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## Reengagement Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

##### 1.1 Applicant Provider

Registered Business/Trading Name:	College of Management and IT PS00651
Address:	College House, 54 Southern Cross Business Park Bray Co. Wicklow
Date of Application:	28.05.2020
Date of resubmission of application:	13.04.2021
Date of evaluation:	
Date of virtual site visit (if applicable):	10.07.2020
Date of reconvene meeting:	10.5.2021 & 24.05.2021
Date of recommendation to the Programmes and Awards Executive Committee:	24.06.2021

##### 1.2 Profile of provider

The College of Management and IT (CMIT) was established in 2004 and is a privately-owned provider based in Bray, Co. Wicklow, Ireland. CMIT has six full-time staff in addition to 13 qualified tutors. In terms of QQI courses, CMIT focuses on a narrow range of programmes in three areas: business, administration and childcare. CMIT specialises mainly in blended learning, combining live online classes with personalised tutor-support, video, and online resources. CMIT offers a small number of classroom-based courses, however blended learning comprises most of the current provision.

CMIT provides programmes for mature adults, most of whom are in the workforce and are seeking to upskill. Types of programmes include:



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- (1) blended learning childcare award, which includes live online classes,
- (2) delivery of train-the-trainer programmes which includes both in-class and online delivery, and
- (3) corporate training, which includes online learning and in-class delivery.

The current QQI course offering consists of the following programmes:

Level 5	5N1364 Digital Marketing
Level 5	5N2428 Medical Terminology
Level 6	6M5013 Administration
Level 6	6M2007 Early Childhood Care and Education
Level 6	6M4985 Business
Level 6	6S3372 Training and Development
Level 6	6N1957 Special Needs Assisting

CMIT is approved to deliver programmes leading to QQI and ILM awards. It also provides a range of “pure eLearning” IT courses. All content for QQI validated programmes is developed by CMIT and delivered through its e-learning platform which is managed in house by its specialised staff while hosting, security management, back-ups, and updates are outsourced. The e-learning platform is the fundamental resource that unpins delivery of all blended learning programmes.

CMIT is an ISO 9001:2015 approved organisation; the ISO approval process requires an annual Quality Assurance inspection.

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## Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr. Áine Ní Shé	Chair	Cork Institute of Technology
Celestine Rowland	Report Writer	Galway Business School
Janet Tumulty	Senior Leader in similar type provider	New Links Training Solutions
Naomi Pasley	Blended Learning Expert	Hibernia College

## Part 3 Findings of the Panel

### 3.1 Summary Findings

At the outset of this report, the panel makes several commendations in relation to CMIT's approach to the reengagement process.

The panel would like to thank the college and all the team for the constructive and open manner in dealing with queries in advance of the virtual site visit.

The panel would also like to thank CMIT for facilitating the demonstration of the Virtual Learning Environment to two members of the panel (Naomi Pasley and Janet Tumulty). The panel further commends the expertise of CMIT staff in their knowledge of the e-learning platform, its easy navigation system, the clarity with which resources and supports for learners and tutors are organised on the platform, and the support it provided for the teaching and learning environment and course offering within the college.

The panel would like to commend the CMIT team on their collective work ethic and diligence on behalf of each CMIT student and on the very clear and cohesive approach to support the work of the college in delivering its offering.

The panel commends CMIT on the work done on the number and clarity of the flow charts presented in the documentation.

It is very evident to the panel that there is a clear quality culture embedded in CMIT, and that it has a learner centred philosophy, with clear, consistent and constant support of the learner.

It is also evident to the panel that CMIT has engaged with the reengagement process and has dedicated significant resource to the quality assurance documentation in advance of the application and the



virtual site visit of the panel. The commitment of the Quality Director, tutors, and all members of the CMIT who presented on the day of the virtual site visit was clear to the panel.

These strengths notwithstanding, the panel found, based on the documentation submitted and discussions during the virtual site visit, that several areas of CMIT's draft QA procedures needed to be addressed before they could be recommended to QQI for approval. The panel therefore recommended that approval of CMIT's QA procedures be refused pending mandatory changes, as proposed in this report, being made. CMIT had six months from the date of the QQI decision to make a revised application.

The mandatory changes spanned a number of areas and are set out in more detail in Section 6.1 of this report.

Firstly, the panel had concerns pertaining to Governance and Management particularly in relation to the composition of the committees, the reporting structures within and among the committees as well as the separation and impartiality of the commercial and academic decision-making within the college. While it was evident that a lot of thought has gone into the committee structure, the panel found that there was a significant lack of clarity around the reporting lines and where ultimate responsibility lay for academic decision-making and implementing of decisions and timelines.

The panel identified, as a mandatory change, that the composition and remit of the Results Approval Panel be addressed to ensure that academic decision making is impartial and independent and not influenced by commercial considerations. In this regard, the panel recommended that the college reconsidered the advisability of including the college director on this committee.

The panel identified, as a mandatory change, that the provider reviews its QA documentation to address a number of issues.

While the panel is satisfied, based on the discussion at the virtual site visit, that the requirements of QQI's core guidelines are clear to the CMIT team, it also found that the QQI requirements were not fully represented in the provider's QA documentation.

Further, the panel found that the format of the QA documentation was not completely clear and was not easily navigable for the learner or other stakeholders of the college.

Finally, the panel found that the QA documentation did not sufficiently document the approach to the learner experience within the college.

The panel identified, as a mandatory change, that the assessment review process be reviewed, particularly in relation to the grounds for seeking a recheck, a review or appeal, feedback and grades and clarity



around the steps that are followed, by whom and whether an appeal is rejected or upheld, with clear policies around special circumstances, appeals and infringements.

The panel identified, as a mandatory change, that CMIT documents clearly its teaching, learning and assessment strategy, including a clear definition of its blended learning model, so that they are clear to all stakeholders.

The panel reconvened on May 10<sup>th</sup> 2021 to undertake a desk review of the evidence subsequently submitted by the provider. The panel required a small number of clarifications including explicit statements showcasing blended learning as the provider's primary mode of delivery; and that the Learner Charter address more clearly what the provider can expect from the learner in terms of effort as well as the value and culture of academic integrity awareness within the field of online learning.

The panel reconvened on 24<sup>th</sup> May 2021 to undertake a desk review of these clarifications. It is the panel's view that the provider has now satisfactorily addressed the mandatory changes and clarifications and has responded appropriately to the Panel's initial specific advices.

The Panel commends the provider on its clear and considered response to the mandatory changes, specific advice and clarifications. The panel further commends the provider acknowledging the comprehensive approach taken by the provider to enhancing its quality assurance system. It is evident that the provider has really embraced the process and has responded fully and thoroughly to the panel's feedback and has enhanced its QA procedures by taking a wide-ranging view of the changes required. CMIT has completely reviewed its QA policies and procedures between the evaluations of the panel.

The panel consequently recommends approval of the College of Management and IT QA policies and procedures to QQI.

The panel has a new specific advice and encourages the provider to develop and review the Learner Charter to ensure that it continues to be fit for purpose in light of the rapid changes in the practice of monitoring academic integrity particularly in the online learning environment and also to ensure that it adequately captures learner responsibilities considering those reviews.

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

	Tick <u>one</u> as appropriate
<b>Approve</b> College of Management & IT draft QA procedures	X
<b>Refuse approval</b> of College of Management & IT draft QA procedures <b>with mandatory changes</b> set out in Section 6.1  (If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)	
<b>Refuse to approve</b> College of Management & IT draft QA procedures	



## Part 4 Evaluation of provider capacity

### 4.1 Legal and compliance requirements:

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.1.1(a)</b>	<b>Criterion:</b> <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	<b>Yes</b>	CMIT is a company limited by guarantee with a company registration number of 451082. CMIT's documentation indicates that 1,246 learners have been certified for full awards since 2011 and 3,696 learners for component awards.
<b>4.1.2(a)</b>	<b>Criterion:</b> <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	<b>Yes</b>	CMIT has provided a Certificate of Incorporation, registration number 451082.
<b>4.1.3(a)</b>	<b>Criterion:</b> <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	<b>Yes</b>	CMIT confirmed that there are no collaborative relationships with other providers.
<b>4.1.4(a)</b>	<b>Criterion:</b> <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	<b>Yes</b>	CMIT's application does not reflect any partnerships or relationships to the scope of the access sought. Partnerships with various ETBs/ SOLAS / Skillnet and DYCA / ECCE are identified in public information.
<b>4.1.5(a)</b>	<b>Criterion:</b> <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	<b>Yes</b>	The evidence provided in support of the provider's application is indicative of compliance with Irish / EU legislation
<b>4.1.6(a)</b>	<b>Criterion:</b> <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it</i>	<b>Yes</b>	CMIT is in good standing with QQI. CMIT is a FETAC and subsequently a QQI provider since 2011.

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	<i>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>		
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**Findings**

The panel has been assured that CMIT meets the legal and compliance requirements within 4.1 and the panel accept this assurance. CMIT has a track record of providing QQI validated awards or component awards since 2011.



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

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
4.2.1(a)	<b>Criterion:</b> <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	<b>Yes</b>	Evidence submitted is indicative that CMIT has a sufficient resource base and is stable and in good financial standing. CMIT's application was accompanied by: <ul style="list-style-type: none"><li>• Tax Clearance Certificate</li><li>• Auditor's report pertaining to 2020</li><li>• Summary of Insurance Policy Cover</li></ul>
4.2.2(a)	<b>Criterion:</b> <i>Does the applicant have a reasonable business case for sustainable provision?</i>	<b>Yes</b>	The applicant has an established track record and has a five-year strategic plan that was shared with the panel.
4.2.3(a)	<b>Criterion:</b> <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	<b>Yes</b>	The panel identified a number of mandatory changes in relation to this criterion which are listed in Section 3.1 and Section 6.1 of this report. The panel is satisfied that these have been satisfactorily addressed by the provider.
4.2.4(a)	<b>Criterion:</b> <i>Are there arrangements in place for providing required information to QQI?</i>	<b>Yes</b>	CMIT is in good standing with QQI

**Findings**

The panel had concerns pertaining to Criterion 4.2.3(a). These are discussed in section 5.1 and are reflected as mandatory changes in 6.1 and 6.2 of this report.

The panel is now satisfied that the Academic Board, the Results Approval Panel and the Programme Committee have all been reconfigured in line with the mandatory changes identified by the panel and that the governance and committee structure of the provider is now fit for purpose ensuring the integrity of academic processes within the institution.

**4.3 Programme development and provision requirements:**

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.3.1(a)</b>	<b>Criterion:</b> <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	<b>Yes</b>	The provider has an established record with QQI since 2011.
<b>4.3.2(a)</b>	<b>Criterion:</b> <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	<b>Yes</b>	The number of full-time and part-time staff and contractors are well established and there are regular training sessions with all staff.
<b>4.3.3(a)</b>	<b>Criterion:</b> <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>	<b>Yes</b>	The panel is satisfied that the provider's track record of certification and its approach to the reengagement process reflects its capacity to cooperate and assist QQI with information as specified in the Qualifications and Quality Assurance Act. However, at the original site visit, the panel identified mandatory changes to the programme validation process. These are set out in Section 3.1 and 6.1 and 6.2 of this report. The Panel is satisfied that the mandatory changes in relation to the programme validation process have been satisfactorily addressed by the provider.



<b>4.3.4(a)</b>	<b>Criterion:</b> <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i>	<b>Yes</b>	The provider is well established and well resourced. As most programmes are delivered online, there are well established procedures for assessing suitability of premises for face-to-face delivery and examination as required.
<b>4.3.5(a)</b>	<b>Criterion:</b> <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	<b>Yes</b>	CMIT has procedures in place to facilitate Access, Transfer and Programme, which are outlined in the provider's documentation. Please note advice in relation to reasonable accommodation provision in section 3.1 and 6.2 of this report. The panel is satisfied that the provider has defined clearly the reasonable accommodation supports available to learners as well as how these are accessed.
<b>4.3.6(a)</b>	<b>Criterion:</b> <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	<b>Yes</b>	The Panel found at the close of the initial site visit that the QA documentation needed to more adequately reflect a fair and consistent assessment policy and identified mandatory changes in relation to assessment, assessment strategy and to appeals. The panel is



			satisfied that these changes have now been appropriately made.
<b>4.3.7(a)</b>	<b>Criterion:</b> <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	<b>Yes</b>	Section 8 of CMIT's QA policy document outlines the learner protection policy options being considered and CMIT will implement an insurance bond or will organise a bank bond for all QQI validated programmes of more than three months duration.

**Findings**

The panel recognises that the provider has an established track record with QQI and is well resourced. The panel identified mandatory changes in relation to Programme Development and in relation to assessment, an assessment strategy and the appeals process which are outlined in Section 6.1 of this report.

The panel is now satisfied that the appeals process has been revised and is clear in relation to the grounds for making an appeal and the process of an appeal with a very learner friendly flowchart developed to illustrate the process. The process for deferring an assessment or an examination and the provision of reasonable accommodation is now clearly documented in the reasonable accommodation policy as well as how learners' access these supports. The policy on extenuating circumstances has been revised.

The panel is now satisfied that the assessment criteria and assessment rubrics have been mapped to the programme learning outcomes for all QQI modules. Definitions in relation to pass, merit and distinction are now clear and included in the revised assessment policy.

The panel is now satisfied that a workplace rubric of assessment has been developed which is consistent and fair with grade indicators as to the suitability of the tasks assessed, the level of skills displayed and the fitness to practice of the individual learner increasing objectivity and impartiality while at the same time promoting the academic integrity of the assessment of the learner in the workplace.



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#### **4.4 Overall findings in respect of provider capacity to provide sustainable education and training**

Whilst the panel offered a number of commendations to CMIT at the close of the initial site visit, the panel nonetheless identified some mandatory changes set out in Section 6.1 of this report and identified some documentation that needs to be updated to relation to these.

Following a review of the revised documentation submitted by CMIT, the panel is now satisfied that the issues identified have all been fully addressed by the provider. The Panel is therefore happy to recommend approval of CMIT's QA procedures to QQI.

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## **Part 5 Evaluation of draft QA Procedures submitted by the College of Management & IT**

*The following is the panel's findings following evaluation of the College of Management & IT 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:***

Following review of the documentation submitted and at the conclusion of the virtual site visit, the panel found that QQI's guidelines under this criterion had not yet been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require a system of governance to be in place that protects the integrity of the academic processes and standards. CMIT identified in its gap analysis prior to its reengagement submission that governance was an area of vulnerability and proposed to establish an Academic Governance Board to give a more formal structure to governance and management within the college. This gap identified by the college also involved the development of a specific QA policy separating academic and commercial decision making.

However, QQI's guidelines also require that the groups or units responsible for the oversight of education and training, research and related activities are identified in the provider's documented procedures, and that the terms of reference for these groups or units are documented and published.

During the site visit, and in open and constructive dialogue with the college, the panel learned that the Academic Governance Board as envisaged had not yet been established. The panel noted that the Academic Governance Board, on the basis of the QA documentation submitted by CMIT, was largely comprised of external stakeholders, with only one internal member envisaged.

The panel found that the composition and terms of reference of the Academic Governance Board and how it interacts with other committees in the college; the reporting structures; and who is responsible for academic decision making needed to be revised and finalised. Several mandatory changes identified by the panel pertain to this and related to the balance of external and internal representation on the Academic Governance Board, the way in which the learner and the tutor are represented and included in academic decision making, and the relationship between the Academic Governance Board and the Board of Directors. These mandatory changes are set out in Section 6.1.

The panel also found that the composition and remit of the Results Approval Panel needed to be addressed so as to ensure that academic decision making is impartial and independent and not influenced by commercial considerations. In this regard, the panel identified a mandatory change and recommended that CMIT reconsider the inclusion of the college director as a member of this committee.

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QQI's guidelines also require QA systems to consider risk. In Section 12 of the QA Manual, CMIT outlined in detail its policies and procedures in relation to risk management and assessment including risks in relation to enrolment, assessment and certification, financial and legal risk, and the impact of both Brexit and the COVID-19 pandemic on its operations.

Following a review of the revised documentation presented by the provider, the panel is now satisfied that the Academic Board has been reconfigured to include learner and tutor representation and the balance between internal and external stakeholders is more appropriate to the size of the college.

The Results Approval Panel has also been reconfigured and the Managing Director no longer sits on this panel thus separating academic and commercial considerations further underpinning academic integrity processes within the college.

The provider has established the Programme Committee and expanded its remit to incorporate the Programme Development Committee revising the policy and procedure for programme development in the process. Improvements and amendments to programmes is now clearly defined as well as where responsibility ultimately lies for approval of all improvements and amendments.

## **2 DOCUMENTED APPROACH TO QUALITY ASSURANCE**

### ***Panel Findings:***

Following review of the documentation and having concluded the virtual site visit, the panel found that QQI's guidelines under the criterion of QA had not yet been fully addressed by the provider.

QQI's guidelines require the provider's quality assurance policies and procedures be fully documented, published and available as required in usable formats. As well as that, procedures must be effective and fit for purpose.

During the site visit, the panel observed that areas of the QA documentation submitted for reengagement needed further development, including a teaching, learning and assessment strategy. Some processes, including assessments and appeals were lacking in clarity and needed to be reviewed. Consequently, the panel identified several mandatory changes in relation to this in this report (see 6.1).

The panel commends the college on the strength and appropriateness of the Learner Charter which is accessible on the Virtual Learning Environment but not included in the QA Manual. The panel identified a mandatory change in this regard; this is as outlined in section 6.1 of this report.

The panel discussed in an open and constructive manner with the CMIT team the requirement to have learner accessible and friendly language and processes, and the need for the learner lifecycle to be



clearly embedded in the core policies and in those areas that provide greatest risk to the college, particularly in the areas of results approval and appeals.

During the site visit, the panel also discussed the challenges faced by CMIT in dealing with several QA systems and the need to reflect these in the QA documentation. While cognisant of these challenges, the panel found that the college's QA documentation needed to clearly reflect QQI's Core QA guidelines. Throughout the document, the language around some of the policies and procedures appeared to reflect ISO requirements which can be quite technical and less accessible than what is indicated in QQI's Core Guidelines. For example, the panel was of the view that the policy referred to as a 'compliance policy' was the equivalent of a complaints policy and that the latter nomenclature would be more accessible to learners.

During the virtual site visit, discussion took place on the appropriateness of the inclusion of certain technical specifications in Section 11 of the QA manual in relation to the IT security and privacy requirements in a public facing document. This was agreed by CMIT. The panel advised that these specifications should be moved to the appropriate section of the Virtual Learning Environment for access by staff and learners as appropriate. This is outlined in Specific Advices in Part 6.2 of this report.

Following a review of the revised documentation submitted, panel would like to commend CMIT on its wholehearted commitment to the reengagement process which is highlighted throughout this report. This is particularly evident in the work undertaken in reviewing and restructuring the QA manual which now represents and is completely aligned to QQI's Core Guidelines.

The provider was further commended by the panel for the work undertaken to make its QA manual more easily navigable by revising the language and making it clearer and more accessible for learners and other stakeholders.

The provider has reviewed and updated its teaching, learning and assessment strategies and has included clear definitions of its blended learning model and strategy. The panel had a small number of clarifications in this regard including a suggestion for the inclusion of more explicit statements in the provider's teaching and learning policy showcasing blended learning as the provider's primary mode of delivery.

The Learner Charter is now included in the QA documentation and has been further clarified following the panel's review to include a policy on Academic Integrity and what the provider can expect from the learner and detailing learner responsibility in terms of effort. The Learner Charter also emphasises the value and culture of academic integrity awareness within the organisation particularly considering the emergence of new types of academic misconduct within the field of online learning.

The provider has revised its policies and the learner journey is clear from pre-enrolment to completion ensuring transparency and accessibility for all stakeholders.





### **3 PROGRAMMES OF EDUCATION AND TRAINING**

#### ***Panel Findings:***

During the virtual site visit, the panel discussed the processes for programme development and approval with the provider representatives. The Programme Development Committee, at that time, was tasked with both existing programme review and development and new programme development. The panel identified a mandatory change in this regard, that the college review the remit and composition of the Programme Development Committee and reconsider its title to reflect more clearly its actual remit. Following that, new programme development should be a subset of the committee. The panel also recommended that learner representation should be included on the programme boards.

The panel is satisfied that the college operates a very transparent and open communication culture in relation to programme development. Suggestions from tutors as they progress through a programme are encouraged and welcomed and are acted on quickly. However, the panel found that there needs to be a more formalised approach to how proposed changes to programmes and modules are approved and implemented. The panel advised that the policy on programme development be reviewed and the process on who suggests changes, and how these changes are approved and implemented be documented in detail.

During the virtual site visit, discussion took place on the challenges involved in conducting interactive classes for the bigger cohorts of students, and on how the guided directed and self-directed learning provided by CMIT tutors supports a more interactive approach as well as the one-to-one messaging service which allows learners engage with the tutor or with each other through specific module forums. The Panel advised that the split between directed and self-directed learning be more clearly documented.

CMIT has a fit for purpose admission, recognition and completion procedure, provides each student with a Personal Learning Plan, and allocates each student a personal tutor for the duration of their programme. The panel noted a few items in the Personal Learning Plan that might merit further clarification including the need to attend 22 webinars out of a total of 28 as well as processes regarding non-attendance at webinars or failure to present for examinations as scheduled. The panel identified a mandatory change that the process of deferring assessments and examinations be clearly stated and be fair and consistent for all learners; this is documented in 6.1 of this report.

The college also has a policy on the provision of reasonable accommodation for learners. The panel further advised that the college define clearly the areas that in which it can reasonably support students and the evidence that needs to be supplied by the applicant to access this accommodation. This is documented in Section 6.2 of this report.

The panel is now satisfied that the appeals process has been revised as well as the process for deferrals with a very learner friendly flowchart developed to illustrate the process. The provision of reasonable

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accommodation is now clearly documented in the reasonable accommodation policy as is learner access to this accommodation.

The panel is now satisfied that the assessment criteria and assessment rubrics have been updated and conform to QQI policies on assessment.

The panel is now satisfied that a workplace rubric of assessment has been developed which is consistent and fair as well as the fitness to practice of the individual learner increasing objectivity and impartiality while at the same time promoting the academic integrity of the assessment of the learner in the workplace.

#### **4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT**

##### ***Panel Findings:***

QQI's guidelines require that a provider assures itself as to the competence of its staff, that the pedagogical standards of teaching staff are maintained and enhanced, and that procedures be in place for performance management.

The panel noted that there are some discrepancies in the QA documentation and reengagement application as to the numbers of full-time and part-time staff employed in the college. There was some discussion during the site visit as to the differences between employees and contractors and the panel was satisfied with the clarifications given by the provider in this regard during the visit.

The panel is satisfied that the college has a systematic approach to staff training and there are adequate resources on the Virtual Learning Environment in relation to induction for new staff and training and development for existing staff. There are opportunities even within a small cohort of staff for staff advancement.

Active learning that is practical and applicable in the workplace forms the basis of almost all courses on offer in CMIT particularly in the area of Childcare.

On the basis of the information provided, the panel is satisfied that the workplace mentors are sufficiently experienced and get enough training to carry out their role in the workplace. The panel advised that the documentation be updated to ensure clarity of language around the assessment tools given to mentors and supervisors in the workplace so ensure that assessment be fair and consistent.

At the conclusion of the virtual site visit, the panel was satisfied that there is sufficient training of tutors in relation to plagiarism and referencing. The staff who presented on the day of the site visit conveyed a professional and well-informed approach to giving appropriate feedback to learners in relation to assessment and work carried out, so that learner grade expectations were managed from the outset. The college uses a messaging system where the learner can engage on a one-to-one basis with their



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tutor or with each other through forums on the VLE. There is no face-to-face interaction between staff and learner.

Each staff member is allocated a number of learners on their respective courses and provide one-to-one support through the college's private messaging service. The panel commends this approach and the very clear guidelines for tutors and learners as to response times to learner queries and when learners can expect feedback, usually within five days of the assessment submission.

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## 5 TEACHING AND LEARNING

### *Panel Findings:*

At the conclusion of the site visit, the panel found that QQI's guidelines under this criterion had not been fully addressed and identified a number of mandatory changes in this regard.

QQI's 2016 Core Statutory Quality Assurance Guidelines require that a provider respects and attends to the diversity of learners and their needs, and encourages a sense of autonomy in the learner, while encouraging adequate support and guidance.

On the basis of the discussion at the virtual site visit, the panel is satisfied that the college has a very clear teaching and learning philosophy that is student centred and supports the learner throughout their journey with the college. However, the panel found that this philosophy was not clearly articulated in the documentation and therefore identified, as a mandatory change, that the college develop a teaching and learning strategy that reflects the work it is already doing in this area.

Most courses in CMIT are delivered through blended learning. How blended learning is implemented in the college is not clear from the QA documentation presented, and the panel identified, as a mandatory change, that the college define clearly its blended learning strategy and policies, both for the learner and for its tutors.

The student support team offers support for all non-academic areas including questions in relation to application or managing access to the e-learning platform.

The panel is now satisfied that the provider has reviewed its teaching, learning and assessment strategies including a clear definition of its blended learning model, strategy and policies as well as including explicit statements in the provider's teaching and learning policy showcasing blended learning as the provider's primary mode of delivery.

## 6 ASSESSMENT OF LEARNERS

### *Panel Findings:*

Following review of the documentation and the virtual site visit, the panel found that QQI's guidelines under this criterion had not been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require a provider's policies and procedures to ensure the credibility and security of assessment procedures and to address how assessment promotes and supports effective learning and teaching and enables learners to demonstrate the achievement of learning outcomes.



While the panel is satisfied that CMIT has invested significantly in its development of internal practices pertaining to assessment, it identified mandatory changes that pertain to assessment.

The panel identified as a mandatory change that the college develop a clear assessment strategy. Assessment criteria and assessment rubrics need to be established for each module and these need to be mapped to the learning outcomes of the module and of the programme. Learners need clear information on what constitutes the different grades awarded in each module.

During the discussion, the panel learned that all assignment briefs are internally verified and there is a process of second marking. This needed to be made clear to learners and to tutors. Clarity was also needed on whether this happens with all assessments, or with a defined percentage of assessments submitted, or with borderline cases.

On the basis of the documentation and discussion, the panel understood that the college did not have defined submission dates for assessments, and that learners could decide when they are ready to submit, thus allowing for multiple submissions of a given assessment. The panel recommended that the number of submissions should be capped so that assessments are fair and consistent for all learners, and that there needed to be clarity around marks awarded for re-submissions, and / or late submissions.

The assessment review process needed to be reviewed particularly in relation to the grounds for seeking a recheck, a review or appeal, feedback and grades, and clarity was needed on the steps that are followed and by whom and whether an appeal is rejected or upheld. The panel identified, as a mandatory change, that CMIT conduct a complete review of its assessment review and appeal process.

The majority of CMITs' learners are already in employment and seeking to upskill and use their current positions for the work-based assessment element of their chosen programme. Each student is allocated a supervisor or manager in the workplace and a mentor from CMIT who supports their learning in the workplace. The panel understands that CMIT organises Garda Vetting as required.

The panel identified, as a mandatory change, the development of a workplace rubric of assessment so that the assessment of learning in the workplace is less generic and more consistent and fairer. The rubric should include grade indicators as to suitability of the tasks assessed, the level of the skills displayed and the fitness to practice of the individual learner particularly in relation to childcare. This rubric will increase objectivity and impartiality and promote the academic integrity in the assessment of the learner in the workplace.

The panel also recommended that CMIT review its complaints procedure in relation to workplace assessment or the nature of the workplace experience. It is noted that all childcare placements are in Tusla approved centres.

The panel advised that the college develop provisions in its QA procedures to deal with scenarios such as if a work placement is paused or a learner is dissatisfied with their work placement. It was not clear from the documentation if a learner who fails to fulfil the minimum number of work placement of six hours per week will have to exit the programme.



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The Panel complimented the college for the very detailed flowcharts on the Certification Administration Process for the different validation bodies. Oversight of who has access to these certification records and how the management and storage of the data operates needed to be specified.

Following a review of revised documentation submitted, the panel is now satisfied that the appeals process has been revised and is clear in relation to the grounds for making an appeal and the process of an appeal with a very learner friendly flowchart developed to illustrate the process. The process for deferring an assessment or an examination and the provision of reasonable accommodation is now clearly documented in the reasonable accommodation as well as how learners' access these supports. The policy on extenuating circumstances has been revised.

The panel is now satisfied that the assessment criteria and assessment rubrics have been mapped to the programme learning outcomes for all QQI modules. Definitions in relation to pass, merit and distinction are now clear and included in the revised assessment policy.

The panel is now satisfied that a workplace rubric of assessment has been developed which is consistent and fair with grade indicators as to the suitability of the tasks assessed, the level of skills displayed and the fitness to practice of the individual learner increasing objectivity and impartiality while at the same time promoting the academic integrity of the assessment of the learner in the workplace.

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## **7 SUPPORT FOR LEARNERS**

### ***Panel Findings:***

The panel is satisfied that QQI's guidelines under this criterion of QA have been addressed and has offered commendations to CMIT in this regard in section 3.1 of this report.

QQI's guidelines require that in addition to learner supports and resources being integrated and coherent, that the learning environment includes pastoral care supports provided by staff for learners.

As previously noted, CMIT staff work very diligently on behalf of each CMIT student and have a very clear and cohesive support system in place to support the learner in their journey through the course. The e-learning platform and the instant messaging system as well as the timelines in providing feedback on assessment supports the student throughout their programme.

CMIT representatives affirmed that the provider's commitment to the welfare of its learners was key to the success and sustainability of its operations. As most learners are already working in their respective careers and following courses to upskill, learners are ambitious and engaged with their course of study and usually require more academic than pastoral care support. Pastoral care is provided by the dedicated Student Services Director. The panel commends CMIT on its Student Charter, and finds that it clearly underlines the commitment of the college to the support of its learners.

The panel expects that the addition of learner representation on the governance structure of CMIT as outlined in 5.1 and 6.1 of this report will only further enhance the effective learner supports and involvement already in place in the college.

The Academic Board now includes learner and tutor representation and a learner now sits on the new Programme Board ensuring that the learner voice is heard.

## **8 INFORMATION AND DATA MANAGEMENT**

### ***Panel Findings:***

The panel is satisfied that QQI's guidelines under this criterion of QA has been addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require that reliable information and data are available for informed decision-making.

CMIT has an integrated IT and e-learning system that maintains all its learner and staff records. All data needed to successfully complete a course of study with CMIT is managed through the e-learning platform, and CMIT is committed to its continual enhancement. There was a lot of documentation in Section 11 on the technical protocols and supports in place for the security and protection of the e-

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learning platform and the data therein, how it is accessed, managed and supported. The panel advised that this might be more appropriately consigned to the e-learning platform for access by learners and tutors as appropriate. This is documented in Section 6.2 of this report in Specific Advices.

CMIT confirmed that the provider adheres to GDPR legislation. Documented procedures are in place in relation to the processing of data that cover what is processed and why. The college might consider more references to GDPR within the QA documentation.

The provider has revised its Information on Data Management in line with the panel's advice. Policies relevant to learners, tutors and staff have been placed in Section 8, Information and Data Management policies. Detailed IT operations procedures have been placed in a separate IT Operations Manual that is not published.

## **9 PUBLIC INFORMATION AND COMMUNICATION**

### ***Panel Findings:***

The panel is satisfied that QQI's guidelines under this criterion of QA have been addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require that policies and procedures are in place to ensure information published is clear, accurate, objective, up to date and easily accessible.

CMIT has a very comprehensive website with full information online on each course and each component within a course and is easy to navigate and book a course. There needs to be some updates to courses that are no longer new as they have testimonials from previous learners.

The panel has noted that requests for a brochure require a learner to fill in an online form and suggests that the college might review this and make brochures and other marketing collateral freely available to the public.

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

### ***Panel Findings:***

n/a



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## **11 SELF-EVALUATION, MONITORING AND REVIEW**

### ***Panel Findings:***

QQI's 2016 Core statutory Quality Assurance Guidelines require a provider to review, evaluate and report on education and training services it provides and the QA systems and procedures that underpin these.

CMIT has instituted procedures that address monitoring, review and self-evaluation. There has been a number of reviews and evaluations carried out before the current re-engagement process commenced. The provider also has well-established annual self-evaluation, monitoring and review processes under the auspices of ISO and while it has a different focus to QQI's QA Core policies and procedures, it is a useful annual exercise in this regard.

The panel has identified a number of mandatory changes in relation to monitoring and review of programmes in Section 3.1 of this report.

The provider has established the Programme Committee and expanded its remit to incorporate the Programme Development Committee revising the policy and procedure for programme development in the process. Improvements and amendments to programmes are now clearly defined as well as where responsibility ultimately lies for approval of all such changes.

## **12 TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING**

### ***Panel Findings:***

CMIT delivers most of its programmes through blended learning. The rationale for its chosen delivery methodology is based on the identification of student demand. CMIT is a dedicated provider of accredited programmes via tutor-led eLearning and its entire organisational structure, QA Policies and Procedures and business model is focussed specifically on operating in this area.

As already indicated in this report in Section 3.1, the panel members commend the provider on the quantity and quality of the information provided to learners on the e-learning platform and on the expert use of the platform by both management and tutors. However, at the close of the site visit, the panel found that how blended learning is implemented in the college was not clear from the QA documentation as indicated in Section 5 of this report. The panel identified, as a mandatory change, that the college define clearly its blended learning strategy and policies both for the learner and for tutors.



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As indicated in Section 5.0 of this report, the provider has now addressed the issue and included explicit statements in relation to blended learning in their Teaching and Learning Policy.

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## **Evaluation of draft QA Procedures - Overall panel findings**

The panel acknowledges the established track record and good standing of CMIT with QQI and with its stakeholders. The reengagement process involves a comprehensive evaluation of a provider's QA policies and procedures, as well as a site visit to the provider's premises that facilitates a full day of discussions between the panel and the provider.

In the case of CMIT and in the circumstances arising from the COVID-19 pandemic, a virtual site visit was organised on 10<sup>th</sup> July 2020 between the CMIT team and the panel members.

CMIT representatives have engaged in a consistently constructive and open manner with the panel and been responsive to requests for additional information as well as to the panel's suggestions and observations.

In Section 3.1 of this report, the panel has offered several well-deserved commendations to CMIT. Notwithstanding those, following a review of the documentation submitted and at the conclusion of the site visit, the panel found that several areas of CMIT's draft QA procedures needed to be addressed before they could be recommended to QQI for approval. The panel therefore recommended that approval of CMIT's QA procedures be refused pending mandatory changes being made.

These mandatory changes along with some specific advices are set out in 6.1 and 6.2 of this report. CMIT had six months from the date of QQI decision to make a revised application.

The panel reconvened on May 10<sup>th</sup> and notwithstanding the excellent work that had been done in relation to the mandatory changes and panel advices, the panel needed some further clarifications which the college provided. The panel reconvened on May 24<sup>th</sup> to further review these clarifications.

It is the panel's view that the provider has satisfactorily addressed the mandatory changes and clarifications and responded appropriately to the panel's initial specific advices. The panel commends the provider on its clear and considered responses to all its queries, particularly in addressing the mandatory changes. The panel acknowledges the comprehensive and wide-ranging approach taken by the provider in enthusiastically embracing the process thus enhancing its QA policies and procedures. The panel is happy to recommend CMIT's QA procedures to QQI for approval.



## **Part 6 Mandatory Changes to QA Procedures and Specific Advice**

### **6.1 Mandatory Changes**

The following proposed mandatory changes were identified at the conclusion of the site visit by the panel on 10<sup>th</sup> July 2020. The panel reconvened on May 10<sup>th</sup> 2021 and sought further clarifications.

The panel reconvened May 24<sup>th</sup> 2021 to evaluate evidence submitted by the College of Management and IT in support of the proposed changes. Following the evaluation of the evidence submitted, the panel is satisfied that the College of Management and IT has adequately addressed the issues set out in Section 6.1 below and has responded appropriate to its advices.

The panel commends the College of Management and IT on its wholehearted engagement with the process, with the clarity and extensiveness of its responses and on its commitment to enhance its quality assurance policies and procedures.

#### **1. Governance and Management**

The panel has concerns pertaining to Governance and Management of CMIT, particularly in relation to the composition of the committees, the reporting structures within and among the committees, as well as the separation and impartiality of the commercial and academic decision-making within the college. Accordingly, the panel proposes the following mandatory changes:

- a) Review the composition and remit of the Academic Governance Board particularly in relation to the number of internal and external stakeholders and the inclusion of learner and tutor representation on the Board.
- b) The composition and remit of the Results Approval Panel needs to be addressed so as to ensure that academic decision making is impartial and independent and not influenced by commercial considerations. In this regard, the provider should reconsider the proposal to include the college director in the membership of this committee.
- c) The remit and composition of the Programme Development Committee should be reviewed, and its title reconsidered. New programme development should be considered as a subset of the committee.

#### **2. QA Documentation**

The provider should undertake a complete review of its QA documentation to address each of the following issues:

- a) QQI's core guidelines should be fully represented in the documentation.



- b) The QA documentation should be made clearer and easily navigable for the learner or other stakeholders of the college.
- c) CMIT needs to document clearly their teaching, learning and assessment strategies for all stakeholders, including a clear definition of its blended learning model, strategy and policies.
- d) The Learner Charter should be included in the provider's QA documentation.
- e) The provider should ensure that its approach to the learner experience and the learner journey within the college is documented clearly.

### **3. Assessment**

- a) The provider should review the process of deferring assessments and examinations in order to ensure that it is clearly stated and is fair and consistent for all learners.
- b) The assessment review process needs to be reviewed, particularly in relation to the grounds for seeking a recheck, a review or appeal, feedback and grades given, and clarity around the steps that are followed with clear policies around special circumstances, plagiarism, unfair practice and infringements.
- c) Assessment criteria and assessments rubrics need to be established for each module and these need to be mapped to the learning outcomes of the module and of the programme. Learners need clear information on what constitutes the different grades awarded in each module.
- d) A workplace rubric of assessment should be developed so that the assessment of learning in the workplace is less generic and more consistent and fair, with grade indicators as to suitability of the tasks assessed, the level of the skills displayed and the fitness to practice of the individual learner. This is particularly important in relation to childcare. This rubric will increase objectivity and impartiality and promote the academic integrity in the assessment of the learner in the workplace.

## **6.2 Specific Advices**

1. The panel advises that the policy on programme development is reviewed and the process on who suggests changes, how these changes are approved and implemented is documented in detail.
2. The panel also recommends that learner representation be included on the programme boards.
3. The panel advises that the documentation be updated to ensure clarity of language around the assessment tools given to mentors and supervisors in the workplace so as to ensure fair and consistent assessment.
4. The panel advises that the college should define clearly the areas that they can reasonably support reasonable accommodation for students and the evidence that needs to be supplied by the applicant to access this accommodation.

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5. The panel advises that technical protocols and supports in place for the security and protection of the e-learning platform, as documented previously in Section 8, might be more appropriately placed on the e-learning platform for access by learners and tutors as needed.

Following its meeting on May 24th 2021, the panel has a new specific advice:

6. The panel encourages the provider to develop and review the Learner Charter to ensure that it continues to be fit for purpose in light of the rapid changes in monitoring academic integrity particularly in the online learning environment and also to ensure that it adequately captures learner responsibilities considering those reviews.

## **Part 7 Proposed Approved Scope of Provision for this provider**

<b>NFQ Level(s) – min and max</b>	<b>Award Class(es)</b>	<b>Discipline areas</b>
5-6	Major & Component, Special Purpose Awards	Education, Business, Administration and Law, Health and Welfare
Delivered through blended learning modes		



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## **Part 8      Approval by Chair of the Panel**

This report of the panel is approved and submitted to QQI for its decision on the approval of the draft Quality Assurance Procedures of College of Management & IT.

Name:



Date: 14<sup>th</sup> June 2021

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

1. Application Form for Approval of QA Procedures and Reengagement
2. Quality Assurance Policies and Procedures Manual
1. Legal Entity Evidence
2. Organisation Chart
5. Financially Sound Evidence
6. Public and Employer Liability Insurance
7. Tax Clearance Certificate
10. Strategic Plan
11. VLE access
12. Tutor Contract Template
13. Tutor Employee Template
12. Personal Learning Plan
13. Special Circumstances Application
14. Handbook on Governance and Committees
15. Organisational Chart
16. Roles and Responsibilities
17. Learner numbers per programme

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

Name

Role/Position

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Mr Seán O'Connor	Managing Director
Ms Sinéad O'Connor	Student Services Director
Ms Claire Fannin	Quality Director
Ms Maria Holmes	Certification Administrator
Ms Gemma Healy	Childcare Tutor
Ms Sarah Jane Cashman	Business Tutor

*Appendix:* Provider response to the Reengagement Panel Report

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FAO: Dr. Deirdre Stritch  
Quality and Qualifications Ireland (QQI)  
26-27 Denzille Lane  
Dublin 2  
D02 P266

15<sup>th</sup> June 2021,

**Re: Provider Response to Reengagement Panel Report**

Dear Deirdre,

Firstly, CMIT would like to thank the panel for their review and evaluation of the CMIT Quality Assurance Policies and Procedures submitted as part of our reengagement application. We found the level of engagement and discussion during the panel interactions to be very positive and the feedback received was most valuable in enhancing our Quality Assurance Policies and Procedures.

We welcomed the detail and clarity provided in relation to the required changes to be implemented within the six-month timeframe. We also welcomed the specific advices provided by the panel which were aimed at further enhancing some aspects of our Quality Assurance Policies and Procedures.

We wish to acknowledge the new specific advice from the panel in the report issued following the reconvene meeting held on the 24<sup>th</sup> of May 2021. We agree that the rapidly changing practices in relation to monitoring academic integrity in an online environment require continuous monitoring, review and action to ensure the highest standards of academic integrity are maintained. This will be an area of focus and continuous review.

We are pleased that the panel have recommended the approval of our Quality Assurance Policies and Procedures at the next PAEC Committee Meeting.

Yours Sincerely,

A handwritten signature in blue ink that reads 'Claire Fannin'.

Claire Fannin  
Academic Director