



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	Barrow Consultancy and Training Ltd
Address:	Market Square Bagenalstown Co. Carlow
Date of Application:	February 2020
Date of resubmission of application:	16th October 2020
Date of evaluation:	5 th and 16 th of June 2020
Date of virtual site visit (if applicable):	17 th June 2020
Date of recommendation to the Programmes and Awards Executive Committee:	10 th September 2020 and 4 th February 2021

1.2 Profile of provider

Barrow Training and Consultancy Limited is a regional private provider with one premises based in Bagenalstown, Co. Carlow. It was founded in 2008 and agreed a Quality Assurance Agreement with FETAC (antecedent agency to QQI) in 2010. Barrow Training specialises in professional training in the areas of Health and Safety, Healthcare and Healthcare Management, Childcare, Hospitality, Tourism and Personal and Professional Development.

Barrow Training and Consultancy have a strong management and administrative team based in the premises in Carlow, many of whom have relevant backgrounds in education and industry. In addition, a panel of qualified tutors that are also experienced industry professionals are drawn upon for programme delivery. Many members of both the management and tutor teams have long standing relationships with Barrow.



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Since the establishment of the Common Awards System (CAS) the provider has 48 programmes validated with 8 leading to major awards. The provider offers programmes at level 4, 5 and 6 on the National Framework of Qualifications. The most recent programme validated by QQI for the provider was a programme designed for a blended mode of delivery and was validated under the new QQI Validation Policy and Criteria in December 2018. The provider offers two other blended learning programmes in addition to the newly validated programme. QQI certification data from 2018 indicates that nearly 1,000 learners were entered for certification with 899 learners put forward for certification for non-major awards. The certification data shows that the most frequent major award is Childhood Care and Education at Level 5 and Level 6. At the component award level there is significant activity at level 5 and 6 in manual handling, special needs assisting, communications, care skills and care of the older person, but also delivery in other areas such as work experience and team leadership.

In addition to QQI accredited programmes, Barrow Training offers two programmes accredited by PHECC (Pre-Hospital Emergency Care Council) and a range of short non-accredited programmes. Barrow Training also became and first private training provider in Ireland to receive the ISO 9001 (2015) Quality Management System standard in 2016. The centre was only the second company in Ireland to achieve the 2015 standard.

Barrow Training and Consultancy offers further education and training programmes as part of publicly funded job activation schemes nationwide, to corporate clients and private individuals and has arrangements with second providers to offer its programmes to a wider cohort of learners nationally. Barrow Training and Consultancy also offers a traineeship as a subcontractor to a primary contractor for an ETB under a national procurement framework.

**Part 2 Panel Membership**

Name	Role of panel member	Organisation
Dr. Michael Hall	Chair	Head of Department, I.T. Tralee and formerly Registrar of I.T. Tralee
Treasa Brannick O’Cillín BL	Panel Member and Secretary	Practicing Barrister and Formerly FET Development Officer, City of Dublin Education and Training Board
Aoife Prendergast	Panel Member	Lecturer in Social Care, Limerick I.T
Angela Higgins	Panel Member	Education and Development Officer, Kildare Wicklow ETB
Christopher O’Callaghan	Panel Member	Training and Business Development Management, NCU Training

Part 3 Findings of the Panel**3.1 Summary Findings**

The panel acknowledges the track record and established good standing of Barrow Training and Consultancy Ltd. and equally the positive and open attitude of the provider to the reengagement process, taking the view that it presented a valuable learning opportunity to improve the manner in which it delivers training services to learners. The positive disposition of the provider’s team aided the examination of quality assurance processes conducted by the panel in conjunction with the provider, in particular, as part of the full-day online meeting. The commitment, passion and experience of the management and support team was clearly evident.

The reengagement process has involved a comprehensive review by the panel of Barrow Training and Consultancy’s quality assurance (QA) manual, related documentation and a lengthy and robust review meeting. During the latter, the panel engaged directly with key members of staff working at both executive and operational and across different areas, achieving triangulation of information/documentation provided as part of the review. A learner-centred approach was evident across the organisation as a whole, with a clear commitment to learner support and progression.

At the conclusion of the meeting with the provider, a number of areas of vulnerability were identified with the provider which related to:

1. Adherence to QQI’s Statutory Quality Assurance Guidelines on Blended Learning as part of the delivery by the provider of blended learning programmes. This is separate and distinct from the current online provision of programmes, as agreed with QQI as part of an emergency response to the Covid-19 crisis.



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2. Adherence to QQI's Core Statutory Quality Assurance Guidelines, Statutory Quality Assurance Guidelines developed by QQI for Independent/Private Providers coming to QQI on a Voluntary Basis as it relates to collaborative arrangements, and any relevant aspects of programme validation requirements which have a bearing on same.
3. The composition and workings of dedicated academic and quality assurance governance units, information to learners, GDP requirements as they relate to learner data in particular where third parties are concerned and the structure and completeness of the QA manual.

The panel was of the view that the issues identified could not be addressed by the provider in a short time frame and therefore recommended that QQI refuse approval pending the mandatory conditions prescribed, in order to allow Barrow Training and Consultancy sufficient time to submit evidence to the panel that the mandatory changes identified had been satisfactorily addressed.

The panel reconvened on 26th November 2020 to undertake a desk review of evidence resubmitted by the provider. It was the view of the panel that Barrow Training and Consultancy Ltd had made significant progress and had achieved the required enhancements to its QA procedures. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.



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3.2 Recommendation of the panel to Programmes and Awards Executive Committee of QQI

	Tick <u>one</u> as appropriate
Approve Barrow Consultancy and Training Ltd. draft QA procedures	X
Refuse approval of Barrow Consultancy and Training Ltd. draft QA procedures with mandatory changes set out in Section 6.1 <small>(If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)</small>	
Refuse to approve Barrow Consultancy and Training Ltd. draft QA procedures	



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

	Criteria	Yes/No/ Partially	Comments
4.1.1(a)	Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	<p>The Relevant Company Registration Office (CRO) details were provided to the panel.</p> <p>While there seems to be another connected company the applicant provider is a distinct legal entity which has education and/or training as its principal function.</p> <p>The provider also indicated that to the best of its knowledge this criterion is met.</p>
4.1.2(a)	Criterion: <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	Yes	<p>Based on the information presented to the panel the provider is established in the EU and has a substantial presence in Ireland.</p> <p>The provider also indicated that to the best of its knowledge this criterion is met.</p>
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	<p>Based on the process undertaken, evidence provided in writing/orally, there are two collaborative relationships in place with other non-QQI accredited provider who deliver validated programmes of the applicant provider. In addition, the applicant provider is a sub-contractor for another provider under an ETB public</p>



			<p>procurement framework for contracted training.</p> <p>There are also a number of other collaborative type relationships, where the provider is reliant on the capacity of third parties, in relation to VLE, I.T services and quality assurance software/platform.</p> <p>The panel is not aware of any other collaborative arrangements. However, there was a lack of detail in relation to the nature and management of such relationships, in particular in relation to second providers.</p>
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	<p>Based on the process undertaken, evidence provided in writing/orally the provider has entered into collaborative arrangements with other providers, however, the provider is not relying on the capacity of such third parties to reengage.</p> <p>The provider does rely on the capacity of third parties with regard to the provision of a VLE, I.T support and quality assurance software. These arrangements are subject to contractual agreements.</p> <p>The provider also indicated that</p>



			to the best of its knowledge this criterion is met.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes.	Based on the process undertaken, evidence provided in writing/orally, in general there would not seem to be any issues in relation to regulatory and legal compliance in the broad sense. However, at the time of the original site visit, the provider was not in a position to demonstrate full compliance with the relevant law on data protection, and vulnerabilities were identified in relation to a number of arrangements with third parties. This gave rise to concerns which are described in more detail further on in the report. These have now been satisfactorily addressed by the provider.
4.1.6(a)	Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>	Yes	Based on the process undertaken, evidence provided in writing/orally, there would not seem to be any issues in relation to standing of the provider within the Irish qualification's system. The provider also confirmed to the best of its knowledge this criterion is met.

Findings

The provider has been established for quite some time, with a long-standing track record in the industry and has achieved ISO certification in addition to being a FETAC/QQI accredited provider since 2010.



However, a number of vulnerabilities were identified at the original site visit that had not been sufficiently ameliorated at the time of evaluation of the application for re-engagement. Despite, there being commercial arrangements in place with other providers (non-QQI accredited) to deliver validated programmes on behalf of the applicant provider, there was a significant lack of detail and clarity in relation to the following:

- The criteria and decision-making processes employed to approve entering into a collaborative arrangement including whether reference was made to the relevant Statutory QA Guidelines
- Which entity the learners had a contractual relationship with and who is ultimately responsible for the learner and delivery of programmes as validated.
- the delineation of roles and responsibilities in relation to the programme and the management of the contractual relationship, how quality of the validated programme was being assured by the applicant provider, and the consistency of same in relation to the relevant Statutory QA Guidelines

In addition, there were also issues with GDPR and third parties, whereby virtue of the relationships with third parties it was highly probable that data processing was occurring, but it was indicated by the provider that data processing agreements were not in place, and the provider was not in a position to confirm that circumstances existed which would not preclude the need for such agreements.

Following changes implemented during the interim period, the panel is satisfied that collaborative provision through second providers has ceased and therefore the issues identified in relation to this aspect of the provider's QA procedures outlined above no longer persist. Should the provider wish to engage in collaborative provision in the future, quality assurance procedures underpinning such provision must be submitted to QQI, and approval secured.

**4.2 Resource, governance and structural requirements:**

	Criteria	Yes/No/ Partially	Comments
4.2.1(a)	Criterion: <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	Yes	<p>Based on the process undertaken, evidence provided in writing/orally, there would not seem to be any issues in relation to this criterion. Evidence submitted is indicative that this is the case. Evidence included, a tax clearance pin number for 2019, current public liability insurance and a letter from the company's accountants confirming that the accounts are up to date with returns required by the Companies Registration Office (CRO). The accountant's letter also confirmed that the provider's tax affairs are up to date and that it holds a valid tax clearance certificate.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>



4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	<p>Based on the process undertaken, evidence provided in writing/orally, the provider is a well-established provider in the sector, with a strategy for growth. The provider delivers many qualifications that are required for compliance as part of the regulation in general and in relation to certain sectors e.g. healthcare and childcare.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	<p>Based on the process undertaken, evidence provided in writing/orally, at the conclusion of the site visit the panel was not wholly satisfied with the governance structures of the provider.</p>
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	<p>Based on the process undertaken, evidence provided in writing/orally, there is evidence of processes in place to provide QQI with information as required, including the holding of Results Approval Panels.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>

Findings

At the conclusion of the initial evaluation, the panel was of the view that the provider's governance and decision-making structures needed to be strengthened in the following areas:

- i) Separation between academic and commercial decision making, the use of 'online' instead of 'blended' in promotional information, use of a rolling individualised intake model being used



- for blended programmes instead of a cyclical class group intake model, despite a validation condition to that effect.
- ii) Separation between the parties/units which develop, deliver and propose modifications to programmes and the governance units which approve programmes, modifications, review programmes and ensure they are delivered in compliance with validation requirements. In addition, some issues were identified in relation to validation conditions for the most recent QQI validated programme.
 - iii) Governance units to be thoroughly embedded into the decision-making processes of the provider. For example, there was a lack of awareness amongst staff in relation to governance units and approval processes.
 - iv) Appropriate levels of externality which could ameliorate some of the issues already identified, by ensuring greater levels of broader sectoral perspective and objectivity and ensures the absence of undue influence from commercial considerations in academic decisionmaking.

Following changes implemented during the interim period, the panel is satisfied that fit for purpose governance structures are in place.

Programme development and provision requirements:

	Criteria	Yes/No/ Partially	Comments
4.3.1(a)	Criterion: <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	Yes	Based on the process undertaken, evidence provided in writing/orally, the provider has been registered with QQI (formerly FETAC) since 2010 and has been delivering accredited further education and training programmes since then. The provider also confirmed to the best of its knowledge this criterion is met.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	Based on the process undertaken, evidence provided in writing/orally, the provider has a core



			<p>management and administrative team, many of whom are industry professionals and having a background in training. The provider relies on a cohort of training staff to deliver programmes. The panel met with an experience trainer within the childcare sphere.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>
4.3.3(a)	Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	<p>Section 45(3) of the Act prescribes the following:</p> <p>The provider of the programme concerned shall—</p> <p>(a) co-operate with and assist the Authority in the performance of the Authority’s functions in so far as those functions relate to the functions of the provider,</p> <p>(b) establish procedures which are fair and consistent for the assessment of enrolled learners to ensure the standards of knowledge, skill or competence determined by the</p>



			<p>Authority under section 49 (1) are acquired, and where appropriate, demonstrated, by enrolled learners,</p> <p>(c) continue to comply with section 65 in respect of arrangements for the protection of enrolled learners, if applicable, and</p> <p>(d) provide to the Authority such information as the Authority may from time to time require for the purposes of the performance of its functions, including information in respect of completion rates</p> <p>The standard conditions of validation require co-operation.</p> <p>Based on the process undertaken, evidence provided in writing/orally, the panel is of the view that the provider, and the core team, have the capacity to comply with the requirements set out in Section 45(3). It would be remiss of the Panel not to</p>
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			<p>highlight the need for the provider to strengthen its programme governance function within the provider, to ensure full compliance with existing conditions of QQI validation, as it was clear there was some lack of adherence to same in relation to the healthcare support programme which was validated for delivery using a blended mode. Governance structures did not ensure full compliance was achieved pre-Covid. In addition, if full compliance had been achieved, this would have enhanced response measures in light of Covid-19.</p> <p>Following a review of the revised QA documentation submitted by Barrow, the panel is now assured that the issues identified above have been satisfactorily addressed.</p>
4.3.4(a)	<p>Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i></p>	<p>Undetermined – please see ‘findings’ below.</p>	<p>A site visit could not occur due to adherence to public health guidelines, in response to Covid-19.</p> <p>The provider confirmed to the best of its knowledge this criterion is met.</p>



4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	Based on the process undertaken, evidence provided in writing / orally, there are quality assurance procedures in place in relation to ATP.



			<p>However, at the time of the initial site visit, there were issues in relation to access arrangements with second providers and the evaluation of learner needs to determine suitability for entry onto the provider's programmes. The panel has been advised that collaborative provision through second providers has ceased and therefore the issues identified in relation to this aspect of the provider's QA procedures outlined above no longer persist.</p>
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	<p>Based on the process undertaken, evidence provided in writing/orally, assessment instruments are devised and reviewed centrally and issued to teachers. The provider also has a bank of assessment instruments to alternate and deal with repeats. The provider has processes in place for both internal verification and external authentication. The provider also conducts Result Approval Panels.</p>



			The provider confirmed to the best of its knowledge this criterion is met.
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	Yes	Based on the process undertaken, evidence provided in writing/orally, where PEL is applicable, insurance cover is provided to learners. The provider confirmed this to the best of its knowledge and this criterion is met.



Findings

The panel was not in a position to conduct a physical site visit due to restrictions under public health requirements: a virtual, full-day meeting was held instead. The provider is well established with a strong team, a developed infrastructure and resource base in place. Access to necessary and specified resources is of particular relevance in relation to Special Validation Requirements (SVRs) for certain programmes and programme modules e.g. access to hoists etc. Verification of same would need to be addressed either in supplemental evidence which addresses the mandatory changes set out at Part 6 of this report or through a scheduled site visit.

At the conclusion of the original evaluation, the panel was of the view that there were vulnerabilities in terms of access to programmes in particular in the follow areas:

- In relation to the provider's programme(s) which are delivered on their behalf by other providers, it emerged that the arrangement was that one such programme was primarily filled by the second providers learners, with some spaces being kept for the applicant provider's learners. This provided that the recruitment and selection of what are deemed the second provider's learners was being conducted solely by the second provider. It would seem that there were separate and distinct contractual relationships being formed with the learners depending on which provider recruited them. Pursuant to an MOU rather than a 'contract for services' second providers were subject to a *per capita* payment to the applicant provider and vice versa for any places taken by the applicant provider's learners. Such an arrangement would not seem permissible as the applicant provider has ultimate responsibility for their validated programme and the learners which participate on such programmes.
- The provider confirmed that there was not a single formal learner selection process and interviews were not conducted. There was no detail in the QA manual on how learners are assessed for suitability for entry or the procedure by which this is established. More detail and documentation was needed in relation to entry requirements and the assessment of the learners to determine their suitability for programmes, including in relation to English language requirements as part of entry criteria and verification of same. The panel advised that this should be clearly reflected in procedures and information to learners including on the website. Monitoring and review of the effectiveness of such measures should be reported on and overseen by the relevant governance unit while ensuring academic decision making is not unduly impacted by commercial considerations.

Following changes implemented during the interim period, the panel is satisfied that fit for purpose governance structures are in place; the issues identified above have been addressed and collaborative provision has ceased.

4.3 Overall findings in respect of provider capacity to provide sustainable education and training

The provider is well resourced, with a strong management and administrative team and access to



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external expertise so capacity is present; however, the panel found at the end of the original evaluation that ensuring compliance with certain regulatory requirements needed to be strengthened through enhancing academic governance structures and activities in the key areas outlined in this report.

Following changes implemented during the interim period, the panel is satisfied that fit for purpose governance structures are in place and collaborative provision has ceased.



Part 5 Evaluation of draft QA Procedures submitted by Barrow Training and Consultancy Ltd.

The following is the panel's findings following evaluation of Barrow Training and Consultancy quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016) and Topic Specific QA Guidelines - Blended Learning. Sections 1-11 of the report follows the structure and referencing of the Core QA Guidelines.

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

The Panel examined the membership and Terms of Reference (TORs) of all governance units prior to the meeting with the provider. It was clear that the provider was attempting to create a comprehensive system of governance to support quality programme delivery. It was understood by the panel that the development of governance systems is a newer dimension to quality assurance policies and procedures and can be particularly challenging for smaller providers. It is emphasised that the governance system for a small provider needs to fit its context and therefore does not have to be the same as for other larger providers.

Upon examination of the structures that had been developed, the panel found that these seemed to be more akin to corporate governance rather than to academic governance of a small provider of education and training, with no significant externality. Governance structures included a Board of Management, a Quality Committee and a Programme Committee. There appeared to be no decision-making powers in the said Committees. Separate Results Approval Panels were formed on an *ad-hoc* basis.

The TORs prescribed a wide scope of important work to the committees, which would presume a substantial workload and frequent meetings. However, this did not seem to be reflected in practice. Equally, under the TORs, many members of the small internal team populate, and even chair, governance units to which they might be expected to report to ensure sufficient oversight and accountability, in particular to ensure a separation of academic and commercial decision making.

The provider has a strong programme management layer in the organisation and uses lead assessors in programme areas. Assessment instruments are developed centrally under the auspices of the Programme Committee, however, it was not clear if this Committee was convened as part of approval processes of assessment instruments or the development of content as teaching staff seemed unaware and unfamiliar with the espoused approval processes despite having developed content.

The Panel is of the view that such quality assurances processes, and wider staff awareness thereof, are especially important in relation to developing content for the Virtual Learning Environment (VLE). The Panel noted that there was no member of the internal team with a recognised qualification in TEL or Blended Learning. External expertise in the area was not evident as part of governance and decision making in relation to blended delivery to ensure adequate quality assurance for a blended mode of delivery, as well as the review and monitoring of same.



This was reflected in terms of the content in the VLE and the Panel was of the view that the lack of variety and interactivity in the sample VLE material provided could be enhanced by the input of external expertise in the area.

It was unclear what governance unit is charged with the function of ensuring compliance with validation conditions in particular as they related to the programme validated for a blended mode of delivery, as certain programme validation conditions did not seem to have been fully complied with despite having been imposed in December 2018. These included quality assurance procedures to underpin blended delivery in line with QQI statutory QA guidelines on blended learning which requires *inter alia* processes to ensure content is appropriate for prescribed learning outcomes and sufficiently interactive.

Ensuring the quality of blended delivery was not identified as a vulnerability as part of the provider's gap analysis despite it being a challenge for all providers of blended programmes due to the remote aspect of delivery.

The area of governance in relation to programme development and modification, including content development needed to be strengthened, in particular in relation to the detail and presentation of content for the Virtual Learning Environment. Quality assurance processes should ensure that the persons proposing modifications to existing programmes or developing new programmes/content for existing programmes were not the same as those approving them. The panel found that clear separation was required in this regard. It is also important that a governance unit has responsibility for considering and approving programmes that have been developed for QQI validation prior to their submission to ensure compliance with QQI's Validation Policy and Criteria.

A system of governance within a provider of education and training programmes must ensure sufficient separation between commercial and academic decision-making, in order to protect the integrity of academic processes and standards. In this report, the panel makes no suggestion that commercial interests have unduly interfered with academic decision making, and it further notes that the provider is reputable and held in high regard in the sector, but academic governance and decision making required strengthening and clearer separation from commercial decision-making. The Panel suggested that increasing the degree of externality could only benefit the process of self-evaluation as part of the governance system. The provider was conscious of this vulnerability, highlighting it as part of its self-evaluation and advised the panel of its approach from a day-to-day operations perspective.

The task for the provider within the educational context is to move to an enhanced system of academic governance which is clearly embedded into the decision-making processes of the organisation. Academic governance should provide for restrictions on role combinations to ensure appropriate separation of decision-making functions. This includes a function in relation to the consideration of risk and the monitoring and review of operational activities. The Panel was of the view that incorporating a degree of externality, particularly at the higher levels of governance, would be an essential step to address these academic governance matters in that it would promote confidence and transparency, contribute to more robust self-evaluation processes and further promote a culture of quality. In addition, such externality would assist in ensuring objectivity in compliance with regulatory requirements.

The Panel was of the view that academic governance units should be empowered to formulate appropriate responses to risk and in light of self-evaluation (monitoring and review processes), and be empowered to ensure follow-up occurs at the operational level thereby promoting transparent academic roles and accountability within the organisation. From the information the provider had furnished, the panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes in this area.



The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had, for example, revised the name and membership of their governance units, strengthened the Terms of References for the relevant units and identified a separation of responsibilities between those reporting to the units and the membership of the units to achieve sufficient separation, and assigned monitoring, review functions to governance units to ensure adherence to quality assurance procedures and validation agreements. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.



2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Barrow Training and Consultancy documents its QA system within its Quality Assurance Manual, with policies and related operating procedures, handbooks and forms. In addition to the Manual, there is also a learner handbook and training staff are provided with teaching and learning resources and assessment instruments. The provider uses an online system to support its quality assurance activities. The provider is to be commended on the extensive work that has been carried out in developing a Quality Assurance Manual and associated documentation to address relevant statutory guidelines but the panel found at the close of the original evaluation there was more work to do, in particular in relation to academic governance requirements, in addition to corporate requirements to reflect the specific context of Barrow Training and Consultancy and promote ownership of quality assurance as a provider led quality assurance system.

The team is highly committed and learner focused. From discussions with staff, it emerged that there were additional areas of good practice that were informal in nature, and which needed to be formalised and reflected in the QA manual. The panel was of the view that the documentation needed to 'catch up' with the practices of the team, so to speak.

Key areas of vulnerability were also identified in the documented approach. These included collaborative provision and blended learning procedures with the need for more comprehensive procedures to be developed in both areas to address all aspects of the relevant statutory guidelines. These areas needed to be clearly mapped to same so that the provider through its governance structures can be assured of this. The conditions which relate to governance, must be implemented and reflected in the QA manual, including increasing the degree of externality in the structures and providing for clear restrictions on certain role combinations to ensure conflicts of interests are avoided and the necessary separations in decision making are upheld,

In addition, the panel also found it necessary for Barrow to revise the QA Manual and connected Learner Handbook to provide for the following:

- a. Distinct chapters including relevant forms
- b. Drawing together disparate documents to form single topic chapters
- c. Remove personnel names from the document
- d. Make QA documentation available to all stakeholders.
- e. Data protection requirements
- f. Make learner handbook more learner-focused, reader-friendly and concise.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. The relevant updates were made to the Quality Assurance Manual, and the structures, policies, procedure and relevant forms described therein. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

**3 PROGRAMMES OF EDUCATION AND TRAINING**

The provider has a scope of provision that takes in health and safety, childcare and healthcare programmes as its main areas of provision. The style of delivery is in the main short courses, often offered on a part-time basis with higher frequency. For a small provider, there is a significant number of QQI validated programmes. The provider has 48 validated programmes with 8 leading to major awards. It emerged through discussion with the provider, that this is why it tends to be approached to engage in collaborative arrangements with non-QQI accredited providers, as QA approval and programme validation processes are considered lengthy and resource intensive.

All programmes are legacy programmes validated prior to 2018 except for the Level 5 Healthcare Support programme which was validated for blended delivery subject to a number of conditions. Prior to the Covid-19 crisis, there were three programmes in delivery via a blended mode, the newly validated programme and two legacy programmes. It is noted that the provider has an audit schedule for programmes, which is commendable, but the panel advised that this needed to be strengthened to record implementation and outcomes of the audits. The issue in relation to governance and adherence to conditions of validation has already been flagged and elucidated already in this report and addressing issues already identified was necessary to fully address this thematic area in terms of the governance of programmes, including monitoring and review.

It was clear from the meeting with the management team and trainers that the ethos for programme delivery is learner centred. A tangible passion for helping learner progress through education and training was evident from the team.

The provider described the learner life cycle from recruitment to progression to the panel as it related to blended programmes (pre-Covid) and there was a lot of emphasis on communication and care for the learner. At the time of the original evaluation, the system described to the panel was as follows: the potential applicant will express an interest in a programme and will then be spoken with directly to answer any questions. If an applicant wishes to meet someone in person, they can call to the offices or make an appointment as an open-door policy is operated. There is no formal, documented interview process. Referrals also come from private individuals, corporate clients and through labour market activation schemes. Currently, assessments, including those in relation to English Language Proficiency, are carried out on a more informal basis. The approach taken seems to be mainly in the form of guidance rather than specific assessment. However, the provider advised that applicants are required to have a 'B' level of proficiency in line with the Common European Reference Framework for Languages. It is important to note that there is quite a difference between a B1 and B2 in this regard. There is a positive onus on a provider to formally and accurately assess the learning needs of an applicant prior to giving them a place on a programme to ensure it meets their learning needs. This should be reflected in access procedures and in relation to information to the public so that learners are empowered to make informed choices at the outset. The panel is also of the view that it is important for the provider to have clear entry criteria on their website for each of the courses, which includes English Language proficiency requirements.

There was also a discussion in relation to the quality assurance processes for work-based elements of programme delivery, and the provider confirmed that apart from the supervisor's report no other work-based assessment was occurring. The provider works with a network of established work-placements that have accepted learners for a number of years, and supervisors would be quite experienced new work-placements are subject to additional monitoring. Supervisor packs are issued to the relevant supervisor for each placement.

The learner is assigned a tutor for the purposes of monitoring the work placement element of the



programme. The tutor checks in on them weekly in terms of how they are getting on, and also conducts site visits. Where a tutor cannot carry out a site visit, the Quality Assurance Manager will carry it out. In general, the Supervisor will be contacted in the first instance to arrange a meeting, where the student's progress will be discussed, in a bid to identify whether there are any areas the learner needs to work and how these can be further supported by the provider and the work-placement. Feedback is given to the learner from the supervisor and tutor throughout, mainly informally, and then a supervisor's report is completed at the end of the placement. All parties are encouraged to reflect on feedback and identify any improvements that can be made. There is provision for unannounced site visits, as an additional tool for monitoring. Both supervisors and learners are aware of the possibility of unannounced visits.

Staff described an open and communicative approach being maintained with both trainers and learners as part of programme delivery. It was also clear from the discussions with the provider's management team that there is an emphasis on a collaborative approach being taken with learners, tutor and supervisor, with significant value placed on both formal and informal communication, taking feedback and reflecting on same.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd's enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had, for example, assigned a programme monitoring and review function to the relevant governance unit to ensure adherence to validation agreements is assured. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

The provider has a good pool of academic talent from which to draw and uses a panel of qualified tutors for programme delivery, many of whom seem to be with the provider for quite some time.

There was evidence of Barrow's approach to recruitment and selection when sourcing a new training staff member which included establishing criteria for the role by programme area, including specific qualifications, experience, an ability to deliver utilising their qualifications and experience, and that the candidate demonstrates an attitude which values the learner. The applicant will then be subject to an interview and if successful will take part in an induction process which includes sitting in on other tutors' classes and then also having a member of the quality assurance team sit in on their classes and give feedback. In terms of managing staff, there are close monitoring systems used which include an online quality assurance platform with associated software. Formal and informal meetings occur with training staff to discuss any issues arising and the core team with core contracted trainers will often work together to develop resources for teaching and learning.

Many of the members of the management and administration team have experience in delivering courses as tutors and they utilise this to support training staff. Feedback is given by the Quality Assurance Manager to tutors at the end of programmes to aid reflection and development and in the same vein EA reports are shared with training staff, demonstrating a collaborative approach to continuous professional development.

During the meeting, the panel interviewed a member of the provider's training staff with regard to



teaching and learning approaches. The interviewee had also engaged in external authentication within the FET sector. This provides a significant opportunity for staff development and should continue to be encouraged.

The training, management and administration staff interviewed confirmed that they felt supported in terms of pursuing professional development and also spoke of a very positive work culture. Staff are also given opportunities to engage in devising assessment, teaching and learning resources, programme/module content and programme development. Nevertheless, there were gaps evident in terms of formal qualifications in relation to Technology Enhanced Learning (TEL), including an absence of experience in the use of blended learning as a pedagogy. As the provider has moved into blended learning, it is essential in the interests of learners that staff build up capability in this area enabling them to reflect in a wider and more informed manner in terms of how the provider is approaching this type of delivery, developing and improving practice. This also applies to the area of academic governance, quality assurance and further development of staff capabilities in these areas, including through formal study would enable the provider to address identified vulnerabilities more effectively going forward.

The panel were delighted to hear from the provider that post-graduate courses were being considered with staff to support them in terms of further professional development and the fees would be discharged by the provider. It was very evident that the provider recognised the talents of their staff, took pride their abilities, and understood the importance of investing further in their staff to develop their skills and talents.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had, for example, included an external TEL expert to the membership of the relevant governance unit. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

**5 TEACHING AND LEARNING*****Panel Findings:***

Multiple examples of good practice in teaching and learning were provided by management and training staff during the meeting with the provider. The provider's teaching staff outlined practices that were indicative of learner-centred pedagogy. The passion of management and training staff in terms of supporting the development of their learners and facilitating progression really shone through in the discussions. The provider develops teaching and learning resources based on the relevant learning outcomes centrally and administers them to training staff. When content, assessments are developed they are shared with training staff for consultation and comment.

During the meeting, the panel interviewed a member of the provider's training staff with regard to teaching and learning approaches. The staff member interviewed favoured the approach of being fully resourced and would not consider making changes to course delivery/content as part of her role without discussion with the Quality Assurance Manager. She stated that if she was of the opinion that a change was needed she would alert a member of the management staff but that she would not change anything unilaterally apart from her presentations, which she reflected on and updated regularly. In this regard, there is a certain degree of autonomy in that teachers can deliver their modules depending on their own background and style. Feedback is taken from tutors at the end of course delivery and changes can be proposed then. The interviewee had also engaged in external authentication in other providers, which is an important means of engaging with the wider national community of practice to enhance teaching practice.

There was evidence of the monitoring of the quality of teaching and learning through the induction programmes, learner evaluations and through the promotion of open communication with training staff. There was evidence of reflection on teaching and learning resources within the organisation, as they were subject to updating. However, there was a lack of evidence of reflection at both management and trainer level in relation to blended delivery and this would warrant some enhancement of the staff skill set to achieve an equivalent quality to the face-to-face delivery. The examination of programme delivery in accordance with a blended pedagogy, using a VLE will be dealt with specifically further on in the report.

There was also discussion in relation work-based learning, and the processes used by Barrow to ensure work-based learning covers the required content to the required standard. This is achieved through a network of established placements, with experienced supervisors, supervisor packs and monitoring through communication with learners, supervisors and site visits. To ensure students are learning best practice, learners are requested to demonstrate their skills in class, or the tutor will conduct a demonstration. If learners advise that they were not taught to best practice this is corrected with them and followed up on with the work-placement. In the event that a work-placement cannot meet the needs of the learner they will be moved to an alternative placement.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

**6 ASSESSMENT OF LEARNERS****Panel Findings:**

Policies and procedures on fair and consistent assessment of learners are set out in the QA manual and in the Tutor and Learner Handbooks. The approach to devising assessment instruments is that they are centrally devised with marking schemes and these are provided to tutors/trainers as part of their resource material. The updating of assessments occurs centrally, where necessary. The Programme Management Committee oversees the quality assurance of the assessment process. There is a bank of assessments so alternate assessments can be issued. Repeat examinations are permitted and limited to 3 in total.

From interviewing training staff, the above approach to assessment seems to be favoured; however, the training staff were also keen to point out that new ideas in terms of developing assessments are welcomed by management. New tutors are mentored in relation to the marking of assessments during their induction phase.

Carrying out skills demonstrations in the workplace is encouraged and is carried out by Barrow's training staff. This will often involve learners using equipment and models of practice in their work-based environments. Learners are only brought into the Barrow Consultancy and Training site for skills assessments using Barrow equipment where doing so in the workplace is not possible. The Barrow team confirmed that apart from the Supervisor's Report, work-based assessors do not carry out summative assessments. However, formative assessment is encouraged especially in relation to skills demonstration and will occur on the programme either in the work-placement or in class.

For QQI programmes, Internal Verification (IV) occurs and the relevant forms are distributed to the internally appointed verifiers. In addition to quantitative style internal verification, which is standard within the FET Sector, Barrow staff also advised that there are lead assessors in each programme area who conduct a more in-depth quality assurance of assessments in the form of cross-moderation. External authenticators (EA) are selected for the examination of learner evidence at the end of a programme cycle in line with FET sector practice. Multiple certification periods are utilised. Border line grades are dealt with as part of the IV and EA process, and form part of sampling strategies for the provider.

The provider also has a policy for learner appeals, with a specific application form and stated deadlines. For learner appeals an external subject expert is selected usually from the relevant approved External Authenticator list. Fees apply to applications for an appeal. Where an appeal is successful the fee paid will be refunded. The panel did recommend that an appeal is an extreme measure and that there should be options below an appeal which are made available to learners such as inspection by the learner or rechecks with the tutor or another assessor within the provider before putting a learner to the expense and time frames involved with processing an appeal.

The provider has a Results Approval Panel (RAP) whose membership depended on the programme areas. This panel examines EA reports and affirms that learners have met the required standards through assessment to be put forward for the relevant award. The panel found that the RAP must be referenced in the provider's corporate structure diagram(s) and quality processes.



Alternative assessments were developed in light of the Covid-19 crisis, and while the panel acknowledges that the Programme Management Committee oversees the quality assurance of the assessment process, there appeared to be no evidence of this Committee meeting in response to the Covid-19 crisis and the consideration of the additional challenges and the related restrictions presented in terms of quality assuring programmes and in particular assessment. This is discussed in more detail in other areas of the report.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report

7 SUPPORT FOR LEARNERS

Panel Findings:

It was very clear from the meeting the management team and trainers that the ethos for programme delivery is learner centred.

The panel explored the area of supports for learners with special needs, in particular how reasonable accommodations are identified. While there was no official interview / selection process, there was a learner information sheet issued to learners, which they can use to flag that English is not their first language and/or any particular additional needs they may which require reasonable accommodation or additional supports. This is relayed to the tutor and the tutor supports that learner's additional needs including those on blended programmes, giving additional face-to-face time if necessary. The provider advised that assessments can be broken down into smaller assessments if necessary, and additional clarifications will also be provided. A reader or a scribe, translation dictionaries and more time are among the reasonable accommodations that can be provided. A learner may flag that they have additional needs during the programme also and this will be catered for.

Reasonable accommodation relates specifically to learners with some form of disability or learning difference and who need additional support in the interests of fairness and ensuring that the learners are not unduly disadvantaged by their situation in comparison to other participants. The needs assessment of learners applying for reasonable accommodations should be informed by relevant expertise, utilise relevant reports which the learner may provide, to identify the needs arising from a particular disability and the appropriate supports to be put in place. In terms of teaching and learning, enhancing the use of universal design can be beneficial for all learners in terms of the development and delivery of teaching and learning content and materials and assessment.

The measures described by the provider are learner focused, bespoke in nature and the variety of supports cited were positive. However, there was some lack of detail on how assessments are carried out and informed prior to interventions being prescribed, including in the assessment process. A provider must ensure they assess fully the true learning needs of an applicant in line with appropriate entry criteria at the application stage as this is the most effective means of ensuring a learner is prescribed the correct programme to meet their needs. In addition, or in conjunction with this initial assessment and where appropriate, an assessment of reasonable accommodations which may be



needed to address a disability should also be conducted. The lack of detail on these points in the quality assurance documentation and on the website needed to be addressed.

The panel found that collaborating partners should also be advised of entry requirements and requirements in relation to the assessment and provision of reasonable accommodations, and appropriate supports. Barrow Training has ultimate responsibility for learners and programmes and reserves the right to assess learners for entry to their programmes as they are obligated to do so, and to ensure reasonable accommodation is used where needed and in the appropriate manner.

The Learner Handbook was considered an excellent resource and the provider was commended on its assembly. There was a discussion about making it more user-friendly in terms of its language and length, but, overall, it was seen as a positive resource which could be kept under review to be added to and updated regularly.

In terms of learner supports from a teaching and learning perspective, it would seem that there are governance systems in place under the auspices of the Programme Management Committee to monitor the teaching and learning resources and their adequacy and learner representation is provided for in this governance unit. It was confirmed by the member of teaching staff interviewed that learning resources are updated and expanded on as necessary. The interview also outlined a solid process for the development of teaching and learning resources. However, the adequacy of resources in relation to blended learning required more examination and development in conjunction with a TEL external expert until more internal expertise is developed. This is dealt with in more detail further on.

There was discussion and confirmation that learners have access to the relevant resources including hoists etc. However, the panel were not in a position to carry out a site visit due to restrictions in the interests of public health. From discussions with the management, administrative and training staff there is a clear commitment to pastoral care as part of programme delivery, an open approach to communication and learner evaluations are provided for at the end of programmes.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The provider has a dedicated section in its QA manual on information and data management. There is a dedicated member of the team responsible for data protection. The provider also has a policy and mechanism for dealing with version control of its QA documentation to ensure staff are accessing the most up to date information.

Learners are advised that data will be collected and for what purpose. There are limitations placed on access to information depending on role. For example, tutors have access to learner names and addresses but they do not have access to social security numbers or dates of birth. The name and contact details of learners are only held for 1 year. Once the PPS number is inputted on the QQS it is not necessary to be retained. The panel advised that this process could be strengthened in relation to the online quality assurance platform, and to reconsider the number of staff registered on the system for full access as there shouldn't be a need for all staff to have full access to all the learner data, and finally to have a clear 'end of life' policy which was front facing for the benefit of learners.



The panel were satisfied that Barrow are working relatively effectively in terms of capturing and utilising data sets as part of monitoring and review, but the provider needed to review 'opt in' versus 'opt out' provisions to ensure the default setting was not to collect data unless the learner had actually consented by 'opting in'. Staff were for the most part well-informed regarding developments in this field and their potential and impact on the organisation. However, there were key vulnerabilities identified with the provider in relation to sharing of data with a number of third parties. It was emphasised that examination of third party arrangements and the sharing of data was necessary to ensure GDPR compliance, in particular how data shared was used and how it was stored by third parties, putting data processing agreements in place and also the backing up of information. There was a useful discussion in relation to this area, which focused on the team generating solutions to the issues identified and was very positive and productive in nature.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The provider operates a website which the Panel explored in advance of the meeting. There were concerns expressed about the lack of detailed programme-related information on the website. For example, details of entry criteria; the assessment of same and requirements in relation to English language proficiency and testing. In addition, the term 'online' was used instead of 'blended learning' on the website. The management team advised that this had been discussed at length and it was decided that using the term 'online' for blended courses might be better as not everyone understood what was meant by the term 'blended learning'. While it was acknowledged that a balance had to be struck in this regard; the panel advised that compliance in relation to information to learners had to be achieved first and foremost to ensure that information was accurate and that learners could make informed choices. There is a distinct difference between an 'online' courses, which are delivered wholly online versus a 'blended learning' course which requires some face-to-face contact as part of directed learning.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. However, there were still some issues identified on the public facing website, but the panel is satisfied that this can be addressed sufficiently through implementation of the recommended Condition as set out in Part 7, in particular through carrying out an audit practice to ensure alignment to the new QA procedures. The panel is therefore able to



recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING (incl. Apprenticeships)

Panel Findings:

Barrow Training had a number of collaborative arrangements for the delivery of programmes; two with second providers that delivered Barrow's validated programmes, and one where Barrow was a sub-contractor for a main contractor under a national procurement framework utilised by certain Education and Training Boards. In the latter case, the programme was a traineeship and therefore a programme validated for another provider.

In relation to Barrow's two second providers, Private/Independent providers are required to have effective quality assurance procedures which must *'include provision for engagement with external partnerships and second providers...including sub-contracting of provision'*. In the interests of transparency and accountability providers are required to publish the details of all such arrangements including the nature of the collaborative relationship.

A private/independent provider is required to exercise due diligence prior to entering into collaborative arrangement. The relevant guidelines provide a non-exhaustive list of indicative areas that voluntary providers should consider before determining whether to enter into a collaborative arrangement with another provider. These include legal, reputational and compliance requirements, resource, governance and structural requirements and programme development and provision requirements.

A private/independent provider is required as part of monitoring procedures to review and evaluate quality. A fundamental requirement of a provider's quality assurance system involves the monitoring and review of its programmes of education and training including the quality assurance system and procedures which underpin these. In doing so, existing effective practice is identified and maintained, while areas needing improvement are addressed. Implicit in this is the requirement that Barrow has the ability to conduct this type of monitoring and also be in a position to adequately remedy deficiencies regardless of where or by whom their programme is being delivered.

Pursuant to the Qualifications and Quality Assurance Act 2012, a provider that applies for validation in its own right to QQI and who is successful in securing validation is the body responsible for every aspect of delivery of that programme. Where collaborative provision involves a contractual arrangement that permits another provider (non-QQI accredited or otherwise) to deliver one of the provider's QQI validated programme(s), it requires detailed formal and legal agreements. Such agreements should set out clearly the expectations, the key performance indicators (KPIs), processes that are to be followed, including quality assurance processes how monitoring and review will be managed, including the recording of same and how non-compliance will be dealt with, including investigations and sanctions. This will often take the form of a detailed 'contract for services' which is supported by a document which sets out operationally how the contracted training will be managed to guide both parties. This aspect often takes the form of a dedicated quality assurance manual. The quality assuring of contracted training requires dedicated and experienced personnel to ensure adherence through monitoring and managing the process which should include formal records of site visits, monitoring reports etc. This is required to protect the learners, ensuring they receive the same service as they would if the programme was delivered by the primary provider, and to address the potential reputational risk posed to the primary provider, the sector, QQI and the National Framework of Qualifications.



In the case of this provider, the precise nature of the commercial arrangement with a number of second providers and the benefit to learners was unclear, as the relationship was mainly governed by brief Memorandums of Understanding. There appeared to be provision for payments from the second provider to the primary provider, which seemed to be atypical of a subcontractor type relationship in the sector and it was not clear that Barrow has a direct relationship with all learners for their programmes delivered in this manner, and for whom they should be ultimately responsible.

There was an application form for second providers to apply to deliver on behalf of Barrow, which did not capture all of the information necessary to carry out an evaluation which could be considered in line with the guidelines. There were no detailed contractual documents such as a contract for services provided. However, the provider was clear that the second providers were furnished with their QA manual and must deliver in accordance with this and that all staff are to be inducted by Barrow to deliver in accordance with their policies, processes and procedures, and monitoring takes the form of provision for site visits, and receipt of learner evaluations at the end of the programme via post. The Panel considered this last point to be another reason why the Barrow QA processes needed to be absolutely clear and interpretable in the same way be all readers.

Despite procedures in place in relation to the furnishing of learner evaluations at the end of programmes, which include that another learner must collect the evaluations and post them and not the second provider, the provider acknowledged they would not always know if a learner had a complaint. The provider did describe more robust procedures in terms of the vetting and approval of tutors of the second provider by Barrow Training which involves checking their qualifications and experience before approving them.

It is recognised that contracting out the delivery of a provider's validated programmes presents a significant level of challenge in terms of regulation and compliance and risk to reputation of not just to the provider but to the regulatory and qualifications system. Notwithstanding this, the challenges are not insurmountable and collaborative arrangements can bring many benefits, which include access to another provider's resources and expertise. To sufficiently address the associated risks, however, the provider needed to review this aspect of their quality assurance as a matter of urgency, including but not limited to, publishing the details of the nature of the commercial arrangements, providing for detailed contractual agreements, as well as dedicated and appropriately detailed documents on the management of second providers. This could be prepared in the form of a manual to quality assure all aspects of the relevant collaborative provision of programmes, thereby ensuring learners experience the same standards of delivery as if they would directly from Barrow Training.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. Following changes implemented during the interim period, the panel is satisfied that collaborative provision through second providers has ceased and therefore the issues identified in relation to this aspect of the provider's QA above no longer persist. Should the provider wish to engage in collaborative provision in the future, quality assurance procedures underpinning such provision must be submitted to QQI, and approval secured. The panel is therefore able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.



11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

The provider has engaged in significant self-evaluation as part of the re-engagement process. There is ample evidence that the provider has updated their documentation and has established governance systems which at their core involve a cycle of self-evaluation, monitoring, review, improvement planning and implementation. The documentation and governance system established by the provider were reviewed by the panel and vulnerabilities were identified which have been outlined in Section 5.1., Section 5.2 and other relevant sections.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had, for example, revised the name and membership of their governance units, strengthened the Terms of References for the relevant units and identified a separation of responsibilities between those reporting to the Units and the membership of the units to achieve sufficient separation, and assigned monitoring, review functions to governance units to ensure adherence to quality assurance procedures and validation agreements. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.' draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

12 TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING

Panel Findings:

The Panel noted that the current remote teaching provisions in place in response to the Covid-19 pandemic, which include wholly online delivery, are not part of the evaluation as they are separate and distinct and subject to a bi-lateral agreement between the provider and QQI. Instead, the evaluation focused on pre-Covid 19 compliance and the plan for the future after the conclusion of the aforementioned agreement. In carrying out the evaluation, the panel examined the relevant documentation and were provided login details for the provider's Virtual Learning Environment (VLE), specifically for the healthcare support course on the VLE, which was validated by QQI for blended delivery in December 2018. Prior to Covid- related restrictions, the provider was also delivering two other programmes using a blended mode of delivery. The panel were also cognisant of the conditions set down as part of the validation of the healthcare support programme which aimed at addressing the following:

- to have actual classes taken in at multiple points in the year and not have individualised rolling intake
- to structure the 20 hours of face to face contact hours per module
- the total no. of learners were limited to 20 in year 1 and 50 in year 2 for the whole programme.
- A tutor should not have more than 10 learners under their tutelage [the tutor stated she had 25]
- achieving full compliance with the blended learning procedures including to have more variety



and interactivity in the VLE

- to have opt in versus opt out to comply with GDPR

The provider was very clear in terms of its reasoning for moving into blended delivery, as it was in response to the needs of learners with work and family commitments who could not participate in a full-time centre-based course and therefore needed more flexible learning opportunities. The provider is commended for pursuing a strategy of developing its provision to provide these opportunities. In doing so, the provider is aware that a significant number of additional quality assurance considerations apply.

Under the relevant statutory guidelines, a blended mode of programme delivery requires a mix of both face-to-face and online delivery through a VLE. The remote element of delivery requires additional quality assurance. A blended programme should at least achieve parity in terms of quality that a learner would receive if the programme was delivered solely via a face-to-face format. This presents the challenge of ensuring the necessary level of interactivity and variety of learning activities, and provision for collaboration in the VLE to replicate or enhance those associated with traditional delivery.

The provider's sample content, presented via the VLE consisted of automated slides with module content, broken down into units and there were formative assessments at the end of the unit in the form of quizzes. The content was a summary of the key points that needed to be covered in each unit, and there were links for further self-directed reading. However, some of these links included open source sites which the Panel considered needed upgrading to more traditional directed 'academic reading' resources. There was no evidence of any other TEL tools being used in the VLE including any which might have encouraged student collaboration or discussion of the subject with their peers. The presentation of the content was limited in the main to reading slides. There was nothing visible that might have encouraged or developed interaction. In terms of performing assessment, there were formative assessments in the form of quizzes. The summative assessment took the form of a home assignment. The assignment brief(s) relevant to the module could be accessed from the date of enrolment.

The staff did speak passionately about how useful visual learning resources are for learners. However, there was little evidence of the use of any model of instruction relevant to blended learning, including models in relation to e-activities and e-moderation. As a result, there was a lack of interactivity and collaborative learning evident or any process which would facilitate and develop same. There did not seem to be a coherent approach which the Panel could identify as being consistent with guidelines.

Despite the conditions of validation, the provider advised that individualised rolling intake of learners was in place and both the online manager and the tutor interviewed confirmed that tutors were assigned up to 25 learners. Learners who signed up to the blended learning programme were in general not part of a class. The provider advised that they had interpreted the conditions as being that they could enrol 10 learners per module on a rolling intake basis. The Panel was concerned that the provider should have auditing processes that could have provided evidence to the Board of Management that validation conditions were or were not being met.

The tutor monitors the progress of their assigned learners in the VLE and if they think that a learner did not spend enough time on some of the slides the learner would be asked to revise them further. There is provision in the VLE for the learner to contact the tutor and if the tutor is not online at the time, the learner will be contacted later when the tutor sees the relevant notification. From discussions with the provider it was clear that the minimum face-to-face hours were not formally structured for either the tutor or the learner and seemed to be allocated in the main at the request of a learner where they felt they needed face-to-face time.



There seems to be limited provision for group-based synchronous learning. The programme discussed is delivered with predominately individually scheduled asynchronous learning opportunities. The provider did advise that sometimes the tutor would attend a group in their work environment where there was a class enrolled and at their request. The Panel felt that this did not accord with the conditions set down as part of validation and should have been highlighted by a post-validation audit or other follow-up process.

From a review of the procedures, the VLE and the manner in which blended programmes were being delivered they did not appear to map to, or otherwise be in compliance with the statutory guidelines for blended learning. This was somewhat compounded by an apparent lack of relevant in-house expertise in delivering using a blended mode. There appeared to have been no recent relevant CPD and external TEL experts were not utilised in developing procedures, programmes or content. The lack of adherence to validation conditions was raised with the provider, and the provider confirmed that upon a return to normal practice, the conditions would be revisited. This did raise the questions in relation to governance which have been addressed already in this report.

The relevant governance unit needed to review the policy and procedures for blended learning in relation to the guidelines, and once these have been established, the programmes needed to be reviewed against the newly developed and compliant policies and procedures and thereafter the conditions of validation to ensure compliance is achieved.

The panel reconvened on 26th November 2020 to undertake a desk review of Barrow Training and Consultancy Ltd.'s enhancements in this area. The panel were of the view that the work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had, for example, the provider has assigned a programme monitoring and review function to the relevant governance units to ensure adherence to quality assurance procedures and validation agreements. In addition, the provider has also appointed an external TEL expert to the relevant governance unit. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.'s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report.

Evaluation of draft QA Procedures - Overall panel findings

The panel commends Barrow Training and Consultancy Ltd. on its full engagement and open dialogue with the panel and on its responsive approach. Throughout the reengagement process the panel had opportunities to explore with the provider all of the relevant areas of quality assurance as set out in the QQI QA Statutory Guidelines include relevant sector and topic specific guidelines. These discussions have illuminated the nature of the provider's provision, their culture, ethos and systematic approach to quality in the interests of learners.



The panel notes that the provider had self-identified areas of vulnerability through its self-evaluation. The panel also acknowledges that the provider has completed significant work in documenting and formalising quality assurance processes to promote excellence. At the conclusion of the initial evaluation, the panel was of the view that there was more work to be done to complete, strengthen and embed academic governance structures and quality assurance procedures, in particular, in relation to the provision of programmes via second providers and through a blended mode of delivery. Both areas required additional and bespoke procedures and related documentation to assure quality and need to be subject to robust governance.

A combination of clearly documented quality assurance policies, procedures and supporting documentation and a robust governance system adhering to the quality cycle of ‘monitor, review, implement’ as part of continuous self-evaluation and improvement will serve the provider well into the future and drive a culture of excellence hereafter.

The panel reconvened on 26th November 2020 to undertake a desk review of evidence resubmitted by the provider. It was the view of the panel that Barrow Training and Consultancy Ltd. had made significant progress and had achieved the required enhancements to its QA procedures. The panel were therefore pleased to be able to recommend that QQI approve Barrow Training and Consultancy Ltd.’s draft QA procedures subject to recommended Conditions as set out in Part 7 of this report

Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following mandatory changes and specific advice were identified at the conclusion of the site visit on 17th June, 2020 by the Panel. The Panel reconvened on 26th November 2020 to evaluate evidence submitted by Barrow Training and Consultancy Ltd in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that Barrow Training and Consultancy Ltd has addressed the issues set out in Section 6.1 below, and made progress on the items in Section 6.2 and recommends the provider for approval subject to the conditions set out in Part 7 below.

6.1 Mandatory Changes

1. Revise QA policy and procedures for blended learning to ensure that programmes validated to be delivered in blended mode (i.e. combination of face-to-face and online delivery) comply or exceed expectations of the relevant QQI quality assurance guidelines, validation policies and agreements. This includes ensuring absolute clarity is provided for in terms of defining ‘blended learning’ by applying the QQI definition of blended learning and related terms.
2. Revise QA Collaborative Delivery Quality Assurance procedures and then revisit existing agreements to ensure adequate clarity, transparency and protection for all stakeholders.
3. Review Governance structures to address the following:

- a. Committees should be more obviously embedded in the decision-making processes of



the Provider – for example, the relevant governance units were not sufficiently utilised in critical quality assurance planning as part of Covid-19 related contingency planning.

- b. Devise clear restrictions on the combinations of roles that staff members can hold to ensure clear separation of academic and commercial interests – in both operational and decision making processes.
 - c. Enhance objectivity and externality of key QA related decision making processes – e.g. independent chair with academic governance experience on the BoM.
4. Review practices to ensure full compliance with the data protection and privacy rights of learners in line with relevant legislation, in particular but not limited to the controlling and processing of data by third parties and securing learners consent in terms of how their data is used.
 5. Revise QA Manual including the following:
 - a. Distinct chapters including relevant forms
 - b. Drawing together disparate documents to form single topic chapters
 - c. Remove personnel names from the document
 - d. Make QA documentation available to all stakeholders.
 - e. Data protection requirements
 - f. Make learner handbook more learner-focused, reader-friendly and concise.
 6. Revisit the Gap Analysis exercise in light of this report, including mandatory changes and recommendations herein.

6.2 Specific Advice

The following specific advice was identified by the Panel at the conclusion of the site visit on 17th June 2020:

1. Continue to support staff CPD in governance and service specific areas, in particular to develop in-house expertise in blended learning and academic quality assurance.
2. In considering ISO9001 a top-down system standard, consider QA as a bottom-up 'instruction manual' focused approach to be owned, used and reviewed by all stakeholders



Capture QA requirements from all accreditation bodies in a coherent manner as part of the organisation's QA system.

3. Include tutor representative(s) on committees (PD, QA, etc) and increase awareness of governance structures among wider teaching staff.
4. Acknowledge existing expertise and draw on this in final decision making as part of governance.
5. Capture current informal best practice in QA policy and procedures
6. Update Risk Register following completion of the gap analysis referred to in the conditions above.

Specific Advice, 26th November 2020

The following Specific Advice was identified by the Panel at the reconvene meeting on 26th November 2020:

1. The panel strongly recommends that the provider seeks revalidation of programmes which use a blended mode of delivery supported by their new QA procedures.
2. Public and learner information is amended to reflect the new quality assurance procedures.

Part 7 –Conditions of QA Approval

Overall the panel is satisfied that the mandatory changes have been met and are approved subject to the following:

Conditions

1. The relevant governance unit carries out an audit to ensure the practice of programme delivery adheres to the new QA procedures and to provide for a routine schedule of such audits as part of a quality improvement cycle.
2. Quality assurance procedures were not submitted for collaborative provision, and therefore such provision is not approved. The provider is required to insert a positive statement in their quality assurance manual that it does not engage in collaborative provision. The provider is required to submit QA procedures for this purpose and secure approval before engaging in collaborative provision in the future.

The panel commends Barrow Training and Consultancy Ltd on their work in making their quality assurance procedures and governance structures more coherent and robust, providing for more enhanced and comprehensive learner supports and strengthening protections for learners in terms of their data.

**Part 8 Proposed Approved Scope of Provision for this provider**

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
3-6	Major, Non-Major	Early Childhood Care and Education
3-6	Major, Non-Major	Healthcare
3-6	Major, Non-Major	Hospitality and Tourism
3-6	Major, Non-Major	Retail Skills
3-6	Major, Non-Major	Business Studies and Management
3-4	Major, Non-Major	General Learning -
3-6	Non-Major	Community Development and Social Studies
3-6	Non-Major	Health and Safety



Annexe 1: Documentation provided to the Panel in the course of the Evaluation

Document	Related to
Application form and supporting documentation	Re-engagement Application
Gap Analysis	Re-engagement Application
QA Manual, related SOPs and supporting documents	Re-engagement Application
Staff and Learner Handbooks	Re-engagement Application
Additional Policies and Procedures as per request	Request for Further Information by the Panel
QQI Certification data and reports	Profile of Applicant for Re-engagement

Annexe 2: Provider staff met in the course of the Evaluation

Name	Role/Position
Marian Manning,	CEO
Joe Manning,	Director Strategic Planning and Finance
Norah Ryan,	Training and Finance Manager
Vicky Nolan,	QA Manager (induction, academic QA, examinations officer, RPL, registrar, coordination of accredited / non-accredited training, projects, SOP's for staff and tutors)
Donna Purcell,	Online Manager
Siobhan McNally	Project Manager

Appendix: Provider response to the Reengagement Panel Report

Barrow Consultancy & Training Ltd.,
High Street,
Bagenalstown,
Co. Carlow,
R21 TH22

14th January 2021

Quality and Qualifications Ireland (QQI)
26/27 Denzille Lane
Dublin 2,
D02 P266

Dear Ms Cotter,

Barrow Training would like to acknowledge and thank the Panel for their work in undertaking a desk review of its enhancements to its quality assurance procedures late last year.

The Barrow Training team deems the resulting report to be constructive and supportive in ensuring a high-quality service for its learners, and in continuing to enhance its quality assurance framework.

Furthermore, Barrow Training would like to thank the staff at QQI for their support and guidance throughout the reengagement process.

Enclosed is Barrow Training's response to the Panel's commendations, conditions of QA approval, and specific advice.

Yours sincerely,



Vicky Nolan

Quality Assurance Manager

Barrow Consultancy and Training Ltd

1. Commendations of the Panel

Commendation
<p><i>"The panel commends Barrow Training and Consultancy Ltd on their work in making their quality assurance procedures and governance structures more coherent and robust, providing for more enhanced and comprehensive learner supports and strengthening protections for learners in terms of their data."</i></p>
Provider Response
<p>Barrow Training found the re-engagement process to be a very rewarding, constructive and supportive process for us as an FET provider. The external expertise offered during this process greatly enhanced our quality assurance framework, and will continue to do so as it is maintained, reviewed and improved.</p> <p>Barrow Training thanks the Panel for their thorough review of its QA procedures, and the advice that they have offered throughout.</p>

2. Conditions of QA Approval

Condition of QA Approval
<p>1. <i>The relevant governance unit carries out an audit to ensure the practice of programme delivery adheres to the new QA procedures and to provide for a routine schedule of such audits as part of a quality improvement cycle.</i></p>
Provider Response
<p>Barrow Training notes and accepts this condition of QA approval, and will ensure all aspects of the new QA procedures are covered in its audit schedule (QF220 – Appendix 1) to ensure adherence as suggested.</p>

Condition of QA Approval
<p>2. <i>Quality assurance procedures were not submitted for collaborative provision, and therefore such provision is not approved. The provider is required to insert a positive statement in their quality assurance manual that it does not engage in collaborative provision. The provider is required to submit QA procedures for this purpose and secure approval before engaging in collaborative provision in the future.</i></p>
Provider Response
<p>Barrow Training acknowledges that it has ended all collaborative partnerships with other providers and, should this change in the future, will adhere to the condition of QA approval to submit QA procedures to QQI and secure approval before engaging in any such collaborations. A positive statement has been added to section 4.6.4 of the Barrow Training quality assurance manual stating that it does not engage in collaborative provision, evidence of which is presented in Appendix 2.</p>

3. Specific Advice

Specific Advice
<i>1. The panel strongly recommends that the provider seeks revalidation of programmes which use a blended mode of delivery supported by their new QA procedures.</i>
Provider Response
Barrow Training welcomes the Panel's advice on this issue and will consider seeking revalidation of all blended learning programmes under its newly approved quality assurance procedures specific to the area of blended learning.

Specific Advice
<i>2. Public and learner information is amended to reflect the new quality assurance procedures.</i>
Provider Response
Barrow Training agrees with the Panel's advice, and the quality assurance procedures will be published on its website for public access now that they have been approved. https://www.barrowtraining.ie/about/quality-assurance

Appendix 1 – QF220 Audit Schedule



QF 220	Issue date
Issue No 05	Jan-21

TOPIC	QQI QA Reference	PHECC QA Reference	2021	2022	2023	2024	2025	2026
Governance and Management of Quality	1		Mar-21	Mar-22	Mar-23	Mar-24	Mar-25	Mar-26
Documented Approach to Quality Assurance	2		Mar-21	Mar-22	Mar-23	Mar-24	Mar-25	Mar-26
Programmes of Education and Training	3		Mar-21	Mar-22	Mar-23	Mar-24	Mar-25	Mar-26
Staff Recruitment, Management and Development	4		Mar-21	Mar-22	Mar-23	Mar-24	Mar-25	Mar-26
Teaching and Learning	5		Mar-21	Mar-22	Mar-23	Mar-24	Mar-25	Mar-26
Assessment of Learners	6		Jul-21	Jul-22	Jul-23	Jul-24	Jul-25	Jul-26
Support for Learners	7		Jul-21	Jul-22	Jul-23	Jul-24	Jul-25	Jul-26
Information and Data Management	8		Jul-21	Jul-22	Jul-23	Jul-24	Jul-25	Jul-26
Public Information and Communication	9		Jul-21	Jul-22	Jul-23	Jul-24	Jul-25	Jul-26
Other Parties Involved in Education and Training	10		Jul-21	Jul-22	Jul-23	Jul-24	Jul-25	Jul-26
Self-Evaluation, Monitoring and Review	11		Jul-21	Jul-22	Jul-23	Jul-24	Jul-25	Jul-26
Blended Learning	Topic Specific	Topic Specific	Oct-21	Oct-22	Oct-23	Oct-24	Oct-25	Oct-26
Organisational Structure and Management		1	Oct-21	Oct-22	Oct-23	Oct-24	Oct-25	Oct-26
Learning Environment		2	Oct-21	Oct-22	Oct-23	Oct-24	Oct-25	Oct-26
Human Resource Management		3	Oct-21	Oct-22	Oct-23	Oct-24	Oct-25	Oct-26
Course Development, Delivery & Review		4	Oct-21	Oct-22	Oct-23	Oct-24	Oct-25	Oct-26

Barrow Consultancy and Training Ltd.

High Street, Bagenalstown, Co. Carlow. R21 TH22
 T: 059 9721416 E: info@barrowtraining.ie W: www.barrowtraining.ie
 SOLAS Registration Number: 903768 QQI Roll Number: 38599H

Appendix 2 – Page 93 of QA Manual with statement on Collaborative Partnerships (Section 4.6.4)



- Previous experience of delivering programme assessment or work in the relevant field
- Agree to undertake appropriate training and attend appropriate briefings
- Must not have delivered training for Barrow Training previously

4.6.2.3 Responsibilities

- Confirm the fair and consistent assessment of learners consistent with the provider's procedures and with accrediting body's policy
- Review internal verification report(s) and authenticate the findings/outcomes
- Apply a sampling strategy to moderate assessment results
- Visit Barrow Training and meet with appropriate staff
- Identify any issues/irregularities in relation to the Assessment Process
- Recommend results for approval
- Produce an external authentication report using the template provided by Barrow Training

4.6.3 Accreditation Bodies

Barrow Training currently offers programmes accredited by QQI and PHECC. Any proposal for a new programme partnership must be reviewed and approved by the Quality Assurance Committee. The proposal is considered under the following headings, prior to forming a Programme Development Committee:

- Barrow Training scope of practice
- Quality assurance
- Financial implications
- Legal implications
- Risk

4.6.4 Collaborative Partnerships

Barrow Training does not engage in collaborative provision with other providers and must submit QA procedures to the relevant accrediting body for this purpose and secure approval, prior to engaging in any collaborative provision in the future.