

HECA supports the intentions outlined in the Validation Policy and agrees with the criteria used to determine suitability for validation. The intention to raise the standard of validation submissions and, by extension, programme developments which are fit for purpose, is something HECA supports.

Primarily it is noted that the expectations and requirements outlined within the manual are significantly greater than what has been accepted to date and that which is required in institutions with Delegated Authority from QQI. It is appreciated that providers with Delegated Authority, like Designated Awarding Bodies, are not subject to the QQI process. However, the concern is that a provider looking for validation for a programme from QQI is subject to overly excessive requirements in comparison. It can be assumed that the practice of the IoTs and the DABs satisfy the requirements of the European Standards and Guidelines and they appear to enable a validation panel to make an informed decision on whether a programme proposal is fit for validation. It is therefore of concern that such a significantly greater degree of documentation and information is required from those who seek validation from QQI. Some private and independent providers seek to secure programme validation through an IoT rather than directly with QQI. HECA feels there should be equity of standard and equivalence of process for all providers and that currently those providers who choose to seek validation from QQI are being disadvantaged as a result of doing so.

Our general concerns relate to the requirement to produce output documents, such as a programme specific programme handbook (rather than an example) in advance, the likelihood for continual repetition within the document between different sections and between the programme document and other documents, and the scale of documentation and detail required particularly in the context of validation applications for minor and special purpose awards and awards that share extensive commonality. Further concerns related to the absence of what we believe to be a vital transitional period as well as the lack of information sessions and exemplars. Furthermore, it is a worry that the excessive documentation will either deter potential panel members participating or will result in only superficial review of the documentation.

Specific concerns were raised relating to the mapping document and the critical self-evaluation. HECA members recognise what is being attempted by the implementation of these and welcome the intention. However, the concern is the likelihood for further repetition and the production of unwieldy documents. Again, information sessions and exemplars may assist in this area.

The validation process timeline is a further area of concern for providers. We recognise and appreciate the efforts of QQI to progress validation applications as quickly as possible, but the validation application process of 25 weeks is, in our view, excessive and impedes our ability to be responsive and competitive. There are particular stages of the year where the extensive gap between meetings of the PAEC means a longer timeframe for validation is more likely.

There is a real concern that the imposition of unsustainable requirements is going to negatively impact the sector, with the increased likelihood of providers seeking out alternative awarding bodies, including from other jurisdictions. HECA, along with QQI and its predecessors, has strived to establish the reputation of the private and independent higher education sector as one that is quality and standards

focused. We are concerned of the reputational risk arising from the unintended consequences of the validation demands.

We acknowledge the changed focus of QQI in assuming the role of regulator but nonetheless feel this shift should not be at the expense of the QQI relationship with providers in the capacity of being providers' academic awarding body. Recent efforts to provide increased support to providers in recognition of the challenges presented by the implementation of the validation policy are greatly appreciated and HECA would welcome such supports continuing as part of the relationship with providers going forward.

Since our meeting the HECA Teaching and Learning Committee has also voiced concerns about the impact of the revised template and guidelines on good teaching and learning design. The HECA Teaching & Learning Committee plays a lead role in the continuous improvement of teaching, learning and assessment practices in HECA colleges and the on-going professional development of our teachers. In this capacity the Committee is concerned that aspects of the current QQI approach to programme review and validation act to inhibit rather than enhance the quality of educational outcomes. The following points have been communicated from the Committee to be taken under consideration in any constructive critical review of the procedures.

- Learning is a process not a product. Much of the programme documentation and panel procedures seem to miss this point. The single most significant influence on the student learning experience is the quality of teaching. Teachers who are empowered, trusted, well trained and adequately resourced will consistently deliver high quality learning outcomes.
- The current systems constrain the advancement of a continuous cycle of improvement once a programme or module has been validated. Teachers/lecturers are often reluctant to critically question assessment practices, outcome statements or teaching strategies as they are reluctant to modify what is already in place.
- The 'fear of change' mind set is all the more dysfunctional when you consider that programme approval is often up to four years in advance of the running of particular modules (as is the case in Year 4 of a new degree). Even when obvious changes are required the 'approved product' is too difficult to modify.
- Learning professionals such as college teachers, and indeed those of us in teaching and learning functions, need to be empowered to make evidence and scholarship based judgements on pedagogic design. As it stands the learning design process is stifled by onerous, repetitive and often un-necessary rules, documentation and time-delays.
- The quality of teaching, learning and assessment in higher education in our sector is in danger of falling behind due to the heavily constrained processes that undermine critical thinking and scholarly reflection on practice; these are the very essence of the academic quality that we seek to uphold.

The HECA Teaching and Learning Committee would welcome an opportunity to contribute to any review and to elaborate on more effective mechanisms to ensure quality and accountability in teaching, learning and assessment practices across the sector.

HECA respectfully requests QOI takes this feedback into consideration and acts in a timely manner to address these very genuine concerns and the significant negative impact the revised requirements are having on providers and higher education.