



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

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| Registered Business/Trading Name: | Dublin Business School |
| Address: | 13/14 Aungier Street, Dublin 2, D02 WC04. |
| Date of Application: | 30 January 2019 |
| Date of resubmission of application: | |
| Date of evaluation: | 05 July 2019 |
| Date of site visit (if applicable): | 05 July 2019 |
| Date of recommendation to the Programmes and Awards Executive Committee: | 05 December 2019 |

1.2 Profile of provider

Dublin Business School (DBS) was established in 1975. It provides undergraduate and postgraduate programmes in the fields of Arts, Humanities, Social Sciences, Business, Law, Management, Marketing and ICT. It also provides professional and executive education and training; including preparation for accountancy examinations. The majority of its students are fee-paying with a small number funded through the Springboard + training fund administered by the Higher Education Authority (HEA).

DBS enrolls over 8,000 students per year, over half of whom are part-time evening students and the remainder full-time day students. Approximately one third of DBS students are international. The majority come from EU countries, with large numbers also from India, China, Malaysia, the United States and Brazil. Three quarters of its students are enrolled on programmes validated by QQI. The remainder are enrolled on unaccredited professional programmes or on programmes leading to awards of other bodies; such as the Institute of Commercial Management (ICM).



In 2003 DBS was acquired by Kaplan Inc., an international education company. Kaplan's programmes include higher education and professional programmes, language instruction, test preparation and services to elementary and secondary learners. The College refers to its repositioning in the Kaplan organisation structure since 2016 and to significant changes in senior staff and culture over that time. DBS has 400 staff and states that it has focused in recent years on filling key academic and leadership posts to increase its organisational capacity and the quality of its outputs. It refers to its focus as being on producing 'career-ready graduates, delivering outstanding learning, supporting student success and remaining independently sustainable' (Application form for re-engagement, p.4). It also refers to its ambition to achieve delegated authority from QQI in the future.

Part 2 Panel Membership

| Name | Role of panel member | Organisation |
|---|--|--|
| Professor Brian Bowe, Head of Academic Affairs and Assistant Registrar | Chair | Technological University Dublin (TUD) |
| Dr Mark Irwin, Dean of Learning, Teaching and Research | International Teaching and Learning Expert | British and Irish Modern Music Institutes (BIMM) |
| Ms Eva Juhl, Institutional Review Facilitator | National QA Expert | Cork Institute of Technology (CIT) |
| Ms Aisling McKenna, Director Quality Promotion and Institutional Research | National QA Expert | Dublin City University (DCU) |
| Mr Dean Murphy, Learner | Learner representative | National College of Ireland (NCI) |
| Dr Trish O'Brien, Consultant | Independent Report writer | O'BRIEN / Governance Design (OBGD) |

Dr. Deirdre Stritch, QA Approval and Monitoring Manager, QQI, attended the site visit as an observer.



Part 3 Findings of the Panel

3.1 Summary Findings

The Panel was impressed with the quality and structure of the QA documentation presented by DBS. The gap analysis conducted between the previous quality assurance procedures and the Core and Sector-Specific QA Guidelines of QQI was thorough and collaborative. The Panel met a large number of staff during the re-engagement visit and considered that they were familiar with the documentation and comfortable with its implementation. The College was reflective in its approach to quality assurance and discussed with the Panel its objective to become increasingly improvement-orientated, following a large number of programme validation and review events. The Panel encourages the College to continue to monitor the effectiveness of its QA procedures. The Panel noted several matters of good practice that have been enabled by the QA documentation and which are referenced throughout this report.

Nonetheless, at the conclusion of the site visit, the Panel had concerns in three areas: the specificity of the terms of reference of the Board of Directors and the Academic Board; the clarity of the information provided to learners on the status of unaccredited programmes offered by DBS; and the College's collection and use of completion rates. These are outlined in section 6.1 of this report and identified as *proposed mandatory changes* (additional items of *specific advice* are included in section 6.2). Given that these issues were discreet, and in the Panel's view could be addressed quickly by the provider, the Panel availed of the option to defer its overall decision for a period of six weeks, and allowed DBS this time to submit evidence to the panel that the changes identified have been satisfactorily addressed.

The Panel reconvened on 27 August 2019 to undertake a desk review of the evidence subsequently submitted by DBS. It is the Panel's view that DBS has satisfactorily addressed the *proposed mandatory changes*. The Panel consequently recommends that QQI approves the QA procedures of DBS. It should also be noted that following the desk review, additional *specific advice* from the Panel is noted in section 6.1.

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

| | Tick <u>one</u> as appropriate |
|--|--------------------------------|
| Approve Dublin Business School's draft QA procedures | X |
| Refuse approval of [the provider's – insert name] draft QA procedures with mandatory changes 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) | |



Refuse to approve [the provider's – insert name] 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 | The College provided a Certificate of Incorporation and a Certificate of Registration as part of its application. |
| 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 | DBS was established as a legal entity in Ireland and is based in Dublin. |
| 4.1.3(a) | Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i> | Yes | DBS is engaged in the collaborative delivery of programmes with Kolej Poly Tech MARA (KPTM) in Malaysia and Sound Training College in Dublin. In both cases, the collaboration is regarding DBS programmes validated by QQI. |
| 4.1.4(a) | Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i> | Yes | The College has relationships with other international providers where students transfer to a DBS programme for part of their programme or to complete the remainder of their programme. An MOU is in place for each partnership. No current agreements are operating outside of the scope of approval sought by the College. |
| 4.1.5(a) | Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i> | Yes | DBS undertakes due diligence, including research on applicable regulations and legislation, when entering into agreements with other parties in other jurisdictions. |
| 4.1.6(a) | Criterion: <i>Is the applicant in good standing in the qualifications systems and</i> | Yes | The College has confirmed that it is in good standing in the qualifications and education and training system in Ireland and abroad. |



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| | <i>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> | | |
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Findings

The Panel is satisfied that DBS meets all of the criteria specified under *Legal and compliance* requirements.

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 | DBS is owned by Kaplan Inc., an international education company operating in more than 30 countries. It is largely funded through student fees; a minority of which are supported through the State funded programme Springboard +. A monthly Senior Leadership team meeting reviews the adequacy of resourcing and any related risks. |
| 4.2.2(a) | Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i> | Yes | DBS has a formalised strategic plan (2017-2021) that it reviews on an annual basis. |
| 4.2.3(a) | Criterion: <i>Are fit-for-purpose governance, management and decision-making structures in place?</i> | Partially | The College has a substantial governance structure in place, not all parts of which are operating as yet. The Panel has identified a <i>mandatory change</i> regarding the terms of reference of the Board of Directors and Academic Board. |



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| 4.2.4(a) | Criterion: <i>Are there arrangements in place for providing required information to QQI?</i> | Yes | DBS's quality assurance procedures reflect its agreed methods of providing information to QQI. |
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Findings

Other than 4.2.3 (a), the Panel was satisfied that DBS met each criterion under *Resource, governance and structural requirements*. The Panel was not satisfied that the role of the Academic Board vis-à-vis the Board of Directors was adequately distinguished. It considered that the ultimate authority of the Academic Board for academic decision-making, and the separation of academic and commercial decision making, were not explicitly confirmed in the documentation provided, and it made a *proposed mandatory change* in this regard. This has now been addressed through evidence subsequently submitted by DBS. Modifications have been made to the Terms of Reference of both governance units, to the DBS Articles of Government, and to relevant sections of the QA Handbook.

4.3 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 | The College was founded in 1975 and has increased the breadth and type of its provision over that time. |
| 4.3.2(a) | Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i> | Yes | From 2016 to 2019 DBS made a large number of key appointments of an academic, management and operational nature. |
| 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 | The standard conditions for validation specified in the 2012 Act include co-operation with and assistance to QQI in the performances of its functions; the establishment of procedures for the fair and consistent assessment of learners; and provisions for the protection of enrolled learners. The Panel is satisfied that the |



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| | | | applicant has the capacity to comply with these standard conditions. |
| 4.3.4(a) | 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> | Yes | The College has sufficient premises, facilities and resources to meet the requirements of the provision proposed. |
| 4.3.5(a) | Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i> | Yes | The College has detailed procedures that support its ATP activities. |
| 4.3.6(a) | Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i> | Yes | The College's quality assurance documentation, infrastructure, and implementation, support fair and consistent assessment. |
| 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 | DBS's PEL arrangement is a Deed of Guarantee from Kaplan Inc., DBS's parent company. The Deed is renewed each year and a formal letter is submitted to QQI by Kaplan. |

Findings

The Panel is satisfied that DBS meets all of the criteria specified under *Programme development and provision requirements*.

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

The Panel is satisfied that DBS has the capacity to provide sustainable education and training. It has a long track record in education and training and has evolved its QA policies and procedures to meet QQI requirements and to reflect its learning and experience. The College has developed, and keeps under review, an organisational strategy that will direct the academic decisions it makes over the coming period and it has recently made a series of key appointments that should support it in delivering on its strategic plans.



Part 5 Evaluation of draft QA Procedures submitted by DBS

The following is the panel's findings following evaluation of DBS quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016). 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 College explained to the Panel that it has put a lot of consideration into its governance structure and has looked at roles, functions and membership. It described its governance structure as being key to sustainability and to systemic quality assurance and improvement.

The division between commercial and academic considerations is a key aspect of QQI's *Core Statutory Quality Assurance Guidelines* and so the Panel focussed on the roles of the Board of Directors and Academic Board (featured in Part A, Section 1 of the QAH). The Board of Directors is the most senior body governing the College and is comprised of the Chair (CEO Kaplan UK, Ireland and the Middle East), the Executive Dean of DBS, a Secretary (who is the General Counsel of Kaplan International) and two other Directors (the Director of Learning of Kaplan UK and an Independent Director position that is currently vacant). The Board of Directors make decisions on, for example, academic direction (e.g., to pursue a new field of learning) and the resource implications of the introduction of new programmes. Otherwise, the Academic Board is described as the 'most senior academic Authority in DBS' (QAH, Part A, Section 1, p.10).

The Panel noted and commended the College's increase in faculty representation on the Academic Board in preparation for the re-engagement process. Two student representatives from the Students' Union are also members. In discussions with senior staff, the Panel was satisfied that the dominant role of the Academic Board in academic decision-making is understood; however, it considered that the terms of reference of the Board of Directors and Academic Board should better confirm these respective roles.

There are five committees reporting into the Academic Board. One of the roles of the Learning, Teaching and Assessment Committee was identified as being to workshop policies and procedures. The Quality Enhancement and Risk Management Committee was described as playing both a development and review role; it appears largely to act as a home for matters requiring attention that are not captured elsewhere, rather than being a risk management committee in the usual understanding of that term. Corporately, a separate risk register is maintained that manages operational risk. The Panel had some reservations regarding the compatibility of the title and role of the Quality Enhancement and Risk



Management Committee and queried whether the College had considered separating the ownership of QA regulations and enhancement.

The College intends introducing Programme Boards that will sit once a semester and systematically analyse programme data and information; these would be in addition to Programme Team Meetings. Programme Boards will include full and part-time staff and student representation and will feed into an Annual Programme Report. There are approximately 100 programmes, overseen by Course Directors, that would need to be managed in this way. The College is considering the practicalities of how this will operate. The Panel suggested that Course Directors could delegate the chairing of Programme Boards.

The Panel considered that as a number of elements of the academic governance structure are newly established, they are naturally untested. As a result, the College may find itself amending the governance system over time to meet its needs. In this regard, the Panel emphasised the importance of keeping the effectiveness of the governance system under review.

Specific advice:

- Articulate a rationale for the proposed committee structure. In doing so, review the effectiveness of committee terms of reference, align committee titles with functional remits, and seek opportunities to simplify reporting lines.
- Consider the appointment of Programme Board Chairs who would report to the Course Directors and avoid the burden on the Course Director role that may result from the introduction of Programme Boards.
- Ensure that the changes made to governance documentation to address the Panel's *proposed mandatory change* are consistently represented throughout the College's QA documentation.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

The Panel complimented DBS on the QA documentation submitted for its re-engagement application. It commended the logical structure of its QA Handbook, which facilitated a more productive engagement by the Panel with the College.

There have been a number of editions of the QA Handbook over time and influenced by quality events: including institutional and programmatic review, and programme validation. The College established a



steering committee and undertook a gap analysis of the QA Handbook content against QQI's *Core Statutory Quality Assurance Guidelines* (2016). Deficiencies identified were assigned to individuals on the steering committee, and the Registrar maintained oversight of the project.

Notable changes to the QA Handbook include the programme review process (QAH, Part C, Section 2), which was informed by the College's engagement with QQI, and a streamlined admissions section (QAH, Part B, Section 1). It has also recently developed a Child Protection Policy (QAH, Part A, Section 2). The College has identified further development work it would like to complete on its appeals and complaints procedures. It is also in the process of developing quality assurance policies and procedures to address QQI's *QA Guidelines for Providers of Blended Learning* (2018). In developing its individualised policies and procedures the College reviews published QA documentation as a guide and a form of benchmarking.

At the time of the site visit the QA Handbook had been made available to staff in draft format, pending the outcome of the re-engagement process. The College is developing an online portal to compartmentalise its content for easier navigation. It is also delivering workshops to staff to familiarise them with the content of the QA Handbook and makes use of message boards and posters to highlight specific procedures at opportune times (e.g., examination regulations).

Specific advice:

- Review quality assurance documentation for any references to legacy language.

3 PROGRAMMES OF EDUCATION AND TRAINING***Panel Findings:***

Almost half of the programmes delivered by DBS are undergraduate, a quarter are post-graduate programmes at levels 8 and 9 and the final quarter is made up of unaccredited short courses. The common objective of all of these programmes is the College's intention to create career-ready graduates. In recent years DBS has engaged in various validation and programmatic review events with QQI. Its updated QA policies and procedures have been informed by these experiences (QAH, Part C, Section 2).

The College is currently considering its complement of programmes and deciding which it will continue with and which it may retire. It explained that it is not reliant on high progression within programmes to sustain its business model as its revenue is based on several different types of programmes and markets. It is primarily focussed on successful participation as a marker of quality.



The Panel noted the high proportion of DBS programmes that do not lead to recognised awards. Some of these programmes lead to exemptions from the first year of accredited programmes. The College indicated that it is considering the longer-term status of these programmes. The Panel was informed that is the intention of the DBS to review its current provision of programmes that do not lead to a QQI award (or other recognised qualification), and to move towards having all programmes validated and on the NFQ (or alternative). However, the process to achieve this, and timelines involved, were not clearly articulated. The Panel was also advised that this provision is being brought within the College's formal QA system. For example, the module descriptors of the College's diplomas have been recently reviewed, and unaccredited programmes are subject to internal moderation, if not external examination. Some concerns remained for the Panel regarding the nature of these programmes, and their relationship with accredited programmes, and it has provided specific advice in this regard.

Specific advice:

- Continue to plan towards formal accreditation of all offerings, prioritising programmes of one year's duration;
- Ensure that qualifications recognised for advanced entry - accredited or otherwise – and including in articulation contexts, are subject to rigorous approval and continuous review in line with best practice and recognised European standards.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT**Panel Findings:**

The College described itself as evolving from a somewhat negative culture with relatively low levels of staff engagement – as measured by a Kaplan staff engagement survey. It described the actions it took to address culture, which included providing clarity of direction, increasing internal communication and making “a conscious effort to live a set of behavioural values” (*Application form for re-engagement*, p.3). DBS experienced a high level of staff turnover leading to a strain on individuals and issues arising in quality. It made a series of important appointments from 2016 to 2019, including a Head of Academic Programmes, Head of Faculty and School Operations, Registrar, Assistant Registrar, Head of Quality, Enhancement & Innovation in Teaching and Learning, Course Directors and a Learning Technologist. The College considers itself now to be adequately resourced but requiring time for these new posts to embed themselves fully and optimally into the organisation. It noted that subsequent results of the Kaplan staff engagement survey show a positive trajectory.

The College explained that its part-time and full-time lecturer contracts are the same; the only



difference is payment interval. Hourly rates for part-time staff include preparation, assessment duties, and attendance at required meetings, whilst additional payments are made for engagement in, for example, programme development work.

New recruits are approved by the Academic Appointments Sub-Committee (QAH, Part A, Section 1), which looks at their qualifications and experience and makes recommendations to the Faculty Manager on appropriate supports. Staff mentors provide new staff with an overview of, for instance, the student profile and IT and teaching and learning supports available. The Panel was impressed with the extent of arrangements in place for new recruits, and the attention given to addressing their practical and academic information and support needs. Equally, the College acknowledged that the current model of support is not scalable and that further mentors will need to be trained and new models of training considered.

Where breaches in the implementation of QA arise, the College described a gradual escalation in staff performance management if needed; it also identified that systematic breaches across staff may suggest an academic management issue that goes beyond the individual. Lecturer issues arising in student feedback are highlighted and addressed by the Faculty Manager. Remedies include informal feedback, the assignment of a mentor, and facilitating peer observation.

Specific Advice:

- Systematise the current informal supports to staff by formalising initial teacher training and continuous professional development (CPD) opportunities for all teaching staff.

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

Academic staff described the teaching and learning experience in DBS as engaging and participatory with a strong employment focus. The College explained that it is continually looking at what teaching, learning and assessment modes are available to its learners, and that its initiatives in this area are influenced by its wish to make learning flexible, mobile and accessible. The College is an active collaborator with the *National Forum for the Enhancement of Teaching and Learning*.

DBS is currently reviewing its teaching, learning and assessment strategy and identified continuous professional development as a key pillar of this. Three areas it has identified to focus upon next year are assessment and feedback; the in-class learning experience; and supervision.



As noted previously, the College is in the process of developing procedures that have regard to QQI's guidelines on blended learning; it is currently conducting a gap analysis from institutional, programme and learner perspectives. An Education Technology User Group has been established to showcase the potential use of digital tools to support teaching and learning to the lecturing community. Workshops are also held on developing a virtual learning environment (VLE). Lecturers spoke of their use of Moodle for posting class materials and providing annotated feedback. Videos are also increasingly being utilised as a study tool.

The Panel commended the College's commitment to the enhancement of teaching and learning and viewed this as an emerging area of good practice in DBS.

6 ASSESSMENT OF LEARNERS

Panel Findings:

From its discussions with staff, the Panel considered that assessment regulations (QAH, Part B, Section 5) are well-understood, including the parameters within which changes to assessment methods can be made, and the governance of related decisions.

All assessment is internally moderated. The role of the External Examiner was described by the College as being important in order to verify and better understand the programmes they are running. In this sense, in addition to formal external examiner reports, an opportunity is taken to elicit commentary and ideas. Most external examining, depending on the programme, is at modular level.

Procedures regarding academic integrity are included in the QA Handbook (QAH, Part B, Section 3) and reminders of requirements are provided during term time. The library offers student supports and stand-alone courses that students can sign up to. An anti-plagiarism tool is also available through Moodle. Individual and repeat offences are managed through the committees of the Academic Board. In terms of assessment supports, systems have been developed for students requiring accommodations and these have been codified to ensure consistency.

The College noted that the new student management system that will be launched in 2020 will automate student transcripts and avoid manual interventions that can create risks to the quality of data.



7 SUPPORT FOR LEARNERS

Panel Findings:

The College noted the increasing importance of providing and being known for high-quality learner supports as a higher education provider. The student body of DBS is made up of an almost equal split of full and part-time students. 40% of its full-time students are international. This student makeup is recognised in the accommodations provided by the College, which were commended by the Panel.

The College has placed an emphasis on the provision of student supports in the first six weeks after a student's enrolment. To promote progression, the College has also appointed a Student Engagement Officer and is utilising the substantial amount of data at its disposal to identify early warning signs of students at risk of leaving their programmes. This complements the work of the Head of Student Experience and the Student Experience Team Lead. Where possible, the College has also recruited former students to student service functions, as they have immediate insight into issues with which students may present.

A Student Council has been established that is student-led and made up of class representatives, mentors and other students. Class representatives are trained by the College; this is a follow-on from the involvement of DBS with the National Student Engagement Programme (NStEP). The format of student meetings has also been modified in the light of NStEP recommendations. Student Council and student representative meetings were characterised as contributing to institutional analysis and providing the College with an opportunity to close the loop on feedback received. The Student Council is also utilised as a means of engaging with students on quality assurance procedures.

The College has elected not to have a student counsellor on-site but rather to partner with an external service that can guarantee a meeting with a counsellor within 72 hours of a request. A set number of sessions are free to students and any additional supports required are charged at a reduced rate. The College has ensured that its network of student mentors and class representatives are trained in suicide prevention. On College-related matters, a one-stop service desk has been established for students to drop in and meet with their programme coordinators. The aim is to resolve the student's issue before they leave the desk.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The Panel commended the College's advanced development and use of data analytics for predictive



purposes. In discussion with staff, it was clear that the College has focussed on this area and is becoming a reference point for other institutions in utilising data as an early warning system for low student engagement and potential dropout.

The Head of IT is responsible for the development and implementation of General Data Protection Regulations (GDPR). This applies when dealing with its own operation, but also in the context of collaborations and articulation arrangements. The College has significantly benefitted from the resources of Kaplan, and the advice of its legal team, in the development and implementation of its GDPR policies and procedures. This includes the provision of compulsory training for all staff.

As noted previously, the College is working on the introduction of a new student management system. This will provide it with further assistance in tracking staff and student information. As a web-based system it will also give access to staff and students to additional information.

Whilst impressed by the College's utilisation of data, the Panel identified during its site visit that the College was not capturing completion rates. As this is a legislative requirement under the Qualifications and Quality Assurance Act (2012) the Panel identified this as a *proposed mandatory change*, particularly in the context of data that should be available to inform programmatic review and as a performance indicator. This has now been addressed to the satisfaction of the Panel through evidence subsequently submitted by DBS. The College has modified its QA documentation to confirm that completion data will inform both programme monitoring and review. It is also engaging in research with other national parties to define the components of completion data. Arising from its desk-review of the evidence submitted by DBS, the Panel has identified a *specific advice*. It considers that the College, having committed to capturing completion data, could deliberate further on how this data will be used to increase the effectiveness and strategic capability of its quality assurance systems e.g., to inform benchmarking, entry profiles, and acceptable progression rates.

Specific advice:

- Further consider how the College's use of completion rates can increase the effectiveness and strategic capability of its quality assurance system.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

A tailored Student Handbook is issued for every student of every programme and includes information relevant to the duration of that programme. This is refreshed as required. The College has also been



innovative in how it communicates QA procedures to its learners, placing notices on Moodle and using physical posters to highlight procedures relevant to the QA cycle.

As referenced in section 3 above, DBS offers a large number of unaccredited programmes. It told the Panel during its site visit that it informs students that these programmes do not lead to awards included in the National Framework of Qualifications (NFQ). It also indicated that it was engaging with QQI to agree appropriate wording to that effect. The Panel considered that DBS could be more proactive and clearer in communicating where programmes are unaccredited. Equally, the Qualifications and Quality Assurance Act (2012) requires that information regarding the status of a programme, specifically that it does not lead to an award if that is the case, is provided to learners in advance of their enrolment. As a result, the Panel identified as a *proposed mandatory change* that Information communicated to learners and the public on non-accredited programmes offered by DBS must be compliant with the requirements set out in section 67 of the 2012 Act. This has now been addressed to the satisfaction of the Panel through evidence subsequently submitted by DBS. The College has included on its website, offer letter, and Learner Handbook a clear statement that these programmes do not lead to awards in the NFQ and will make this same modification to the next version of its printed brochure. Arising from its desk-review of the evidence submitted by DBS, the Panel has identified a *specific advice* on additional information that the College could provide to learners regarding its unaccredited programmes.

Specific advice:

- Include further information for learners, in the College's offer letter and in its Learner Handbook, on the implications of the lack of recognition on the NFQ of its unaccredited programmes, including the extent of exemptions available for learners wishing to subsequently pursue accredited degrees at DBS.

10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING (incl. Apprenticeships)**Panel Findings:**

DBS is engaged in collaborative delivery of programmes with Kolej Poly Tech MARA (KPTM) in Malaysia and Sound Training College in Dublin. In both cases, the collaboration is regarding DBS programmes validated by QQI. The arrangement with KPTM includes staff from DBS lecturing in Malaysia and attending examination boards. Staff from KPTM also visit Dublin, and external examiners visit both sites.

Programmes offered in Sound Training College are managed within the same QA framework as DBS programmes and are essentially treated as part of the College. In the event that further collaborations



are considered, the due diligence procedures applied by DBS were explained to the Panel (these are included in Part C, Section 3 of the QAH).

In addition, the College has a number of articulation agreements. These relationships are informed by staff on the ground who review the standing of potential partners and their programmes. An MOU is first entered into which becomes more granular as the details of the relationship are confirmed. Staff from Dublin deliver on programmes in China, which satisfies the requirements of the Ministry in China and also benefits the College by getting involved in the programme prior to the transfer of students to Dublin. The College informed the Panel that its articulation agreements are continuously reviewed in the context of student progress and underpinning modules in the home country are revised and strengthened if necessary. The Panel commended the clarity of the templates established by the College to document its agreements.

As referenced earlier, the College identified that it wishes to further develop its complaints and appeals procedures. It was noted by the Panel that the complaints and appeals arrangements for collaborative partners should be clarified as part of this process.

Specific advices:

- Ensure that agreements with other parties reflect the grievance, appeals, and disciplinary procedures that apply to these arrangements.

11 SELF-EVALUATION, MONITORING AND REVIEW***Panel Findings:***

As noted under Part 4 above, students complete surveys throughout the year and highlight issues regarding modules and their delivery. Feedback on the overall programme experience is currently sought through the class representative meetings and, in turn, Programme Team meetings review the minutes of class representative meetings and address the issues arising where possible. As part of closing the feedback loop, the College produces an end-of-year student feedback summary report that captures what was said and what was done within the previous period. This is shared with the Student Council.

As part of its governance structure (referenced in Part 1) the College intends introducing Programme Boards in addition to Programme Team meetings. These will provide an opportunity for a larger representation of the programme, both staff and students, to review the programme on a semester-basis. Annual programme reports will arise from these meetings, which will reflect the data and



feedback that is reviewed by the Programme Boards. These internal quality assurance measures will inform the externally regulated five-year programmatic review.

The College said that the programmatic reviews it has recently undertaken represented a valuable experience and one that assisted in transitioning lecturers from a module to a programme perspective. The process was described as iterative, involving close collaboration with programme teams, and informed by feedback and research.

As its QA procedures have been amended and updated in recent times, and as part of its routine monitoring activities, the Panel emphasised the importance of keeping the effectiveness of these procedures under review as they are implemented.

Evaluation of draft QA Procedures - Overall panel findings

The Panel was impressed with the quality and structure of the QA documentation presented by DBS. The gap analysis conducted between the previous quality assurance procedures and the Core and Sector-Specific QA Guidelines of QQI was thorough and collaborative. The Panel met a large number of staff during the re-engagement visit and considered that they were familiar with the documentation and comfortable with its implementation. The College was reflective in its approach to quality assurance and discussed with the Panel its objective to become increasingly improvement-orientated, following a large number of programme validation and review events. The Panel encourages the College to continue to monitor the effectiveness of its QA procedures. The Panel noted several matters of good practice that have been enabled by the QA documentation and which are referenced throughout this report.

Nonetheless, at the conclusion of the site visit, the Panel had concerns in three areas: the specificity of the terms of reference of the Board of Directors and the Academic Board; the clarity of the information provided to learners on the status of unaccredited programmes offered by DBS; and the College's collection and use of completion rates. These are outlined in section 6.1 of this report and identified as *proposed mandatory changes* (additional items of *specific advice* are included in section 6.2). Given that these issues were discreet, and in the Panel's view could be addressed quickly by the provider, the Panel availed of the option to defer its overall decision for a period of six weeks, and allowed DBS this time to submit evidence to the panel that the changes identified have been satisfactorily addressed. The Panel confirms that DBS effectively addressed and provided evidence of addressing the *proposed mandatory changes* outlined in Section 6.1 within the allocated 6 week period. As a consequence, the Panel recommends that QQI approves the QA procedures of DBS.



Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following *proposed mandatory changes* were identified at the conclusion of the site visit on 05 July 2019 by the Panel. The Panel availed of the option to defer its decision to allow DBS an opportunity to address these issues within a six-week period. The Panel reconvened on 27 August 2019 to evaluate evidence submitted by DBS in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that DBS has adequately addressed the issues set out in Section 6.1 below.

6.1 Proposed Mandatory Changes

- At the time of the visit, the Panel requested that the terms of reference of the Academic Board and the Board of Directors be made clear, and explicitly confirm the separation of academic and commercial decision-making. It also requested that the ultimate authority of the Academic Board for academic decision-making be confirmed. The Panel identified this as a *proposed mandatory change*. This has now been addressed to the satisfaction of the Panel through evidence subsequently submitted by DBS within the six-week period allocated. Modifications have been made to the Terms of Reference of both governance units, to the DBS Articles of Government, and to relevant sections of the QA Handbook.
- At the time of the visit, the Panel requested that the information communicated to learners and the public on non-accredited programmes offered by DBS be made compliant with the requirements set out in section 67 of the 2012 Act. The Panel identified this as a *proposed mandatory change*. This has now been addressed to the satisfaction of the Panel through evidence subsequently submitted by DBS within the six-week period allocated. The College has included on its website, offer letter, and Learner Handbook a clear statement that these programmes do not lead to awards in the NFQ and will make this same modification to the next version of its printed brochure.
- At the time of the visit, the Panel requested that DBS integrate completion data into its quality assurance procedures, including programmatic review, as a performance indicator. The Panel identified this as a *proposed mandatory change*. This has now been addressed to the satisfaction of the Panel through evidence subsequently submitted by DBS within the six-week period allocated. The College has modified its QA documentation to confirm that completion data will inform both programme monitoring and review. It is also engaging in research with other national parties to define the components of completion data.



6.2 Specific Advice

- Articulate a rationale for the proposed committee structure. In doing so, review the effectiveness of committee terms of reference, align committee titles with functional remits, and seek opportunities to simplify reporting lines.
- Consider the appointment of Programme Board Chairs who would report to the Course Directors and avoid the burden on the Course Director role that may result from the introduction of Programme Boards.
- Ensure that the changes made to governance documentation to address the Panel's *proposed mandatory change* are consistently represented throughout the College's QA documentation.
- Review quality assurance documentation for any references to legacy language.
- Continue to plan towards formal accreditation of all offerings, prioritising programmes of one year's duration.
- Ensure that qualifications recognised for advanced entry - accredited or otherwise – and including in articulation contexts, are subject or rigorous approval and continuous review in line with best practice and recognised European standards.
- Further consider how the College's use of completion rates can increase the effectiveness and strategic capability of its quality assurance system.
- Include further information for learners, in the College's offer letter and in its Learner Handbook, on the implications of the lack of recognition on the NFQ of its unaccredited programmes, including the extent of exemptions available for learners wishing to subsequently pursue accredited degrees at DBS.
- Ensure that agreements with other parties reflect the grievance, appeals, and disciplinary procedures that apply to these arrangements.

**QQI**

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Part 7 Proposed Approved Scope of Provision for this provider

| NFQ Level(s) – min and max | Award Class(es) | Discipline areas |
|----------------------------|----------------------------------|--|
| NFQ Levels 6-9 | Major, Minor and Special-Purpose | Business, Law, Marketing, Accounting, Finance, ICT, Social Sciences, Psychology, Psychotherapy, Film, Journalism, Media, |

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 DBS.

Name:

Date:

22nd November 2019



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

Documentation submitted to the Panel prior to site visit

- Re-engagement Application, including:
 - The completed application form
 - Company information
 - Collaborative Agreement Templates
 - Financial viability information
- The DBS QA Handbook
- QQI relevant documentation and agreements
- Additional information was also provided to the Panel by DBS, including on:
 - Governance roles and responsibilities
 - Staff roles and responsibilities
 - Monitoring arrangements
 - Advanced learner entry to programmes
 - Enrolment, progression and completion data and its use

Evidence submitted to the Panel post site visit to address proposed mandatory changes

- Modified governance policies and procedures
- Modified Articles
- Modified programme monitoring and review policies and procedures
- Sample reporting template
- Screenshots of the DBS website
- Amendments to the DBS Brochure, Offer Letter and Learner Handbook

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

| Name | Role/Position |
|---------------------|---|
| Andrew Conlan-Trant | Executive Dean |
| Lori Johnston | Registrar |
| Kerry McCall Magan | Head of Academic Programmes |
| Emma Balfe | Head of Faculty and School (Acting) |
| Tony Murphy | Head of Quality Enhancement and Innovation in Teaching and Learning |
| Grant Goodwin | QA Officer |
| Martin Doris | Assistant Registrar |
| Tim Burrows | Kaplan UK |
| Ann Masterson | Course Director (Acting), Business and Law |
| Andrew Quinn | Course Director, Accounting and Finance |
| Cliona Beirne | Director of Marketing and Admissions |
| Shane Mooney | Head of Student Experience |
| Eddie Ormonde | Head of IT |
| Darragh Breathnach | Head of Academic Operations |
| Michael Bruder | Head of Finance |
| Julie Sharp | Head of HR (Maternity Cover) |
| Marta Piasentin | Product Manager – Professional Programmes |
| David Williams | Course Director, ICT |
| Michael Maguire | Course Director, Marketing |



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|---------------------|--|
| Cathal O’Keeffe | Course Director, Psychology, Psychotherapy and Social Studies |
| Michael Kielty | Head of Department – Arts, Languages & Study Abroad Programmes |
| Clive Gargan | Lecturer |
| Terri Hoare | Lecturer |
| Ray Whelan | Lecturer |
| Ber Higgins | Lecturer |
| Rory O’Donnell | Lecturer |
| Rosie Reid | Lecturer |
| Siobhain O’Donnell | Lecturer |
| Niamh Cullen | Lecturer |
| Patrick Mongey | Lecturer |
| Barnaby Taylor | Lecturer |
| Enda Murphy | Lecturer |
| David Wallace | Lecturer |
| Terry Ball | Lecturer |
| Heikki Laiho | Lecturer |
| Stephen Henderson | Lecturer |
| Paul Laird | Lecturer |
| Dylan Corbet | Lecturer |
| James Browne | Lecturer |
| Richard O’Callaghan | Lecturer |



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|------------------|---|
| Tanya Balfe | Admissions Manager |
| Justine Brunton | Assessment and Regulations Manager |
| Lee Richardson | Data Analytics and Reporting Manager |
| Sarah Sharkey | Student Engagement Officer |
| Isabel Ashburner | Learning Technologist |
| Ciara Lambe | Faculty Manager |
| Seamus Coogan | Faculty Manager |
| Cliona McHugh | Faculty Manager |
| Anita Dwyer | School Administrative Officer / Programme Coordinator |
| Adam Crowther | Student Experience Team Lead |
| Jane Buggle | Deputy Librarian |

Appendix: Provider response to the Reengagement Panel Report

Dr Deirdre Stritch,
Quality and Qualifications Ireland
26/27 Denzille Lane
Dublin 2
D02 P266

21st November 2019

Dear Deirdre,

DBS Re-Engagement with QQI

I am writing to submit DBS's full formal response to the final panel report dated 2 September 2019.

Further to the Mandatory Changes which were accepted by the panel in the report, we can confirm that the associated updates within the Quality Assurance Handbook, Articles of Government and on the DBS website and brochures have been made and presented to the DBS Academic Board at its meeting on 24 September 2019. The new brochure is included with this letter, with the changes made as previously advised.

As an appendix to this letter I am also sending on our responses to the Specific Advice in Section 6.2 of the report. I also attach the factual accuracy document in which a couple of minor items are identified.

Please do not hesitate to contact me should QQI or the panel require anything further.

DBS would like to thank the panel members for their time and deliberation through this process, and for providing such detailed consideration and advice.

Yours sincerely,



Lori Johnston
Registrar

Appendix: Responses to Specific Advice

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| <p>Articulate a rationale for the proposed committee structure. In doing so, review the effectiveness of committee terms of reference, align committee titles with functional remits, and seek opportunities to simplify reporting lines.</p> | <p>As per pages 8/9 of the panel report, through the Re-Engagement process additional boards and committees have been introduced, namely Programme Boards and the Quality Enhancement and Risk Management Committee. Following discussions with the panel DBS acknowledges that the latter committee is indeed functioning to capture issues that are not captured elsewhere, and that it may well be desirable to separate out the two functions. At this point in time, operating as a working group, this committee is serving as a very useful tool to help to identify and action items. All matters raised are documented and actions tracked, and it is envisaged that this can be reviewed in a number of months to categorise issues and use this to inform how this is dealt with going forward, including the potential to separate ownership of regulations and quality enhancement.</p> <p>As discussed, DBS has come through a considerable process of change in the past 2–3 years, with new roles, individuals, Programme Review and Re-Engagement, and we remain committed to continuous improvement. In planning for the next stages, including Cyclical Review, all governance structures will be kept under review and additional mechanisms put in place or changes made as required.</p> |
| <p>Consider the appointment of Programme Board Chairs who would report to the Course Directors and avoid the burden on the Course Director role that may result from the introduction of Programme Boards.</p> | <p>Since the panel visit, Senior Lecturers in the following areas have been appointed: Accounting and Financial Services; ICT; Arts & Creative Media; and Counselling & Psychotherapy, Psychology, Social Science and Social Care.</p> <p>Further appointments are to be made in due course for Business and Law and Marketing. A key remit for Senior Lecturers is to support Course Directors, in particular with respect to requirements around on-going monitoring of programmes, and to include management of Programme Boards.</p> |

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| Ensure that the changes made to governance documentation to address the Panel's <i>proposed mandatory change</i> are consistently represented throughout the College's QA documentation. | The Terms of Reference for the Academic Board and Board of Governors have been updated to reflect this. The Quality Assurance Handbook and other associated documentation has also been reviewed to ensure any other references are updated accordingly. |
| Review quality assurance documentation for any references to legacy language. | The Quality Assurance Handbook and other associated documentation has been reviewed by the Registrar to address any legacy language. |
| Continue to plan towards formal accreditation of all offerings, prioritising programmes of one year's duration. | The Head of Academic Programmes and Professional Product Manager have commenced an initial review of all professional programmes with a view to prioritising programmes for review and potential accreditation. DBS is also in discussion with Kaplan UK regarding the possibility of accreditation as a Kaplan Professional Award (on the RFQ). |
| Ensure that qualifications recognised for advanced entry – accredited or otherwise – and including in articulation contexts, are subject to rigorous approval and continuous review in line with best practice and recognised European standards. | The Registrar periodically carries out audits of Admissions files. It was agreed at the last Admissions Committee Meeting, held on 28 August 2019, that the Admissions Manager would hold files from 2019 intakes for the Registrar to carry out a review in November/December 2019. This audit will also include a review of articulation agreements. This timeframe was identified based on other on-going work within the College as this is a relatively quieter period. |
| Further consider how the College's use of completion rates can increase the effectiveness and strategic capability of its quality assurance system. | The Registrar and Data Analytics Manager are looking at this process currently, and this aligns with recent work with QQI and other private providers to pilot Annual Institutional Quality Reports (as currently required of public institutions) and to agree consistent definitions across the sector for reporting around terms such as enrolment, progression and completion. It has been agreed that AIQRs will be piloted with all private providers in 2020 and DBS see this as an opportunity to engage with such data and develop its strategic QA goals. |
| Include further information for learners, in the College's offer letter and in its Learner Handbook, on the implications of the lack of recognition on the NFQ of its unaccredited programmes, including the extent of exemptions available for learners wishing to subsequently pursue accredited degrees at DBS. | Learner Handbooks for the professional Diplomas have been updated with information relating to the lack of NFQ recognition, i.e. as per wording on the website and in the brochure. Exemptions have been reviewed by all Course Directors and these will also be detailed in full in the next iteration of the Handbooks. |

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| <p>Ensure that agreements with other parties reflect the grievance, appeals, and disciplinary procedures that apply to these arrangements.</p> | <p>DBS currently has two collaborative agreements, with Sound Training College and Kolej Poly-Tech Mara. The current agreement with Sound Training College explicitly states procedures for Complaints and Appeals, as well as learner supports and feedback mechanisms. The agreement with KPTM states arrangements for oversight and QA but does not explicitly detail appeals and complaints. The updated Quality Assurance Handbook, including policies for appeals, complaints and disciplinaries, was presented to the staff at KPTM at a visit in September 2019 by the Registrar, and this will be followed by a letter formally detailing these aspects. The content of the agreement itself will be amended at its next renewal.</p> |
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