



**Ollscoil na hÉireann**  
National University of Ireland

**Response of**  
**the National University of Ireland (NUI)**  
**to**  
**the Department of Education and Science**  
**on**  
**Amalgamation of Qualifications and Quality Assurance**  
**Bodies Consultation Paper on Implementation**

**(DES Consultation Paper May 2009)**

## **INTRODUCTION**

The National University of Ireland welcomes the opportunity to respond to the Consultation Paper on the *Amalgamation of Qualifications and Quality Assurance Bodies* (May 2009). It is noted that the purpose of the amalgamation is to seek to ensure a coherent approach to qualifications and quality assurance through the amalgamation of the National Qualifications Authority of Ireland (NQAI), Higher Education and Training Awards Council (HETAC) and Further Education and Training Awards Council (FETAC), the three bodies established in 2001 under the Qualifications (Education and Training) Act, 1999 and the incorporation in the new agency of the functions currently undertaken by the Irish Universities Quality Board (IUQB).

As a university established under the Irish Universities Act 1908, and which since 1910 has been exercising powers under its Charter to grant higher education institutions the status of Recognised Colleges of the university and to award degrees and other qualifications in those colleges, subject to appropriate quality standards being achieved, NUI is pleased to contribute to the public consultation process on the amalgamation of the three agencies. In particular, NUI wishes to respond to the specific proposals in the Consultation Paper that certain of the statutory functions it has exercised successfully since 1910 would be transferred to the new body and that later 'it might .... be appropriate to consider the other functions .... and whether it is sustainable to have a distinct organisation to undertake them'.

## **GENERAL RESPONSE TO THE DOCUMENT**

NUI acknowledges the valuable work done by HETAC, FETAC and NQAI since their establishment. HETAC, like its predecessor NCEA, has been important as a quality assurance and awards agency, and in particular, has made a significant contribution in enabling private colleges to gain access to national awards and providing public reassurance in relation to the standards in those colleges. The establishment of the National Framework of Qualifications represents a considerable achievement in bringing greater clarity to the complex range of qualifications developed over time across the educational spectrum. NUI has co-operated fully in the NFQ, has sought the inclusion of its qualifications in the framework (all but a very small number of its qualifications now being included in the NFQ), has promoted the framework with its Recognised Colleges and is engaged in continuing dialogue with NQAI towards the further development of the framework through the placement of legacy awards.

NUI is fully committed to the principles of access, transfer and progression. In response to developments in further and higher education, NUI Matriculation Regulations have been revised to facilitate increased access to the NUI institutions and make provision for non-traditional pathways to entry, such as FETAC Level 5 and Level 6 qualifications and Approved Access/Foundation programmes. In 1999, NUI published an NUI Senate Policy Document *An NUI Qualifications Framework for Lifelong Learning Access Progression and Transfer*. Expressing support for the concept of a National Qualifications Framework, the document expressed commitment to 'the achievement of an integrated framework of qualifications within NUI, with transparent paths of



progression from the lowest to the highest levels of awards' and made provision for the award of NUI Certificates and Diplomas attracting credits towards degree awards. NUI encourages and facilitates its Recognised Colleges in the implementation of access, transfer and progression procedures, consistent with the maintenance of the standard and quality of its awards.

### **Concept of a single agency**

NUI agrees that the amalgamation of a number of separate agencies in a single agency may over time lead to efficiencies, and in particular may generate savings in administrative support services. However, it is noted that the model of a single agency covering the entire spectrum from basic literacy awards to doctoral degrees has not found favour elsewhere and that, in particular, across the countries represented in the European Association for Higher Education Quality Assurance, the majority of the member agencies are concerned solely with higher education. NUI suggests that there is a certain risk involved in bringing together a higher education awards body and a further education awards body. While the desire to achieve seamless progression between the two sectors is appreciated, this could create a serious reputational risk to the qualifications on the higher education side. NUI suggests that a change in the national awarding body may not be helpful to the higher education institutions which up to now have received HETAC awards, in seeking to enhance the standing of their awards, nationally and internationally and that there may also be a threat to the international standing of awards made by the universities. Similarly it is suggested that the combination in a single state agency of responsibility, on the one hand, for external quality assurance in the universities and higher education institutions making their own awards, and on the other, for awards in further education and in a range of higher education colleges, may not be ideal.

### **Educational vision**

While it is appreciated that the Consultation Paper has been drafted with a view to achieving a number of core objects, and streamlining the activities of a number of agencies, NUI nevertheless feels compelled to comment on the rather limited view of education and specifically of higher education communicated by the document. Higher education, like the other education sectors, is defined in terms of the delivery of a quality service to all learners, and universities are considered merely as service providers. References to the mission of higher education are confined to utilitarian and functionalist objectives. While there are references to active citizenship, human capital and national competitiveness, and to 'world class qualifications and quality assurance systems' (p.9), the essential nature and purposes of higher education, and specifically of university education, do not feature prominently in the document.

The Senate considers it essential that the formation of a new body with the potential to be an important one for higher education in Ireland and with a remit in relation to external assurance be accompanied by an articulation of a broad vision for higher education, not merely one based on economic imperatives. NUI made a similar point in its submission to the Higher Education Strategy Group, in relation to planning the future for higher



education. In that submission, NUI referred to the following short statement of the essential nature and purposes of higher education contained in the HEA Strategic Plan 2008-2010 (2008, p.8):

Higher education is, first and foremost, concerned with advancing and pursuing knowledge. This is achieved through teaching, by the transmission of existing knowledge and, through research, by the discovery of new knowledge. The connection between teaching and research is an integral and fundamental one. The values of a higher education institution centre on the quest for knowledge in a culture of scholarship and learning and an ethos of academic integrity and freedom. Through the fulfilment of their many roles, our higher education institutions play a key part in developing individual students with a spirit of enquiry, and in ways that help them to realise their full potential, both in careers and as citizens in a democratic society.

The NUI submission referred also to the priority status accorded to higher education in the National Development Plan (NDP) 2007 – 2013 “The future capacity and quality of Ireland’s higher education system is vital to our social, cultural and economic well-being”. (2007, p. 202).

The submission went on to say that:

As a force in Irish society, the higher education sector is extending its reach, influencing an increasing proportion of the population as the participation rate (now hovering around 60%) grows. It is developing its capacity to reach an even larger segment of Irish society, through initiatives to increase access and successful participation by disadvantaged students and through lifelong learning initiatives. The influence of higher education will be manifested not just in the levels of skills that graduates will contribute to the workforce, but also in the ideas, attitudes and mentality that will characterise their personal and social lives. The decisions made now in relation to higher education, and in particular to universities, and their implementation in coming years will have a profound impact on the nature of Irish society, on the kind of democracy we will live in, on our institutions, our social structures and values, our understanding of ourselves and our position in the world, our culture and our prosperity. They have the capacity to affect our standing in the world and the way in which we are perceived from outside. They will also have a bearing on the ways in which Irish society can respond to powerful external influences, such as global media and communications technologies and in general to the phenomenon of globalisation.

The Senate considers it worth repeating these comments here. It will be essential for the new quality assurance body to have a full understanding of the separate missions of the different sectors within the Irish educational system, and for these to be articulated from the outset and reflected ultimately in the structure and functioning of the new body and in its relationships with universities. The comment on p. 21 of the Consultation Paper that ‘this is not to say that the provision of a single unified legislative model will entail a “one-size fits all” approach to quality assurance in the various sectors’ is not reassuring given the relatively impoverished vision of education communicated by the document.

There is a need for a clear unambiguous statement recognising the different missions of institutions at various levels in the education system and in particular, given the binary structure of the higher education sector, of the different missions within higher education. There needs to be a firm



commitment that these differences will be reflected in the arrangements to be made for external quality review.

### **Learner-centred education**

The Consultation Paper lists (p.8) as a core object of amalgamation ‘focus on the centrality of the learner and on the impact of the system on the learner and the individual citizen’, noting (p.9) that ‘the Qualifications (Education and Training) Act, 1999 was framed with the intention of putting the needs of the learner at the heart of formal and non-formal education and training provision’. NUI fully accepts that in an age of mass higher education, with larger-scale institutions and greater diversity in the student body, there is a need for greater focus on the learner than at a time when the student population was relatively homogeneous. However, NUI suggests that the emphasis on the learner may have become disproportionate and that there is a need also for due acknowledgement of the centrality of the teacher in higher education. Apart from the many references to providers, the document has little to say about the role of the university teacher, the very considerable specialist expertise of professors and lecturers gained through deep immersion in their subjects and extensive research, the centrality of this body of knowledge in higher education and its importance to high quality higher education. While the document recognises that the new organisation ‘will be dealing with an enormous diversity of provision’, NUI could find no mention of teachers or teaching, or professor, or academic. As an organisation which as part of its quality assurance responsibilities is called on to recognise teachers in its Recognised Colleges, declaring them to be ‘recognised teachers of the University’, NUI finds the omission of any reference to the contribution to quality higher education of university teachers surprising and a serious underestimation of the role of a profession which ultimately has more responsibility for the quality of higher education than any quality assurance system or organisation.

Similarly given the priority given to research in Government policy, NUI is also surprised that there is little acknowledgement in the Consultation Paper of the extensive research role of the universities. The inextricable link between university research and teaching is reflected in the structuring of internal quality assurance processes in the universities and needs also to inform new arrangements for external quality review.

### **Size of the new agency**

NUI finds it surprising that a Board of six members should be considered adequate. In a board of six where (p. 33) ‘it will also be important to include some members with wider business/management community and learner perspectives, as well as international expertise’ it seems there will be little space for an Irish academic voice or for any significant university input. While it is appreciated that a stakeholder nomination model would be unworkable, it is suggested that for a body with such a broad remit, a somewhat larger body of expertise at Board level would be advisable. If the new agency is to have a meaningful relationship with the universities in relation to external quality assurance, it would seem essential for it to include some relevant expertise at Board level.



## **RESPONSE SPECIFICALLY IN RELATION TO NATIONAL UNIVERSITY OF IRELAND: SECTION 4.4**

### **4.4.1 NUI Role**

NUI considers that the overview of its functions contained in the Consultation Paper provides a narrow, restricted interpretation of the role and operation of the organisation and misses the core purpose of NUI as the centre of the federal university. As a statutory body, the Senate is unhappy with the manner in which its statutory role and the activities of NUI have been portrayed in the document.

For example, statutorily the Senate is responsible for ‘the appointment of extern examiners and the determination of their functions, with the concurrence of the Constituent Universities’. In the DES document this is described (p. 29) as ‘Agreement to the appointment of extern examiners’. In fulfilling the statutory function in respect of extern examiners, NUI - by agreement with the Constituent Universities - undertakes extensive work in relation to the extern examining system, as a contribution to the Constituent Universities and as a means of enabling them to collaborate in the interests of continuing to maintain comparably high standards. NUI undertakes similar work in relation to the Recognised Colleges. The work done in this area makes a meaningful contribution to quality assurance and enhancement in the NUI institutions.

The document overlooks the governance responsibilities of the Senate, upheld by the Supreme Court in 2008, in respect of academic staff of the Constituent Universities appointed prior to the enactment of the 1997 legislation.

In relation to Recognised Colleges, the functions of NUI, as set out in the statutes of the University, go much further than ‘agreement to quality assurance arrangements of the Recognised Colleges and review of the effectiveness of the quality assurance procedures of the Recognised Colleges’. The process of declaring an institution ‘a Recognised College of the National University of Ireland’ involves full-scale review of the institution concerned, in accordance with the terms of NUI Statutes. In relation to the NUI Recognised Colleges, the NUI Recognised Colleges Committee has functions similar to those exercised by NUI in relation to the then NUI Constituent Colleges, prior to the 1997 Act. In exercising a quality assurance role, NUI can call on the significant collective expertise of the Constituent Universities and has substantial experience in disciplines which have not up to now come within the remit of HETAC, viz. Medical and Health Sciences (other than Nursing). NUI has over one hundred years experience as a course validation and awarding body. The approval of degree and other programmes in the NUI Recognised Colleges has been influenced by the standards of comparable programmes in the NUI Constituent Universities, where such exist; and where they do not, as in the case of art and design and theology, by standards pertaining in degree programmes in other universities. NUI is aware of the national standards published by HETAC in 2005 in relation to its awards and is satisfied that where those standards relate to disciplines taught in the NUI Recognised Colleges (Business, Art and Design and Nursing being the relevant ones), they are met in full.



In listing the other functions of NUI, the document refers to 'printing parchments for the making of awards'. We believe this to be a useful service provided by NUI to the Constituent Universities and also to the Recognised Colleges. As a centrally provided service, it results in savings for each of the individual institutions. However, in terms of the overall mission of the organisation, it is a relatively minor function.

Of even less significance in the range of functions and activities of NUI is the provision of support to NUI Convocation. In addition to maintaining the Convocation register, this consists largely of making a room available for meetings of Convocation and administering Convocation Elections (held every five years for membership of the Senate and four times in the lifetime of the University for elections of Chancellor).

Separate from the Convocation Elections, NUI also, under the Seanad Electoral (University Members) Act, 1937, as amended, continues to maintain the register of electors and administer elections to Seanad Éireann in the NUI Constituency. This is a major year-round operational function. Through their funding of NUI, the NUI institutions have subsidised this operation on behalf of the State, which provides funding for the NUI Seanad Éireann constituency only at election time.

The primary function of NUI is to be the central forum for the National University of Ireland and accordingly

- to provide the secretariat for the Senate which is the representative body for all four Constituent Universities and also the Recognised Colleges, and for the committees of the Senate
- to be the centre of the federal university in the capital city, its facilities available to the Constituent Universities as a resource
- to support and promote the federal university
- to continue to uphold its tradition and values, its name and the internationally recognised and accredited degrees and other qualifications bearing its name
- to support and promote the language and history of Ireland, scholarship and research in Celtic Studies (common to all four Constituent Universities) and Irish cultural heritage.

Without such a central focus the National University of Ireland would effectively cease to exist as a federal university. Without a central organisation, it would consist of four separate universities linked by history and shared legal names which would become meaningless without a focal point to unite them.

While the main purpose of the Consultation Paper is to propose new arrangements for external quality assurance in further and higher education, and while the Budget announcement in November 2008 referred merely to 'discussions with the National University of Ireland around the possibility of including some of the related functions of the NUI in the new organisation' the DES document goes far beyond this. In essence the document must be seen



as ultimately proposing the dismantling of a federal university which has been a significant national institution and setting aside over one hundred years of history, tradition and a shared culture, together with a shared brand developed over the history of the University and which enjoys high international status.

Such a proposal would seem to run counter to the policies pursued both nationally and at European level of promoting inter-university collaboration. NUI provides a vehicle through which the NUI Constituent Universities can readily come together for collaborative purposes. NUI suggests that rather than proposing to dismantle a structure which has been effective for over a hundred years, DES rather should envisage expanding the NUI federal university and providing the opportunity for other Irish universities and higher education institutions to form links with the National University of Ireland.

NUI points out that as an awarding body, established statutorily and under Charter, it is responsible for the administration of examinations and the awarding of the highest degrees of the University, viz. higher doctorate degrees on published work. The Constituent Universities have agreed that the administration of these degrees which are open to NUI graduates and members of staff of the NUI institutions, should remain a central function, given the smallness of the Irish academic community in individual subjects and the need for transparency and objectivity.

In describing NUI awards as 'prizes and bursaries', the document is also rather dismissive of a broad range of awards from undergraduate to post-doctoral level, highly prestigious, many going back to the establishment of the University and some even further to the Royal University of Ireland. These awards are administered annually by NUI with the expertise and support of academics from across NUI, in addition to extern examiners drawn from within and outside of Ireland. The awards, partly funded by NUI resources and partly from bequests, are intended to promote research and scholarship, to identify, reward and publicly acknowledge the most distinguished academic achievements across the NUI institutions and across the range of disciplines in the Humanities and the Sciences. In so doing they promote the National University of Ireland as an international centre of excellence.

The NUI awards competitions may be seen as a contribution to quality enhancement and to promoting continuing high standards in the Constituent Universities and the Recognised Colleges. For example, the impact on scholars and scholarship of one of the major NUI awards is apparent in *A Century of Scholarship Travelling Students of the National University of Ireland* (NUI, 2008).

NUI wishes also to draw attention to other services provided by the organisation to the Constituent Universities, such as support for Postgraduate Applications Centre (PAC) the NUI company which provides a central processing service for a wide range of postgraduate programmes, both within and outside NUI (including the Postgraduate Diploma in Education).

In addition, NUI provides highly sought-after documentation services to NUI graduates, being responsible for issuing replacement parchments and translations, and for certifying and authenticating copies of documents. These



services, useful to graduates and employers, are provided as a central service on the basis of the extensive graduate records and records of matriculation held by NUI.

NUI draws attention to its cultural contribution, as reflected for example in its publication since 1939 of *Éigse A Journal of Irish Studies*, (and previously of *Lia Fáil*) or its support for academic publishing in the Constituent Universities and Recognised Colleges.

NUI refers to its role in co-ordinating the consultation role of the Constituent Universities in relation to the Leaving Certificate examinations through the appointment of representatives to liaise with the State Examinations Commission in connection with individual subjects.

NUI points to the importance of its archival services. NUI is the repository in its archives of the records of the National University of Ireland since its foundation as also of the records of the Royal University of Ireland founded in 1879 and provides a service in making those archives available to scholars and researchers.

Finally, NUI draws attention to its role in promoting NUI qualifications internationally, securing their continuing recognition for academic and professional purposes and in general, serving the interests of NUI graduates internationally. NUI notes the proposal (p.26) that the new agency will have a role in promoting the recognition of Irish qualifications abroad; however, NUI suggests that this will not supplant the role of each individual institution in promoting its own qualifications.

#### **4.4.3 NUI and Qualifications Ireland – Related Functions**

The second paragraph of the section headed 'NUI and Qualifications Ireland – Related Functions' communicates a similarly sterile and process-driven vision of the proposed new organisation and its role: 'the new organisation and a range of diverse further and higher education and training providers will have a quality assurance relationship which involves the implementation of institutional quality assurance procedures by these providers and the review (of) the effectiveness of quality assurance procedures by Qualifications Ireland'.

The document states that the proposed new body will 'review the effectiveness of the quality assurance procedures of the Constituent Universities....' before arguing in a complete *non sequitur* that 'A key issue arising accordingly is whether the new organisation should have the award-making and the quality assurance role of the NUI in relation to their Recognised Colleges'. The Senate points out that under the 1997 Act 'A recognised college is a recognised college of the National University of Ireland' rather than of the NUI Constituent Universities and would therefore contend that the award-making and quality assurance role of the NUI merits consideration on its own terms rather than as an adjunct to the review of the quality assurance procedures of the Constituent Universities.

The document notes correctly that the NUI had intended that the IUQB would take on the role of reviewing the effectiveness of its quality assurance procedures before going on to say that 'This would mean that, at a minimum,



QI would take on this role'. NUI would be quite happy to be subject to external review of its framework for quality in Recognised Colleges by the new agency, on the same basis as the Constituent Universities will be subject to external review by the body. In response to the recent IUQB *Handbook for the Institutional Review of Irish Universities* (2009), NUI has written to IUQB to advise that once the Framework for Quality in Recognised Colleges is complete, NUI intends to invite IUQB to apply the IRIU process to NUI.

The document suggests that the new body 'could make awards for the Recognised Colleges'. While clearly it would be open to the current Recognised Colleges to seek awards from the new body, and while NUI would encourage DES to seek the views of its Recognised Colleges, NUI believes that the loss of its awards and their replacement by awards of a previously unknown body could have serious implications for those colleges, nationally and also internationally. NUI is confident, based on experience, that degrees and other qualifications of the National University of Ireland have a high value internationally and considers that this should not lightly be set aside, particularly at a time when the internationalisation of Irish higher education is a priority. NUI acknowledges that it will be a matter for the Recognised Colleges to decide whether or not they wish to leave NUI and seek to replace NUI degrees with qualifications of the new body. However, NUI points out that a number of the Recognised Colleges previously elected to forego the qualifications of HETAC in favour of longer-established and better known awards of the National University of Ireland.

The document notes that 'An alternative (to qualifications from the new body) open to any of the Recognised Colleges would be to have a direct relationship with any university and it is understood that some of the existing Recognised Colleges are already exploring options such as these'. NUI is aware that Shannon College of Hotel Management is in the process of disentangling itself from ownership by the Dublin Airport Authority (having previously been owned by Aer Rianta) and being integrated within NUI Galway and that similarly, Milltown Institute, as part of its own development strategy is currently in discussion with Trinity College. NUI suggests that DES should consult the other Recognised Colleges in relation to their future intentions.

From its own consultations, NUI has established that the preferred option of the NUI Recognised Colleges would be to remain part of NUI.

NUI notes the comment in the Consultation Paper that 'There is a lack of clarity in existing legislation on the quality assurance relationships in the recognised and linked colleges of universities'. NUI questions the rationale for the proposal in the document for treating Recognised Colleges and Linked Colleges differently. NUI believes that both sets of institutions should be treated equally. In NUI's view, it makes no more sense to propose to remove NUI's degree-awarding powers in respect of its Recognised Colleges than it would to propose ending the capacity of other universities to make awards in Linked Colleges.

NUI points out that it has an honourable record as the awarding body in Recognised Colleges; that its role is a developmental one as is clear from the fact that three former Recognised Colleges have developed into fully-fledged



universities – NUI Maynooth, DCU and UL – and also from the academic progress made by the current Recognised Colleges, nationally and internationally; and that the effectiveness of its approach to quality assurance in those colleges is evident *inter alia* in continuing high stakeholder confidence in those institutions, high academic quality in their graduates and high levels of responsiveness to the needs of their individual sectors. In its Recognised Colleges Committee, NUI provides a central forum where the Recognised Colleges, which in general are niche institutions, come together and share ideas and experiences with one another as also with representatives of the four NUI Constituent Universities.

The document questions the continuing statutory role of NUI in setting matriculation requirements and ‘whether it is appropriate for the NUI role to continue or whether this role should be subsumed by the institutions involved in the implementation of the procedures set by Qualifications Ireland’. NUI points out that statutorily the basic NUI matriculation requirements are set by Senate and that the Constituent Universities have decided, as part of their identity as a federal university, to maintain common basic matriculation requirements, notably in relation to the Irish language. The administration of these requirements is undertaken centrally by NUI, as a service to the Constituent Universities and Recognised Colleges. On the basis of the Constituent Universities continuing to have common basic matriculation requirements, any change in the current arrangement would need to be considered in terms of its possible implications for the Irish language, currently a matriculation requirement only in NUI universities and Recognised Colleges.

NUI points to the support provided to NQAI in its role as the Irish ENIC-NARIC through the project undertaken collaboratively by the Admissions Officers of the four NUI Constituent Universities in reviewing the range of European and other international school-leaving qualifications for the purposes of matriculation and points.

Finally, the chapter finishes by repeating the same partial listing of NUI activities, before going on to expose the fiction of the consultative process in the following terms: ‘Following consideration of the possible future of these functions’, (clearly anticipating no future other than their removal), ‘it might then be appropriate to consider the other functions which are not closely related and whether it is sustainable to have a distinct organisation to undertake them’.

NUI suggests that in overlooking the central role and purpose of the organisation, DES has either completely misinterpreted the mission of the organisation or plans its abolition.

The chapter on NUI presents a distorted and reductionist view of the role and functions of an organisation which has served Ireland educationally, economically, socially and culturally for over a hundred years, a small lean organisation (estimated net cost in 2009 €1.33m, and receiving an annual State grant of €12,697) which continues to make an important contribution, has a unique body of expertise and merits a continuing place in the structure of higher education. NUI is fully prepared to participate in new arrangements



for quality assurance under the new body but demands that its role as the central forum of the National University of Ireland, as a degree-awarding body *inter alia* in respect of its Recognised Colleges, as an organisation providing services to the Constituent Universities and Recognised Colleges, to students, graduates and the general public, be left intact.

NUI is not aware that the views of the Constituent Universities on the future of the federation have been sought and suggests that these will be vital in the consideration of the future of NUI. On the basis of consultations undertaken by the Chancellor with Presidents, the Senate is satisfied that the constituent universities are in favour of the continuation of the federal university.

NUI notes (p. 8) that among its stated objects, the new body will 'seek to facilitate a diversity of providers of education and training'. NUI considers that the proposals in relation to NUI which effectively would mean less diversity in the higher education landscape are incompatible with this object.

NUI has noted the commitment expressed in the Paper to respecting diversity, echoing the strong statement in the *Standards and Guidelines for Quality Assurance in the European Higher Education Area* (2009, p.11) that 'a single monolithic approach to quality, standards and quality assurance in higher education (is) inappropriate'. We have referred earlier to the mention in the Consultation Paper (p. 21) that a 'one size fits all' approach to quality assurance is not intended. In NUI's view, the proposals in the document relating to NUI, while presented under the guise of coherence, very much reflect a 'one size fits all' approach to the framework for quality assurance and awards in higher education.

Noting (p.2) that a stakeholder consultation period of May 2009 to June 2009 is set out in the document, NUI points out that it had first sight of the document on 20 May 2009 leaving very little time for the preparation of a considered response on proposals with a potentially profound impact on the organisation.



## **SUMMARY**

In summary, NUI appreciates the rationale for merging the NQAI, HETAC and FETAC though it has pointed to the potential risk involved for higher education institutions in sharing awards with the further education sector. We are critical of the absence of an articulated vision for higher education in the document. We believe that such a vision should be an essential element in the establishment of the new body and that the values of teaching and learning should be emphasised, in addition to student-centred values. NUI considers that a Board of six members would have insufficient expertise for its role.

NUI rejects the proposals contained in the Consultation Paper which are designed to achieve the removal of powers contained in the NUI Charter of 1908 and preserved in the Universities Act 1997. NUI considers that such a change would be highly damaging and could not be advanced on the basis of cost-saving. The objective advanced in the Consultation Paper of achieving coherence in quality assurance arrangements could be secured through the new agency being given responsibility for external review of NUI quality assurance in respect of Recognised Colleges.

NUI finds that the document completely overlooks its central function and purpose as the focus of the National University of Ireland and undervalues its role and activities. In NUI's view, the veiled threat to the continuing existence of the organisation contained at the end of Section 4.4, which effectively is a threat to the continuance of the National University of Ireland as a federal university, with a brand enjoying high recognition and standing nationally and internationally, is potentially more damaging to Irish higher education than the proposed change to its awarding role. The international reputation of the NUI degrees of Bachelor, Master and Doctor has been built up over the century of the existence of the University: this should not lightly be set aside.

The Senate considers that in relation to NUI, the content and tone of the proposals contained in the Consultation Paper go far beyond what was contained in the Budgetary Statement of November 2008. At a time when the Government has appointed a Strategy Group to consider the future for Irish higher education, the Senate believes that apart from the proposed merging of agencies, the changes suggested by DES are premature.



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