not detailed and in other sections it is. For example:

“The modules presented were, in general, very well put-together.”
Level 8 Comment on validation criterion 5 PG23275

- For the same programme:

“There was evidence in the site visit of an excellent team-based approach to the design, delivery and assessment of the programme. The integration of the programme in terms of design, delivery and assessment should continue to be reviewed. A detailed narrative now precedes the transferable skills matrix which gives the rationale for the transferable skills complement delivered as well as linking each skill to the programme aims and outcomes and tracing their development through the modules. The panel notes and encourages the ongoing exploration of online delivery options. The College’s commitment to access finds expression in the

provision of an extensive set of support services in the evenings and at weekends. This is highly commendable. The College-wide and non-programme specific supports are noted and are excellent.”

Level 8 Comment on Validation Criterion 9 PG23275

- The expected employment opportunities for graduates are rarely mentioned by panels:

“The proposed programme compares favourably with existing related (comparable) programmes in Ireland and beyond. Comparators should be as close as it is possible to find “

Criterion 3 b(iii)

And

“There is evidence of employment opportunities for graduates where relevant.”

Criterion 3 b(v)

- The legacy criteria had benchmarking of programmes against comparators as a criterion. This was not dealt with by evaluation panels in any detail. However, benchmarking remains an important quality assurance process for programme development. It is also an important indicator for prospective learners and for employers.

5.5 ANALYSIS OF THE REQUIREMENTS OF STAKEHOLDERS

5.1 Introduction

QQI validation policy November 2017 states:

“When a programme of education and training is validated by QQI:

a) the provider of the validated programme is assured that QQI will, when requested by the provider, make an award to learners who successfully complete the programme;

b) a prospective learner is assured that the programme will help them achieve the standard required for the corresponding QQI award; and

c) stakeholders (e.g. funders and employers) investing in the programme are assured that it will adequately prepare learners for the corresponding QQI award.

It must be noted that these assurances are not absolute because, for example, validation of new programmes addresses them in advance of their provision.”⁹

The award standard itself is also of interest to learners and other stakeholders. The widespread use of BA and BA(Hons) for specialist programmes in business and computing leaves the question open as to what standards are being used in the evaluation of the programme. These programmes are not normally validated against the generic award type descriptors. Some programmes are validated against the Arts and Design Standard.

Furthermore, what is actually achieved by a learner is the minimum intended programme learning outcomes. These can differ for different programmes with the same award stem and programme title. The independent validation reports are independent of the provider and thus constitute valuable information to guide stakeholders. Provision of information on standards and programme outcomes would facilitate learners in choosing programmes.

Validation reports are publicly available documents and there are a range of stakeholders who may have an interest in them. The comments below envisage the expansion of the role of validation reports to cater for a wider audience. Comments on how the existing format and the existing practice of panels address these concerns are provided. Ways of dealing with the deficiencies are also suggested.

5.5.2 Funders, quality assurance agencies and other regulatory authorities

This group would have an expectation that the evaluation panel was competent, independent and that the examination of the programme was thorough. Current evaluation panels have these qualities but the information on evaluation panels in the reports is insufficient to establish this to outside observers. This aspect is expanded upon in the Section 2 on independent evaluation panels. Quality assurance agencies and regulatory authorities are also interested in ensuring that all of the validation criteria are met. This is the case but the evidence presented in the reports vary. Award standards are not explicitly stated in all cases in the independent validation reports. Although they are specifically required to be reported on in the independent evaluation template it is not often clear which standards are involved.

Funders of programmes and of learners have an interest that the programme produces graduates with transferable skills. The process implies, through the achievement of the knowledge, skills and competence, that graduates have transferable skills and competencies. This could be made more visible by the inclusion of the minimum intended programme learning outcomes in the report.

Information to funders and learners on the qualifications of those delivering the programme is rarely present in reports. Fifty-eight of the 305 evaluators who served on panels had the title Doctor and three had the title Professor. These figures are incomplete as there was no requirement to provide titles in the reports. The reports confirm the adequacy of the independent evaluators but often provide little detail.

5.5.3 Programme teams and academic committees of providers

It is in the interest of programme development teams that there be a thorough and collegiate assessment of a programme against known criteria by authoritative peers. The current format of the programme submission document, the evaluation process and the structure of the independent evaluation report provides for this. The predominance of subject experts on the panels can lead to aspects of pedagogy being neglected.

Programme teams also require that there is a clear exposition of weaknesses where they occur. The conditions set by independent evaluation panels to deal with the weaknesses should be clear and not overly prescriptive. The format of the independent evaluation report allows for this. Conditions and recommendations should be linked either to the criteria or to the programme outcomes where the deficiency or opportunity for improvement resides.

Programme teams also expect that good practice in programme design, delivery and assessment be recognised. This is not a feature of many reports.

Academic committees have similar concerns as programme teams but also have a further interest in broader issues such as teaching, learning and assessment strategy. Evaluation panels often recommend revision of these but do not indicate what good or best practice is or what the actual deficiency in the current practice is.

5.5.4 Prospective learners

The independent validation report is the most extensive independent document relating to the programme of study that is freely available to prospective learners. Learners require information on the quality of the programme and also on its specific outcomes. The current report format is deficient in that it does not state the minimum intended programme learning outcomes. Neither do many reports deal with the areas of employment opportunity for graduates. Staff/learner ratios are not provided in the reports although programme schedules do indicate delivery workload per week/semester.

5.5.5 Employers of graduates

The comparability of programmes and the graduate attributes are aspects that would interest employers. Comparability is rarely mentioned in reports. Benchmarking of programmes would give employers a reference by which to judge a programmes suitability.

5.5.6 Foreign education funding authorities and private study abroad agencies

These groups have similar interests to some of the groups stated above. What is of particular interest is the comparability of the programme to other programmes in Ireland and abroad. Progression possibilities and routes are of interest to these stakeholders. Progression is not covered in detail in most current independent validation reports. Where it is mentioned as a weakness, it is the lack of articulation of the progression possibilities that concerns panels. The progression opportunities afforded by a programme are an important aspect of the programme. International learners are often interested in Irish qualifications as part of a pathway to further qualifications elsewhere in the world.

5.5.7 Admission offices of higher educational institutions

Admission Offices often have to make judgements on whether an award held by a prospective learner is sufficiently aligned with a particular advanced programme. Additional information on the speciality of the programme or the programme minimum intended learning outcomes would be of assistance to such stakeholders.

5.5.8 The wider higher educational system

Indications of good practice in programme design, delivery and assessment, opportunities for improvement in assessment and teaching and learning strategy, if included in independent validation reports would allow the reports to be used to disseminate improvements in educational provision. This would require the inclusion of authoritative persons in those areas on independent evaluation panel.

5.6 RECOMMENDATIONS – OPPORTUNITIES FOR IMPROVEMENT IN REPORTS

- A formal part of the validation event should be the consideration of the minimum intended programme learning outcomes against the proposed standards. Where deficiencies are found these should be addressed by conditions. The validation report template does contain the references to standards and to minimum intended programme learning outcomes. It should be a requirement that the validation report contains the standards used and the minimum intended programme learning outcomes with commentary. If implemented this would

put the standards and programme outcomes at the centre of the validation process. It would address many of the difficulties mentioned above.

- The identification and promotion of good practice should be an outcome of the validation process. Directions to this effect should be given to independent evaluation panels. Where it is identified, good practice should be described in such a way as to be of value to the wider higher educational community.
- QQI should require that all independent evaluation panels have a designated secretary, in addition to the chairperson. Together with the chairperson, the secretary should ensure that all major elements of the validation process are covered, that the discussion is noted and that contextual information is provided for any conditions, recommendations and examples of good practice. This may require training for secretaries similar to that provided to chairpersons.
- Independent evaluation panels should deal with the areas of employment expected for graduates of the programme. A judgement should be made as to whether the claims made in the programme submission are reasonable. Providers should be required to suggest employment areas and possible job titles suitable for the graduates of the programme.
- In a way similar to employment possibilities, academic progression routes should be discussed at evaluation events. The report should indicate whether in the view of the independent evaluation panel the successful graduate with the appropriate grade of qualification would be adequately prepared for further study. This statement should indicate the range of programme specialities that would be a suitable progression pathway.
- Benchmarking of programmes should be a required part of the independent validation report. At Higher Certificate and Ordinary Bachelor's Degree comparisons could be made with programmes within the Irish Higher Education system. At Honours Bachelor's Degree, Master's Degree and Postgraduate Diploma level programmes comparisons could be made with programmes in the Institute of Technology, Dublin Institute of Technology and University sectors. Where comparators do not exist in Ireland then suitable programmes abroad should be used.
- In the case of Master's Degrees and Postgraduate Diploma programmes the inclusion of external experts from outside the Irish higher education system would facilitate comparison between programmes.

6 Programme Review and Revalidation

6.1 INTRODUCTION

This chapter covers the revalidation of programmes following a programme review. It covers the scope of the analysis undertaken, the identification of recurring strengths, opportunities for improvement and weaknesses as identified in independent panel reports. The programme review reports were also analysed to determine whether they provided evidence of meeting the stated objectives of a programme review.

Programme review is a provider-owned quality assurance procedure that addresses a single programme or group of related programmes. Independent providers whose programmes require revalidation by QQI to continue, need to design their programme review processes with this in mind to avoid duplicated work. QQI has published a Programme Review Manual 2018 for pilot implementation which provides templates which must be used when preparing a programme review report and the QQI independent evaluation report on an application for validation of a programme of education and learning. Revalidation is described in Figure 14 which is an extract from “Policies and criteria for the validation of programmes of education and training. QQI November 2017.”

Revalidation of a programme of education and training is a formal QQI determination. It requires application for revalidation by an eligible provider. Revalidation follows a programme review and is distinct from it.

A programme review may result in significant modifications to a programme but there are limitations. A programme review might identify a requirement for a new programme validation leading to a QQI award as distinct from a modification to an existing one. In that case QQI insist that a new programme validation must be made separately.

QQI validated programmes are always validated conditionally. Furthermore, all validation determinations are subject to a duration of enrolment; this is typically five years. The duration of enrolment is variable and defined to be the interval during which learners may be enrolled on the validated programmes. Revalidation is validation by QQI of a programme that has emerged or evolved from a programme that has been previously validated by QQI. Programmes may have reached a point where, for example, it needs to be substantially modified or updated such that the end result is a new programme. Revalidation is also required for any programme that is to continue to enrol learners following expiry of the duration of enrolment. It results in a validated programme, which is substantially based on the previously validated programme. QQI, therefore, does not require the provider to make a de nova validation application in respect of such programmes.

Figure 15 Description of revalidation. Extract “Policies and criteria for the validation of programmes of education and training. QQI November 2017.”

The core validation criteria apply to all programmes, new programme submissions, as well as programme revalidations. Each faculty and or college agrees in advance with QQI special considerations for the review including, for example:

“The introduction of new programme structures, changes in programme title, and the implementation of Assessment and Standards (Revised 2013) plus other considerations.”

Consideration for the programme review PG21927

6.2 SCOPE OF THE ANALYSIS OF PROGRAMME REVIEWS AND REVALIDATIONS

Twenty-five programme review reports were analysed to identify recurring strengths, opportunities for improvement and weaknesses within programmes as identified by programme review panels. Eleven of the reports followed the current template for the independent programme review report. It is a QQI requirement that in all cases the current version of the General Programme Validation Manual must be completed whether or not the programme is to be modified. One report was a desk review undertaken by two independent evaluators and the remaining fourteen reports followed the previous legacy format.

Seventy-eight programmes were re-validated as a result of undertaking a programme review. All programmes except for one submitted by colleges for revalidation were approved. Reports indicated with * in **Table 40** below followed the current programme review process and the current validation reporting template. One programme, an MSc in Finance, was validated as a result of a desk review by two independent evaluators. Minor award programmes were not included in the analysis as they were outside the scope of the project.

Table 40 provides a breakdown of the independent evaluation reports for programme reviews per award standard that were analysed to identify recurring strengths, weaknesses and opportunities for improvement.

- Programmes leading to awards in arts at Master's Degree, Postgraduate Diploma, Honours Bachelor's Degree, Ordinary Bachelor's Degree and Higher Certificate accounted for seventy- four percent of the revalidations.
- Programmes leading to awards in science at Master's Degree, Honours Bachelor's Degree, Higher Diploma, Ordinary Bachelor's Degree and Higher Certificate accounted for seventeen percent of the revalidations.
- Programmes leading to awards in business at Master's Degree, Postgraduate Diploma, Higher Diploma, Higher Certificate and Master of Business Administration accounted for nine percent of the revalidations.
- No programmes were re-validated at either Honours Bachelor's Degree or Ordinary Degree in Business.

Table 40 Breakdown of independent evaluation reports for programme reviews per award standard

College and Faculty	MA	BA (Hon)	BA	MBA	MB	MSc	BSc (Hon)	PGDip	High. Dip	Higher Cert	Total
Carlow College (Business)*	1	4	2								7
Griffith College (Faculty of Business)		4	1							1 ¹	6
Irish College of Humanities and Applied Sciences Limited (All programmes)	6	4	4					6 ⁶			20
Griffith College (Faculty of Design)*		2	2								4
American College		2			1						3
The Open Training College*			1							1 ²	2

National College of Ireland						2	2		1 ⁴	1 ³	6
Dublin Business School		3	3								6
National College of Ireland (School of Business)		3								1 ¹	4
National College of Ireland (Postgraduate)	1			1		4		1 ⁷			7
Setanta College			1							1 ³	2
Independent College		1									1
Independent Colleges	1										1
IICP Education and Training Limited.		1	1							1 ²	3
Children's Therapy Centre	1							1 ⁶			2
Gaelchultur Teoranta								1 ⁶			
CCT College Dublin										1 ³	1
National College of Ireland MSc Finance						1					1
National College of Ireland HDip in Business*									1 ⁵		1
Total	10	24	15	1	1	7	2	9	2	7	78

Reports indicated with * followed the current programme review process and the current validation reporting template.

Report indicated with ** was validated following a desk review

1 indicates Higher Certificate in Business

2 indicates Higher Certificate in Arts

3 indicates Higher Certificate in science

4 indicates Higher Diploma in Science

5 indicates Higher Diploma in Business

6 indicates Postgraduate Diploma in Arts

7 indicates Postgraduate Diploma in Business

The seven individual reports for Carlow College were treated as one report for analysis purpose as strengths, weakness and opportunities for improvement were very similar in each review report. The analysis below is therefore based on nineteen reports (25 minus 6).

6.3 RECURRING STRENGTHS, OPPORTUNITIES FOR IMPROVEMENT AND WEAKNESSES OF PROGRAMMES FOLLOWING PROGRAMME REVIEW.

6.3.1 Strengths

6.3.1.1 Overview

Programme review panels made commendations in twelve of the nineteen programme review reports analysed. The total number of commendations made across the twelve programmes was sixty, ranging from zero to seventeen strengths per report. The median was 3.5 and the mode was zero. There was a wide range of individual strengths identified. These strengths were grouped into broad categories covering teaching and learning, supports for students, resources, links with industry, assessment and local engagement. The main recurring strengths identified in the programme review panels reports are provided below.

6.3.1.2 Supports for students (current criterion 11)

Programme review panels commented favourably on the level of support provided to learners on eleven occasions in five of the programme review reports. Various supports were highlighted including learner support for teaching and learning, innovative services provided by the library, mathematical and literacy initiatives, level of IT services and learner support club.

For example both learning resources and access processes were seen as strengths:

“The PRG commends DBS on the innovative services provided by the library and the high level of support extended to students and staff.”

Level 7 Commendation PG21899

“Recognition that induction and transitioning is a process and not an event, with strong links evident in curriculum development and student progression.”

Level 8 Commendation PG22721

6.3.1.3 Teaching and learning (current criterion 9)

Teaching and learning initiatives were identified as strengths in four programme review reports on seven occasions. Specific initiatives were identified in pedagogy, teaching awards, innovation in assessment, simulation games and an e-learning web site e.g.:

“The panel commended the institution on its creative, interactive, student-centred pedagogy, which is considerably enhanced by small class sizes.”

Level 8 Commendation PG22535

“Great innovation in creating distinguished teaching award, Presidents award for assessment innovation, Presidents award for outstanding contribution to student learning.”

Level 8 Commendation PG21868

6.3.1.4 Programme review process

The quality of the documentation provided by colleges, engagement of staff in the review process, and the work involved in undertaking the programme review was highlighted on eleven occasions in seven of the programme review panel reports.

For example in the Programme Review Report (Phase 2) for Carlow College the following comment was made:

“The panel commends the programme team for: (1) the amount of work involved in completing the review and producing the documentation, (2) the open engagement with the panel in discussing all aspects of the programmes.”

6.3.1.5 Assessment (current criterion 10)

In only two of the programme review reports commendations were made in relation to assessment.

“Peer review of assessment”

Level 8 Commendation PG21878

“The PRG commends DBS on the appropriate diversity of assessment strategies and the quality and quantity of feedback.”

Level 7 Commendation PG21899.

6.3.2 Recurring Weaknesses

6.3.2.1 Overview

Programme review panels for the nineteen programme review reports analysed recommended to QQI validation of programmes subject to fifty-seven conditions. Such conditions must be implemented before a certificate of validation is provided by QQI for the programme. Six programme review panel reports for four colleges identified no weaknesses. One report identified eleven areas for improvement prior to recommending the validation of programmes to QQI. The median for weaknesses identified was two and the mode was zero. The weaknesses identified were grouped into the same categories as the strengths as outlined in the section above. These included recurring weaknesses in programmes with MIMLOs, curriculum (content, credits, prerequisites module content), documentation, academic governance, award classification, management structures, resources; teaching, learning and assessment, supports for students and entry requirements. The main recurring weaknesses identified in the programme review reports are provided below.

6.3.2.2 Learning Outcomes (current criterion 2)

Learning outcomes both MIPLOs and MIMLOs were identified as a weakness on ten occasions for six of the programme review reports. The examples below are a sample of the conditions imposed by panels.

“Revise level 9 outcomes.”

Level 9 Condition PG21826

“Module learning outcomes must be re-written to reflect level 9 language.”

Level 9 Condition PG21812

6.3.2.3 Curriculum (current criterion 5)

Recurring weaknesses in relation to the content of modules, credits, module descriptors, splits in modules, titles, pre-prerequisites were identified on eleven occasions in six of the evaluation reports. Some of the weakness in this category are directly related to programme learning outcomes as well. Panels were concerned that standards should be reflected across the whole curriculum and that the curriculum should not be fragmented e.g.

“The syllabus content in the new document must reflect QQI’s level 9 award standards in their entirety and show what precisely is being taught and assessed, with a detailed teaching and assessment strategy included.”

Level 9 Condition PG21812

“More emphasis should be placed on the broad theories of psychology and sociology in the early stages of the programme. It is important to consider broad theories from the dominant paradigms rather than focusing in on specific or narrow sub theories.”

Level 8 Condition PG22392

6.3.2.4 Assessment (current criterion 10)

Weakness in assessment was identified by programme review panels on seven occasion in four of the programme review reports. The weaknesses identified were in linking assessment to learning outcomes, implementing assessment regulations, and quantity and variety of assessment e.g.

“The College needs to articulate a clear assessment strategy that indicates how it will ensure that learners achieve the module and programme learning outcomes and that acknowledges its obligations under the QQI ‘Assessment and Standards’ (2013) Document.”

Level 7 Condition PG21966.

“National College of Ireland (Faculty Business Postgraduate) PG21866 “An articulation of the difference between assessment loads in 5 and 10 credit modules should be provided.”

Level 8 Condition PG21866.

6.3.2.5 Documentation (current criterion 5)

Weaknesses in the documentation provided to the programme review panels were identified in seven cases in four programme reviews from colleges. Various issues were identified including documentation relating to the programme revalidation as well as to the documentation required for programme monitoring and review. In some cases revised documentation was required e.g.

“Section 7 of the Provider’s Programme Report to be updated to clearly set out all the modifications being proposed to the programmes and the rationale for these.”

Level 7 Condition PG23916

“The College must produce a revised programme document to reflect the programme structure as approved.”
Level 9 Condition PG21811

6.3.3 Opportunities for improvement

6.3.3.1 Overview

Recommendations in relation to opportunities for improvement to colleges were identified in all programme review reports. One hundred and eighty-two recommendations were provided. There is no requirement on colleges to implement recommendations. Recommendations were made in relation to most of the validation criteria. The recommendations were grouped into categories similar to the ones used in identifying recurring strengths and weaknesses including quality assurance, documentation submitted, programme development, MIPLOs and MIMLOs, teaching learning and assessment and supports for students and engagement. It is not always made clear in the programme review reports what actions have to be taken to improve the situation.

The following are the most common recurring opportunities for improvement as identified in the programme review panel reports.

6.3.3.2 Curriculum (current criterion 5)

Forty-nine recommendations were made in relation to the curriculum in sixteen of the programme review reports. The recommendations related to most of the ten sub-criterion of the current validation criterion 5. Recommendations made by the independent evaluation panels were in relation to the structure of the programme, no electives offered to students, new modules to be considered for inclusion, and additional material to be covered in the programme. Independent evaluation panels also made recommendations in relation to ECTS credits for modules not consistent with the student work load and the documentation relating to the curriculum. There were no recommendations made in relation to sub-criterion 5j *“The programme duration (expressed in terms of time from initial enrolment to completion) and its fulltime equivalent contact time (expressed in hours) are consistent with the difference between the minimum entry standard and award standard and with the credit allocation.”*

Examples of recommendations that were made are provided below:

“it is recommended that research modules are revised and updated to include a greater variety of methodologies and focus on both quantitative and qualitative methods.”

Level 8 Recommendation PG23978.

“Possibly adding a module in Supply Chain Management in the Bachelor of Arts (Honours) in Business Studies programme.”

Level 8 Recommendation PG21860.

6.3.3.3 Programme Management (current criterion 12)

Recommendations were made in relation to quality assurance, management of programmes, access and transfer procedures and staffing requirements on twenty-three occasions in eleven of the programme review reports. No recommendations were made in relation to procedures for interface with QQI certification.

Examples on the recommendations that were made are provided below:

“Better to use interview rather than oral test or oral examination in determining the suitability of the applicant for the course.”

Level 9 Recommendation PG22565

“Revisit programme director roles and duties to ensure coherence across full-time and part-time programmes and be consistent and explicit in relation to entry requirements for programmes.”

Level 8 Recommendation PG21868

Carlow College “The provider should require all lecturers to be consistent in their use of Moodle and Turnitin; to achieve this, it is recommended that the College identify a clear minimum requirement and disseminate this to all staff (PT and FT).”

Level 9 Recommendation PG23981

6.3.3.4 Teaching and learning (current criterion 9)

Nineteen opportunities for improvement in teaching and learning were identified in ten of the nineteen review reports analysed. These opportunities related to strategies for teaching and learning, the language used in describing either programme or MIMLOs and formative feedback. Some examples of these are provided below:

“Reviewing some of the language in the module descriptors to address the appropriate level of learning.”

Level 7 Recommendation PG22082

“Ensure the programme classifications are aligned to relevant award standards.”

Level 8 Recommendation PG21886

6.3.3.5 Resources (current criterion 7)

Thirteen opportunities for improvement relating to resources were identified in eight of the programme review reports. These opportunities for improvement related to databases and journals for the library, learning resources, services to students such as careers service, suitable rooms and virtual learning environments. Examples of these are provided below:

“Independent College should provide dedicated group work facilities/room for the students.”

Level 8 Recommendation PG21928)

“The College should review its library resources and facilities, particularly access to journals.”

Level 9 Recommendation PG 21927

6.3.3.6 Assessment (current criterion 10)

Eleven opportunities for improving assessment were specified in seven programme review panel reports. These were similar to those specified as weaknesses in the assessment section above e.g.

“Develop strategies for assessment.”

Level 7 Recommendation PG21850

“The panel recommended that learner workload be reviewed given the volume of learner assignments arising specifically from the amount of five credit modules, the amount of learning outcomes and the resultant assignment density. The panel recommended that the staff take care in planning the number of assignments and where possible to set assignments where multiple learning outcomes could be reviewed.”

Level 8 Recommendation PG23963

6.3.3.7 Engagement (current criterion 3)

Ten recommendations were made in eight of the programme review reports in relation to taking account of the views of stakeholders. The majority of the recommendations dealt with engagement with industry or professional bodies. Few reports made recommendations in relation to taking account of inputs from graduates, learners, or other stakeholders. Examples of recommendation relating to external links to industry are provided below:

“Industry Engagement that the College forge closer links with established, reputable institutions with whom it has affiliations, such as the Irish Writers’ Centre. Such bodies as these offer opportunities to share creative and academic p

Level 9 Recommendation PG22536)

“develops more formal relationships with key employers and relevant professional bodies to enhance the availability of work experience opportunities.”

Level 8 Recommendation PG21866

“The panel recommends that there be more graduate / alumni input into the development of programmes given the quality of the feedback from graduates that was evident in the closed session the panel had had with them.”

Level 9 Recommendation PG22536

In summary the main recurring strengths identified in the independent evaluation reports were associated with current validation criterion 9 (Teaching and Learning), validation criterion 10 (Assessment) and validation criterion 11 (Supports for students). Recurring weaknesses in programme submissions were mainly associated with validation criterion 2 (MIPOs consistent with award standard), validation criterion 5 (Curriculum) and validation criterion 7 (Resources). Recommendations for improvement to programmes were mainly in relation to current validation criterion 3 (Programme concept, implementation strategy, and its interpretation of QQI awards standards are well informed and soundly based), validation criterion 5 (Curriculum), validation criterion 7 (Resources), validation criterion 10 (Assessment) and validation criterion 12 (Programme is well managed).

6.3.4 Comments regarding programme review /revalidation reports.

6.3.4.1 Overview

The current template for an Independent evaluation report on an application to QQI for initial validation or re-validation of a programme of education and training has improved the consistency of reports. The legacy validation report did not provide sufficient information on meeting validation criteria and in many cases became a tick-box exercise. The current templates for reporting by independent panels provides greater clarity on what is to be

evaluated and reported. The revalidation template for completion by independent panels is detailed which requires systematically ensuring that each of the current validation criteria are met for each programme submitted for revalidation. The programme review reporting template which is a separate document can be used for reporting on a single programme or a number of programmes. Some of the information in both reports is the same. Normally the composition of the programme review panel and revalidation panel are the same. In cases where a number of programmes are being revalidated subject matter experts and industry experts will be members of the panel relevant to their expertise only but can be members of the overall programme review panel.

There is some evidence at this early stage of implementation that clarification is required in relation to completing both the independent programme review report and independent evaluation report for revalidation. There are inconsistencies arising in relation to the evidence to provide in the independent revalidation report to support the recommendation to QQI.

Guidelines are required for independent evaluation panels in relation to the information to be provided in the independent programme review report. Recommendations in relation to this are provided below.

6.4 PROGRAMME REVIEW PROCESS

The independent programme review reports were analysed to determine strengths, weaknesses and opportunities of programme re-approval processes. Four of the Independent programme review reports followed the current format as outlined in the Programme Review Manual 2018 published by QQI. One report was an exception where two independent evaluators undertook a desk review of the submitted programme documentation. The remaining fourteen reviews followed the legacy format.

6.4.1 Legacy Format

The legacy process which followed the HETAC Provider Monitoring Policy and Procedures October 2010 consisted of addressing the objectives of the programme review (commonly referred to as the programmatic review) and completing the legacy validation template. The objectives of a programmatic review were to review the development of programmes over the previous five years, with particular emphasis on the achievement and improvement of educational quality. The focus was principally on the evaluation of quality and the flexibility of the programmes' responses to changing needs in light of the validation criteria (Ref Section 3 of HETAC's Core Validation Policy and Criteria 2010) and relevant awards standards.

The programmatic review panels (this was the name at the time of writing the reports) reports were analysed in relation to providing evidence of meeting the objectives as set out above. There were considerable inconsistencies in completing the reports.

Four reports will be dealt with in the next section as they were completed using the template provided in the Programme Review Manual 2018. A desk review was undertaken by two independent evaluators which is excluded in the analysis. The remaining fourteen reports are dealt with in this section.

6.4.2 Objectives

Objective 1 Analyse the effectiveness and efficiency of each validated programme, including details of learner numbers, retention rates and success rates.

Three of the reports dealt with this objective very well and provided information on student numbers, retention rates and success rates. A recurring weakness was that the majority of the reports did not provide sufficient information in relation to this objective. No information was provided in eleven of the reports. In some of these cases discussions did take place in relation to the effectiveness of the programmes.

Objective 2 Review the development of the programmes in the context of the requirements of employers, industry, professional bodies, the Irish economy and international developments.

Overall the objective was reasonably well dealt with in the reports. Two reports were very good and provided detailed and appropriate information. Ten reports provided information to show that the objective was covered reasonably well and two did not explicitly deal with the objective.

Objective 3 Evaluate the response of the provider/school/department to market requirements and educational developments.

Five reports provided findings in relation to both aspects of this objective the market requirements and educational developments. Four reports only dealt with educational developments with no findings in relation to response of the college/faculty to market requirements. One report focused on the market requirements with no reference to educational developments and the remaining four reports did not provide any findings. Recommendations were made in some cases for example to formalising teaching and learning or in relation to undertaking extensive marketing campaigns.

Objective 4 Evaluate the feedback mechanisms for learners and the processes for acting on this feedback.

The objective was covered well in the reports analysed. Good evidence was provided. Recommendations were made in a number of reports to review its current arrangements for securing learner feedback and ways of formalising the effective measures in place.

Objective 5 Evaluate the physical facilities and resources provided for the provision of the programme(s).

The objective was reported on in all cases with one exception. Commendations were made in two reports and conditions imposed in two cases.

Objective 6 Evaluate the formal links which have been established with industry, business and the wider community in order to maintain the relevance of its programmes.

The objective was dealt with in all reports to some degree with one exception. One commendation was made in relation to engagement with the local community. Recommendations were made in four cases to formalise a more structured approach industry engagement as well as inputs from students past and present.

Objective 7 Evaluate feedback from employers of the programmes' graduates and from those graduates.

The objective was not dealt with in eight of the reports. In four reports there were recommendations in relation to monitoring the employment of graduates, formalising industry advisory groups across all programmes is monitored.

Objective 8 *Review any research activities in the field of learning under review and their impact on teaching and learning (notwithstanding that the reviews of the research degree programmes may be undertaken separately).*

The objective was not dealt with in seven reports. Recommendation were made in three reports on detailing current research activity, research output could be expanded and made more visible.

Objective 9 *Evaluate projections for the following five years in the programme(s)/field of learning under review.*

The objective was not dealt with in ten reports. There were some discussions in the remainder.

Revalidation templates contained information on changes to programmes and revised programme schedules were submitted.

6.4.3 Summary

Table 41 provides a summary of how well each of the objective were covered in legacy reports. It was difficult on many occasion to extract information on the objectives as the reports were in many cases not structured to address the objectives. The information was taken from both the legacy validation template and the programme review document.

Independent review panels did recommend following the review that the programmes met the award criteria. The reports may not have captured all of the relevant information provided in the programmatic review submission provided by the independent provider.

Table 41 Summary of reports reporting on the programme review objectives using the legacy format

Objective	Dealt with in the independent review report	Not covered at all or inadequately
1	3	11
2	12	2
3	10	4
4	14	0
5	13	1
6	13	1
7	6	8
8	7	7
9	4	10

The analysis indicates that there were recurring weaknesses in the reporting by independent review panels. The reports were mainly written for the benefit of the programme development and the provider in mind. It is evident that a revised format was required to standardise on the reporting of findings, ensuring each objective was addressed and facilitating panels in making recommendations to QQI on the revalidation of programmes.

6.4.4 Independent Programme Review Report using Programme Review Manual 2018.

The current programme review process is significantly different in a number of respects from the past ‘programmatic review’ process. The details of the process are available in the QQI Programme Review Manual 2018.

Four independent providers undertook reviews following the pilot implementation of the new process. See **Table 42**. Each provided a programme review report and a validation report for each of the programmes.

Table 42 Programme Review Reports and Validation Reports per review

College	Number of programme review reports	Number of validation reports
1	7	7
2	2	2
3	1	1
4	1	1

While there were individual programme review reports for each of the programmes within colleges, the findings and recommendations were the same in many cases except for recommendations relating to individual programmes.

The following is an analysis of the programme reviews under each of the six sections of the current template:

1. Introduction.
All reports provided a brief introduction
2. Provide an account of the independent review process, setting out the evidence perused, the agenda for the site visit, and the persons interviewed. All reports provided an agenda and a list of the documentation that was provided to them. A list of those that attended meetings with the Independent Review Panel was documented. An analysis of those that attended is provided below in **Table 43**

Table 43 Analysis of those attending meetings with the independent review panel.

College	Meeting with management and staff	Meeting with learners	Meeting with graduates	Meeting with employers
1	Yes	Yes	Yes	No
2	Yes	Yes	No	No
3	Yes	Yes	Yes	Yes
4	Yes	Yes	No	No

It would be normal practice that independent review panels would meet with learners and graduates. Meeting with employers of graduates would enhance the review process.

3. Address the provider's programme review report and report on findings under the nine objectives shown below:
 - The fitness for purpose of the programme (including its objectives, intended learning outcomes, organisation, teaching, learning and assessment strategies, staffing, resources and management) in light of experience.
 - The actual achievement by the programme of its stated objectives.
 - The profile of learners who were enrolled and its suitability for the programme.
 - The performance of enrolled learners (grades, attrition, completion, benchmarking) and how the provider has responded to this.
 - The quality of the learning environment and the learning opportunities afforded to learners by the programme.
 - The suitability of the learner workload in light of experience (whether it is excessive or inadequate).
 - The effectiveness of procedures for the assessment of learners including summative and formative assessment of learners and external examining procedures.
 - The quality assurance arrangements that are specific to the programme.
 - The proposed modifications to the programme.

Reports relating to two of the colleges provided detailed information under each of the nine headings and made recommendations where appropriate in relation to findings under each of the headings. Commendations and recommendations were also provided.

The reports from the reviews of programmes in the other two colleges only provided a general statement that the panel was satisfied that a robust review was undertaken including coverage of all relevant elements of the programme listed. Commendations and recommendations were provided.

4. Evaluate the modified programme (as documented) intended to be submitted for revalidation against the QQI validation criteria and sub criteria.
5. Completed independent evaluation reports were provided in each case. Two reports relating to one college were completed post the implementation of the recommendations proposed by the panel.
6. Summarise the findings and make recommendations to the provider. Recommendations were provided in all reports.
7. Specify name, qualifications, experience and roles for each panel member and provide declarations of all relevant interests (there must be no conflicts of interest).

Names and affiliations were provided for all panel members. Qualifications of panel members were not provided in all cases. The details of the composition of panels is shown in **Table 44**.

There is a tacit QQI requirement that panels must have a university representative on the panel for programme validations leading to an award above Ordinary Bachelor's Degree.

Table 44 Composition of the Review Panels.

	Provider 1	Provider 2	Provider 3	Provider4
Number of Panel members	7	7	8	6
Number of female members	3	3	5	2
Number of male members	4	4	3	4
Learner representation	1	1	1	1
Independent Provider representation		1 Chairperson (M)	2. Chairperson (F)	
DIT/IOT /NCAD representation	1	2	2	4.Chairperson (F)
University representation	3 Chairperson (F)	1 Univ. .Ulster	1	
Employer representation	1	2	2	1
Conflict of interest	No conflict of interest reported	No conflict of interest reported	No conflict of interest reported	No conflict of interest reported

The independent programme review reports for Carlow College are examples of good reporting. In particular, the section on “Addressing the provider’s programme review report as it has been provided and the findings from the site visit” where each of the objectives is dealt with. The proposed modifications to the programme are summarised succinctly. The detail provided on each panel member on their qualifications, experience and role for each member is presented well.

6.4.5 Commentary and Findings

The Programme Review Template has the potential to provide greater consistency and comparability of reports compared to the previous legacy template. The reports by the independent review panel is the basis for the independent provider’s follow up action of the external evaluation and it provides information to society regarding the activities of the college.

There is little or no evidence provided in some independent review panel reports to support findings. Reports should cover evidence, analysis and findings; and features of good practice demonstrated by the college (ESG 2.6 Reporting 2015).

There is little or no data provided on student numbers, progression rates, success rates in examination and graduate employment information. This information is useful for prospective and current students as well as for graduates, other stakeholders and the public (ESG 1.8 Public Information 2015).

The review process should include meetings with graduates and employers of graduates. One of the objectives of a programme review is to determine what reputation does the programme and independent provider have with stakeholders. Important stakeholders are graduates and employers who can provide feedback on programme modifications, what challenges and opportunities are likely to arise in the next five years and what modifications to the programmes are required in light of these. In section 6 of the template for the provider’s programme review report (Phase 1) the provider is to evaluate the formal links which have been established with industry, business and

the wider community in order to maintain the relevance of its programmes and evaluate feedback from employers of the programmes' and from those graduates. The Programme Review Template provided in the manual does not explicitly ask the independent programme review panel to report on this even if some reports have reported. This should be addressed in the future.

There is a lack of international representatives on programme review panels. *“The involvement of international experts in external quality assurance is desirable as it adds a further dimension to the development and implementation of processes.” (ESG 2015 Section 2.4 Peer Review Experts).*

The qualifications of all members of the independent review panel are not provided.

One Bachelor of Arts Honours Degree programme with 180 ECTS credits had an exit Ordinary Bachelor of Business programme with 180 credits recommended for validation and subsequently validated. The exit programme had the first year modules all from another programme. This does not constitute the normal requirements for exit awards. The embedded (exit) programme should have been submitted by the provider for validation as a principal programme. (PG23961).

Overall inconsistencies in the detail of relevant information provided in reports are appearing at this early stage of implementation of the Programme Review Manual 2018 and the current version of the Independent Validation Template. The risk is that other Independent Review Panels will adopt poor practice based on review reports already completed. Good reports are available and should be provided as examples to follow.

6.4.6 Recommendations

- Training should be provided to panel members and in particular chairpersons and secretaries on completing the independent programme review report in relation to providing evidence to support findings and recommendations.
- QQI should inform panels whether the evaluation report is to be completed pre or post implementation of recommendations made by independent programme review panels.
- The Template for the Independent Programme Report should be amended to include details on what statistical data should be reported on in the report.
- Revalidation following non-standard procedures should be resisted.
- The Template for the Independent Programme Report should be amended to include a section on reporting on:
 - The evaluation of formal links which have been established with industry, business and the wider community in order to maintain the relevance of its programmes and
 - Evaluating feedback from employers of the programmes' and from those graduates.
- A report should be required from the independent provider stating how it has addressed the conditions and recommendations as determined by the independent review panel. This report is to be considered by the independent panel and if they are satisfied that the conditions have been met only then should the recommendation be made to QQI for validation. Although it is not a requirement for validation that recommendations have to be implemented, independent providers should address the recommendations and if not accepting them provide a rationale for that decision. It is noted that some independent providers already provide such a report.

7 Findings of the Thematic Analysis

7.1 OVERVIEW

The findings are based solely on the evidence provided in the independent panel reports. The programme documentation submitted by independent providers for initial validation, revalidation and programme review submissions were outside of the scope of the thematic analysis. The analysis was limited to higher education programmes excluding research degree programmes where QQI is the awarding body. This accounts for six percent of nationally validated higher education programmes in Ireland. This analysis does not deal with higher education programmes in the university sector or in the institute of technology sector.

- All applications for validation by QQI were independently evaluated against the published validation criteria.
- One hundred and thirty-four reports of programmes were analysed. Fifty-eight were initial validation reports. A further seventy-eight were revalidations under a programme review process. There were eighteen separate programme reviews examined.
- The analysis of the relevant reports showed that seventy-one percent of programmes validated or revalidated were at Honours Bachelor's Degree level or above.
- Awards in Arts accounted for sixty percent of the programmes validated, awards in Science for twenty-five percent and awards in Business accounted for thirteen percent based on the reports analysed.
- Programmes from seventeen independent providers of higher education programmes were analysed. Initial validations were from seven providers and revalidations were from nine providers.

7.2 EVALUATION PANELS

- All public higher education institutions were represented on independent review panels. There were 193 from the DIT/IOT/NCAD sector and seventy-one from the Irish university sector.
- Amongst subject matter experts, 107 were from the DIT/IOT/NCAD sector and sixty-one from the Irish university sector. A further seventeen were from universities from outside of the state.
- On the validation panels for Honours Bachelor's Degrees, Higher Diplomas, Master's Degrees and Postgraduate Diplomas, nine of the 112 subject matter experts (7%) were from universities from outside the state.
- Teaching and learning experts were indicated on nine of the fifty-eight independent evaluation panel and five of the eighteen programme review panels.
- Secretaries were assigned to five of the eighteen programme review panels and twenty-eight of the fifty-six validation panels.
- Forty percent of the 458 panel members were female. Twenty-nine percent of the chairpersons were female as were thirty-seven percent of the subject matter experts.
- Learners were represented on twelve of the fourteen panels formed under the current validation policy.
- There were industry representatives on all but two of the validation panels and on all of the programme review panels.

7.3 INITIAL VALIDATIONS – REPORTS

7.3.1 Overview

- The best reports gave clear decisions and provided evidence and context for those decisions. The current independent evaluation report encourages this.
- There is a lack of clarity in the independent evaluation reports leading to awards in Arts. It is not always stated whether programmes have been developed taking cognisance of the generic award type descriptors of the National Framework of Qualification or the Arts and Design Award Standard. The award standards for Business or Computing were quoted but no indication was provided of which learning outcomes of the relevant standard were referenced.
- Independent evaluation reports did not provide information as to why a programme was validated in Arts when the programme was in the discipline area of business or science.
- Reported weaknesses and opportunities for improvement focus on module content. Teaching and learning do not get the same detailed attention.
- There was little mention of expected employment opportunities for graduates. Employment opportunities were not mentioned in either the strengths, weaknesses or as opportunities for improvement.
- Evaluation panels were reluctant to commend aspects of the programmes either for initial validation or revalidation. There were eighty-nine commendations compared to 299 weaknesses and 350 opportunities for improvement.
- The median number of weaknesses recorded is five, that for opportunities for improvement was also five, while strengths were not recorded in most cases.
- Nine programmes were refused validation, this included one programme that was refused twice. The median number of weaknesses found within this group was eleven.
- Where outcomes were mentioned they were not analysed. Where they were required to be revised examples of weaknesses were not given and examples of good practice were similarly absent.

7.3.2 Current format reports

- The current validation report format allows for the consideration of each of the criteria for validation. This allows for the comparison between reports and promotes consistency. Improving the guidelines and training secretaries will improve the consistency between reports and comparability of reports.
- Panels using the current validation report format tended to provide context and evidence for decisions. In one case there was minimal comment beyond the assertion of compliance with criteria.
- Current validation reports have comments on staff and staffing requirements that were absent from the legacy reports.
- The use of “Not satisfactory”, “Partially satisfactory” and “Satisfactory” where conditions are imposed showed a varied approach to those categories by the panels.
- Sixteen percent of the criteria were dealt with without comment or with minimal comment.

7.3.3 Legacy format reports

- Legacy format reports did not address the criteria directly. Legacy criteria 1 and 2 attracted most recommendations and conditions. Whereas, criterion 6 dealing with viability of programmes was dealt with, with minimal comment.
- The legacy format encouraged a ‘tick-box’ approach where decisions were made, and conditions set with little context or evidence.
- The legacy format reports did not comment extensively on the benchmarking of programmes.
- Thirty-six percent of the decisions were recorded with no or minimal comment.
- Twenty percent of the criteria had conditions applied.

7.4 INITIAL VALIDATIONS –PROGRAMMES

7.4.1 Overview

- Recurring Issues raised by panels as strengths weaknesses, or opportunities for improvement across all levels of the NFQ were access, modules, MIPLOs, documentation and assessment.
- No strengths were recorded in thirty programmes. No weaknesses were recorded in ten programmes
- Panels varied in their allocation of conditions and recommendations. For example, revision of MIPLOs was seen as a condition in some cases and a recommendation in others.
- For every strength, three weaknesses were recorded and four opportunities for improvement.

7.4.2 Recurring strengths in programmes (commendations)

- Access was found to be a strength in Higher Certificate and Ordinary Bachelor’s Degree programmes.
- Industrial engagement was seen as a strength at Master’s level programmes.
- The engagement and enthusiasm of programmes staff was seen as a strength and commended upon.
- Innovative and varied assessment procedures were seen as strength of some programmes.

7.4.3 Recurring weaknesses in programmes (conditions)

- Conditions were applied to Master’s programmes to control access. These conditions were focused on either restricting access to suitable students or to providing defined access routes for students.
- Assessment was an issue at all levels. Improvements in assessment strategy and the need for variation in assessment procedures was recommended. Programme teams were also required to combine assessments in order to reduce the workload of learners.
- Panels paid close attention to modules. Changes to modules were required, new modules were proposed, and modules were repositioned within programmes. In six out of ten Master’s level programmes the programme outcomes were required to be revised as they were not seen to be at an appropriate level. Modules had to be amended in eight of the ten programmes.

7.4.4 Recurring opportunities for improvement (recommendations)

- The recommendations made by panels were in the same areas as the conditions.
- The most recurring issue was the content of modules, the description of the modules and the removal and replacement of modules. Besides this there were suggestions for the inclusion of topics or the exclusion of topics from modules.
- Assessment figured strongly with recommendations for the diversification of assessment instruments and the reduction of the number of assessments. A move from summative to formative assessment was encouraged as was the development of assessment strategies. Integration of assessments across modules was encouraged.
- A feature of the Master's level reports was the concern expressed for graduate progression from programme to employment. Providers were urged to monitor the destination of graduates. Increased attention was also required on the expected roles of graduates and the development of a graduate profile.

7.4.5 Coverage of the legacy validation criteria

- Thirty-six percent of validation reports stated that the validation criteria were met with minimal comment.
- Twenty percent of validation reports stated that validation criteria were met subject to conditions.
- Twelve percent of validation reports stated that the validation criteria were met with comments attached.
- Fifteen percent of validation reports stated that validation criteria were met with recommendations.
- The criteria that caused the most difficulty were criteria 1, 2, 4 and 7.

7.4.6 Coverage of the current validation criteria

- The coverage of the current criteria is more evenly spread than in the legacy criteria.
- The number of criteria that were satisfied with comments has increased from twelve percent to twenty-eight percent for the current validation criteria.
- The proportion of criteria with conditions attached at twenty-three percent is similar to the previous legacy format.
- The conditions attached and the recommendations are dispersed across the criteria to a greater extent than in the legacy format.
- The criterion where most conditions are imposed is validation criterion 5 (programmes written curriculum is well structured and fit for purpose).
- The criterion where panels made recommendation for improvement were criterion 10 (assessment strategies) and criterion 9 (teaching and learning criterion).

7.5 PROGRAMME REVIEW AND REVALIDATIONS

The recurring strengths, weaknesses and opportunities identified in the programme review reports and revalidation reports are provided below. Recurring strengths were associated with current criteria 9,10 and 11. Recurring weaknesses with criteria 2, 5 and 7. Recurring opportunities for improvement were associated with criteria 3, 5, 7, 10 and 12.

7.5.1 Recurring strengths in programme reviews and revalidation (commendations)

- Independent programme review panels commented favourably on the level of support provided to learners. Various supports were highlighted including learner support for teaching and learning and innovative services provided by the library as examples.
- Teaching and learning initiatives were identified as a recurring strength. The initiatives were mainly different in each case.
- The quality of documentation provided by independent providers, engagement of staff in the review process, and the work involved in undertaking the programme review and revalidation commended in many cases.

7.5.2 Recurring weakness in programmes (conditions)

- Similar to initial validations the recurring weaknesses were related to learning outcomes both MIPLOs and MIMLOs.
- Recurring weakness were identified in relation to the curriculum including content, credits, module descriptors and pre-requisite modules. Some of the weaknesses in this category were directly related to programme and module learning outcomes.
- Assessment in particular in linking assessment to learning outcomes was identified as a recurring weakness.

7.5.3 Recurring opportunities for improvement (recommendations)

- Programme management was identified as a recurring area for improvement. Recommendations were made in relation to quality assurance, management of programmes, access and transfer and staffing requirements. No recommendations were made in relation to the interface with QQI.
- Opportunities for improvement were identified in teaching and learning. These opportunities related to strategies for teaching and learning, language used in describing either programme or module learning outcomes and formative feedback.
- Improvements in resources were identified as an opportunity for improvement in programmes. These opportunities related to databases, journals in libraries, learning resources, services to students such as a career service, suitability of rooms, and virtual learning environments.
- Assessment similar to those specified as weakness were identified as areas to improve upon.
- Recommendations were made in relation to taking account of the views of stakeholders such as industry or professional bodies. Very few reports made recommendations in relation taking account of the views of learners, graduates of the programme or other stakeholders.

7.5.4 Programme review reports and revalidation reports

- The current template for the independent evaluation report for revalidation has improved the consistency of reports as it has for initial validations as stated above.
- There are inconsistencies arising in relation to completing the independent evaluation report pre or post initial feedback to independent providers and their consideration of recommendations.
- Similar weaknesses and opportunities for improvement are identified in reports on a recurring basis within individual colleges.

- The analysis indicates that there was recurring weakness in the reporting by independent review panels when using the programmatic review legacy template. The reports were mainly written for the benefit of the programme development team and the provider in mind. In most cases all of the objectives were not reported on at all or adequately as indicated below:
 - Objective 1 was not covered adequately in the majority of cases.
 - Objectives 2 to 6 were covered adequately in the majority of cases.
 - Objectives 7 to 9 were not covered adequately in the majority of cases.
- The current Programme Review Template has the potential to provide greater consistency and comparability of reports compared to the previous legacy template. There are improvements in reporting but there are areas where there needs to be greater consistency. Below are the findings on the pilot implementation of the current programme review template:
 - All reports provided a brief introduction.
 - All reports provided an agenda and the documentation that was provided to the panel. A list of those who attended meetings was provided in all cases. In all cases meetings were held with management, staff and learners.
 - In two cases meetings were held with graduates and in the other two cases the panel did not meet with graduates.
 - Only in one case did the panel meet with employers.
 - Reports relating to two of the providers provided detailed information under each of the nine headings of the programme review. The reports from the other two providers only provided a general statement that the panel was satisfied that a review was undertaken including coverage of the relevant elements.
 - Completed Independent Evaluation Reports were provided in each case. Two reports relating to one independent provider were completed post implementation of the recommendations proposed by the panel.
 - Recommendations were provided in all reports.
 - Names and affiliations were provided for all panel members.
 - Qualifications of panel members were not provided in all cases.
- There is little or no evidence provided in some independent review panel reports to support findings. Reports should cover evidence, analysis and findings; and features of good practice demonstrated by the college (ESG 2.6 Reporting 2015).
- There is little or no data provided on student numbers, progression rates, success rates in examinations and graduate employment information. This information is useful for prospective and current students as well as for graduates, other stakeholders and the public (ESG 1.8 Public Information 2015).
- The review process should include meetings with graduates and employers of graduates. One of the objectives of a programme review is to determine what reputation does the programme and provider have with stakeholders. Important stakeholders are graduates and employers who can provide feedback on programme modifications, what challenges and opportunities are likely to arise in the next five years and what modifications to the programmes are required in light of these.
- In section 6 of the template for the provider's programme review report (Phase 1) the provider is to evaluate the formal links which have been established with industry, business and the wider community in order to maintain the relevance of its programmes and evaluate feedback from employers of the programmes' and from those

graduates. The Programme Review Template provided in the manual does not explicitly ask the independent programme review panel to report on this even if some independent evaluation panels have reported. This should be addressed in the future.

- The representation of females on independent programme review panels is low.
- There is a lack of international representatives on programme review panels. The involvement of international experts in external quality assurance is desirable as it adds a further dimension to the development and implementation of processes. (ESG 2015 Section 2.4 Peer Review Experts).

Overall inconsistencies in the detail of relevant information provided in reports are appearing at this early stage of implementation of the Programme Review Manual 2018 and the current version of the Independent Validation Template. The risk is that other independent programme review panels will adopt poor practice based on review reports already completed. Good reports are available and should be provided as examples to follow.

8 Recommendations

8.1 INTRODUCTION

The recommendations are the considered views of the authors of the report. They are provided to enhance the quality of submitted programmes for validation and the independent evaluation reports. The recommendations below are based on the findings of the thematic analysis of reports by independent evaluation panels for initial validation and revalidation as published on the QQI web site as well as independent evaluation programme review reports provided by independent providers. Programme submissions and programme reviews by independent providers did not form part of the thematic analysis.

8.2 RECOMMENDATIONS IN RELATION TO PROGRAMMES

- Explicit statements of entry requirements for programmes should be required in programme submissions. In particular, for programmes at Honours Bachelor's Degree, Higher Diploma, Master's Degree and Postgraduate Diploma where candidates are admitted based on a qualification in a different discipline area (current validation criterion 4).
- Greater attention needs be paid by independent providers to specifying the MIPLOs. The MIPLOs to qualify for the QQI award sought must also be consistent with the relevant QQI awards standards (current validation criterion 2). It must be evident that they are at the appropriate level for the award.
- Independent evaluation panels in the evaluation of the programme submission should ensure that the MIPLOs have been internalised by the staff delivering the programme.
- In the case of programmes leading to an Honours Bachelor's Degree in Arts where the programme is in business or a business related discipline, the learning outcomes in the business award standard that are applicable should be specified. It is recommended that in such cases, the rationale as to why an arts award is justified and not a business award is to be provided in the submission document.
- QQI should develop guidelines in relation to the title of programmes which would help in distinguishing between an Honours Bachelor's Degree in Arts in business or business related areas and an Honours Bachelor's Degree in Business.
- The progression opportunities throughout the higher education sector for graduates of Honours Bachelor's Degree in Arts programmes should be clearly commented on in independent evaluation reports.
- In the case of multidisciplinary programmes where for example there are elements of business and science the rationale for choosing a particular award should be justified. In such cases the independent evaluation report should indicate which topics in the curriculum address the elements of the relevant standard in which the award will be made. This is particularly required when the award to be made is at Honour Bachelor's Degree, Higher Diploma, Postgraduate Diploma and Master's Degree. The majority of the subject matter experts on the independent evaluation panel should be from the stem in which the award is to be made.

- Programme submissions from independent providers need to improve the level of content described in the module descriptor, module titles should reflect the module outcomes as well as the syllabus and be understood by external stakeholders. If placement is an element of the programme this should be reflected in the title of the module (current validation criterion 5).
- The module credits appropriate to the student workload involved, the position of modules in the curriculum, pre-requisites when applicable and the sequencing of modules requires improving in programme submissions.
- Improvements are required in assessment strategies and plans. These should inform the design of assessment tasks and the criteria for determining whether the MIPOs have been achieved. Greater level of innovation and more variety of assessment including team based assessment is required. Furthermore, the programme assessment strategy for the programme as a whole and module assessment strategies for constituent modules must be clearly linked and documented (current validation criterion 10).
- Programmes submitted for validation and revalidation following programme review needs to be improved upon in relation to MIPO's and content at higher levels particularly at Master's Degree and Postgraduate Diploma level.
- Independent providers should engage with the National Forum for the Enhancement of Teaching and Learning in Higher Education. This would enhance programme submissions in relation to good practice and innovations in teaching, learning and assessment.
- There should be far greater graduate and employer input into programme development. This is particularly the case at programme revalidation when graduates of the programme have entered employment (current validation criterion 3).
- Improvements are required the teaching and learning environment. Students must have access to appropriate learning resources, support services and facilities in respect of the breadth of the curriculum (current validation criterion 7).

8.3 RECOMMENDATIONS IN RELATION TO THE VALIDATION REPORTS

- The evidential supports cited in support of conclusions in the initial validation and revalidation reports needs to be explicit.
- Good practice guidelines including well-written reports where positive evidence is provided to support decision should be made available to panels.
- Independent evaluation panels should ensure that there are no inconsistencies occurring between the body of the report and the final commendations, recommendations and conditions.
- Well-written reports where weaknesses, opportunities for improvement and cases of good practice are described well should be a resource to be made available to the wider higher educational community.
- Teaching and learning specialists should be included on independent evaluation panel to encourage a change

by focusing more attention on learning outcomes, teaching and learning, and assessment when evaluating programme submissions. This will contribute to the on-going enhancement of programmes.

- QQI should determine how best to address the preparation of learners for active citizenship as per ESG 2015.
- In order to ensure that conditions and recommendations are provided in context the validation report template should be modified to include specific section for conditions and recommendations under each criterion.
- The validation report template should be modified to include a section for the MIPLOs to be included in the report. This would focus attention on this aspect of the validation criterion which is at the core of a number of weaknesses identified in the findings of the review.
- In cases where the programme submitted is multidisciplinary the independent validation report should indicate which topics in the curriculum address the elements of the relevant standard in which the award will be made. This is particularly required when the award to be made is at Honours Bachelor's Degree, Higher Diploma, Master's Degree and Postgraduate Diploma. In such cases the majority of the subject matter experts should be from the stem in which the award is to be made.
- Panels to take account of the identification of good practice where applicable and describe it in such a way as to be of value to the wider higher educational community. The identification and promotion of good practice should be an outcome of the validation process.
- Independent evaluation panels should consider the areas of employment expected for graduates of the programme (current validation criterion 3). A judgement should be made as to whether the claims made in the programme submission are reasonable. Independent providers should be required in the programme submission to suggest employment areas and possible job titles suitable for the graduates of the programme.
- The academic progression routes should be commented on in the independent evaluation report (current validation criterion 4). The report should indicate whether in the view of the evaluation panel the successful graduate with the appropriate grade of qualification would be adequately prepared for further study. This statement should indicate the range of programmes that would be suitable.
- Although it is covered under current validation criterion 3 sub-criterion b(ii), benchmarking of programmes should be commented on within reports. Higher Certificate and Ordinary Bachelor's Degree programmes should be benchmarked against programmes where they exist within the Institutes of Technology and the Dublin Institute of Technology. In relation to Honours Bachelor's Degree, Higher Diplomas, Master's Degree and Postgraduate Diplomas benchmarking again with IOT, DIT as well as the universities.
- Where substantial changes are required to a programme the independent evaluation panel should not re-design the programme proposed for validation. Instead, the independent provider should be required to resubmit the programme again for validation having taken account of the deficiencies of the initial submission.
- Guidelines should be provided by QQI on what constitutes an embedded programme.
- Guidelines for determining when to propose conditions and recommendation should be provided by QQI to ensure a consistent approach is adopted by independent evaluation panels.

- The response by the independent provider to the findings, conditions and recommendations should be made available and included on the QQI web site with the validation report.
- QQI should develop a reporting template for independent panels to comment on the response from the independent provider to the conditions and recommendations made by them. This should also form part of the information provided on the QQI web site. It would inform external stakeholders that conditions of validation have been addressed as well as the any changes made to programmes as a result or recommendations or the reasons for not implementing any recommendation.

8.4 RECOMMENDATIONS IN RELATION TO THE PROGRAMME REVIEW PROCESS AND REVALIDATION OF PROGRAMMES

- Revalidation provides the opportunity to update and modify the original programme. Revalidation benefits from the availability of evidence from the historic provision of the programme (on which the proposed programme is based). The independent programme review report should provide both qualitative and quantitative information on the effectiveness of the programme.
- The Template for the Independent Programme Report should be amended to include details on the statistical data to be reported. A standard format would ensure consistency in reporting. Information should be provided in the Independent Programme Review Report on the findings of the providers' self-evaluation report. This should include data in relation to the collection, analysis and use of relevant information for the effective management of their programmes (ESG 1.7 Information Management). Information should be provided the profile of learners, number of learners entering a programme, learner progression, success and drop-out rates, student satisfaction with their programmes, and graduate employment information (ESG 1.8 Public Information).
- The Template for the Independent Programme Report should be amended to include a section on reporting on:
 - The evaluation of formal links which have been established with industry, business and the wider community in order to maintain the relevance of its programmes, and
 - Evaluating feedback from employers of the programmes' graduates and from the graduates.
- Revalidations following non-standard procedures should be resisted. If they do take place an explanation should be provided as to the reasons a standard procedure was not required.
- QQI should discuss with independent providers how best to improve submissions so as to eliminate recurring weaknesses and to improve documentation.
- The Independent Programme Review Report should provide a list of the programmes for revalidation and a corresponding list of the programmes they are replacing. Information should be provided on changes to programme titles, award standards, MIPLOs, ECTS credits, or to any change related to a condition of initial validation. The impact on current students registered on the current programmes should be discussed with the independent provider and recommendations made in relation to implementation of any proposed changes.
- Some providers may offer a programme in multiple centres. If changes have occurred to where programmes are running since the initial validation these should be recorded in the Independent Programme Review Report and Revalidation Report.
- QQI should ensure that new programme validations are not part of the programme review process. This could

be achieved by QQI specifying the amount of change to a programme that would warrant a complete validation process.

8.5 RECOMMENDATIONS IN RELATION TO EVALUATION PANELS.

- QQI should appoint a secretary to each panel.
- Training should be provided by QQI for all panel members in particular chairpersons and secretaries to ensure compliance with all policies and procedures for initial validations and revalidations of programmes.
- The representations of females on panels needs to be increased as well as the number in the role of chairpersons with a reduction in the number in the position of secretary.
- A broader representation of academics and industry experts from outside the state would help to underpin the quality of the system and its comparability with other educational qualifications systems within the EU. This is especially important at the higher levels of programmes, in particular Master's Degree and Postgraduate Diploma programmes.
- Qualifications and appropriate biographical details of panel members should be included in the independent validation report and programme review report.
- The composition of both initial and revalidation panels for Master's Degree and Postgraduate Diplomas should have a high proportion of members with doctorates.
- An increase in the number of subject matter experts from the university sector should also be considered.
- QQI should require that the chairpersons of initial and revalidation panels and have experience in institutional quality assurance including validation of programmes.
- To enhance the transparency of the evaluation process for validation, programme review and revalidation the chairperson of the evaluation panel should not be from the independent provider sector.

9 Methodology

9.1 INTRODUCTION

This report was commissioned by QQI to provide a thematic analysis of reports related to:

- The approval of new programmes (e.g. academic validation, professional accreditation) of new programmes of higher education; and
- The re-approval following review and modification of previously approved programmes.

The current report constitutes the first part of the review and deals with those programmes offered by independent providers. Independent providers consist of for profit and not-for-profit private colleges offering higher education programmes in Ireland.

9.2 APPROACH

The approach taken was to rely only on the documentary sources and to base findings on a close analysis of those sources. Only data available in the source documents was used in the analysis of programme reports and the programme review reports.

9.3 SOURCES OF DATA

- The source of data for review of the approval of new programmes was the QQI website at <https://qsearch.qqi.ie/WebPart/Search?searchtype=validationreports>. This contains all of the reports of the independent evaluation groups on applications for approval of new programmes.
- Programmatic reviews produce two reports. The first is an independent report on the self-evaluation undertaken by the provider of the suite of programmes under consideration. This was normally referred to in the past as the programmatic review report. Currently, it is referred to as the programme review report. Prior to June 2017, these were published on the QQI website. Since June 2017 they have not been published by QQI but are available from the independent providers.
- The second part of the process is a revalidation report. All revalidation reports are available on the QQI website. *Revalidation is validation by QQI of a programme that has emerged or evolved from a programme that had been previously validated by QQI.*¹⁰

9.4 ANALYSING THE DATA

- The reports were placed in groups based on their type and level of award. All reports were analysed by one of the reviewers. A sample of each group report was further analysed by the second reviewer to ensure consistency of approach. However, in cases where a conflict of interest arose only one of the consultants analysed the reports.

- Details of the evaluations and of the programme reviews were entered into a database. This included programme details, panel details, and any conditions, commendations and recommendations made by panels.
- The programme reports were analysed to determine which criteria were addressed and comments were placed against these on the database. The legacy report template required the independent evaluation panel to answer forty-eight questions and a further four per module. These were also allocated into groups that corresponded to the nine validation criteria.
- The commendations, recommendations and conditions were further categorised into particular aspects or characteristics. These characteristics were also matched against the criteria.
- For each programme and programme review the relevant strengths, weaknesses and opportunities were logged as were the extent to which the criteria were addressed.
- This data allowed the reviewers to gauge the extent to which the criteria were met and the amount of evidence in the reports to support the decisions of the independent evaluation panels.
- The membership of the independent evaluation panel was included on the database. Details of names, functions on the panels and their organisations were included. Qualification details were included when provided in the reports. Where panel member was referred to as Doctor or Professor this was noted. The position of panel members in their organisations was not recorded sufficiently often to allow for useful analysis.
- The database allowed the production of the tables used in this thematic analysis.
- Where the reviewers made a judgement e.g. on the desirable features of reports and of panels, this is indicated in the body of this report.
- The findings were based on the evidence in the reports or occasionally, where absences were apparent, on the lack of evidence.
- Recommendations are the considered views of the authors.

Appendix 1 The 2013 validation criteria

Outline Programme Validation Criteria

The validation criteria are outlined as follows:

- **Standards:** The **minimum intended programme learning outcomes** must be consistent with the relevant awards standards and the National Framework of Qualifications (NFQ) **award-type descriptors**.
- **Access standard:** The **prerequisite learning** for participation in the programme and any other assumptions relating to the programme's **target learners** must be explicit.
- **Learning:** The programme must enable its **target learners** to attain the **minimum intended programme learning outcomes** reliably and efficiently (in terms of learner effort). The concept of minimum intended programme learning outcomes and its relation to teaching, learning and assessment are explained in Assessment and Standards, Revised 2013.

3.2 ELABORATED PROGRAMME VALIDATION CRITERIA

This section elaborates upon the outline validation criteria. It applies to all programmes. The elaboration is aligned with the ESG Standard 2.1 and the corresponding guidelines. Supplementary criteria for programmes with a transnational or collaborative dimension are provided in Policy for Collaborative Programmes, Transnational Programmes and Joint Awards 2012. Additional criteria for the validation of research degree programmes are established in Research Degree Programme Policy and Criteria 2010.

ESG Standard 2.1 states that: Institutions should have formal mechanisms for the approval, periodic review and monitoring of their programmes and awards. The relevant elements of the corresponding guidelines are explored in the following sub-sections which provide explicit criteria for the validation of programmes.

3.2.1 Development and publication of explicit intended learning outcomes (ESG)

To validate a programme it is necessary to know 'where learners start' and 'where they get to'. Therefore, validation is only possible where the following are explicitly specified:

- The target learners' prerequisite learning and any other relevant assumptions about programme participants;
- The minimum intended programme learning outcomes and any other educational objectives of the programme.

Validation requires evidence that the minimum intended programme learning outcomes are consistent with the applicable awards standards and the relevant NFQ (National Framework of Qualifications) award-type descriptor(s) (see Assessment and Standards, Revised 2013.)

Since awards standards are cumulative, the programme's prerequisite learning specification must include the knowledge, skill and competence specified at lower NFQ levels in the applicable awards standards for which the programme does not provide learning opportunities. This is especially important for conversion

programmes at higher levels in the NFQ. The intended learning outcomes of major award programmes should emphasise profound learning outcomes much more than transient learning outcomes. This requirement arises from the nature of the learning outcomes specified by the NFQ and awards standards. Transient learning outcomes are those which are relatively easily acquired and date more quickly. An example of this kind of learning might be skill in the use of a particular software package—one learns how to operate the software without much concern about why the user interface is the way it is or about the underpinning algorithms or data structures. Profound learning takes longer to acquire and dates more slowly if at all—it changes a person significantly. Examples of this include learning to speak a modern language, to play a musical instrument or to be proficient in mathematical methods. This perspective is only an approximation but can be a useful alternative way of thinking about kinds of learning and approaches to learning.

3.2.2 Careful attention to curriculum and programme design and content (ESG)

Validation requires evidence that target learners may achieve the intended programme learning outcomes. The following points elaborate on the specific evidence that should be presented.

1. The programme's content and learning environment must be appropriate to the programme's intended learning outcomes.
 - (a) The programme's staff (assessors, teachers, etc.) as a group must be competent to enable learners to develop (achieve) the intended programme learning outcomes and to assess learners' achievements as required by QQI through Assessment and Standards, 2009;
 - (b) The programme's learning environment (physical, social, and intellectual and recognising that the environment may be virtual) including resources (see the final paragraph of this section) and supports, should be consistent with the intended programme learning outcomes; the places at which, or virtual spaces within which, instruction is to be provided should be specified and suitable;
 - (c) Programme content including reading lists, lecture notes, and any other material used by the programme should be appropriate;
 - (d) The programme should make reasonable accommodation for people with disabilities (including access) (see the various guidelines published by AHEAD www.ahead.ie and Policies, Actions and Procedures for Access, Transfer and Progression for Learners);
 - (e) If the programme is to be accessed by international students, appropriate provisions should be made. See Provision of Education to International Students: Code of Practice and Guidelines for Irish Higher Education Institutions (IHEQN) 2009.
2. The programme should involve authentic learning opportunities to enable the achievement of the intended programme learning outcomes.
 - (a) The programme's strategy for enabling learners to move from the minimum access standard to the minimum intended programme learning outcomes should be explicit, realistic and viable. The programme should be provided in a way that its intended learning outcomes can be reliably and efficiently attained by the learners. It is to be expected that all learners who are judged qualified to access a particular programme should be able to graduate from that programme subject to their making a reasonable effort and complying

with the programme's conditions.

(b) The programme and module assessment strategies (for both formative and summative assessment) should be both clear and appropriate (see Assessment and Standards 2009). They should provide for the verification of the attainment of the intended learning outcomes.

(c) In the case of a modular programme the pool of modules and learning pathway constraints should be explicit and appropriate in light of the intended programme learning outcomes (see Section 7.0). Providers of modular programmes should have effective guidance services for learners on the selection of appropriate learning pathways.

3. The programme should compare well against benchmarks (where appropriate):

(a) The programme (characterised by its curriculum, assessment strategies, learning environment, prerequisite learning and minimum intended learning outcomes) should be comparable with other programmes (at the same level) in similar fields of learning which are designed to prepare graduates for similar roles. Comparisons should also be made with programmes at higher and lower NFQ (or equivalent) levels and the proposed programme's intended learning outcomes should be appropriately situated relative to those of the benchmarking programmes.

The information about the programme as well as its procedures for access, transfer and progression should be consistent with the procedures described in national Policies, Actions and Procedures for Access, Transfer and Progression for Learners

(a) The presentation of the programme should not lead learners to presume that successful completion of the programme will entitle them to enter a particular profession or progress to another programme unless this is actually the case.

(b) If, for example, the programme is designed to meet the educational requirements of a regulated profession or recognised professional body this should be stated explicitly.

(c) The programme's use of ECTS (credit) and provisions for Recognition of Prior Learning should be consistent with the ECTS Users' Guide 2009; Assessment and Standards 2009 and with relevant national policy including:

- i. NQAI's Principles and Operational Guidelines for the Implementation of a National Approach to Credit in Irish Higher Education and Training 2006
- ii. NQAI's Principles and Operational Guidelines for the Recognition of Prior Learning in Further and Higher Education and Training 2005

4. The programme should meet genuine education and training needs

(a) The provider should have evidence that the programme meets the target learners' education and training needs.

(b) The programme as a process and the intended programme learning outcomes should be adequately informed by the views of appropriate stakeholders such as learners, graduates, lecturers, employers, relevant advisory bodies, social and community representatives.

(c) The provider should demonstrate that its programme compares favourably with other similar programmes already in place.

(d) When the provider is either part of the public service or its programme is publicly funded, it should demonstrate that in developing new programmes it has given due regard to relevant public policy.

5. The programme should be viable

(a) The provider should have a viable delivery/business-plan for the programme. This is important for several reasons. For example if the programme assumes a certain cohort size it may not function as planned if either insufficient or excessive numbers are recruited.

(b) The provider should have satisfactory contingency arrangements for adapting to changing circumstances or coping with failure of the programme (having due regard for the interests of learners).

(c) The programme should be consistent with the provider's mission and strategy.

6. All programmes should have procedures for assessment of learners which should be consistent with

Assessment and Standards, Revised 2013

(a) A programme assessment strategy should be provided for the programme as a whole and module assessment strategies for each of its constituent modules.

7. The provider should have, where required, suitable arrangements for protection for enrolled learners (see Section 6.1) in the event that it ceases to provide the programme.

8. The provider should have appropriate quality assurance arrangements for the proposed programme. Any new quality assurance arrangements required should be agreed with QQI. Where QQI is the awarding body such new arrangements should be detailed with the application for validation.

The points above also cover the ESG guideline on the "availability of appropriate learning resources". Learning resources include information resources (such as libraries and online databases); physical resources (such as laboratories, equipment, study areas and studios) and human resources (such as tutors, counsellors, advisors and peers where applicable).

3.2.3 Specific needs of different modes of delivery and types of higher education (ESG)

The specific needs of different modes of delivery and types of higher education should be addressed appropriately by all programmes. This is a cross-cutting criterion. Modes of delivery include, for example, full time, part-time, distance learning, e-learning (including blended learning), experience-based learning, problem-based learning. Types of higher education include for example academic, vocational, professional education and training.

Appendix 2

List of programmatic reviews and the programmes revalidated under the review

13/04/2018			Carlow College, Faculty of Business
PG23970	B.A.	Arts and Humanities	
PG23971	BA	Applied Social Studies in Social Care	
PG23972	B.A.(Hons)	Social, Political and Community Studies	
PG23975	B.A.(Hons)	English and History	
PG23978	B.A.(Hons)	Arts and Humanities	
PG23980	B.A.(Hons)	Applied Social Studies (Professional Social Care)	
PG23981	M.A.	Leadership in Therapeutic Child and Social Care	
22/04/2015			Griffith College, Faculty of Business
PG21957	BA(Hons)	in Business Studies (HRM)	
PG22077	BA(Hons)	in International Hospitality Management	
PG22080	BA(Hons)	in Accounting and Finance	
PG22082	BA	in Marketing	
PG22083	HC in Business		
PGXXXX	BA(Hons)	in Business Studies	
11/05/2015			Irish College of Humanities and Applied Sciences Limited All programmes in college
PG21824	MA	in Cognitive Behaviour Therapy	
PG21825	PGDip in Arts	in Cognitive Behaviour Therapy	
PG21826	MA	in Childhood and Adolescent Studies	
PG21827	PGDip in Arts	in Childhood and Adolescent Studies	
PG21829	PGDip in Arts	in Counselling and Pastoral Care	
PG21830	MA	in Clinical Supervision in Professional Practice	
PG21831	PGDip in Arts	in Clinical Supervision in Professional Practice	
PG21832	MA	in Leadership and Management	
PG21834	PGDip in Arts	in Leadership and Management	
PG21835	PGDip in Arts	in Counselling and Psychotherapy	
PG21835	MA	in Counselling and Psychotherapy	
PG21847	BA(Hons)	in Counselling and Psychotherapy	

PG21848	BA(Hons)	in Counselling and Youth Studies
PG21849	BA(Hons)	in Counselling Studies
PG21849	BA(Hons)	in Counselling and Addiction Studies
PG21850	BA	in Counselling Studies
PG21853	BA	in Counselling and Psychotherapy
PG21855	BA	in Counselling and Addiction Studies
PG21856	BA	in Counselling and Youth Studies
PG22544	MA	in Counselling and Pastoral Care

01/11/2017

Griffith College
Faculty of Business

PG23961	B.A.(Hons)	Fashion Design
PG23962	B.A.	Fashion Design
PG23963	B.A.(Hons)	Interior Architecture

12/07/2016

The American College, Dublin
All Programmes in College

PG23964	B.A.	Interior Design
PG22534	BA(Hons)	in Liberal Arts
PG22535	BA(Hons)	in International Business
PG22536	MB	in International Business

01/12/2017

The Open Training College,
All Programmes in College

PG23916	BA	in Applied Management (Human Services)
PG23918	HC in Arts	in Applied Management

National College of Ireland,
School of Computing

PG21859	HC in Science	in Computer Applications and Support
PG21863	M.Sc.	in Cloud Computing
PG21868	B.Sc.(Hons)	in Business Information Systems
PG21869	HDip in Science	in Web Technologies
PG21870	M.Sc.	in Web Technologies

06/03/2015

Dublin Business School,
School of Arts

PG21886	B.Sc.(Hons)	in Computing
PG21861	BA(Hons)	in Journalism
PG21866	BA(Hons)	in Social Sciences
PG21897	BA(Hons)	in Arts
PG21899	BA	in Journalism and Media
PG21902	BA	in Film and Media

25/10/2015

National College of Ireland
School of Business

PG21903	BA	in Social Studies
PG22720	HC in Business	
PG22721	BA(Hons)	in Business
PG22723	BA(Hons)	in Human Resource Management

31/05/2015

National College of Ireland
School of Business
Post Graduate Programmes

PG22899	BA(Hons)	
Pg21877	M.Sc.	in Marketing Practice
PG21878	MBA	in Management
PG21879	MA	
PG21882	M.Sc.	in Human Resource Management
PG21885	M.Sc.	in International Business
PG21887	PGDip in Business	in Entrepreneurship
PG22538	M.Sc.	in Marketing

13/04/2018

Setanta College

PG21966	B.Sc.	In Strength and Conditioning
PG21963	HC in Science	In Strength and Conditioning

13/04/2018

Independent Colleges

PG21927	MA	
PG21967	BA (Hon)	in Dispute Resolution
PG21828	BA	in Business Studies

09/05/2016

Gaelchultur Teoranta

Gaelchultur

PG22565 PGDip in Arts in Translation

02/04/2015 Children's Therapy Centre

PG21811 MA in Creative Psychotherapy (Humanistic and Integrative Modality)

09/02/2016 IICP Education and Training Limited

PG22386 HC in Arts in Counselling and Psychotherapeutic Studies

PG22380 BA in Integrative Counselling and Psychotherapy

20/05/2015 CCT College Dublin

PG21953 HC in Science in Computing in Information technology

07/04/2017 National College of Ireland

PG20047 HDip in Business in Finance

10/06/2016 National College of Ireland

PG21913 M.Sc. In Finance

Appendix 3 List of programmes validated or refused validation under the initial validation process

Programme Code	Award level	Award Title	Programme Title	Validated	Validation date	Provider
PG19680	7	BB		Validated	Sept 17	CCT College Dublin
PG20047	8	HDip in Business	in Finance	Validated	Sept 17	National College of Ireland
PG20493	7	BB		Validated	Sept 17	Galway Business School
PG21040	8	B.Sc.(Hons)	in Computing	Validated	Sept 17	Dublin Business School
PG21687	6	HC in Science	in Business Computing	Validated	April 2015	National College of Ireland
PG21691	8	B.Sc.(Hons)	in Technology Management	Validated	Sept 15	National College of Ireland
PG21784	6	HC in Arts	in Early childhood Education	Validated	June 2015	National College of Ireland
PG21785	7	BA	in Early Childhood Education	Validated	June 15	National College of Ireland
PG21787	8	BA(Hons)	in Early Childhood Education	Validated	Sept 15	National College of Ireland
PG21796	8	BA(Hons)	in Adult and Workforce Education	Validated	Sept 15	National College of Ireland
PG21802	8	BA(Hons)	in HRM Strategy and Practice	Validated	June 15	National College of Ireland
PG21818	7	BA	in Adult and Workforce Education		June 15	National College of Ireland
PG21819	6	HC in Arts	in Adult & Workplace Development	Validated	June 2015	National College of Ireland
PG21924	7	B.Sc.	In Information Technology	Validated	Sep 15	CCT College Dublin
PG22061	8	BA(Hons)	in Pharmaceutical Business Operations	Validated	Sept 15	Griffith College
PG22062	9	M.Sc.	in Pharmaceutical Business and Technology	Validated	Sept 15	Griffith College
PG22102	7	B.Sc.	in Information Technology	Validated	Sept 15	CCT College Dublin
PG22124	7	B.Eng.	in Industrial Engineering	Validated	Sept 15	Griffith College
PG22517	9	M.Sc.	in FinTech	Validated	Sept 16	National College of Ireland
PG22518	9	M.Sc.	in Cyber Security	Validated	Sept 16	National College of Ireland
PG22523	8	HDip. in Science	in Computing	Validated	Sept 16	National College of Ireland
PG22525	8	HDip. in Science	in Data Analytics	Validated	Sept 16	National College of Ireland
PG22537	8	HDip. in Science	in Web Technologies	Validated	Sept 15	National College of Ireland
PG22538	9	M.Sc.	in Marketing	Validated	Sept 16	National College of Ireland
PG22542	9	M.Sc.	in Non- Profit Management	Validated	Sept 16	National College of Ireland
PG22544	9	MA	in Personal Leadership and Pastoral Care	Validated	Sept 16	National College of Ireland
PG22547	8	HDip. in Science	in Financial Technology	Validated	July 16	National College of Ireland

PG22548	8	B.Sc.(Hons)	in Computing	Validated	July 2016	National College of Ireland
PG22568	8	BA(Hons)	in Computing and Business Information Systems	Refused	Sept 15	IBAT College Dublin
PG22586	8	BA(Hons)	in Computing and Business Information Systems	Refused	Sept 16	IBAT College Dublin
PG22697	8	BB(Hons)	Bachelor of Business (Hons)	Validated	Sept 16	CCT College Dublin
PG22706	8	BA(Hons)	in Business Management	Validated	Sept 17	National College of Ireland
PG22708	8	BB(Hons)	with International Business	Validated	Sept 17	Galway Business School
PG22715	9	M.Sc.	in International Pharmaceutical Business Management		Sept 17	Griffith College
PG22719	8	BA(Hons)	in Accounting and Finance	Validated	July 17	National College of Ireland
PG22770	8	BA(Hons)	in Business	Refused		IBAT College Dublin
PG22781	7	BA	in Montessori Education	Refused	July 2015	Dorset College, Dublin
PG22784	8	BA(Hons)	in Computing	Refused	July 15	Dublin Business School
PG22785	8	HDip in Science	in Computing	Validated	Sept 15	Dublin Business School
PG22787	8	HDip in Science	in Data Analytics	Validated	July 15	Dublin Business School
PG22789	6	HC in Arts		Validated	July 15	Dublin Business School
PG22805	6	HC in Business	in Finance and Business	Refused	Sep. 2017	National College of Ireland
PG22915	8	HDip in Science	in Data Analytics	Refused	June 17	Griffith College
PG22921	9	PGDip in Science	in Medical Device Technology and Business	Validated	Mar 17	Griffith College
PG22948	6	HC in Business		Validated	Feb 2017	Galway Business School
PG22983	8	B.A.(Hons)	IN Audio and Music Technology	Validated	Sep. 2017	Griffith College
PG23071	9	M.Sc.	in Medical Device Technology and Business	Refused	Sept 17	Griffith College
PG23171	9	M.Sc.	in Data Analytics	Validated	Sept 17	Dublin Business School
PG23175	8	HDip. in Science	in Financial Technology	Validated	Dec. 2017	Dublin Business School
PG23195	8	B.Sc.(Hons)	in Nursing in General Nursing	Validated	Sept 17	Hibernia College
PG23217	8	HDip. in Science	in Computing	Validated	July 2017	CCT College Dublin
PG23343	7	BA	in Animation	Validated	Sept 17	Griffith College
PG23383	6	HC	in International Financial Services	Validated	July 2017	National College of Ireland
PG23425	8	HDip in Business	in Finance	Validated	Sept 17	National College of Ireland
PG23577	8	HDip in Science	in Financial Technology	Validated	Dec 17	Dublin Business School

Appendix 4 Detailed consideration of the validation criteria under the 2013 validation policy.

Indicative examples are provided of selected comments from evaluation reports relating to each of the validation criterion.

Legacy criterion 1. The programme's content and learning environment must be appropriate to the programme's intended learning

Criteria 1 attracted considerable attention. Twenty three of the forty-three programmes evaluated were found to be deficient in this area and required the conditions to be imposed. A further ten had recommendations attached.

Besides the general issues of access (See criterion 5 below) learners with disabilities or facilities for international learners did not require conditions or suggest opportunities for improvement.

Staffing was an issue in three of the six programmes that were refused validation. Where conditions on staffing were imposed it was to ensuring that particular skills gaps were dealt with. Where this arose it was in specialised programmes at levels 8 and 9. In validated programmes at levels 6 and 7 staffing did not arise as an issue

The minimum intended programme learning outcomes were a recurring issue. Level 9 and level 8 programmes came in for particular attention. MIPOs were seen to be deficient in that their level was not appropriate or they were required to be formally aligned to the Award Standards.

“Programme and module learning outcomes should be reviewed to ensure that the taxonomy used consistently represents level 9 on the National Framework of Qualifications”

Level 9 Condition PG22518

“Programme learning outcomes should be separately listed in the documentation. An exercise should be undertaken to ensure that the taxonomy used for these outcomes is consistently appropriate to the level of the programme and their articulation allows the module to be appropriately assessed.”

Module learning outcomes need to be written using a suitable taxonomy (i.e. the verbs employed must be appropriate to their level)

Level 8 Conditions PG22548

Opportunities for improvement involved requests that content be reviewed or that new topics be included in the programme.

Learning resources were an opportunity for improvement. The updating of reading lists and the provision of particular online publications were suggestions. This applies equally to all levels of programmes.

Legacy criterion 2. The programme should involve authentic learning opportunities to enable the achievement of the intended programme learning outcomes.

This criteria shared a broad area with criteria 1 above. The delivery time for modules came in for the imposition of condition in two cases PG20492 and PG22697:

“GBS were asked to review the contact hours for the proposed Part-time provision to ensure a proportional increase in contact time such that these students are not disadvantaged with respect to Full-time students on the same programme, in light of the proposed increase in on-line delivery in both streams.”

Level 7 Condition PG20493

The structure of the curriculum was also a concern. In one programme that was refused validation the panel identified weaknesses in the curriculum:

“There is insufficient integration and cohesion of modules in the programme design, delivery and assessment to support the proposed award”

Level 8 Reason for refusal PG586

At level 9 there were concerns that the academic focus of a programme might be lost:

“The programme content should be reviewed to ensure that academic priorities take precedence over industry led priorities and a narrower focus should be taken. The creation of a graduate profile may assist in creating that focus”

Level 9 Condition PG22518

Legacy criterion 3. The programme should compare well against benchmarks

This criteria was not dealt with in any detail. For validated programmes it was not mentioned or very brief comments were made about it. Panels may have interpreted this requirement to have been satisfied when the programmes outcomes were aligned to the standards.

Legacy criterion 4. The information about the programme as well as its procedures for access, transfer and progression should be consistent with the procedures described in National Policies, Actions and Procedures for Access, Transfer and Progression for Learners

Transfer and progression are rarely mentioned in the reports. Where access arises as a condition it is typically in level 9 specialist programmes:

“ Given the nature of this programme, the mathematical capacity of the learner needs to be ascertained and clarified prior to undertaking its study; this could be made clearer in the Programme Outline (see Section 5) and in terms of Access Criteria (see Section 6.5.1).”

Level 8 Condition PG22547

“The entry requirements to be updated to clearly state that a 2nd class honours degree in a cognate discipline (e.g. science, engineering, quality) is required for entry to the programme.”

Level 9 Condition PG22062

Information about the programme did not prompt any recommendations or conditions.

Legacy criterion 5. The programme should meet genuine education and training needs

This criterion was not met in any of the programmes that were refused validation.

Panels were not convinced that the programmes were well founded:

“The level of stakeholder engagement as evidenced in the programme submission was not satisfactory.”

“The level of support for the programme as evidenced in the programme submission was not sufficient to justify the programme.”

Level 8 Reason for Refusal PG22770

This criterion attracted a number of recommendations. These recommendations suggested increased engagement with local industry and clearer articulation of the core competencies of graduates:

“A clearer and stronger rationale should be presented for this programme proposal, including firmer evidence of the views of local industry/enterprise as well as referencing relevant sources such as the Expert Group on Future Skills Needs.”

Level 6 Recommendation PG22948

“A clearer and stronger rationale should be presented for this programme proposal, including firmer evidence of the views of local industry/enterprise as well as referencing relevant sources such as the Expert Group on Future Skills Needs.”

Level 7 Recommendation PG22093

Legacy criterion 6. The programme should be viable

The viability of programmes was not raised to any extent, except in those programme that were refused validation.

Legacy criterion 7. All programmes should have procedures for assessment of learners which should be consistent with Assessment and Standards, Revised 2013

This criterion attracted considerable attention with conditions being attached and opportunities for improvement being suggested.

Legacy criterion 8. The provider should have, where required, suitable arrangements for protection for enrolled learners (see Section 6.1) in the event that it ceases to provide the programme

The PEL arrangements were deemed to be acceptable in all cases except two where the validations were refused.

Legacy criterion 9. The provider should have appropriate quality assurance arrangements for the proposed programme

The quality assurance requirements of the programmes went unremarked in the main. Panels did not look for additional quality assurance procedures over and above those that were agreed previously with QQI.

Appendix 5 Detailed consideration of the validation criteria under the current 2017 validation policy.

Indicative examples are provided of selected comments from evaluation reports relating to each of the validation criterion.

Current criterion 1. Provider is eligible to deliver this program in this discipline at this level.

There was little comment on this criterion as evaluation panels are only formed for eligible providers. One issue raised as to whether the statutory requirements in relation to nursing programmes had been fulfilled.

“However, the programme has been designed to prepare learners to be eligible for registration with the Nursing and Midwifery Board of Ireland (NMBI). NMBI must approve the programme before it can be offered to learners. But it must be validated by QQI before submission to NMBI for approval.”

Level 8 Condition PG23195

Current criterion 2. Objectives and outcomes stated and clear and consistent with Award Sought

This area received a fuller range of discussion than appeared under the legacy format. Two programme teams received commendations for their work in aligning outcomes to the appropriate award standards. Where conditions were imposed they were to align outcomes with the programme standards. This criterion when not met was also a reason for refusal of validation

“Overall the proposed programme does not meet criterion 2.

Key concerns with regard to the clarity and consistency of the programme objectives and outcomes with the award being sought relate to

- *a lack of fit between programme title and programme content and minimum intended learning outcomes*
- *weakness of the articulated programme learning outcomes representing a single coherent learning goal*
- *weaknesses in the articulated programme learning outcomes being aligned to the aim of the programme*
- *weaknesses in the articulated programme learning outcomes consistently expressing Level 8 Science standard.”*

Level 8 reason for refusal PG22915

Current criterion 3. Programme concept, implementation strategy, and its interpretation of QQI awards standards are well informed and soundly based.

The format allows for the decision of the panel to be justified. This improves the report and gives evidence to support decisions:

“The panel is satisfied that the programme development team articulated, both in the written submission document and during the panel visit, a satisfactory rationale for providing this programme. This included findings from recent international reports, Government strategy documents, output from the European Financial Forum (2015) Skills needs reports in the Financial Services and input from the Irish FinTech Sector. All of these pointed to a rapidly growing industry that aims at providing financial services by making use of software and modern technology. Enterprise Ireland’s response to the DES Skills Statement of Strategy 2016 – 2018 highlighted the need for ‘conversion programme’s for graduates, and those already in employment, in areas of high skill demand – such as FinTech.”

Level 8 Comment PG22577

It also allowed for apparent contradictions between the commentary in the body of the report and the formal recommendations and conditions in the summary of the report. In PG23171 criterion 3 is marked as partially met but all the sub-criteria are indicated as having been met.

In some cases the problem is stated. The comment related to criteria 3 in PG22921 outlines clearly the weakness detected by the panel:

partially. [sic] The development of the programme involved some industry but this seemed quite limited to 1 or 2 companies and consultation with the Irish Medtech [sic] Association would provide a broader base across the industry. The industry involvement did not reflect the breadth of the industry in Ireland. The argument is made in terms of programmes in Ireland. There are no international comparators. Given the global nature of the industry in particular with regard to regulation the proposed programme should be benchmarked internationally for any future validation applications.

Level 9 Comment PG22921

This weakness is addressed in the conditions for validation:

“The programme development team interact with the Irish Medtech Association as the relevant industry body for the medical devices industry. This would ensure that the whole industry is both aware of the programme and can contribute to its development and provide employment opportunities for graduates.”

Level 9 Condition PG22921

This condition not only contains the proposed remedy for the weakness but also the benefits that would accrue.

Current criterion 4. Access, transfer and progression arrangements are in satisfactory.

This criteria attracted more conditions than any other. Panels were concerned with the conditions for access to advanced programmes, level 9 programmes and level 8 Higher Diploma programmes. In one case the area occasioned extensive comment and two separate conditions:

“ The panel notes that the programme has been developed in a new and rapidly developing area and that it is intended for re-skilling or up-skilling. As a consequence, DBS does not intend to grant advanced entry or exemptions. The panel supports this policy. Where learners are admitted with a non-cognate degree, at Level 8, and with 1 to 2 years’ work experience, the panel recommends as a special condition of validation that it is stated that the work experience must be in a cognate area. This must be included in the revised documentation and in the information made available to learners.”

And

“The panel recommends as a special condition of validation that learner supports made available to full-time applicants/students are made equally available to part-time applicants/students on this programme”
Level 8 PG23577.

The quality of information provided to prospective learners was also addressed. Gender balance in information was also an issue:

“Include profiles of female learners as well as male in the programme proposal and promotional materials.”
Level 9 Condition PG22921

Current criterion 5. The programmes written curriculum is well structured is fit for purpose.

Curricular issues came to the fore under this heading. Panels required that the curricula be modified in order that the outcomes be achieved:

“The curriculum for the programme be reviewed to ensure the flow of modules from one stage to the next stage (e.g. streams) serves to ensure the development of the student’s knowledge, skills and competences in discipline areas”
Level 8 Condition PG23766

Poor curricular design was also a reason for a refusal

“The proposed programme does not meet this criterion. The panel remained unconvinced that there was a well-structured and fit-for-purpose curriculum. The purpose of the programme to prepare persons coming from Level 8 non-cognate primary degrees for careers in data analytics is not possible based on the volume of learning required and the time provided in which that learning would occur. The intended learning outcomes are not adequately fit for purpose given the title of the programme.”
Level 8 Reason for refusal PG229015

At level 9 there was concern that learners would not be sufficiently prepared for the dissertation and conditions were imposed to correct this on two programmes.

“The panel was concerned about the lack of Research Methods in the first two semesters. The development of academic skills required at Level 9 was a concern.”
Level 9 Reason for refusal PG23071

Current criterion 6. There are sufficient qualified and capable programme staff available to implement the programme as planned.

This attracted positive comments from panels:

“There are sufficient qualified and capable programme staff available to implement the programme as planned. The expert panel commends the quality of the staff associated with this programme, as evident from the CVs presented in Section 7 of the Programme Submission as well as Section 6.9 of the SER and the meetings with programme staff”.

“The support for staff training and development provided by the College, which was also obvious from the panel meetings, was further deemed commendable”

Level 8 Commendation PG23425

When conditions were applied sometimes they are not very informative.

“all sub-criteria are met with the exception of one which is partially met. The College could prepare additional information to ensure that there is clear evidence that all aspects of the sub-criteria here are addressed. The documentation provided almost fulfilled this criterion,”

Level 8 Comment PG22915

Current criterion 7. There are sufficient physical resources to implement the programme as planned.

Programme planning over five years did not appear as an issue for recommendations or of conditions. Panels focused on the physical learning resources for specialist programmes. The availability of laboratories was a concern. IN PG23195 panels required details of a skills laboratory to be provided.

“Before the programme is validated QQI must be furnished with (and approve) the detailed minimum specifications for the proposed Skills Laboratory and details of the proposed Skills Laboratory venue(s).”

Level 8Ccondition PG23195

Current criterion 8. The learning environment is consistent with the needs of the programme learners.

Panels commented on learning environment and deemed them to be adequate. The focus of the comments on this criterion were on the physical and social environment. There was no distinction made between the intellectual environment required for different levels of programmes.

Current criterion 9. There are sound teaching and learning strategies.

This criteria attracted commendations, conditions and opportunities for improvement. In some cases recommendations were included in the body of the report but did not appear in the list for formal recommendations and the conclusion of the reports. In the case below the criteria was indicated as partially fulfilled:

“Partially. The learning strategies are appropriate and will support this industry focused programme. The learning opportunities are authentic and well supervised. The college should indicate on the modules’ descriptors the actual time the learner will have with their supervisor on a one-to-one basis, as distinct from group meetings, particularly where students are meeting mentors or academic supervisors.”

Level 6 Comment PG23383

In one case the condition was a major re-organisation of the first stage of the programmes:

“Restructure stage 1 of the programme by removing the 20 ECTS credit modules (i.e. Animation Studio 1 and Animation Studio 2) and replacing them with smaller units of learning.”

Level 7 Condition PG23343

Current criterion 10. There are sound assessment strategies. Consistent with QQI Policy, interfaces with agreed QA procedures, sample assessment instruments have been provided, sound moderation procedures in place. formative assessment procedures.

Assessments and assessment strategy attracted the highest number of opportunities for improvement. As indicated in the Section 1.2.2 Panels were interested in reducing over assessment and varying the types of assessment

“... However, the team was recommended to vary the types of assessment and to integrate assessment within a semester”

Level 7 recommendation 23343

“Volume of assessment on the proposed programme should be reviewed and an assessment schedule for each stage be prepared.”

Level 8 Recommendation PG23765

Current criterion 11. Learners on the programme are well informed, guided and cared for.

Panels were usually dealt with this criteria with little comment however in an apprentice programme the issues of complaints and disciplinary procedures was considered.

“Complaint, disciplinary and Academic appeal procedures should clearly separate issues to be dealt with by the employer alone and those to be dealt with by the programme board or the college. These procedures should be outlined in the MOA between the college and the employer and should acknowledge the overall responsibility of the college as coordinating provider for academic quality control.”

Level 6 Condition PG23383

Current criterion 12. The Programme is well managed.

Issues arose with QA in situations where providers were collaborating with other institutions in the provision of programmes.

“Griffith would also apply to Pulse and the previous collaboration between the two institutions showed this.”

Level 7 Condition PG23343

“Partially. The QA procedures follow the topic specific guidelines for apprenticeship programmes and complement the Colleges approved QA procedures. These procedures include governance arrangements, staff and consortium issues as well as periodic revisions of the programme. Some of these are subject to recommendations and conditions of the evaluation panel.”

Level 6 Condition PG23383

Appendix 6 Analysis required under the conditions of the tender

Extract from the tender document for the review

4 Analysis Requirements

The analysis should focus on the following:

1. Recurring strengths, weaknesses and opportunities for improvement of programmes communicated by the relevant reports. The kinds of programmes of interest are:
Master's Degree programmes;
Honours Bachelor's Degree programmes (three and four year);
Ordinary Bachelor's Degree programmes;
Higher Certificate programmes;
2. (a) and (b) are offered by all the main providers. (c) and (d) are uncommon in the universities. Research degree programmes are excluded from this analysis (though they may be addressed incidentally by some relevant reports that will need to be analysed).
3. Recurring strengths, and weaknesses and opportunities for improvement of the relevant reports in terms of their clarity, the usefulness of the information they provide stakeholders about programmes and the evidential supports cited in reports in support of conclusions. Stakeholders include those who require, either directly or indirectly, objective information about the quality of programmes: for example

the academic committees (i.e. the Programme and Awards Executive Committee in the case of the Contracting Authority) responsible for approving programmes (e.g. information about whether the programme meets the approval/accreditation process requirements and criteria);

the programme development teams (e.g. information that will help enhance the programme);

prospective students (e.g. information that will help inform student choice);

prospective employers of graduates (e.g. information that will help inform expectations concerning graduates) and

Government and its agencies (e.g. concerning the quality of the programmes).

4. Not all these groups typically read (re-) approval/accreditation reports. Reports are normally addressed directly to (a) and (b). Nevertheless, the reports are expected to be a source of objective evaluation that supports information about the programmes that might be provided to these groups.

5. Analysis of the characteristics of expert panels and their diversity (generally reports are the outcomes of evaluations/reviews by expert panels). Identification of any recurring strengths, and weaknesses and opportunities for improvement of the validation panels and the information provided about them. Within each arm of the study (as defined below) evaluation of the consistency of panel characteristics and consideration of the diversity.
6. Recurring strengths, and weaknesses and opportunities for improvement of programme re- approval/ accreditation processes (this should look at the programme review process (through the reports) as well as the process for formal approval/accreditation of the modified programme (sometimes called re-accreditation/re-approval, e.g. revalidation).

5. Cross cutting analysis

- a. Recurring strengths, and weaknesses and opportunities for improvement of the reports in terms of their use of evidence to back up assertions. Identification of examples of exemplary practice in the effective use of evidence.
 - b. Consistency of reports.
 - c. Comparability of reports.
 - d. In all the above, determine whether factors such as academic discipline, programme duration (e.g. three-year vs. four-year bachelor programmes) and such like are associated with specific strengths or weaknesses.
6. Identification of opportunities for improvement.

For the first stage of this study (the stage that addresses outcomes of the Contracting Authority's approval processes and related matters) there are additional objectives:

7. The consistency of the reports (e.g. style, application of the criteria) from one programme to another.
8. The consistency of the reports with the Contracting Authority's published validation policy and particularly the 12 validation criteria.
9. Some analysis may be limited by the quantity of available data.

For the professional accreditation arm of this study (part of the Second Stage) we are interested in comparisons between the professional accreditation reports and the corresponding academic accreditation reports. We would like to understand how academic approval and professional accreditation compare. We expect the approval/ accreditation/review reports to be internalised by the researchers and the analysis to be on the meaning of the reports rather than on statistical analyses of the text (e.g. how many times such a word is used)

Appendix 7 Glossary of some terms used in this report

This appendix is largely taken from QQI's Assessment and Standards and reproduced in "the Green Paper on Assessment of learners and learning, (For Consultation)" 2018. Those entries in italics are drawn from that source or from other QQI documents.

<i>Academic Committee</i>	<i>A top-level deliberative committee with overall responsibility for the governance of academic affairs.</i>
<i>Assessment</i>	<i>Learner assessment (specifically assessment of learning) means inference (e.g. judgement or estimation or evaluation) of a learner's knowledge, skill or competence by comparison with a standard based on appropriate evidence. Self-assessment is included in this. Assessment has many purposes.</i>
<i>Assessment instrument</i>	<i>Any assessment task and criteria, along with procedures for its conduct, together with the explicit grading scheme (i.e. grading rubrics)</i>
<i>Award</i>	<i>An award which is conferred, granted or given by an awarding body and which records that a learner has acquired a standard of knowledge, skill or competence.</i>
<i>Award Standards</i>	<i>Award standards are the expected prior learning required to qualify for an award. Award Standards and award type descriptors are structured and presented under the three main strands: Knowledge, Know-how and Skill and Competence; currently these are further divided in the NFQ into eight to eleven sub-strands (depending on the award-type). The National Framework of Qualifications (NFQ) defines these terms.</i> <i>Awards standards describe the required learning for awards at specified levels. In the NFQ in specified of learning. Higher education awards standards are (ideally) concise texts that normally cover broad fields of learning. However, professional qualifications-specific award standards may also be determined where appropriate.</i>
<i>Commendations</i>	<i>Commendations are made in validation, revalidation and programmatic review reports when panels detect a particular strength. In this review commendations were synonymous with strengths.</i>
<i>Conditions</i>	<i>See weakness(es) below</i>
<i>Current validation reports and criteria</i>	<i>This is the term used to describe the reports published under the 2016 validation policy¹¹ This policy required that twelve criteria be met in order that the programme be validated. Accompanying the new validation policy was a Programme Validation Manual and report template This manual facilitates the evaluation panel in determining whether to recommend to QQI validation of the programme or not. The template is to help ensure a consistent approach is adopted by evaluation panels and that the twelve criteria be addressed directly. This new format was a substantial change to the legacy format and is referred to as the current validation report format</i>
<i>External examiner</i>	<i>An external examiner is an independent expert who is a member of the broader community of practice within the programme's field of learning and whose accomplishments attest to this/her likelihood of having the authority necessary to fulfil the responsibilities of the role.</i>
<i>Independent providers</i>	<i>The Irish higher education system is conventionally divided into three distinct sectors depending on the level of autonomy of the institutions and their relationship to QQI. The independent providers are those institutions that provide programmes for which QQI is the awarding body. These institutions are typically for profit or not for profit self-funding colleges</i>
<i>Intended learning outcomes</i>	<i>The intended learning outcomes represent the educational goals. They describe the learning outcomes that the teacher intends that learner will attain as a result of teaching and learning activities (see minimum intended programme learning outcomes below).</i>

<i>Learning environment</i>	<i>Learning environments are diverse. Teachers and other learners are part of a learner's learning environment as are workplace colleagues if applicable. Learning environments have both physical and social structures. Learners interact with the learning environment; the environment responds to the learner, and the learner to the environment.</i>
<i>Learning outcomes</i>	<i>A learner's knowledge, skill and competence change as a result of learning. The learner changes.</i>
<i>Legacy validation reports and criteria</i>	This term is used in this review to describe the reports published under the validation policy published in 2013 All programmes reports published before February 2017 and some published between February 2017 and November 2017 used the template that followed the legacy format. Evidence was required under nine criteria. (See Appendix 1). These were the criteria that are referred to in this document as the legacy validation criteria. A template for validation reports was used during this period. This was structured as a series of forty- eight questions and an additional four questions per module. The questions were not formulated to address the criteria directly. This format is referred to in the report as the legacy validation report format. This was accompanied by introductory material.
<i>Level</i>	<p>This term is used in this report to indicate the level of a programme on the National Framework of Qualification (NFQ).</p> <p>The NFQ is a ten level framework. Higher education awards are those at levels 6 to 10. The major awards at these levels are as follows</p> <p>Level 6: Higher Certificate</p> <p>Level 7: Ordinary Bachelor's Degree</p> <p>Level 8: Honours Bachelor's Degree and Higher Diploma (HDip)</p> <p>Level 9: Master Degree and Post Graduate Diploma(PGDip)</p> <p>Level 10: Ph.D., and Professional Doctorates. (Not covered in this review)</p>
<i>Minimum intended programme learning outcomes (MIPLOs)</i>	<i>The minimum achievement (in terms of knowledge, skill, and competence) that the learner is certified to have attained if he/she successfully completes a particular programme (i.e. passes all the required assessments). These must always be specific by the provider. A learner who completes a validated programme is eligible for the relevant award if he or she has demonstrated, through assessment (including by recognition of prior learning), attainment of the relevant minimum intended programme learning outcomes. MIPLOs are not normally assessed directly but their achievement is implied by the cumulative achievement of the MIMLOs.</i>
<i>Minimum intended modules learning outcomes (MIMLOs)</i>	Minimum intended modules learning outcomes are written for all modules. They reflect in their language the NFQ level of the module.
<i>Module</i>	<p>A programme of education and training of small volume. It is designed to be capable of being integrated with other modules into larger programmes. A module can be shared by different programmes.</p> <p>In describing the educational formation provided by an independent module, it is sufficient to specify (i) the learning outcomes.ii) the assumed prior learning.</p>
<i>Modules descriptors</i>	Modules descriptors include the title of the modules, the credit volume and level of the modules, the minimum intended modules learning outcomes, indicative content, assessment instruments and schedule and learning resources
<i>Named awards</i>	<p><i>Within an award type (e.g. honours bachelor's degree) the particular awards that are named with respect to a field of learning (e.g. honours bachelor of science degree)</i></p> <p><i>Standards for named awards often include reference to knowledge, skill and competence within a specific field of learning (the standards may be expressed by the MIPLOs approved at validation where a generic QQI award standard is used)</i></p>

NFQ	The National Framework of Qualifications is a ten level framework. Higher education awards are those at levels 6 to 10. See entry on Level above
Opportunities for improvement	See recommendations below
Panels	Panel is a term used to describe the independent expert groups that evaluate programme for initial validation and those that are involved in programmatic reviews and revalidations.
Programme	<p>A programme of education and training refers to any process by which learners may acquire knowledge, skill or competence. It included courses of study or instruction, apprenticeships, training and employment.</p> <p>A major award programme will normally require some kind of ‘cohesion generating ‘process which integrates constituent modules so that the minimum intended programme learning outcomes are supported. The cohesion generating process should establish the epistemological and cultural identity of the programme.</p>
Programmatic review	A programmatic review refers to the review of a suite of programmes that have been previously validated. The programmes reviewed are normally within discipline or within a faculty of a provider. Programmatic reviews consist of an evaluation of a self-evaluation report presented by the provider and the revalidation of the programmes. Normally programmes are reviewed within five years of initial validation.
Provider	<i>A ‘provider of a programme of education and training ‘ is a person who or a body which, providers, organises or procures a programme of education.</i>
Recommendations	Recommendations are made by panels in validation, revalidation and programmatic review reports. They are suggestions to improve the programme. They are not required to be implemented by the provider. They are synonymous with ‘ opportunities for improvement in this report.
Reports	Reports are those produced by independent evaluation panels. Validation reports are produced following an initial validation event. Programmatic review reports are produced following a programmatic review accompanied by a revalidation report for each programme revalidated during the review.
Review	This document is referred to as a review. Its purpose is to review and analyse the validation, revalidation and programmatic review reports.
Validation	<p><i>Validation is a regulatory process that determines whether or not a particular QQI award can be offered in respect of provider’s programme of education and training.</i></p> <p><i>A programme of education and training is validated where QQI confirms under section 45 of the 2012 Act, “ that the provider of the programme has satisfied it that an enrolled learner of that provider who completes that who completes that programme will acquire, and where appropriate be able to demonstrate, the necessary knowledge, skill or competence to justify and award of QQI being offered in respect of that programme”</i></p>
Weakness(es)	A weakness is an aspect of a programme that requires amendment to ensure that the programme meets the criteria for validation. A condition or conditions are imposed to ensure that the programme can be validated. Conditions are taken to indicate weakness

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