Approval of Higher Education Institutions’ (Linked Providers) Quality Assurance Procedures

1. Context
Trinity College Dublin, the University of Dublin, herein referred to as Trinity, as a Designated Awarding Body (DAB) has prescribed responsibilities under the Quality & Qualifications Act 2012 (QQI Act 2012) and QQI Sector Specific Guidelines for Designated Awarding Bodies with respect to arrangements with higher education institutions (HEIs) seeking or receiving validation of programmes of education and/or research leading to Trinity Awards. Under the Act these providers are referred to as Linked Providers.

Linked providers are responsible under §28(1) of the Act to “establish procedures in writing, for quality assurance for the purposes of establishing, ascertaining, maintaining and improving the quality of education, training, research and related services the provider provides”. §33 (1) of the Act requires that before establishing procedures under §28(1) of the Act “a linked provider shall submit a draft of the proposed procedures to the relevant designated awarding body for approval”.

2. Purpose
The purpose of this policy/procedure is to outline the process by which Trinity will fulfil its responsibilities under §33 (1) of the Act to:

- approve the proposed quality assurance procedures;
- refuse to approve the proposed quality assurance procedures but make recommendations to the linked provider, as Trinity considers appropriate; or
- refuse to approve the proposed procedures.

This policy/procedure also outlines the process by which Trinity will on an ongoing basis, review and approve linked providers’ new and revised procedures subsequent to initial approval.

3. Scope
This procedure applies to aspirant and existing linked providers with whom Trinity is planning to or has entered into arrangements in respect of validated programmes of education.

4. Benefits
The policy/procedure provides clear direction to linked providers on the process for Trinity approval of their quality assurance procedures.
5. Definition
The QQI Act Part 1 (3) defines linked providers as higher education providers that do not have the power to award degrees, but provide a programme of education and training that satisfies all or part of the prerequisites for an award of the designated awarding body through arrangements with a designated awarding body.

Trinity identifies three classes of linked providers:

i. Where Trinity as the designated awarding body validates programmes of education;

ii. Where Trinity as the Designated Awarding Body validates and shares in the delivery of programmes of education;

iii. Aspirant linked providers contacting Trinity to act as their designated awarding body with respect to programmes of education.

6. Principles
6.1 Quality and its assurance is the primary responsibility of the linked provider, it involves planning, defining, assessing and improving practice.

6.2. Successful quality assurance systems are efficient, well communicated and integrated into the normal activities of the linked provider’s operations and are fit for context and purpose.

7. Procedure for Initial Approval of Linked Providers’ Quality Assurance Procedures

7.1 Notification
7.1.1 Trinity will notify linked providers with whom it has formal memoranda of understanding governing education provision of the requirement to submit draft quality assurance procedures for approval.

Trinity will negotiate a timeframe for submission with each linked provider given its individual context, and strategy with respect to an application for the proposed International Education Mark and the Trinity’s schedule for quality reviews.

7.1.2 Aspirant linked providers requesting that Trinity act as a validating body for programmes of education provided by them will be asked to submit their quality assurance procedures for approval as part of the formal due diligence undertaken prior to signing a new Memorandum of Understanding (MOU).

Where an MOU is pre-existing and the validating arrangement is a change to the existing arrangement, the request to submit quality assurance procedures for approval will form part of either a revised MOU or a formal contract.

7.2 Submission
7.2.1 Linked providers will submit hard and soft copies of their quality assurance procedures in the first instance to the Trinity’s Quality Officer, who will acknowledge receipt within three working days.
7.2.2 Linked providers’ quality assurance procedures are required to give regard to the following:

i. Qualifications & Quality Assurance (Education and Training) Act 2012;

ii. QQI Core Statutory Quality Assurance Guidelines (April 2016), applicable to all Higher Education Institutions and incorporating the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG May 2015);

iii. Relevant QQI Policies e.g. Protection of Enrolled Learners Policy, Access, Transfer & Progression Policy, and Recognition of Prior Learning Policy;

iv. In addition for existing linked providers:
   - Memoranda of Understanding or contracts that form the basis for the arrangements with Trinity;
   - Trinity policies upon which the linked providers procedures are contingent for their full enactment e.g. External Examiner Policy, New Programme Design and Approval Policy

v. In addition for aspirant linked providers:
   - the relevant Quality Assurance guidelines under which their programmes of education are currently validated e.g. QQI Independent and Private Providers Quality Assurance Guidelines

vi. Where applicable (to be confirmed at the time of notification) the linked providers’ quality assurance procedures may also need to demonstrate alignment with:
   - Professional and Statutory Body standards and curriculum requirements for validated programmes of education;
   - QQI Policy Code of Practice for the provision of programmes of education and training to international learners;
   - QQI topic-specific quality assurance guidelines e.g. Research Degree Programmes.

7.3 Assessment for Approval

7.3.1 In assessing the linked provider’s quality assurance procedures, Trinity will apply the following criteria:

i. Compliance
   - the linked provider’s proposed quality assurance policies and procedures demonstrate that they have regard to the requirements of source documents outlined in 7.2.2;
   - the linked provider submits a plan to publish its proposed policies and procedures as specified under §33(3) to ensure access and availability to staff, students and stakeholders, as appropriate.

ii. Governance
   - the linked provider meets legal, reputation and compliance requirements as an established HEI in Ireland and in all jurisdictions in which it operates through third party arrangements e.g. parent organisations, subsidiaries, collaborations and partnerships nationally and internationally.
   - the linked provider demonstrates that the necessary resource, governance and structural arrangements are in place to show that it is in good financial standing, has fit-for-purpose governance, management, decision-making and reporting structures
(internally and externally), has sufficient and sustainable resources, i.e. human, infrastructure and financial, to support good quality educational provision including appropriately qualified staff, facilities, equipment and learning resources – library and IT.

- the linked provider demonstrates that the development and approval of documented procedures has been conducted under the authority of its governing council, board or equivalent executive committee; and where applicable in consultation with internal and external stakeholders;
- the linked provider’s proposed quality assurance procedures demonstrate appropriate document control as evidenced on each procedure (i) the position with designated responsibility for oversight of implementation of the procedure; and (ii) the date on which the policy and procedure gained initial approval and (iii) the date of next review.

7.4 Process for Approval

7.4.1 Upon receipt of the draft quality assurance procedures, the Quality Office will conduct a preliminary desktop assessment to ensure completeness of the received documentation against 7.2.2 above;

7.4.2 The Trinity Registrar will establish a working group (Linked Provider Quality Assurance LPQA) specific to each linked provider to include the following ex officio membership:
   - Trinity Registrar (Chair);
   - Academic Secretary;
   - Dean of Undergraduate Studies/Senior Lecturer and/or Dean of Graduate Studies as appropriate;
   - Representatives from the School(s) on the respective Associated College Degrees Committee or Management Committee;
   - Other subject matter experts as required/appropriate to the context e.g. financial, legal, risk and/or compliance;
   - Nominee(s) from the Quality Committee;
   - Quality Officer (Secretary).

7.4.3 Each LPQA working group is separate to and independent from the linked provider’s respective governance Associated College Degrees Committee/or equivalent.

7.4.4 The LPQA working group is expected to meet within three weeks from the time of acknowledgement of receipt to conduct the assessment for approval of the linked provider’s submission, and to complete a report to recommend either:
   - to approve the proposed procedures of a linked provider;
   - to approve the proposed procedures but make recommendations;
   - to refuse to approve the procedures.

7.4.5 The report of the LPQA working group will be communicated in writing to the linked provider within a further three weeks’ period to advise:
   - that the proposed procedures will proceed to the Quality Committee and the University Council for approval; or
- a proposed timeframe for resubmission to Trinity if the linked provider is invited to address recommendations/gaps in their procedures, in which case the process outlined above is repeated.
- that the proposed procedures are refused approval.

7.4.6. The submission of documentation for approval by the University Council will only be made during the statutory term when meetings of the University Council are scheduled and when upon resubmission, any recommendations are deemed to have been satisfactorily addressed.

7.5 Outcomes of the Approval Process by the University Council

7.5.1. The linked provider will be informed in writing of the decision by the University Council, subsequent to the approval of the relevant University Council minutes, that:
   a. the proposed procedures are approved;
   b. the recommendation is to approve the proposed procedures but make recommendations;
   c. the recommendation is to refuse to approve the proposed procedures.

7.5.2. Upon approval of the proposed procedures, the linked provider must under §33 (3) of the Act publish the procedures in such form and manner as Trinity directs and shall provide a copy of the procedures as published to the Trinity’s Quality Office and to the QQI.

7.5.3. Where the University Council makes recommendations, the linked provider will resubmit the draft procedures as required under §33 (4) of the Act for approval at a subsequent meeting of the University Council before publishing the procedures in such form and manner as Trinity directs, and provide a copy of the procedures as published to the Trinity’s Quality Office and to the QQI.

8. Ongoing Approval of Linked Providers’ Quality Assurance Procedures

8.1 Following initial approval of a linked provider’s quality assurance procedures under §7 of this policy/procedure, it is expected that new or revised procedures will arise in response to changes in, for example, linked provider’s educational provision; the formal arrangement with Trinity; the QQI Act 2012; new QQI Quality Assurance Procedures, codes or policies; or Professional Accreditation Body requirements.

8.2 New procedures will require the re-establishment of the LPQA working party (outlined under 7.4.2 above) on an ad-hoc basis, to approve new or revised linked provider’s quality assurance procedures.

8.3 Once submitted the timeframes and process for approval outlined for initial approval in §7.3 - §7.5 above, will apply.

9. Responsibility

The responsibility for this procedure lies with the Trinity’s Quality Officer.
10. Legislation and Regulation

10.1. Quality & Qualifications (Education & Training) Act 2012
10.2. Core Statutory Quality Assurance Guidelines 2016
10.3. Sector specific quality assurance guidelines for Designated Awarding bodies
10.4. Sector specific quality assurance guidelines for Independent / Private Providers
10.5. Code of Practice for provision of programmes of education and training to international learners
10.6. Research Degree Programme - Policy and Criteria
10.7. Required Procedures for Access, Transfer and Progression of Learners
10.8. Principles and Operational Guidelines for Recognition of Prior Learning
10.9. European Guidelines for validating non-formal and informal learning CEDEFOP 2015

11. Related Documents

11.1. Appeal Procedure (TBD)
11.2. Quality Review Procedures for Linked Providers (TBD)

12. Document Control

Date of initial approval June 2016 (revised November 2017).
Date of revised Policy/Procedure approval January 2017
Date of next review Academic Year 2019/20