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## The Emergence of Quality Assurance in Irish Higher Education: a Review of European and National Policy and Description of the Dublin Institute of Technology Practice

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## **The emergence of Quality Assurance in Irish Higher Education A review of European and national policy and description of the Dublin Institute of Technology practice**

Aidan Kenny

### **Abstract**

This is the second in a series of three papers which explore and describe ‘quality’ as a tool in the Irish Higher Education sector. This paper reviews macro, meso and micro issues relating to quality assurance within the context of European Union Education Ministers’ communiqués and in Irish national policy. A micro perspective is then undertaken pertaining to the Dublin Institute of Technology describing how quality assurance systems and procedures emerged in the Institute. It also includes the Institute’s response to provisions made in the 1999 Qualifications (Education and Training) Act with reference to the necessity of carrying out quality reviews. The European University Association philosophy as the agency chosen to carry out one such review is outlined. The broad purpose of this paper, and of the previous related paper, is to provide a policy map from macro European to micro institutional level which will aid postgraduate students and those interested in quality assurance in higher education to identify important developments and pursue further research. The inquiry approach utilised is interpretive, descriptions are detailed and meaning is constructed: this is a subjective process firmly located in the broad field of qualitative research. The paper offers a general review of policy documentation together with some critical commentary and personal reflections.

The commercialising and marketizing of education also reflect the cost cutting pressures of globalisation. Schools are being ‘re-engineered’ in much the same way as business corporations.

(Giddens 2004: 510)

In this paper, the second of two in the Summer 2006 edition of Level 3, I outline some of the major milestones in the emergence of quality assurance in the Irish Higher Education (HE) sector. Contextual information is provided by reviewing, European policy (macro), national legislation (meso), and Institute (micro) documents. Analysis is confined to documentary evidence in terms of communiqués from the European Union, Irish Government legislation, acts, national agreements and procedures adopted by the Dublin Institute of Technology (DIT). Reference is also made to the European Network for Quality Assurance (ENQA), the European University Association (EUA), Professor Coolahan’s report ‘Higher Education in Ireland’ (2004), the Conference of the Heads of Irish Universities’ ‘A Framework for Quality in Irish Universities’ (2003), Skilbeck’s report, ‘The Universities Challenged’(2001) and DIT documents. I also reflect on my own experience as an academic participant within the HE sector and as an insider observer during the recent DIT institute quality review carried out by the European University Association (EUA).

**Quality Assurance: European context, higher education sector**

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European higher education institutions, for their part, have accepted the challenge and taken up a main role in constructing the European area of higher education, also in the wake of the fundamental principles laid down in the Bologna Magna Charta Universitatum of 1988. This is of the highest importance, given that Universities' independence and autonomy ensure that higher education and research systems continuously adapt to changing needs, society's demands and advances in scientific knowledge.

(Bologna Declaration 1999)

The Bologna Declaration of 1999 set in motion a policy agenda that has the potential to reshape the HE environment throughout the European Union. It was the successor of the so-called Sorbonne Joint Declaration, 'On Harmonisation of the Architecture of the European Higher Education System', by the four Ministers in charge for France, Germany, Italy and the United Kingdom signed in Sorbonne, Paris on 25 May 1998. The emphasis of this declaration was to establish a vision of an open HE system throughout Europe. Attention was drawn to developing a 'continent' focus on HE domains such as 'intellectual, cultural, social and technical'. The main tenets of this declaration were; access to diverse programmes, enhanced language and IT proficiencies, recognition of first-cycle awards and mobility of students within the Eurozone.

This vision of an open HE sector in Europe was clarified in the Bologna Declaration (1999). The European Ministers of Education set out an agreed statement of intent for a 'Europe of Knowledge'. The main emphasis of this declaration is to establish a 'European Higher Education Area' which is underpinned by 'compatibility and comparability'. The overarching vision is much broader, encompassing the consolidation of a European citizenship in both social and cultural domains and the enhancement of the intellectual and scientific knowledge-base capacity of the citizenship. In order to face the competitive challenges posed by internationalisation in the twenty-first century, the declaration sets out six clear objectives to be met within this decade:

1. easily readable and comparable degrees;
2. two cycles (undergraduate and postgraduate);
3. a system of credit transfer (ECTS);
4. mobility of students (trans-European);
5. European co-operation in Quality Assurance;
6. European dimension in HE education.

The six objectives were further developed in Prague 2001, 'Towards the European Higher Education Area', *Communiqué of the Meeting of European Ministers in Charge of Higher Education in Prague on 19 May 2001*. The fifth objective, co-operation in quality assurance, which is the main contextual focus in this paper, was identified as having a 'vital role' in the HE sector.

Ministers called upon the universities and other higher education institutions, national agencies and the European Network of Quality Assurance in Higher Education (ENQA), in cooperation with corresponding bodies from countries which are not members of ENQA, to collaborate in establishing a common framework of reference and to disseminate best practice.

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(Prague Communiqué 2001)

With this statement the Ministers are clearly giving ENQA legitimacy and a strategic position as a prominent European quality assurance agency. The implicit suggestion is that ENQA should play a central role in quality assurance cooperation, the development of a common framework and benchmarking best practice.

In ‘Realising the European Higher Education Area’, *Communiqué of the Conference of Ministers Responsible for Higher Education in Berlin on 19 September 2003*. The ministers reinforced ENQA’s position by stating:

At the European level, Ministers call upon ENQA through its members, in cooperation with the EUA, EURASHE and ESIB, to develop an agreed set of standards, procedures and guidelines on quality assurance, to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies, and to report back through the Follow-up Group to Ministers in 2005. Due account will be taken of the expertise of other quality assurance associations and networks.

(Berlin Communiqué 2003)

The Ministers communiqué also introduced the notion of ‘accountability’ for the first time, claiming that this responsibility rested with the individual institute within the constructs of national policy. They also indicated the following targets for national quality assurance systems to reach by 2005:

- A definition of the responsibilities of the bodies and institutions involved.
- Evaluation of programmes or institutions, including internal assessment, external review, participation of students and the publication of results.
- A system of accreditation, certification or comparable procedures.
- International participation, cooperation and networking.

For the purpose of this short paper the examination of the above-mentioned documents can only be considered as a review; the full rigour of documentation analysis techniques was not applied. However, I consider that there is sufficient ground to suggest that these four declarations depict an incremental movement; from a vision of an open European HE sector (1998), to a mission with objectives for a European knowledge-based citizenship (1999), to a strategy to meet the objectives for a higher education area (2001), to an operationalising phase to meet targets set (2003). Quality assurance as a tool was introduced in the Bologna Declaration, and the ENQA was gradually positioned as a central agency by both the Prague and Berlin communiqués. Subsequent to the present discourse of this paper an area lacking in research is the positioning of the ‘social model’ within these declarations. Wickham’s (2002) paper presents a macro perspective of the European social model entitled ‘The End of the European Social Model: Before it Began? Available from the Employment Research Centre (ERC) Trinity College.

**Irish context HE sector**

Duff *et al.* (2000) claim that since the 1960s the Republic of Ireland HE sector has gone through quantitative change as a result of internationalisation and globalisation. Indicators of change are given as: ‘massification’ of education and expansion in

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participation by students – in 1965 student enrolments were 19,000 compared to the expected student enrolments for 2005 of 120,000 (2000: 4); increase in State expenditure – £5 million in 1965 compared to £430 million in 1995 (2000: 3); the establishment of Regional Technical Colleges (RTCs) now termed Institutes of Technology (IoTs) and the DIT. Drivers of this change have been: economic development and growth; membership of the EC; opening of international and now global markets; increased competition and the strategy of gaining a competitive advantage; the IT revolution; political, economic, social and cultural change.

Ireland's economic growth has been unprecedented in both the European and international contexts. Sociological theories of development could be applied (the author's conjecture); in the 1960s Ireland was at Rostow's (1960) Transitional Stage 2 or, as in Wallerstein's (1959) World Systems Theory a 'periphery' of the 'core'. However, in 2006 Ireland could claim to be nearing Stage 5 of Rostow's model, 'Mass consumption', and in alignment with a 'core', the European Union. Even Daniel Bell's (1973) thesis on 'post-industrialisation and modernity' could be applicable to the current Irish context (features include: increase in services sector, professionalisation of the workforce, increase in leisure activity, conspicuous consumption). Schweiger and Wickham's research paper (2005) damping some of the above optimistic propositions, provides substantive evidence to suggest that Ireland is a 'dependent economy', over-reliant on foreign multi-national companies. While many academics claim that the fuel for this growth has its genesis in the HE sector and the 'knowledge capital' it has generated, in terms of Becker's 'Human capital' theory (1993), however, which is in line with the approach adopted under the EU Lisbon agenda and national political rhetoric on education, Schweiger and Wickham (2005: 42–43) provide evidence that the state investment in education (in terms of GDP per capita) dropped in 2002 to 17.3 per cent which is below the European average of 25.1 per cent.

Duff *et al.* (2000) caution academia that expansion and increased financial investment in the HE sector comes with the growing proviso of both responsibility and accountability, and that the mechanism for monitoring these is Quality Assurance. Coolahan (2004: 141–146) claims that over the last decade Irish universities, the DIT and IoTs have been taking a keen interest in the quality assurance paradigm. Most of the Irish HE sector developed internal quality assurance procedures during the mid 1990s of their own accord. Statutory legislation was to follow with the introduction of both the Universities Act 1997,<sup>1</sup> and the Qualifications (Education and Training) Act 1999,<sup>2</sup>

Notwithstanding the statutory requirements of the HE sector to introduce quality assurance procedures, the Qualification (Education and Training) Act 1999, of which Coolahan claims TEATAS 'laid the groundwork' (2004: 52), established an authority to oversee, monitor and evaluate this work.<sup>3</sup> The Act makes provision for universities in consultation with the NQAI, to review the effectiveness of their quality assurance procedures on a cyclical basis (section 42 (5)) within five years from the commencement of the Act and thereafter no less than every three years and no more than every seven. This requirement also applies to the DIT (section 39 (4)).

Silbeck reports in 'The University Challenged' that the trans-European rising trend of quality assurance and quality audits in the HE sector as policy items on national

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agendas during the 1990s (2001: 96-110). He claims that exploratory work relating to quality assurance was commissioned by the Heads of Irish Universities in 1994. This led to the establishment of the Irish Universities Quality Steering Committee (IUQSC) in 1995. However in 1999 the HEA, utilising funds from a European Pilot Project, launched a forum called The Conference of Heads of Irish Universities (CHIU). In 2003 after widespread collaboration and consultation the CHIU produced a document entitled 'A Framework for Quality in Irish Universities: Meeting the Challenge of Change'. The document outlines the creation of the Irish Universities Quality Board (IUQB). The primary remit of this board is to:

- increase inter-university co-operation on quality assurance matters;
  - represent the Irish universities at both national and international levels;
  - articulate the resource implications of quality improvement recommendations.
- (Summarised from CHIU 2003: 21)

CHIU in their framework document make explicit connections between European evolving policy – particularly the Bologna Declaration – European quality assurance agencies, ENQA and the EUA, and new found Irish national policies, the Universities Act 1997 and the Qualifications (Education and Training) Act 1999. The framework document provides guidelines which encapsulate self-assessment, external peer review, publishing of the peer review report and a commitment to act upon the findings of the report. The EUA evaluation methodology is cited as a primary step in the critical self- assessment process (CHIU 2003: 32). In 2004–2005 the EUA was commissioned to carry out quality reviews of the seven Irish universities. Copies of their final reports are available at [http://www.iuqb.ie/IUQB\\_EUA\\_Review\\_Reports.html](http://www.iuqb.ie/IUQB_EUA_Review_Reports.html).

From studying the above-mentioned documents I suggest that there is considerable evidence to claim there is convergence at both national and European policy levels in relation to the implementation of quality assurance and quality review mechanisms for the HE sector. This claim is partially supported by some of the qualitative findings from Crozier *et al.* (2005). I suggest the convergence is not restricted to the HE sector. It is part of a broad front quality assurance movement that is being embedded into other economic and social spheres. One example of this is 'The Social Partnership Agreement 2003–2005' which provides for a commitment by the social partners to 'Delivering Quality Public Services', section 24, Modernisation of the Education Sector, (Sustaining Process 2003: 111–117) sets out the measures for the HEA, IoTs and VECs. In relation to IoTs section 24.7 Quality Assurance parties are committed to 'provide for student evaluation of course delivery' (113). And in section 24.35 'Partnership' all parties agree to 'facilitating and improving quality and flexibility in delivery of services' (117). Current developments in this area are the piloting of Performance Development Management Systems (PMDS) co-ordinated by the National Partnership Forum with the assistance of the National Centre for Partnership and Performance (see <http://www.ncp.ie>). Rather than convergence a more radical perspective could be used, suggesting this quality trend in EU and national policy is located in an ideological 'hegemony' (Gramsci 2004) of the centre right capitalist politics commonly termed as neo-liberalism (Hermann 2005).

#### **DIT context**

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The DIT is a comprehensive multi-level higher education provider which has power under the 1999 Qualifications (Education and Training) Act to make its own awards up to Level 10 of the National Framework of Qualification (Ph.D., Doctorate level). The Institute consists of six faculties, caters for 22,000 students annually and employs nearly 1,400 academic staff and 2,200 non academic and support staff. The emergence of the DIT can be located in the vocational education movement in Dublin of 1887. The present statutory position of DIT is set out in the DIT Act 1992. The Act made provisions within the following sections set out in Table 1.

<b>DIT Act 1992</b>	
1 Commencement	13 Provisions in relation to existing staff
2 Interpretation	14 Programmes and budget
3 Establishment of Institute	15 Annual report and information
4 Membership of Institute	16 Grants
5 Functions of Institute	17 Accounts and audits
6 Governing Body	18 Fees and charges
7 Functions of Governing Body	19 Transfer of property and liabilities
8 Dissolution of Governing Body	20 Preservation of contracts and continuance of legal proceedings
9 President	21 Inspection
10 Directors of Institute	22 Expenses
11 Academic Council	23 Regulations
12 General provisions in relation to staff	24 Short title

*Table 1: Sections in the DIT Act 1992*

As can be observed from Table 1 no provision was made for quality assurance or evaluation. Section 15 requires the Governing Body to make an annual report on the Institute ‘proceedings’ and the ‘performance of functions’. Section 21 provides for inspections of the Institute to be carried out by Department of Education Inspectors. This is interesting as there is not mention of accountability, summative assessment or quality assurance procedures at the time of this Act. Although the Institute had an obligation to produce annual operational reports which were returned to the City of Dublin Vocational Education Committee (CDVEC) and then forwarded to the Department of Education, and provision was made for Department of Education inspectors to visit the Institute, it was not until the passing of the 1999 (Education and Training) Act that institutional quality reviews were positioned at a legislative basis. Notwithstanding this deficiency, the Academic Council of DIT (1994) established a steering committee to review the then current situation in the Institute and identify best practice procedures elsewhere. The context for this exercise was the application for degree-awarding powers to be granted to the HEA (see Duff *et al.* 2000: 168–170). In December 1994 a draft Quality Assurance Handbook was produced and presented to Academic Council for consideration. Thereafter a series of consultative meetings took place with staff, and a protracted period of negotiations with the Teachers Union of Ireland Dublin Colleges Branch (TUI) ensued. In 1995 the Quality Assurance Handbook was approved and adopted by the Academic Council on a yearly

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review basis. In relation to international and national policy at the time this was a brave and insightful move by the DIT management. In essence DIT was an ‘early adaptor’.

**Evaluation**

The Qualifications (Education and Training) Act 1999 sets out the type and focus of the evaluation procedure of DIT’s quality assurance procedures. Section 39 (2) provides as follows:

- (a) evaluation at regular intervals and as directed from time to time by the Authority of the programmes of education and training provided by the Institute, including evaluations by persons who are competent to make national and international comparisons in that respect;
- (b) evaluation by learners of programmes of education and training provided by the Institute; and
- (c) evaluation of services related to the programmes of education and training provided by the Institute, and shall provide for the publication in such form and manner as the Authority thinks fit of findings arising out of the application of those procedures.<sup>5</sup>

To comply with this section of the Act the NQAI and the DIT agreed in 2004 to jointly commission the EUA to undertake a quality review of DIT. The EUA was viewed as an impartial and professional agency that had widespread international experience of carrying out quality reviews. The Directorate of DIT welcomed the EUA’s appointment as the external peer review agency to carry out a quality review of DIT. In essence this was a premeditated move by the DIT and the NQAI. The EUA were undertaking quality reviews of the seven Irish Universities and DIT is not sanctioned by the state as a university. However it is considered different from the IoTs in that it can make its own awards up to Ph.D. level 10 of the National Qualifications Framework (see Coolahan 2004: 84–88 for further details). Therefore, to have the same peer review agency, the EUA, carrying out a quality review of DIT, at the same time that it was reviewing the universities, gives credibility to the contention held by some that the DIT belongs in the same HE cluster as the seven Irish universities. It is worth stressing that this did not happen by chance. The Director of Academic Affairs in the DIT tactically emphasised the importance of applying for membership of the EUA. Furthermore the Academic Registrar and a Development Officer of the NQAI discussed the idea with the EUA in Brussels in 2004. When membership was approved both the DIT and the NQAI requested that the EUA carry out the quality review of DIT. Once the EUA agreed to undertake the quality review, Academic Affairs were charged with the responsibility of facilitating the EUA and coordinating the review process.

Thus far I have outlined quality assurance in the broad European context and with specific reference to national policy and local DIT policy. I suggest that there seemed to be a convergence in the strategic policy direction at European, national and Institutional levels. The drivers for this convergence are not transparent. However, speculatively I would point to a possible link with economic ideology. In political terms both the European Community and Ireland seem to be positioning themselves to the right of centre, prioritising economic/business models over social/cultural policies.



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This approach could be identified with neo-liberalism. The notion of quality of service, which incorporated investment and development, seems to have drifted into quality of accountability which encompasses rationalisation measures and budgetary liability. Harvey (1997: 134) suggests: ‘One explanation for the change in perception is that the definition of quality has changed from an academically acceptable notion, based on excellence to an academically unacceptable, externally imposed definition based on value for money’. The Berlin Communiqué (2003) introduced the notion of ‘accountability’ in quality assurance, and the Irish Government in the social partnership agreement (Sustaining Progress 2003: 96) under the heading ‘Commitment to Modernisation’ (Public services) brings business axioms to the foreground such as, ‘results driven’, ‘value for money’, ‘accountability’. I question whether the emphasis of the present policy direction of the quality process is adopting an economic ideology where bottom-line cost indicators have priority and where a resource allocation model will be utilised in relation to targets achieved? If this is the case then what has happened to the value placed on the social and cultural domains of higher education?

With regard to the DIT, the main drivers seemed to have been: (1) a genuine concern for the quality of service a student experiences; (2) the pursuit of degree-awarding powers. The then first President of DIT states in the Quality Assurance Handbook that ‘Academic Quality Assurance in the Institute remains a journey of improvement, towards excellence’ (DIT 1997: xvii). This displayed an academically acceptable model of quality assurance which was not constrained by the control and accountability paradigm but rather favoured the enhancement model.

**The EUA document analysis**

Further insights into the EUA quality review of DIT are presented here. The statement below is an extract from the EUA’s Mission Statement, which suggests that the EUA does not intend to place itself in a control paradigm:

The EUA’s mission is to promote the development of a coherent system of European higher education and research. EUA aims to achieve this through active support and guidance to its members as autonomous institutions in enhancing the quality of their teaching, learning and research as well as their contributions to society.

The EUA was founded in 2001 after a merger between the Association of European Universities and the Confederation of European Union Rectors’ Conferences. It claims to be a representative organisation for both European universities and the national rectors’ conferences. The principal aims of the EUA are set out in Item 1 of their Articles of Association:

**EUA: Articles of Association****1. AIMS**

The aims of the Association are:

- To promote and safeguard university values and the case for university autonomy.
- To promote the development of a coherent system of European higher education and research.

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- To give active support and guidance to members of the Association in their development in higher education and research.
- To give active support and guidance to members of the Association in enhancing their contributions to society.
- To provide information and other services to members of the Association.
- To represent higher education and research and to influence policy making at national and European level, particularly in relation to the European Union.
- To encourage cooperation between members of the Association and the development of effective networks.
- To develop partnership in higher education and research between Europe and the rest of the World.

*Table 2: Extract from the EUA Articles of Association; Adopted on 31 March 2001 at the constituent General Assembly in Salamanca and amended by the 1st General Assembly held in Roskilde on 19 April 2002. The original text is English.*

These are interesting aims. The fact that the EUA considered it necessary to incorporate the first point – safeguard university values and autonomy – would leave any curious researcher to enquire as to whether there is an agenda, either covert or overt, that is seriously attempting to undermine these academic, taken-for-granted principles? In the EUA's Annual Report 2003 the President, Eric Froment, claims that the Association is fulfilling its aims. Membership now stands at 692 universities (including the DIT). The Association has contributed to the development and shaping of European policy relating to the HE sector by way of new items added to both, the Bologna Declaration and the Graz Declaration, and that university autonomy is being ring-fenced by the continuous lobbying of the Association and its member universities. In relation to quality assurance he states that 'the introduction of a European dimension to quality assurance based on the principle that universities are responsible for the developing of internal quality cultures and that the next step at European level must involve all stakeholders in the process' (Froment 2003: 3). He also claims that the Berlin Communiqué incorporated items on standardised European quality assurance mechanisms due to the EUA's proactive engagement with Ministers (8). The EUA's Glasgow Declaration (2005) is a position paper that was presented to European Ministers of Education in Bergen on the 19/20 of May 2005. It would seem that the EUA has successfully established a strategic position at European level as an expert Association specialising in matters pertinent to the HE sector and quality assurance procedures. The EUA claims the Association has carried out 'more than 110 institutional evaluations of universities in 35 countries' (2004: 4).

The EUA mechanism for a quality review process has three main stages: first, the institute under review produces an internal self-evaluation report; second, there is a preliminary visit to the institute by an expert peer review team; and finally additional information is sought before the main visit of the expert review team. This process takes between 10–12 months to complete. The Final expert review team's report is then made public. The EUA state, 'The goal of both the process and report is to enhance the institutional capacity for improvement and change through self reflection' (2004: 6). There is extensive explanatory material provided by the EUA to institutes, outlining the review process in their document 'Quality Review Guidelines: Self-evaluation and Review Visits' (2004). I assert that the process utilised by the EUA is

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firmly positioned within what Yorke (1997) defines as a Quality Enhancement model. The EUA literature I have reviewed and personal experience of a EUA quality review of DIT leads the author to suggest that the EUA steers away from adopting a monitoring, control or accountability mode of evaluation (see EUA 2004, Annex 1: 22). The EUA, as set out in its Articles of Association, clearly respects the autonomy of the institute under review and seeks to contextualise its process and reports within the cultural, academic and social diverse environments in which the institutes operate.

I further propose that upon critical analysis of the EUA's guideline document (2004) and from reflection on the review process that the EUA is adopting a post-positivist stance, in that the Institute under review is not viewed as a distant object for empirical examination and observation by the expert/social scientist. Instead the Institute is viewed as a unique organic entity comprising of complex systems. Reality for the institute is constructed within the cultural, social and economic confines of its environment. This philosophical approach of the EUA is formative rather than summative. It encourages institutes to adopt a critical self-reflective approach, in order to contextualise and gain understanding of the institutes' internal and external strengths and weakness, thereby equipping the institute with strategic information, which it can develop to enhance its capacity to be proactive in implementing suitable and strategic change in a global environment which is in flux.

In conclusion I have mapped out some of the main routes that quality assurance has manoeuvred at European Education Commission level, Irish national level and the HE sector, with particular attention paid to the experience of DIT. In the follow-up paper I will present a detailed case study of the EUA quality review of DIT, utilising a participant observer methodology.

**Notes**

1 Section 35 (1) states: 'A governing authority, in consultation with the academic council, shall, as soon as practicable after the governing authority is established under this Act and at such other times as it thinks fit, require the chief officer to establish procedures for quality assurance aimed at improving the quality of education and related services provided by the university'.

2 Section 28 (1) (b) states that providers should 'establish procedures for quality assurance for the purpose of further improving and maintaining the quality of education and training which is provided, organised or procured by that provider as part of the programme concerned and shall agree those procedures with the Council'.

3 Section 5 (1) 'There shall stand established a body to be known as Údarás Náisiúnta Cáilíochtaí na hÉireann or in the English language as the National Qualifications Authority of Ireland (in this Act referred to as the 'Authority') to perform the functions conferred on it by or under this Act.'

4 Section 3 (1) 'There is hereby established an institute of education and training, to be known as Institiúid Teicneolaíochta Bhaile Atha Cliath or in the English language as the Dublin Institute of Technology, to perform the functions assigned to it by this Act.'

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5 Universities are covered under section 42 (2, a, b, c) of the Act, the requirements are similar to the above.

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