



# RCSI

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ROYAL COLLEGE OF SURGEONS IN IRELAND

COLÁISTE RÍOGA NA MÁINLEÁ IN ÉIRINN

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## **Review of the RCSI in relation to the commencement of its degree-awarding powers**

### **RCSI RESPONSE TO EXTERNAL PANEL REPORT**

**August 2010**

## **1. Introduction**

The Royal College of Surgeons in Ireland (RCSI) is a recognised College of the National University of Ireland (NUI). All diploma and degree programmes offered in RCSI are accredited and overseen by the National University of Ireland (NUI) and candidates are conferred by the NUI. The RCSI was established by Royal Charter in 1784. It's Charter provided, under a 2003 amendment by the Oireachtas, for independent degree-awarding status. In October 2009, the RCSI formally applied to the Minister for Education and Science for approval to enact this bye-law. In January 2010, following announcement of the plan for the dissolution of the NUI, the Minister for Education and Science initiated an external process to be conducted by the Higher Education Authority (HEA) and the National Qualification Authority of Ireland (NQAI). Terms of reference for the review were agreed by the HEA and NQAI in March, an institutional self-assessment was submitted by the RCSI in April, a site visit by an international panel took place on May 19-21<sup>st</sup>, a report from the international panel visit was made available to the RCSI on July 15<sup>th</sup> and a reply was requested by August 6<sup>th</sup> 2010. This document is the RCSI's response to the international panel report.

In advance of our response, we would like to make a more general statement. The RCSI has been engaged in an extremely busy process since initial discussions with the Department of Education and Science in late January 2010, and receiving review terms of reference in March, as indicated above. The whole process has put equivalent time pressures on all of the sectors involved, from the Department of Education and Science (now Department of Education and Skills) to the HEA and NQAI and to the international panel. The review has been completed in an exceptionally tightly specified timeframe; completed to all the deadlines set; and completed in a most collegial and constructive manner by all parties we have met. We sincerely thank all involved for this level of engagement and facilitation of our request to the Minister.

## **2. Initial response to recommendations of the international panel**

The RCSI welcomes the thorough, wide-ranging, fair and constructive report of the international panel. The report captures the broad overview and the subtle nuances of what is a complex organisation. Given the already signalled rapid pace of the review, and the fact that RCSI as an organisation has not worked in this whole organisational mode of review in the past to external degree awarding education-focused review groups, the review is all the more commendable. This review provides the basis for a detailed Action Plan to work to further the educational aspirations of RCSI as a degree awarding institution. The response here is necessarily brief, given the timeframe for turn-around and the Summer/ annual leave period allowing little time for detailed staff consultation on the recommendations. What we indicate is our agreement with the recommendations and initial plan of action on as series of single recommendations as collectively themed by ourselves from the report.

Specifically, we welcome the clear and unqualified recommendation of the Review Panel that:

*“the RCSI’s application to the Minister for Education and Skills for approval of bye-laws to enact its degree-awarding powers should be granted”. (p5)*

We also welcome the list of 32 further recommendations and welcome the opportunity to work to a timeframe for a repeat External Review by the end of 2012 using these recommendations as the template for our quality-related activities in the meantime.

This document is a high-level early response to these recommendations. It will be followed in Autumn/Winter 2010 by the development of a detailed Action Plan to address each of the recommendations. We are pleased to report that some of the signalled activities such as the recruitment of an RCSI Director of Quality have already been achieved over the Summer. A new Quality Office and Quality Committee will be in place by October 2010.

Recommendations can be themed as outlined next. What is outlined here is the broad set of recommended themes and the general mechanism within RCSI by which these will be addressed in the coming years. In each instance there will be consultation with RCSI’s international sites. For completeness within a single document, an Appendix includes all 32 recommendations, as numbered by us from the text received, and re-organised into the seven working themes identified below.

- 1. Governance and public engagement:** A number of recommendations relate to the particular governance structure of the RCSI and the work of the Governance Committee to examine and develop this governance model. The recommendation to engage in public consultation as part of the process for amending the governance structure is noted, as is the reference to incorporating the attitudes, values and expectations of internal and external stakeholders. These recommendations will inform the Council and the Senior Management Team as they progress the development of a Governance structure suitable for a degree awarding institution.
- 2. Resource allocation and finances:** A number of recommendations relate to the College’s diverse portfolio of activities in Ireland and abroad and the need to develop a clear strategic and financial perspective on how these activities complement and /or support the core educational activities in Ireland. These will be addressed by the Senior Management Team and Finance Department.
- 3. Institutional management of degree awarding status:** A number of recommendations relate to the resourcing, planning, systems, procedures and documentation support needed to deliver the additional administrative responsibilities of a degree awarding institution with Irish and international operations. These will be addressed by the Senior Management Team, Quality Committee and Quality Office, with advice from relevant national institutions and clear linkage to the National Qualifications Framework.

- 4. Teaching and learning resources:** A series of recommendations relate to the need for training resources and key performance indicators for staff to deliver on their education and teaching roles, and for clarity and support for promotional prospects relating to education in the academic system. These will be addressed by the Senior Management Team in association with the Quality Committee, Quality Office and Academic Promotions Committee.
- 5. Research activities:** A series of recommendations advise a clear single institutional research strategy that covers all levels of research activity in the College, and incorporates RCSI's Irish and international sites. This should include quality metrics, a funding model and a clear focus on niche areas of expertise, alongside strategic collaborations, in a challenging research environment. These will be addressed by the Senior Management Team in association with the RCSI Research Committee, the College Faculty and research community more widely and with externally appointed advisors.
- 6. Bologna process and related national policies:** A series of recommendations advise greater staff and student awareness and engagement with the Bologna process, and greater effort to engage in student and staff mobility in accordance with the principles of Bologna. A new group cross-institutional group will be established to develop and share expertise in this area across disciplines, undergraduate and postgraduate and staff categories and across campuses.

Two recommendations advise the College to work more closely with national systems (the National Qualifications Framework and the National Academic Recognition Information Centre) to facilitate the integration of national education systems more generally. RCSI will work with these recommendations as a general principle, with the caveat that currently recognition of surgical and other postgraduate medical awards is governed by the Medical Practitioners Act (2007) and implemented by the Irish Medical Council. These recommendations will be addressed by the Senior Management Team in association with the Heads of Schools and Postgraduate Faculties and the Quality Committee.
- 7. Regulation for Irish awarding bodies making awards abroad:** Two recommendations relate to the above. We welcome the Panel's advice to involve a range of national stakeholders in education and healthcare in addressing the generic issue of Irish awarding bodies providing educational awards internationally. These recommendations will be taken up by the Council and Senior Management Team.

In sum, we thank all concerned for the opportunity to submit to external review for degree awarding status and for the work involved by many, particularly international participants, in a very short timeframe, to enable delivery of that review before the Summer 2010 academic break.

**APPENDIX: Summary of recommendations, numbered as the text appears in the report, organised by 7 themes and with the RCSI's first response to these recommendations as signaled in italics**

**1. Governance and public engagement: relevant recommendations**

**1a.** The RCSI requires a governance model that, in structure and process, encourages and facilitates positive and proactive institutional development, along with relationship-building strategies focused on stakeholders (including staff and students), on markets and on sustained revenue generation. Governance structures currently in place at the RCSI may not be appropriate for the challenges the College will face in assuming the role of a degree-awarding institution, or to succeed in a potential period of financial instability. The current opaque role of the Council makes it less evident that the corporate governance structures are clear, transparent and consistently applied both in relation to specific functions and to the particular responsibilities attached to them.

The Panel strongly supports the RCSI governance committee in its endeavours to amend the governance structures, including amending the role and membership of the Council. An in-depth review by the College of the membership and role of the Council is essential. The changes arising from such a review could strengthen the RCSI's ability as a degree-awarding institution, to demonstrate accountability to the wider public. The Panel recommends therefore that the RCSI should engage in public consultation as part of the process of amending its governance structures. An amended governance model will emphasise the centrality and importance of the attitudes, values and expectations of RCSI's extensive body of internal and external stakeholders and has a symbolic importance, even if many or all of the functions of the Council are delegated to boards. Such a structure will promote a more consensual understanding of the policies of the College and will promote a spirit of collaboration with stakeholders. The Panel considers that such an improved governance structure can contribute to strengthening the high-level governance of the RCSI; to reinforcing transparency and public accountability; and to clarifying the governance of the degree-awarding function of the College.

**1b.** The RCSI should ensure that its corporate governance policies and procedures are informed by best national and international practice.

**2.** The RCSI should consider changing the designation of CEO to a title more in keeping with comparable positions in other Irish higher education institutions.

**12.** With regards to the internal review procedures of schools and non-academic departments and services, which the College shall be establishing as part of its quality assurance/quality improvement procedures, the Panel recommends that the College considers inviting representatives from other higher education institutions to participate in these review groups. This would enable a very useful exchange, whereby the College has the benefit of perspectives from disciplines in which it does not engage, and the external party has the opportunity to learn about the quality systems that the College is developing.

### **1. Governance and public engagement: response**

*These recommendations relate to the particular governance structure of the RCSI and the work of the Governance Committee to examine and develop this governance model. The recommendation to engage in public consultation as part of the process for amending the governance structure is noted as is the reference to incorporating the attitudes, values and expectations of internal and external stakeholders. These recommendations will inform the Council and the Senior Management Team as they progress the development of a Governance structure suitable for a degree awarding institution.*

### **2. Resource allocation and finances: recommendations**

**3.** Although staff generally expressed satisfaction with current resource allocation strategies, the panel recommends that more formal and robust processes on resource allocation should be put in place. The development of policies in this area will support the allocation of resources in an effective and equitable manner. Such an approach should significantly contribute to continuous quality improvement within the College.

**4.** The RCSI faces challenges and opportunities surrounding its business model with regard to sustaining its long-term viability. In this context, the strategy of the College with regard to its involvement in education, research and healthcare service provision abroad, was not wholly evident to the review panel during its review. As research has grown in importance in the College, additional costs have been incurred, and there is a need to generate increasing revenue from tuition from international students; contracts for management of international clinical institutions; management of local (Irish) endowment; and philanthropic fund raising. While it is recognised that the international campuses may require a period of investment before seeing a financial return, sustaining this enterprise comes at a substantial opportunity cost. The Panel recommends that the RCSI continues to keep its graduate programmes abroad under review and where appropriate engage external advice to objectively evaluate the return on investment on this business model. Plans to enhance efforts in philanthropy are to be encouraged and more focus here may have a greater return and result in less diversion for the faculty and staff than operating education programmes abroad.

### **2. Resource allocation and finances: response**

*These recommendations relate to the College's diverse portfolio of activities in Ireland and abroad and the need to develop a clear strategic and financial perspective on how these activities complement and /or support the core educational activities in Ireland. These issues will be addressed by the Senior Management Team and the Finance Department.*

### **3. Institutional management of degree awarding status: recommendations**

**5.** Assuming all of the functions of an awarding body will require resources and planning. Accordingly, the RCSI should set out a plan and structure for dealing with the additional administrative responsibilities that will ensue once this activity is assumed by the College. In addition, the RCSI should engage with relevant national bodies and institutions to fully understand its additional duties as an awarding body

and to put in place systems and processes in order to fulfill these responsibilities.

**6.** As a provider and awarding body the RCSI is expected to develop and operate robust and cohesive internal quality assurance/quality improvement policies, procedures and structures. The effectiveness of these internal policies, procedures and structures will be subject to external review by the national quality assurance body expected to be established in 2011. The Panel considers it essential that the College should give careful consideration to the recommendations below as a means of commencing its preparation for fulfilling its responsibilities in this regard.

**7.** Whilst acknowledging the evident existence of quality within the College, a comprehensive quality culture is not evident across all levels and areas of the College's operations. The core elements of a quality assurance/quality improvement system for the College have only recently been agreed and accordingly have not yet been implemented. The Panel considers it essential that the College should progress the establishment of a Quality Assurance Office within the timeframe it has indicated in its Self Assessment Report, and develop systematic processes of quality assurance within the College and across its sites, as a matter of priority. This is particularly important in the context of the College as an awarding body and will contribute to ensuring that the College is not only reactive to the needs and requests of learners, staff and external bodies, but that it is also developing its own assurances of quality which supports individual initiative on quality matters. Systematic quality assurance will lead to a greater level of internal cohesion and a capacity to self-evaluate. It will support the institution as it continues to grow and respond to opportunities and will reinforce existing activities.

**8.** The role of the Director of Quality Assurance is crucial to the College's development as it makes the transition to becoming an awarding body and as it prepares to be externally reviewed under the revised national quality assurance arrangements. It is equally important that the College communicates to all staff a clear and well understood remit for the Director of Quality Assurance and his/her office. This should reflect a developed understanding of how this office will interact with the Quality Committee and clarify which aspects of quality assurance are managed centrally and which are managed departmentally; both in Ireland and abroad. The Panel would like to emphasise that the College will need to consider in this context how it can maintain the advantages of decentralised ownership of quality assurance whilst maximising the benefits to be accrued from more mainstreamed, centralised and strategic quality assurance/quality improvement management.

**9.** The role of the Director of Quality and of the importance and impact of the introduction of systematic quality assurance processes, appropriate to the College's role as an awarding body, must be supported and understood at the most senior levels of the organisation. Quality assurance should inform the organisation's thinking about its governance model and should contribute to its strategic planning.

**10.** Notwithstanding the number of policies and procedures that have been developed incrementally the College must, through the Quality Assurance Office, develop its quality assurance/quality improvement handbook as a matter of priority and in collaboration with staff on all of its sites. The College should consider externally available examples of quality handbooks and should seek to communicate with colleagues in higher education and training to discuss their experiences in this

regard. The College should be cognisant of the *European and International Standards and Guidelines for Quality Assurance in the European Higher Education Area* and the *UNESCO/OECD Guidelines on Quality Provision in Cross-Border Higher Education* in devising its quality assurance/quality improvement handbook. Equally, it will be important to refer to the guidelines and operating principles produced by the National Qualifications Authority of Ireland; the quality assurance guidelines and procedures produced by the Irish Universities Quality Board and the Higher Education and Training Awards Council; and the documentation produced by the Irish Higher Education Quality Network (IHEQN), including the *Provision of Education to International Students: Code of Practice and Guidelines for Irish Higher Education Institutions*. Further, in its capacity as a body responsible for its own awards, the College should consider seeking membership of the IHEQN as a means of regularly communicating with other awarding and quality assurance bodies in the State.

**11.** As a national awarding body, the College has a responsibility to ensure that its policies and procedures regarding programme development, approval, delivery and assessment are particularly strong; with an emphasis on ensuring that programmes developed, are demonstrably linked to the learning outcomes of the award-types and levels of the National Framework of Qualifications; are taught in a manner that is consistent with the achievement of these learning outcomes; and are assessed in a manner that ensures that learners can demonstrate their attainment of these outcomes.

**13.** The College should consider how it can communicate in more detail with its international partners (i.e., Bahrain, Penang and Dubai) regarding the implications of the College becoming an awarding body and the impact this will have on learners, staff and quality assurance/quality improvement processes and structures.

### ***3. Institutional management of degree awarding status: response***

*A number of recommendations relate to the resourcing, planning, systems, procedures and documentation support needed to deliver the additional administrative responsibilities of a degree awarding institution with Irish and international operations. These will be addressed by the Senior Management Team, Quality Committee and Quality Office, with advice from relevant national institutions and clear linkage to the National Qualifications Framework, as advised.*

### **4. Teaching and learning resources: recommendations**

**14.** As detailed above, the range of supports for lecturers within the College has evidently developed over the last number of years. However, there appears to be an absence in the current provision of support on more fundamental issues, such as effective delivery of material, the design of appropriate assessment, and the relationship between these elements and programme/module learning outcomes. As the College moves to the status of having its own awarding powers, the building of capacity within the College on these issues will be crucial to order to ensure that appropriate standards are set and maintained. The Panel recommends that consistent and transparent arrangements are put in place for the training and support of teaching staff.

**15.** Whilst the Panel is fully supportive of the rebalancing of promotion opportunities in line with the College's focus on education and training as well as research, the



College should consider how to make more transparent its criteria for establishing effective teaching and learning.

**16.** Whilst it is evident that equality of opportunity for students and staff is promoted and achieved, the RCSI should undertake to ensure that gender equality is evident across all the activities of College.

**17.** Action taken in response to issues raised in student feedback questionnaires should be documented so that the operational impact of student feedback mechanisms is recorded and clear.

**18.** Under the European Standards and Guidelines, there is a requirement that institutions should ensure that they collect, analyse and use relevant information for the effective management of their programmes of study and other activities. The Panel recommends that RCSI ensures that key indicators are systematically applied across all of its programmes and activities in order to fulfill this requirement.

**19.** RCSI should ensure that it regularly publishes up-to-date, impartial and objective information, both quantitative and qualitative, about all the programmes and awards offered by the College.

#### **4. Teaching and learning resources: response**

*A series of recommendations relate to the need for training resources and key performance indicators for staff to deliver on their education and teaching roles, and for clarity and support for promotional prospects relating to education in the academic system. These will be addressed by the Senior Management Team in association with the Quality Committee, Quality Office and Academic Promotions Committee.*

#### **5. Research activities: recommendations**

**22.** The Panel concurs with the RCSI that the College's research activities are key to the reputation and standing of the College both nationally and internationally. The Panel advises the College to put in place additional metrics and benchmarks against which to assess the research capabilities and outputs of the RCSI against best practice nationally and internationally.

**23.** The Panel understands that research activity should contribute to Ireland's overall national objectives for higher education and research, in particular those set out in the National Development Plan (NDP) and other key policy documents that have been adopted by Government, such as the Strategy for Science, Technology and Innovation (SSTI), the National Skills Strategy, the Report of the Enterprise Strategy Group, Building Ireland's Smart Economy (2008) and the Report of the Innovation Taskforce (2010). The overarching principle is to contribute to the creation of a strong, world-class higher education and research system which address the needs of Irish society and economy and our role in the development of the European Research Area. In this context the Panel recommends that the research activity at the RCSI should be concentrated in areas of specific expertise through sustained investment and the institutional strategic plan should be at the cornerstone of its research strategy. It is recommended that the RCSI should concentrate on its existing strengths and on specifically identified areas of new and emerging potential areas of interest. Furthermore, as Ireland is a small country, the RCSI should seek to continue its research activity in a manner which promotes

effective strategic collaboration between itself, other higher-education institutions and other relevant partners.

**24.** Given the expansion of the College over recent years, the Panel recommends that the RCSI puts in place a comprehensive research strategy across all campuses and faculties. This institutional strategy should include plans to extend research activities and research-led teaching to its international campuses. Structural integration across the College's various research institutes should also form part of the strategy.

**25.** In light of the changing national funding environment and potentially diminishing funds, it is important that RCSI considers as part of its research strategy how research will be funded over the coming years. The Panel strongly supports the RCSI in its resolve to attain 15-20% of its research funding from philanthropic sources.

**26.** The RCSI's plans to strengthen and develop strategic partnerships in the research field are supported by the Panel. It is recommended that the College should seek to broaden its activity in international collaboration. This will serve to augment the College's expertise in international collaboration; give the College an opportunity to extend its reputation internationally; and also assist in identifying additional non-national funding sources.

**27.** The Panel recommends that the strategy put in place for the RCSI Research Institute should be closely aligned with the strategy for research activity throughout the RCSI. This will help to ensure that this important initiative, and one that is unique to RCSI, is better integrated with the rest of the research agenda within the College. It will also ensure that research expertise across all areas is shared and available throughout the College, and that the Research Institute has the same level of scrutiny and transparency in terms of funding as the other RCSI research programmes. Further, the panel recommends that research activities under the Medical and Health Sciences Board and the Surgery and Postgraduate Faculties Board be coordinated. The remit of the Quality Office which the RCSI is about to put in place should extend to both Boards.

### **5. Research activities: response**

*These recommendations advise a clear single institutional research strategy that covers all levels of research activity in the College, and incorporates RCSI's Irish and international sites. This should include quality metrics, a funding model and a clear focus on niche areas of expertise, alongside strategic collaborations, in a challenging research environment. These will be addressed by the Senior Management Team in association with the RCSI Research Committee, the College Faculty and research community more widely and with externally appointed advisors.*

### **6. Bologna process and related national policies: recommendations**

**28.** The average level of knowledge across the College of the purpose and processes underpinning the Bologna Process is relatively low, as is understanding of its relationship with national developments such as the National Framework of Qualifications (NFQ). The Panel considers that the College, including at its most senior levels, should inform itself in more detail regarding the Bologna Process and its objectives and carefully consider how it tangibly applies to national policy developments and in turn to the activities of the College. This knowledge will greatly

benefit the College as it goes about formalising its quality assurance/quality improvement handbook and associated structures, as described on pages 19 and 20. The Panel further recommends that the Institute should use this increased knowledge and expertise to position itself within these developments more centrally and to connect with other institutions and government bodies in this regard.

**30.** As an awarding body, the College is in a position to influence the future shape and function of the NFQ and to engage more proactively than at present with other State organisations in Ireland offering education and training awards included in the NFQ. The Panel recommends that the College takes this opportunity and that it explores the possibility of having its professional (including surgery and postgraduate professional awards) as well as its academic qualifications recognised through the NFQ. It further emphasises the importance in this regard of its recommendation on page 21 regarding further staff development in the areas of writing learning outcomes at a programme and module level that articulate clearly with NFQ levels and award types, and designing suitable teaching, learning and assessment models.

**31.** It is evident that the College supports some student and staff mobility but not necessarily under the umbrella of the Erasmus or Erasmus Mundus programmes. While such lack of engagement is not particular to the RCSI, indeed it is a difficulty shared by medical educators across Europe, the RCSI could do more to stimulate participation in this particular initiative. The Panel therefore recommends that the College should consider developing and promoting the Erasmus exchange programmes from the point of view of the value that can be achieved for the learner in participating in and experiencing such initiatives.

**32.** It is recommended that the College utilise the Irish NARIC services, situated within the National Qualifications Authority of Ireland, for direct comparison advice with Irish qualifications.

## **6. Bologna process and related national policies: response**

*A series of recommendations advise greater staff and student awareness and engagement with the Bologna process, and greater effort to engage in student and staff mobility in accordance with the principles of Bologna. A new committee will be established to develop and share expertise in this area across disciplines, undergraduate and postgraduate and staff categories and across campuses.*

*Two recommendations advise the College to work more closely with national systems (the National Qualifications Framework and the National Academic Recognition Information Centre) to facilitate the integration of national education systems more generally. RCSI will work with these recommendations as a general principle, with the caveat that currently recognition of surgical and other postgraduate medical awards is governed by the Medical Practitioners Act (2007) and implemented by the Irish Medical Council. These recommendations will be addressed by the Senior Management Team in association with the Heads of Schools and Postgraduate Faculties and the Quality Committee.*

## **7. Regulation for Irish awarding bodies making awards abroad: recommendations**

The Panel makes the following additional recommendations to the RCSI, the HEA, the NQAI and the Department of Education and Skills (for consideration in consultation with the Department of Health and Children, the Medical Council and

the Health Services Executive where relevant):

20. The Panel recommends that discussions be coordinated with the national parties responsible for the professional regulation of awards in Ireland, regarding the extent to which these responsibilities apply to the professional regulation of awards of an Irish awarding body abroad.

21. The Panel further recommends that the conditions, if any, regarding an Irish awarding body making awards abroad which it does not award in its home country, should be clarified.

***7. Regulation for Irish awarding bodies making awards abroad: response***

*We welcome the Panel's advice in these two recommendations to involve a range of national stakeholders in education and healthcare in addressing the generic issue of Irish awarding bodies providing educational awards internationally. These recommendations will be taken up by the Council and Senior Management Team.*

***- END OF REPORT -***