QQI
Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Independent Evaluation Report on an Application for Validation of a Programme of Education and Training

Part 1

Provider name	Talentpool Ltd.
Date of site visit	15 February 2019
Date of report	25 March 2019 (Finalised 10ᵗʰ June 2019)

Overall recommendations

Principal programme	Title	Certificate in Data Protection Skills
	Award	Special Purpose Award
	Credit	15
Recommendation *Satisfactory OR Satisfactory subject to proposed conditions¹ OR Not Satisfactory*		Satisfactory subject to proposed conditions and recommendations.

Embedded programme	Title	N/A

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¹ Normally an application that fails to meet the criteria in any of its aspects will be considered as not satisfactory. Nevertheless, so as to ensure that the validation process will not be implemented unreasonably, if an independent evaluation finds that a programme virtually meets the validation criteria but needs some minor modifications, the independent evaluation could conclude "Satisfactory subject to recommended special conditions" where the special conditions prescribe the defects that require to be corrected.

Further, in exceptional cases the 'special conditions' may be used to identify parts of the application that are considered satisfactory on a stand-alone basis. For example, an application might propose a programme to be provided at two locations but the independent evaluation report may find the application satisfactory on condition that it be provided only at one specified location and not at the other. These conditions will not however be used to recommend that QQI can be satisfied with a programme conditional on a different QQI award (e.g. at a lower NFQ level or having a different CAS award title) being sought than the one identified in the application.

Evaluators

Evaluators		
Name	**Role**	**Affiliation**
Ms. Ann Dunne	Chair	Further Education and Training Development Officer City of Dublin Education and Training Board
Ms. Mary Gordon	SME – Academic & Secretary	Course Director (Business and Law) Dublin Business School
Ms. Sabrina Keenan	SME - Industry	Data Protection Officer Irish Blood Transfusion Service
Ms. Claire O'Mahony	SME - Academic	Solicitor/Lecturer The Law Society

Principal Programme

Names of centres where the programmes are to be provided	Maximum number of learners *(per centre)*	Minimum number of learners
Talentpool	12	6
Rented premises e.g. hotels	12	6

Enrolment interval *(normally 5 years)*	**Date of first intake**	Oct-2019 (Year 1)
	Date of last intake	Oct-2024 (Year 5)
Maximum number of annual intakes	48	
Maximum total number of learners per intake	12	
Programme duration (months from start to completion)	2 weeks f/t, 8 weeks p/t	
Target learner groups	The target group for this programme are individuals who are in existing roles that require more specialised Data Protection Skills qualifications or graduates looking to gain employment in a Data Protection role. To be eligible for this programme learners must have successfully achieved a level 7 qualification or higher in a related field of learning e.g. administration business, law, management etc. Learners may apply for recognition of prior learning and will be assessed on an individual basis.	
Approved countries for provision	Ireland	
Delivery mode: Full-time/Part-time	Full Time/Part Time	
The teaching and learning modalities	Directed Learning Group Discussions/ Interactions Practical/ Workshop/ Laboratories/Studio sessions Work Experience/ Simulated Work Environment Self Directed Learning	
Brief synopsis of the programme (e.g. who it is for, what is it for, what is involved for learners, what it leads to.)	This programme module aims to equip the learner with the knowledge, skill and competence to develop standards, measure performance, motivate and empower staff in a Data Protection Role	

Summary of specifications for teaching staff	Professional and educational qualifications and relevant data protection experience (industry) is a mandatory prerequisite to teach/train participants on this programme.
Summary of specifications for the ratio of learners to teaching-staff	The proposed ratio of teaching-staff to learner is 1:12 due to the interactive nature of the programme delivery.

Other noteworthy features of the application

The proposed programme, Certificate in Data Protection Skills, is relevant and appropriate due to the changes as introduced by GDPR 2018.

Part 1A Evaluation of the Case for an Extension of the Approved Scope of Provision (where applicable).

Comment on the case for extending the applicant's Approved Scope of Provision to enable provision of this programme.

N/A

Part 2 Evaluation against the validation criteria

QQI's validation criteria and sub-criteria are copied here in grey panels.

Criterion 1

The provider is eligible to apply for validation of the programme
a) The provider meets the prerequisites (section 44(7) of the 2012 Act) to apply for validation of the programme.
b) The application for validation is signed by the provider's chief executive (or equivalent) who confirms that the information provided is truthful and that all the applicable criteria have been addressed.
c) The provider has declared that their programme complies with applicable statutory, regulatory and professional body requirements. [2]

Satisfactory (yes, no, partially)	Comment
Yes	

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion.

The provider is a well-established provider in good standing with QQI and the proposed programme is in a field where the provider has experience.

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[2] This criterion is to ensure the programme can actually be provided and will not be halted on account of breach of the law. The declaration is sought to ensure this is not overlooked but QQI is not responsible for verifying this declaration of enforcing such requirements.

Criterion 2

The programme objectives and outcomes are clear and consistent with the QQI awards sought	
a) The programme aims and objectives are expressed plainly.	
b) A QQI award is specified for those who complete the programme.	
(i) Where applicable, a QQI award is specified for each embedded programme.	
c) There is a satisfactory rationale for the choice of QQI award(s).	
d) The award title(s) is consistent with unit 3.1 of QQI's *Policy and Criteria for Making Awards.*	
e) The award title(s) is otherwise legitimate for example it must comply with applicable statutory, regulatory and professional body requirements.	
f) The programme title and any embedded programme titles are	
(i) Consistent with the title of the QQI award sought.	
(ii) Clear, accurate, succinct and fit for the purpose of informing prospective learners and other stakeholders.	
g) For each programme and embedded programme	
(i) The **minimum intended programme learning outcomes** and any other educational or training objectives of the programme are explicitly specified.[3]	
(ii) The minimum intended programme learning outcomes to qualify for the QQI award sought are **consistent with** the relevant QQI awards standards.	
h) Where applicable, the **minimum intended module learning outcomes** are explicitly specified for each of the programme's modules.	
i) Any QQI minor awards sought for those who complete the modules are specified, where applicable.	
For each minor award specified, the minimum intended module learning outcomes to qualify for the award are consistent with relevant QQI minor awards standards.[4]	

Satisfactory (yes, no, partially)	Comment
Partially	**Condition –** The panel concluded that the provider needs to provide further evidence to show that this criterion has been met. See below for details.

Principal programme

The panel has evaluated the programme (Minimum Intended Programme Learning Outcomes and Programme Objectives) having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following condition: • The provider shall revise the MIPLO's to ensure they are appropriately expressed, consistent and in line with panel feedback as provided on the site visit on the 15-02-2019.

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[3] Other programme objectives, for example, may be to meet the educational or training requirements of a statutory, regulatory or professional body.

[4] Not all modules will warrant minor awards. Minor awards feature strongly in the QQI common awards system however further education and training awards may be made outside this system.

Criterion 3

The programme concept, implementation strategy, and its interpretation of QQI awards standards are well informed and soundly based (considering social, cultural, educational, professional and employment objectives)

a) The development of the programme and the intended programme learning outcomes has sought out and taken into account the views of stakeholders such as learners, graduates, teachers, lecturers, education and training institutions, employers, statutory bodies, regulatory bodies, the international scientific and academic communities, professional bodies and equivalent associations, trades unions, and social and community representatives.[5]

b) The interpretation of awards standards has been adequately informed and researched; considering the programme aims and objectives and minimum intended programme (and, where applicable, modular) learning outcomes.

    (i) There is a satisfactory rationale for providing the programme.

    (ii) The proposed programme compares favourably with existing related (comparable) programmes in Ireland and beyond. Comparators should be as close as it is possible to find.

    (iii) There is support for the introduction of the programme (such as from employers, or professional, regulatory or statutory bodies).

    (iv) There is evidence[6] of learner demand for the programme.

    (v) There is evidence of employment opportunities for graduates where relevant[7].

    (vi) The programme meets genuine education and training needs.[8]

c) There are mechanisms to keep the programme updated in consultation with internal and external stakeholders.

d) Employers and practitioners in the cases of vocational and professional awards have been systematically involved in the programme design where the programme is vocationally or professionally oriented.

e) The programme satisfies any validation-related criteria attaching to the applicable awards standards and QQI awards specifications.

Satisfactory (yes, no, partially)	Comment
Yes	

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion.

The programme document demonstrates that there has been extensive consultation with a number of relevant stakeholders – potential and existing learners (over 3000 surveys completed), service providers as well as relevant employers and industry sectors, as well as meetings with industry experts in GDPR.

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[5] Awards standards however detailed rely on various communities for their interpretation. This consultation is necessary if the programme is to enable learners to achieve the standard in its fullest sense.

[6] This might be predictive or indirect.

[7] It is essential to involve employers in the programme development and review process when the programme is vocationally or professionally oriented.

[8] There is clear evidence that the programme meets the **target learners'** education and training needs and that there is a clear demand for the programme.

Evidence of stakeholder satisfaction with the programme as proposed was presented to the panel with stakeholders taking the view that the programme is relevant in light of The General Data Protection Regulation (GDPR) 2018.

Criterion 4

The programme's access, transfer and progression arrangements are satisfactory

    a) The information about the programme as well as its procedures for access, transfer and progression are consistent with the procedures described in QQI's policy and criteria for access, transfer and progression in relation to learners for providers of further and higher education and training. Each of its programme-specific criteria is individually and explicitly satisfied[9].

    b) Programme information for learners is provided in plain language. This details what the programme expects of learners and what learners can expect of the programme and that there are procedures to ensure its availability in a range of accessible formats.

    c) If the programme leads to a higher education and training award and its duration is designed for native English speakers, then the level of proficiency in English language must be greater or equal to B2+ in the Common European Framework of Reference for Languages (CEFRL[10]) in order to enable learners to reach the required standard for the QQI award.

    d) The programme specifies the learning (knowledge, skill and competence) that **target learners** are expected to have achieved before they are enrolled in the programme and any other assumptions about enrolled learners (programme participants).

    e) The programme includes suitable procedures and criteria for the **recognition of prior learning** for the purposes of access and, where appropriate, for advanced entry to the programme and for exemptions.

    f) The programme title (the title used to refer to the programme):-
        (i) Reflects the core *intended programme learning outcomes*, and is consistent with the standards and purposes of the QQI awards to which it leads, the award title(s) and their class(es).
        (ii) Is learner focused and meaningful to the learners;
        (iii) Has long-lasting significance.

    g) The programme title is otherwise legitimate; for example, it must comply with applicable statutory, regulatory and professional body requirements.

Satisfactory (yes, no, partially)	Comment
Partially	**Condition –** The panel concluded that the provider needs to provide further evidence to show that this criterion has been met. See below for details.

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following condition:

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[9] Each of the detailed criteria set out in the Policy and criteria for access, transfer and progression in relation to learners for providers of further and higher education and training must be addressed in the provider's evaluation report. The detailed criteria   are (QQI, restated 2015) arranged under the headings
    - Progression and transfer routes
    - Entry arrangements
    - Information provision

[10] http://www.coe.int/t/dg4/linguistic/Source/Framework_EN.pdf (accessed 26/09/2015)

Quality assurance procedures to be implemented throughout the programme in areas such as, but not limited to, access, transfer and progression. Evidence of this implementation is required by the panel who shall be provided with a learner handbook and/or quality assurance handbook specific to the programme.

Criterion 5

The programme's written curriculum is well structured and fit-for-purpose
a) The programme is suitably structured and coherently oriented towards the achievement by learners of its intended programme learning outcomes. The programme (including any stages and modules) is integrated in all its dimensions.
b) In so far as it is feasible the programme provides choice to enrolled learners so that they may align their learning opportunities towards their individual educational and training needs.
c) Each module and stage is suitably structured and coherently oriented towards the achievement by learners of the intended *programme* learning outcomes.
d) The objectives and purposes of each of the programme's elements are clear to learners and to the provider's staff.
e) The programme is structured and scheduled realistically based on sound educational and training principles[11].
f) The curriculum is comprehensively and systematically documented.
g) The credit allocated to the programme is consistent with the difference between the entry standard and minimum intended programme learning outcomes.
h) The credit allocated to each module is consistent with the difference between the module entry standard and minimum intended module learning outcomes.
i) Elements such as practice placement and work based phases are provided with the same rigour and attentiveness as other elements.
j) The programme duration (expressed in terms of time from initial enrolment to completion) and its fulltime equivalent contact time (expressed in hours) are consistent with the difference between the minimum entry standard and award standard and with the credit allocation.[12]

Satisfactory (yes, no, partially)	Comment
Partially	**Condition –** The panel concluded that the provider needs to provide further evidence to show that this criterion has been met. See below for details.

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following condition:
• Provider to submit indicative content for a minimum learning outcome from the module with a corresponding assessment exemplar to ensure the assessment strategy supports teaching, learning and assessment of the programme.
• Grading criteria/marking rubric to be provided to the panel for approval.

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[11] This applies recursively to each and every element of the programme from enrolment through to completion.

In the case of a modular programme, the pool of modules and learning pathway constraints (such as any prerequisite and co-requisite modules) is explicit and appropriate to the intended programme learning outcomes.

[12] If the duration is variable, for example, when advanced entry is available, this should be explained and justified

Criterion 6

There are sufficient qualified and capable programme staff available to implement the programme as planned

   a) The specification of the programme's staffing requirements (staff required as part of the programme and intrinsic to it) is precise, and rigorous and consistent with the programme and its defined purpose. The specifications include professional and educational qualifications, licences-to-practise where applicable, experience and the staff/learner ratio requirements. See also criterion 12 c).
   b) The programme has an identified complement of staff[13] (or potential staff) who are available, qualified and capable to provide the specified programme in the context of their existing commitments.
   c) The programme's complement of staff (or potential staff) (those who support learning including any employer-based personnel) are demonstrated to be competent to enable learners to achieve the intended programme learning outcomes and to assess learners' achievements as required.
   d) There are arrangements for the performance of the programme's staff to be managed to ensure continuing capability to fulfil their roles and there are staff development[14] opportunities[15].
   e) There are arrangements for programme staff performance to be reviewed and there are mechanisms for encouraging development and for addressing underperformance.
   f) Where the programme is to be provided by staff not already in post there are arrangements to ensure that the programme will not enrol learners unless a complement of staff meeting the specifications is in post.

Satisfactory (yes, no, partially)	Comment
Partially	**Condition –** The panel concluded that the provider needs to provide further evidence to show that this criterion has been met. See below for details.

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following condition:

- Governance and Quality Assurance – provider to inaugurate a programme board, which comprises at least one qualified lawyer who practices in the area of data protection and as well as an industry expert in data protection. Should the qualified lawyer have professional experience in data protection this will dispense with the necessity for an industry specific person.
- Terms of Reference and a pro-forma composition of the Programme Board to be provided to the panel for approval.

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[13] Staff here means natural persons required as part of the programme and accountable (directly or indirectly) to the programme's provider, it may for example, include contracted trainers and workplace supervisors.

[14] Development here is for the purpose of ensuring staff remain up-to-date on the discipline itself, on teaching methods or on other relevant skills or knowledge, to the extent that this is necessary to ensure an adequate standard of teaching.

[15] Professional or vocational education and training requires that teaching staff's professional/vocation knowledge is up to date. Being qualified in a discipline does not necessarily mean that a person is currently competent in that discipline. Therefore, performance management and development of professional and vocational staff needs to focus on professional/vocational competence as well as pedagogical competence. Professional development may include placement in industry, for example. In regulated professions it would be expected that there are a suitable number of registered practitioners involved.

- Specifications for Teaching/Training Staff – professional and educational qualifications and relevant data protection experience (industry) is a mandatory prerequisite to teach/train participants on this programme.
- Provider to submit evidence of professional qualifications and relevant data protection (industry) experience of teaching staff providing curriculum vitae exemplars.

Criterion 7

There are sufficient physical resources to implement the programme as planned

a) The specification of the programme's physical resource requirements (physical resources required as part of the programme and intrinsic to it) is precise, and rigorous and consistent with the programme, its defined purpose and its resource/learner-ratio requirements. See also criterion 12 d).

b) The programme has an identified complement of supported physical resources (or potential supported physical resources) that are available in the context of existing commitments on these e.g. availability of:
   (i) suitable premises and accommodation for the learning and human needs (comfort, safety, health, wellbeing) of learners (this applies to all of the programme's learning environments including the workplace learning environment)
   (ii) suitable information technology and resources (including educational technology and any virtual learning environments provided)
   (iii) printed and electronic material (including software) for teaching, learning and assessment
   (iv) suitable specialist equipment (e.g. kitchen, laboratory, workshop, studio) – if applicable
   (v) technical support
   (vi) administrative support
   (vii) company placements/internships – if applicable

c) If versions of the programme are provided in parallel at more than one location each independently meets the location-sensitive validation criteria for each location (for example staffing, resources and the learning environment).

d) There is a five-year plan for the programme. It should address
   (i) Planned intake (first five years) and
   (ii) The total costs and income over the five years based on the planned intake.

e) The programme includes controls to ensure entitlement to use the property (including intellectual property, premises, materials and equipment) required.

Satisfactory (yes, no, partially)	Comment
Yes	

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion.

Criterion 8

The learning environment is consistent with the needs of the programme's learners
a) The programme's physical, social, cultural and intellectual environment (recognising that the environment may, for example, be partly virtual or involve the workplace) including resources and support systems are consistent with the intended programme learning outcomes. b) Learners can interact with, and are supported by, others in the programme's learning environments including peer learners, teachers, and where applicable supervisors, practitioners and mentors. c) The programme includes arrangements to ensure that the parts of the programme that occur in the workplace are subject to the same rigours as any other part of the programme while having regard to the different nature of the workplace.

Satisfactory (yes, no, partially)	Comment
Yes	

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion.

Criterion 9

There are sound teaching and learning strategies
a) The teaching strategies support achievement of the intended programme/module learning outcomes. b) The programme provides authentic learning opportunities to enable learners to achieve the intended programme learning outcomes. c) The programme enables enrolled learners to attain (if reasonably diligent) the minimum intended programme learning outcomes reliably and efficiently (in terms of overall learner effort and a reasonably balanced workload). **d)** Learning is monitored/supervised. **e)** Individualised guidance, support[16] and timely formative feedback is regularly provided to enrolled learners as they progress within the programme.

Satisfactory (yes, no, partially)	Comment
Partially	**Condition** – The panel concluded that the provider needs to provide further evidence to show that this criterion has been met. See below for details.

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following condition:

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[16] Support and feedback concerns anything material to learning in the context of the programme. For the avoidance of doubt it includes among other things any course-related language, literacy and numeracy support.

- Teaching and Learning Strategy –Provider to submit indicative content for a minimum learning outcome from the module with a corresponding assessment exemplar to ensure the assessment strategy supports teaching, learning and assessment of the programme.
- Grading criteria/marking rubric to be provided to the panel for approval.

Criterion 10

There are sound assessment strategies
  a) All assessment is undertaken consistently with *Assessment Guidelines, Conventions and Protocols for Programmes Leading to QQI Awards*[17]
  b) The programme's assessment procedures interface effectively with the provider's QQI approved quality assurance procedures.
  c) The programme includes specific procedures that are fair and consistent for the assessment of enrolled learners to ensure the minimum intended programme/module learning outcomes are acquired by all who successfully complete the programme.[18]
  d) The programme includes formative assessment to support learning.
  e) There is a satisfactory written **programme assessment strategy** for the programme as a whole and there are satisfactory module assessment strategies for any of its constituent modules.[19]
  f) Sample assessment instruments, tasks, marking schemes and related evidence have been provided for each award-stage assessment and indicate that the assessment is likely to be valid and reliable.
  g) There are sound procedures for the moderation of summative assessment results.
  h) The provider only puts forward an enrolled learner for certification for a particular award for which a programme has been validated if they have been specifically assessed against the standard for that award.[20]

Satisfactory (yes, no, partially)	Comment
Partially	**Condition –** The panel concluded that the provider needs to provide further evidence to show that this criterion has been met. See below for details.

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following condition:
- Assessment strategy must support teaching, learning and module content. Exemplar assessment to be provided to the panel, which relates to a specific component of the module descriptor for example Section 1 Introduction to Data Protection.
- Grading criteria/marking rubric to be provided to the panel for approval.

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[17] See the section on transitional arrangements.
[18] This assumes the minimum intended programme/module learning outcomes are consistent with the applicable awards standards.
[19] The programme assessment strategy is addressed in the Assessment Guidelines, Conventions and Protocols for Programmes Leading to QQI Awards. See the section on transitional arrangements.
[20] If the award is a QQI CAS compound award it is not necessarily sufficient that the learner has achieved all the components specified in the certification requirements unless at least one of those components is a capstone component (i.e. designed to test the compound learning outcomes).

Criterion 11

Learners enrolled on the programme are well informed, guided and cared for

a) There are arrangements to ensure that each enrolled learner is fully informed in a timely manner about the programme including the schedule of activities and assessments.

b) Information is provided about learner supports that are available to learners enrolled on the programme.

c) Specific information is provided to learners enrolled on the programme about any programme-specific appeals and complaints procedures.

d) If the programme is modular, it includes arrangements for the provision of effective guidance services for learners on the selection of appropriate learning pathways.

e) The programme takes into account and accommodates to the differences between enrolled learners, for example, in terms of their prior learning, maturity, and capabilities.

f) There are arrangements to ensure that learners enrolled on the programme are supervised and individualised support and due care is targeted at those who need it.

g) The programme provides supports for enrolled learners who have special education and training needs.

h) The programme makes reasonable accommodations for learners with disabilities[21].

i) If the programme aims to enrol international students it complies with the *Code of Practice for Provision of Programmes to International Students*[22] and there are appropriate in-service supports in areas such as English language, learning skills, information technology skills and such like, to address the particular needs of international learners and enable such learners to successfully participate in the programme.

j) The programme's learners will be well cared for and safe while participating in the programme, (e.g. while at the provider's premises or those of any collaborators involved in provision, the programme's locations of provision including any workplace locations or practice-placement locations).

Satisfactory (yes, no, partially)	Comment
Partially	**Recommendation –** Learner Handbook – provided to learners in line with quality assurance and bespoke to this particular programme i.e. Certificate in Data Protection Skills.

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following recommendation:

- Learner Handbook – handbook to be provided to learners in line with quality assurance and bespoke to this particular programme i.e. Certificate in Data Protection Skills and clearly setting out the award level and standard and potential graduate destinations available to the learner.

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[21] For more information on making reasonable accommodations see www.AHEAD.ie and QQI's Policies, Actions and Procedures for Access, Transfer and Progression for Learners (QQI, restated 2015).

[22] See Code of Practice for Provision of Programmes to International Students (QQI, 2015)

Criterion 12

The programme is well managed

a) The programme includes intrinsic governance, quality assurance, learner assessment, and access, transfer and progression procedures that functionally interface with the provider's general or institutional procedures.

b) The programme interfaces effectively with the provider's QQI approved quality assurance procedures. Any proposed incremental changes to the provider's QA procedures required by the programme or programme-specific QA procedures have been developed having regard to QQI's statutory QA guidelines. If the QA procedures allow the provider to approve the centres within the provider that may provide the programme, the procedures and criteria for this should be fit-for-the-purpose of identifying which centres are suited to provide the programme and which are not.

c) There are explicit and suitable programme-specific criteria for selecting persons who meet the programme's staffing requirements and can be added to the programme's complement of staff.

d) There are explicit and suitable programme-specific criteria for selecting physical resources that meet the programmes physical resource requirements, and can be added to the programme's complement of supported physical resources.

e) Quality assurance[23] is intrinsic to the programme's maintenance arrangements and addresses all aspects highlighted by the validation criteria.

f) The programme-specific quality assurance arrangements are consistent with QQI's statutory QA guidelines and use continually monitored completion rates and other sources of information that may provide insight into the quality and standards achieved.

g) The programme operation and management arrangements are coherently documented and suitable.

h) There are sound procedures for interface with QQI certification.

Satisfactory (yes, no, partially)	Comment
Partially	**Condition** – The panel concluded that the provider needs to provide further evidence to show that this criterion has been met. See below for details.

Principal programme

The panel has evaluated the programme having regard to the criterion and sub criteria and recommends that QQI can be satisfied that the programme meets this criterion subject to the following condition:

- Governance and Quality Assurance – inaugurate a Programme Board, which comprises at least one qualified lawyer who practices in the area of data protection and as well as an industry expert in data protection. Should the qualified lawyer have professional experience in data protection this will dispense with the necessity for an industry specific person.

- Terms of reference and pro-forma profile composition of the Programme Board to be provided to the panel for approval.

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[23] See also QQI's Policy on Monitoring (QQI, 2014)

Overall recommendation to QQI

1.1 Principal programme

Select one	
	Satisfactory (meaning that it recommends that QQI can be satisfied in the context of unit 2.3) of Core policies and criteria for the validation by QQI of programmes of education and training;
√ Satisfactory subject to conditions	Satisfactory subject to proposed special conditions (specified with timescale for compliance for each condition; these may include proposed pre-validation conditions i.e. proposed (**minor**) things to be done to a programme that almost fully meets the validation criteria before QQI makes a determination);[24]
	Not satisfactory.

1.1.1 Reasons[25] for the overall recommendation

The panel is satisfied that provider has devised a programme that can deliver the desired outcomes for their learners. The panel is satisfied that the curriculum, staffing and resources are sufficient and fit for purpose subject to proposed conditions of validation.

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[24] Normally an application that fails to meet the criteria in any of its aspects will be considered as not satisfactory. Nevertheless, so as to ensure that the validation process will not be implemented unreasonably, if an independent evaluation finds that a programme virtually meets the validation criteria but needs some minor modifications, the independent evaluation could conclude "Satisfactory subject to recommended special conditions" where the special conditions prescribe the defects that require to be corrected.

[25] Give precise reasons for the conclusions organised under each of the 12 criteria (for the programme and each embedded programme and any modules proposed to lead to QQI awards) citing supporting evidence. If any criteria or sub-criteria are not met by the application this must be stated explicitly giving precise reasons with evidence. A "Not Satisfactory" recommendation may be justified if any one of the applicable criteria or sub-criteria are not demonstrated to be satisfied.

Summary of recommended special conditions of validation

Condition 1 – Programme Objectives and Outcomes – Minimum Intended Programme Learning Outcomes to be revised for Panel approval as per the panel feedback to ensure MIPLOs are appropriately expressed and consistent.

Condition 2 – Quality Assurance – Quality assurance procedures to be implemented throughout the programme in areas such as, but not limited to, access, transfer and progression as well as teaching, learning and assessment. Provider to submit a learner handbook and/or quality assurance handbook specific to the programme.

Condition 3 – Assessment strategy –assessment must support teaching, learning and module content. Exemplar assessment and marking rubric/grading criteria to be provided to the panel for approval, which relates to a specific component of the module descriptor for example Section 1 Introduction to Data Protection.

Condition 4 – Governance and Quality Assurance – provider to inaugurate a Programme Board, which comprises at least one qualified lawyer who practices in the area of data protection and as well as an industry expert in data protection. Should the qualified lawyer have professional experience in data protection this will dispense with the necessity for an industry specific person. Terms of Reference and a pro-forma composition of the Programme Board to be provided to the panel for approval.

Condition 5 – Specifications for Teaching/Training Staff – professional and educational qualifications and relevant data protection experience (industry) is a mandatory prerequisite to teach/train participants on this programme. Provider to submit curriculum vitae(s) for proposed teaching staff.

Condition 6 - Teaching and Learning Strategy – Provider to submit indicative content for minimum learning outcomes from the module with a corresponding assessment exemplar to ensure the assessment strategy supports teaching, learning and assessment of the programme.

Summary of recommendations to the provider

N/A

Declarations of Evaluators' Interests

 All members of the panel have declared that they have no conflict of interest when evaluating this programme.

This report has been agreed by the evaluation panel and is signed on their behalf by the chairperson.

Panel chairperson: Ann Dunne   Date: 25 March 2019

Signed:

1.2 Disclaimer

The Report of the External Review Panel contains no assurances, warranties or representations express or implied, regarding the aforesaid issues, or any other issues outside the Terms of Reference.

While QQI has endeavoured to ensure that the information contained in the Report is correct, complete and up-to-date, any reliance placed on such information is strictly at the reader's own risk, and in no event will QQI be liable for any loss or damage (including without limitation, indirect or consequential loss or damage) arising from, or in connection with, the use of the information contained in the Report of the External Evaluation Panel.

Panel Response to Provider's Amendments to Programme Information to address Special Conditions of Validation

Response to Condition 1: Programme Objectives and Outcomes

The Panel is satisfied that Condition 1 has now been achieved and that the Panel's feedback has been implemented by the provider in line with the QQI Policies and Criteria for the Validation of Programmes of Education and Training 2017. All suggestions have been taken on board and incorporated -particularly in (8) Objectives of Programme -the flow is much more logical and makes more sense for the learner and reflects the sequencing of other well-established DP programmes (pg.4-5). All suggestions have been incorporated and any ambiguity removed in (11) Indicative content per MIMLO - (note -record of processing now in MIMLO 1). However, there are still inconsistencies in the document and the Panel feels further proofreading is required by the Provider

Response to Condition 2: Quality Assurance

The Panel is satisfied that Condition 2 has now been achieved and that the Panel's feedback has been implemented by the provider in line with the QQI Policies and Criteria for the Validation of Programmes of Education and Training 2017. The Panel are satisfied that the Quality Assurance Manual and Learner Handbook as well as the Terms of Reference for the Advisory Board are now in order.

Response to Condition 3: Assessment

The Panel is satisfied that Condition 3 has now been achieved and that the Panel's feedback has been implemented by the provider in line with the QQI Policies and Criteria for the Validation of Programmes of Education and Training 2017. The Panel is satisfied the content will be strictly informed by the Advisory Board, which has a clear set of Terms of Reference.

The Panel expects the content and overall programme delivery to be reviewed on an annual basis (minuted) by the Advisory Board.

Response to Condition 4: Governance and Quality ASSURANCE

The Panel is satisfied that Condition 4 has now been achieved and that the Panel's feedback has been implemented by the provider in line with the QQI Policies and Criteria for the Validation of Programmes of Education and Training 2017. The Panel is satisfied that the Quality Assurance Manual and Learner Handbook as well as the Terms of Reference for the Advisory Board are now in order. The Panel expects the content and overall programme delivery to be reviewed on an annual basis (minuted) by the Advisory Board.

Response to Condition 5: Specification for Teaching/Training Staff

The Panel is satisfied that Condition 5 has now been achieved and that the Panel's feedback has been implemented by the provider in line with the QQI Policies and Criteria for the Validation of Programmes of Education and Training 2017. The Panel is satisfied that the experience of each tutor

has now been provided by way of curriculum vitae and any new tutors would need to be agreed by the advisory board in line with Condition 5.

Response to Condition 6: Teaching and Learning Strategy

The Panel is satisfied that Condition 6 has now been achieved and that the Panel's feedback has been implemented by the provider in line with the QQI Policies and Criteria for the Validation of Programmes of Education and Training 2017**. The Panel advises that the record of processing element is introduced as a record relating to the accountability principle prior to the audit preparation material.** The Panel is satisfied that the teaching and learning strategy is now in line with the feedback and the programme is now fit for purpose and in line with the award standard as requested (Level 6 NFQ) in Data Protection Skills.

The Panel is satisfied that the programme as proposed meets Level 6 (NFQ) and the learners will acquire the necessary knowledge, skills and competencies. The Panel is satisfied that the programme as proposed provides a Special Purpose Award in Data Protection Skills and not a qualification as a Data Protection Officer.

This report has been agreed by the Evaluation Panel and is signed on their behalf by the Chairperson.

Panel chairperson: Ann Dunne   Date: 10 June 2019

Signed: *Ann Dunne* .