Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1   Details of provider

1.1   Applicant Provider

Registered Business/Trading Name:	**New Links Training Solutions Ltd**
Address:	Unit 1 Boeing Avenue Airport Business Park Co. Waterford X91AK46
Date of Application:	2nd April 2019
Date of resubmission of application:	15th April 2019
Date of evaluation:	1. Independent Evaluation Panel formed on the 8th of May 2019 2. Pre-site visit evaluation meeting carried -17th of May 2019 3. Post-site visit evaluation of additional documentation - 23rd July 2019
Date of site visit (if applicable):	31st May 2019
Date of recommendation to the Programmes and Awards Executive Committee:	12th September 2019

1.2   Profile of provider

New Links Training Solutions Ltd. is a regional private training provider based in County Waterford with one premises and currently employs 3 full-time staff and depending on the needs of the company uses between 4 -8 contracted trainers, who are subject matter experts. The services of external expertise is engaged to contribute to the business periodically; these contribute to areas such as internal verification, validation, legal matters, governance, compliance and review of systems and processes.

New Links Training Solutions has been registered with QQI (formerly FETAC) since 2009. The main activity of the business is the delivery of a range of training programmes to a diverse range of learners. Since the establishment of the Common Awards System (CAS) the provider has registered two major awards, and three special purpose awards which include a range of minor awards. The provider offers programmes at level 4, 5 and 6 on the National Framework of Qualifications. The most recent QQI validated programme for the provider was validated in October 2016. Certification data from 2018 indicates significant activity in retail display and selling, training and development, supervisory management programmes, but also delivers in other areas such as manual handling and health and safety. Not all programmes offered lead to QQI awards, some are industry recognised qualifications, unaccredited or bespoke corporate training. The Provider expects an increase in demand for accredited leadership programmes, and is already validated for a module in this area.

The provider services clients in the following broad categories: funded jobseeker short programmes, funded jobseeker long programmes (Momentum 2012 -2017), private sector clients and clients who refer individually or in groups from the not for profit/voluntary sector as Community Employment (CE), TUS, SICAP, Family Resource centres (FRC), Family & Community centres (FCC), Citizens information, Youth Projects, HSE and Department of Social Protection (DSP). The business has also built a reputation for its work with marginalised community groups which includes clients in post addiction treatment/recovery special projects, Traveller projects, disability groups and long term unemployed and to those who work with the groups.

The business has been developing more of a corporate client base in recent years which requires bespoke training to their staff teams, and the provider has been assisted through external expertise as part of business planning, marketing and branding to develop their product offering and communications.

Part 2   Panel Membership

Name	Role of panel member	Occupation and Organisation
Dr. Áine Ní Shé	Chair	Registrar and Vice President for Academic Affairs (Acting), Cork Institute of Technology
Treasa Brannick O'Cillín BL	Panel Member and Secretary	FET Development Officer, City of Dublin Education and Training Board
David Collins	Panel Member	Training Manager, Chevron Training
Rachel Tucker	Panel Member	Training Manager, Community Training & Education Centre

Part 3 Findings of the Panel

3.1 Summary Findings

The panel acknowledges the track record and established good standing of New Links Training Solutions Ltd and equally the positive and open attitude of the provider to the re-engagement process, taking the view that it presented a valuable learning opportunity to improve the manner in which the organisation operates internally, communicates with learners and delivers training services. The positive disposition of the provider aided the examination of quality assurance processes conducted by the panel in conjunction with the provider, in particular as part of the full-day meeting and site visit.

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

At the conclusion of the site visit and meeting with the provider, a number of areas of vulnerabilities were identified with the provider which related to the composition and workings of governance units, information to learners and the structure of the QA manual. The panel gave general advice and direction on how these areas could be addressed. These advices were identified as *proposed mandatory changes* and are outlined in detail in Section 6.1 of this report. The panel was of the view that the issues identified could be readily addressed by the provider and availed of the option to defer its overall decision for a defined period, in order to allow New Links Solutions this time to submit evidence to the panel that the mandatory changes identified had been satisfactorily addressed.

The panel reconvened on July 23rd, 2019 after undertaking a desk review of the documentation submitted by the provider which evidenced how the mandatory changes had been addressed. The panel also convened a meeting with the provider via video link to discuss the documentation submitted. It was acknowledged that the provider had gone further than the minimum requirements determined by the panel as part of their *proposed mandatory changes*.

It is the panel's view that New Links Solutions has satisfactorily addressed the *proposed mandatory changes.* As part of the evaluation of the documentation received and discussion with the provider, the panel did provide *specific advices* in certain areas where additional improvements should be made which included a) the reporting of all activities and decisions of all governance units below the Quality Committee to the Quality Committee as it was the highest governance unit which has external parties, b) additional procedures to be expressed in the QA manual in relation to information to learners as part of collaborative arrangements, including reserving their right to assess the suitability of all applicants to New Links programmes, and obligations related to same, and finally c) statements in relation to additional fees

and refunds of same which may arise during the course of a programme to be included in learner contracts and provided to learner prior to taking up a place. These *specific advices* are set out in more detail in Section 6.2 and were discussed with the provider, who agreed to implement same. The panel consequently recommends that QQI approve New Link Training Solutions QA procedures.

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

	Tick <u>one</u> as appropriate
Approve New Links Training Solutions' draft QA procedures	X
Refuse approval of New Links Training Solutions' draft QA procedures pending 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 New Links Training Solutions' 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: Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?*	Yes	Company Registration Office (CRO) Details are as follows: Type: LTD - Private Company Limited by Shares Number: 566822 Name: NEW LINKS TRAINING SOLUTIONS LIMITED Address UNIT 1 BOEING AVENUE AIRPORT BUSINESS PARK CO. WATERFORD X91AK46 Registered 19/08/2015 Status Normal Based the information presented to the panel the Provider is an established Legal Entity who has Education and/or Training as their principal function.
4.1.2(a)	*Criterion: Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*	Yes	New Links is a legal entity established in the EU with a substantial presence in Ireland, in particular within County Waterford.
4.1.3(a)	*Criterion: Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*	Yes	At the site visit, the Provider confirmed that the there are no dependencies, parent organisations or subsidiaries
4.1.4(a)	*Criterion: Are any third-party relationships and partnerships compatible with the scope of access sought?*	Yes	The provider is not offering certified programmes in conjunction with any third parties. Referral systems operate with state funded labour activation schemes and with private sector employer. The provider uses independent contractors to deliver most of their programmes. Establishing

			a wider panel from which to draw contractors was discussed with the provider. However, the provider confirmed that the risk of having to use unsuitably qualified tutors/trainers to meet learner demand is addressed by their policy of not entering into agreements to deliver a programme until a suitably qualified tutor/trainer has been sourced for that programme.
4.1.5(a)	**Criterion:** *Are the applicable regulations and legislation complied with in all jurisdictions where it operates?*	**Yes**	Based on the process undertaken, evidence provided in writing/orally and opportunity given to provider to disclose, there would not seem to be any issues in relation to regulatory and legal compliance in the broad sense.
4.1.6(a)	**Criterion:** *Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.*	**Yes**	The provider has been registered with QQI (formerly FETAC) since 2009 and there have been no issues identified with the provider. The provider was also subject to a QQI Desk Monitoring Report in August 2017

Findings

From the information the provider has furnished, the panel is satisfied that New Links Training Solutions meet the legal and compliance requirements for re-engagement.

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

	Criteria	*Yes/No/ Partially*	*Comments*
4.2.1(a)	**Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*	**Yes**	Evidence submitted is indicative that this is the case. Evidence included, a tax clearance pin number for 2019, current public liability insurance and a letter from the company's accountants confirming that the accounts are up to date with returns required by the Companies Registration Office (CRO). The accountant's letter also confirmed that the provider's tax affairs are up to date and that they hold a valid tax clearance certificate. The provider relies on a cohort of independent contractors to deliver programmes. Reliability and continuity was raised as an issue. However, many of the contractors have been working with the provider for some time and agreements to deliver programmes are not entered into without a suitable trainer being identified and secured first. The panel did advise the provider to broaden their panel of trainers to avoid being unable to deliver a programme despite learner demand being present.
4.2.2(a)	**Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*	**Yes**	The provider is a well-established provider in the sector, with a strategy for growth. The provider has seen a decrease in the number of learners from labour market activation schemes due to economic recovery in Ireland. The provider formulated a business development strategy with Enterprise Ireland and is now diversifying by building corporate training provision and has achieved significant success already by recruiting large corporate clients within their region.

4.2.3(a)	**Criterion:** *Are fit-for-purpose governance, management and decision making structures in place?*	**Yes, upon review of evidence submitted by the provider post the meeting/site visit and remote meeting with provider.**	At the conclusion of the site visit, the panel was not satisfied that the provider's governance and decision-making structures at that time provided for i) sufficient separation between academic and commercial decision making, and ii) sufficient separation between parties/units which developed/modified programmes and governance units which approved modifications or programmes for submission to validation.
			The panel also found that the governance structure did not have appropriate levels of externality. This is discussed in detail in Section 5.1 of this report. These concerns have been satisfactorily addressed by the provider through:
			i) the appointment of an independent Chair and additional independent members to the Quality Committee, which is the highest governance unit with organisational oversight, and
			ii) the restructuring of sub-committees to ensure sufficient reporting and approval mechanisms are in place.
4.2.4(a)	**Criterion:** *Are there arrangements in place for providing required information to QQI?*	**Yes**	There is evidence of processes in place to provide QQI with information as required.

Findings

From the information the provider has furnished, the panel is satisfied that New Links Training Solutions resource, governance and structural requirements criteria after evaluating additional documentation and having a second meeting with the provider to address the *proposed mandatory changes,* which related to governance in particular.

4.3 Programme development and provision requirements:

	Criteria	Yes/No/ Partially	Comments
4.3.1(a)	**Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*	**Yes**	The provider has been registered with QQI (formerly FETAC) since 2009 and has been delivering further education and training programmes since then.
4.3.2(a)	**Criterion:** *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*	**Yes**	The company has grown in the years since registration and it currently employs 3 full-time staff. Furthermore, and depending on the needs of the provider, it uses between 4 -8 contracted trainers, who are subject matter experts.

The provider relies on a cohort of independent contractors to deliver programmes. Reliability and continuity was raised as an issue. However, many of the contractors have been working with the provider for some time. Most programmes are minor awards of short duration. The provider confirmed that their policy is not to enter into an agreement to deliver a programme without a suitable trainer being identified and secured first.

The panel met with a contracted trainer, that works with the provider both in terms of delivering training and conduction internal verification work. The trainer went through her experience with the provider in terms of quality assurance and commended management for their hands-on approach and supportive work culture.

The panel did advise that the provider broaden their panel of trainers to avoid being unable to deliver a programme despite learner demand being present.

The panel also advised that the provider should consider utilizing their resource base of subject experts to a greater degree by appointing lead trainers in programme areas, thus creating more loyalty and strengthening their programme management and oversight |

			function.
4.3.3(a)	**Criterion:** *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)?*	**Yes, upon review of evidence submitted by the provider post the meeting/site visit and remote meeting with provider.**	From the information the provider has furnished, the panel is satisfied that New Links Training Solution's track record of certification, and its approach to the re-engagement process reflects its capacity to co-operate with and assist QQI and provide QQI with information as specified in Section 45(3) of the 2012 Qualifications and Quality Assurance (Education and Training) Act.

The provider was clear on modifications that can be made to a programme by a private provider and what would require an application for programme validation to be made.

The provider was advised as part of *mandatory proposed changes* that governance of programme development is required, and that approval for submission to QQI validation should occur at the right level and should be separated from those that developed the programme.

The provider substantially addressed this as part of documentation submitted in response to this. It was also agreed in response to *specific advices* that all governance sub-units would report to the Quality Committee which has a high level of externality with an independent chair and other external |

			independent members.
4.3.4(a)	**Criterion:** *Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?*	**Yes**	As part of the site visit the panel viewed the training facility. It had a number of training rooms and break out areas for learners with canteen facilities. Where the provider delivers in-house corporate training sessions, the provider specifies their requirements to the employer/company/organisation concerned in terms of required facilities.
4.3.5(a)	**Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*	**Yes**	The provider has appropriate procedures in place to facilitate Access, Transfer and Progression; these are outlined in their QA documentation.
4.3.6(a)	**Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*	**Yes**	The provider has clear and up to date policies and procedures in place including internal verification and external authentication processes.
4.3.7(a)	**Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*	**Yes**	The provider confirmed that they do not offer programmes of a duration longer than 3 months and that they will not be offering courses of this duration or longer in the future. Provider confirmed if they were ever to change their approach, they would increase insurance coverage to ensure the required level of protection of enrolled learners would be met. There are procedures for learners to defer places on courses etc. .

Findings

From the information the provider has furnished, the panel is satisfied that through the development of updated governance structures in response to the *proposed mandatory changes* the provider will be in a position to meet programme development requirements for validation applications to meet criteria 4.3. The provider uses appropriately qualified training staff, and has put in place a stronger programme management and oversight structure in response to suggestions by the panel, which include the appointment of programme leaders. The provider has policies and procedures in place that pertain to fair and consistent assessment and the protection of enrolled learners in their QA documented submitted as part of their application for reengagement.

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

Appropriate evidence was submitted as part of the provider's application for reengagement, through the site visit/meeting and subsequent submission of modifications made and meeting held in response to *proposed mandatory conditions* to indicate that the provider has the capacity to provide sustainable education and training within its current scope of provision.

Part 5   Evaluation of draft QA Procedures submitted by New Links Training Solutions

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

1   GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

The Panel requested the membership and Terms of Reference of all governance units prior to the site visit. These were examined by the panel prior to the site visit and meeting with the provider. It was clear that the provider was attempting to create a comprehensive system of governance to support quality programme delivery. The provider acknowledged that developing governance structures was new to them but they were very open to it. It was acknowledged by the provider that developing their governance system would be very positive in that problem solving becomes a more collective process with external and independent parties bringing fresh perspective and ideas to the benefit of all parties especially learners. It should be noted that the development of governance systems is a newer dimension to quality assurance policies and procedures and can be particularly challenging for smaller providers. The owners of the business are the Training Manager with responsibility for inter alia Quality Assurance and the Operations Director with responsibility for inter alia sales/new business development.

Upon examination of the structures that had been developed, the panel found that these seemed quite complicated for a small business and the TORs lacked clarity and detail. It was emphasised that the governance system for a small provider needed to fit its context and therefore does not have to be the same as other larger providers. It was also highlighted that two beneficial owners of the business were on many of the governance units and were often chairing them, including the Unit at the highest level tasked with oversight for the organisation as a whole. Through discussion with the provider, it emerged that a number of factors contributed to this situation. Firstly, New Links Training Solutions is a small business. Secondly, it is not a minor request to ask external parties to participate in governance and decision making within an organisation on a voluntary basis. Thirdly, the business owners take their responsibilities very seriously which informs a management practice of exercising a high level of control to ensure activities are being carried out correctly. Whilst acknowledging these contributory factors, the panel advised that the task for the provider within the educational context is to move to an enhanced system of governance which allows information (including information in relation to identified risks) to be considered at the most appropriate level and by the right people, and for decision making and the formulation of responses to occur with transparency and accountability. Ensuring the governance system has a degree of externality, particularly at the higher level governance units, promotes confidence and transparency and contributes greatly to robust self-evaluation, thus driving excellence in programme delivery and outcomes for learners.

A system of governance within a provider of education and training programmes must also address the need to ensure sufficient separation between commercial and academic decision-making, in order to protect the integrity of academic processes and standards. In this report, the panel makes no suggestion whatsoever that commercial interests have interfered with academic decision making, and it further

notes that the provider is reputable and held in high regard in the sector. That said, increasing the degree of externality could only benefit the process of self-evaluation as part of the governance system. The provider was conscious of this vulnerability and highlighted it themselves as part of their self-evaluation and did advise the panel of their approach from a day-to-day operations perspective which involves the Director of Operations always referring all academic requests/queries to the Quality Manager for decision making. However, it needed to be addressed more clearly within the governance system itself.

The area of programme development and modification also needed to be addressed in more detail to ensure that the persons proposing modifications to existing programmes or developing new programmes were not the same as those approving them. The panel found that clear separation was required in this regard. It is also important that the provider has a governance unit with responsibility for considering and approving programmes that have been developed for QQI Validation prior to their submission.

When the issues were raised with the provider, with reference to the relevant sections of the QQI QA Guidelines (2016) and the rationale for requirements in relation to separation and externality, the provider was in agreement and was keen to examine possible alternative approaches to achieve adherence to the statutory QA Guidelines. A number of suggestions were discussed with the provider such as:

- the appointment of an independent Chair to the unit at the highest level with greatest degree of oversight
- Engaging with other independent or community based providers to examine the prospect of entering arrangements in relation to reciprocal participation in governance structures.
- ensuring separation between commercial and academic decision making by having a unit that only engaged in academic decision making.
- Ensuring separation between programme development and programme approval, by having a unit that approves modifications and new programme proposals which is separate from the parties which is proposing the modification or new programme.
- streamlining their structures so that the governance system worked effectively within their context i.e. a smaller provider, with a small scope of provision, delivering short often singular module programmes frequently,

The provider was also encouraged to consider developing the programme level management layer more with lead trainers in programme areas contributing to monitoring, review and decision-making, and to devise a schedule for more in-depth programme evaluations which include the learner voice. A lot of good work was being done in this regard but was being carried out on a more informal basis. However, the provider had already recruited a graduate who now works with marginalised groups in the community to be a member of the Quality Committee.

From the information the provider has furnished, the panel is satisfied this area under QQI's Quality Assurance (QA) Guidelines has been addressed. Proposed mandatory changes were identified in line with the analysis as outlined above and issued in writing to the provider post the site visit (set out in Section 6.1 below). The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address these issues within a defined period. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the *mandatory proposed changes* had been addressed and was satisfied that this had been achieved. This was achieved through the i) appointment of an independent chair to the Quality Committee (replacing the Operations Director) ii)

the appointment of additional independent members to the Quality Committee, and iii) the formation, at programme level, of sub-committees l to monitor and review programmes on a regular basis, with programme leads and with the Quality Subcommittee examining quality assurance policies and procedures. Detailed Terms of Reference and reporting requirements for these committees and sub-committees have been put in place. Specific advices were given to the provider to ensure all sub-committees activities were reported to the Quality Committee, which is the governance unit with organisational level oversight and decision making to ensure connectivity was maintained, and to ensure the Quality Committee is charged with approving programmes prior to submission for validation to QQI or amendments to legacy programmes permitted under validation agreements, and that this is expressly provided for. The panel commends the progress made by the provider with regard to establishing their governance system.

New Links Training Solutions documents its QA system within its Quality Assurance Manual, with policies and related operating procedures and forms. In addition to the Manual there is also a learner handbook and training staff are provided with programme folders which include module descriptors, and administration forms and report templates. The provider uses an online system to store and disseminate to staff, which includes a version control system. All tutors are fully resourced in terms of teaching and learning materials and QA documentation.

Prior to the site visit, a significant amount of work had been put into a comprehensive QA manual, with detailed operating procedures and supporting documentation and forms. This manual had been examined against the new QA Guidelines, and new procedural areas to address gaps and new forms had been developed with new codes, while old forms that were considered still fit for purpose still had their old codes. The provider was developing a new QA system but it was somewhat crafted on to an old system, the old FETAC thematic areas were still evident.

The panel was of the view that the QA manual was not very user friendly and needed to be restructured. The provider had taken the view that because it was a system in operation and therefore live it was difficult to complete a more comprehensive overhaul, and a mapping exercise had been completed demonstrating how all the areas of the new QQI QA Statutory Guidelines were addressed within it. The provider was planning to dismantle the older areas and replace them so that it was more coherent in a staged fashion. The panel were of the view that, in order to make the QA manual more user friendly, it should be restructured in line with the completed mapping exercise or alternatively in accordance with the learner experience life-cycle from recruitment to progression. This would ensure going forward that the provider was on a strong footing, and that monitoring, review and updating of the QA system reflected in the manual would be more straightforward for the provider any new staff, and also for external parties participating in the governance structures and finally for external stakeholders such as QQI. The provider was also advised that all policy and procedure areas should have a policy owner and review date, and to make more connections between the policy documents and the Tutor and Learner Handbooks to ensure cohesion and consistency, especially in terms of information to learners.

From the information the provider has furnished, the panel is satisfied this area under QQI's Quality Assurance Guidelines has been addressed. Proposed mandatory changes were identified in line with the analysis as outlined above and issued in writing to the provider post the site visit (set out in Section 6.1 below). The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address these issues within a defined period. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the *mandatory proposed changes* had been addressed. The provider went further than meeting the minimum requirement set by the panel, and in fact did a significant overhaul of the manual, including reflecting the newly developed governance structures clearly within it (see Section 5.1 above). This provider is to be commended for their hard work in this regard.

3	PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

It was clear from the site visit and meeting the management team and trainers that the ethos for programme delivery is learner centred. A real passion for helping learner progress through education and training was evident from the team. Key thematic areas in terms of access, transfer and progression are outlined in the QA manual.

The provider has limited scope of provision but has approximately 40 minor awards as part of legacy programmes. However, the provider delivers a limited number of these. The style of delivery is short courses, often on a part-time basis with higher frequency. The Training Manager delivers training in her areas of expertise, and subject matter experts are contracted to deliver in addition. There is a core team of regular contractors.

The provider is clear on what changes can be made to a legacy programme within the scope of validation agreements. There was an informal approach to programme review, but new content and learning resources are developed regularly to be added to programme/module folders. This work is completed in the main by the Quality Manager who has subject expertise in most of the programme areas in delivery, but sometimes in conjunction with contracted trainers. Subject experts are used to develop content and class materials and resources for programmes outside this scope of expertise. The approach is quite regimented and controlled in that all trainers are fully resourced and don't make unilateral changes to what is delivered in the classroom. From interviewing training staff, this approach seems to be favoured; however, the training staff were also keen to point out that new ideas to develop content and resources are welcomed by management. Learner feedback is also used to improve programmes and feedback from external authenticators.

For new programmes, it is the intention of the provider to become more focused through re-validation, by decreasing their scope of provision from that of their legacy programmes, as many modules are not delivered anymore.

The provider went through the learner life-cycle from recruitment to progression with the panel. In general, the potential applicant will express an interest in a programme and will then be spoken with directly to answer any questions. Often they tend to want to meet someone in person. Referrals also come from corporate clients and more traditionally through labour market activation schemes. Currently assessments, including those in relation to English Language Proficiency, are carried out on a more informal basis. The approach taken is mainly in the form of guidance rather than specific assessment, and issues can arise where learners are referred to a course that doesn't meet their needs. This situation is often addressed informally with the learner themselves and then with the case worker/supervisor from the body referring them e.g. Momentum.

The panel emphasised the need to have clear entry criteria in course brochures and on the provider's website for each of the courses, this included English Language proficiency requirements. The provider stated that it had previously received advice in terms of customer messaging. This advice indicated that there was too much information on the website and this can be off-putting so they should pare it back to encourage more people to apply. The panel discussed this with the provider, and while it was acknowledged that a balance had to be struck in this regard, the panel advised that compliance in relation to information to learners had to be achieved first and foremost. It was also pointed out to the provider that information on certain fees which pertained to deadline extensions and resubmissions which were not insignificant were not in the learner handbook, on the website or in the learner contract. The panel also advised that it should be clear that fees for appeals are refundable where the appeal is successful.

The panel emphasised that these fees should be reviewed and all fees which may arise during the programme should be set out clearly and in an upfront fashion to learners before taking up a place on the course. It is also an obligation of the provider to assess the suitability of applicants to the programme and ensure to refer them to programmes that will meet their needs. Again it was emphasised that there has to be separation between the person involved in sales and the person assessing the suitability of applicants including English language proficiency.

Learners are advised of transfer and progression options by the provider. Transfers often apply to doing two modules for the Train the Trainer qualification, with some learners doing the first or second module with another provider. Internal progression is encouraged especially for vulnerable learners doing unaccredited courses first to move on to QQI accredited courses. In general, progression advice is given prior to entry onto a programme, during and after by tutors or the Training Manager.

From the information the provider has furnished, the panel is satisfied this area under QQI's Quality Assurance Guidelines has been addressed. Proposed mandatory changes were identified in line with the analysis as outlined above and issued in writing to the provider post the site visit (set out in Section 6.1 below). The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address these issues within a defined period. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the *mandatory proposed changes* had been addressed and was satisfied that this had been achieved. The provider has formalised programme management and review with a group meeting regularly which includes new programme areas leads to monitor programme delivery, make collective decisions and recommend improvements. One page course brochures were developed for all programmes with clear entry criteria and additional fees are now more transparent. The provider is commended for their good work and progress made.

Additional specific advices were given in terms of ensuring the approval of programme modifications (significant modifications within the scope of the provider versus content and teaching and learning resources updates) to legacy programmes and new programme proposals are reported to and subject to the approval by the Quality Committee, and that this is expressly provided for.

Additional specific advices were also given in relation to updating the collaborative arrangements section to include statements to the effect that New Links Training Solutions reserves the right to assess the suitability of all applicants and has an obligation to do so and to ensure in terms of procedures that brochures with entry criteria are disseminated to collaborative partners that refer learners. It should also be reflected in the information to Learners' section. In addition, it should be clear that reasonable accommodations are available and will be assessed on a case by case basis. Lastly all fees which may be charged should be reflected in the learner contract to be issued prior to the learner taking up a place and it should be clear that fees for appeals will be refunded where the appeal is upheld. The provider undertook to implement these improvements as part of the follow-up meeting via video link on the 23rd July 2019.

| 4 | STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT |

Panel Findings:

The approach taken by New Links in terms of recruitment and selection when sourcing a new training staff member is to establish criteria for the role including specific qualifications, experience (2 years wouldn't be considered sufficient), an ability to deliver utilising their qualifications and experience, and that the candidate demonstrates a disposition towards the manner in which New Links Training runs their business, this includes valuing the learner and trainers who value being fully resourced in terms of materials etc.

The process used for recruitment is to request a CV and cover letter, after which then a phone interview will be conducted with the candidate who will then be asked to attend to do a skills demonstration. The Training Manager will nominate the subject area/training session to be conducted. A more in-depth (normally face-to-face) interview is then carried out and the candidate will be questioned on how they propose deliver the course. They will also be questioned on QQI policy and on areas such as validation etc. Their attitude is examined also, as due to the nature of the profession they have to be personable.

Generally, for the face-to-face interview, the Training Manager will often use a subject expert to sit on the interview panel so that they can question more thoroughly on the subject matter expertise. New trainers will be given one course starting off, generally within the community provision area. They are inducted and supported and generally will not mark their first assessments on their own, but with a mentor. It was noted by the panel that the use of subject experts in the recruitment and selection process was essential and that this approach should be expressed formally as part of quality assurance policy and procedures in relation to this area within their QA documentation.

In terms of managing staff, there are close monitoring systems used and training staff can be delivering remotely but reports and attendance records are submitted using an online platform. Team meetings occur with training staff to discuss any issues arising and the core team with core contracted trainers will often work together building resources for teaching and learning.

Retention and Continuous Professional Development are addressed through bringing the team to networking events and there is a culture of supporting training staff interests in their subject areas to enhance delivery. The Training Manager's background is professional development and therefore is keen to promote a community of learning and CPD. One of the trainers is being sent on their own supervisory management course and the administrator is being sent on their own Train the Trainer programme to improve their skills and understanding of the business and key programme areas. One of the core members of the team also went on the recent ETBI training for EAs and it is hoped that she will be able to disseminate her knowledge and experience to the wider team. It is envisaged that more staff members will attend these sessions when advertised again. It was recognised that conducting External Authentication for other providers is a valuable learning opportunity also.

The training and administration staff interviewed confirmed that they felt supported in terms of pursuing professional development. The approach taken in terms of assigning tutors to courses was also discussed with training staff. The process was set out by staff interviewed as initially receiving a request to deliver, this would generally be within their designated skillset and be asked to confirm that she was confident to deliver the course and then if she was available she would confirm that booking to deliver. She is then

given all the relevant information is given in terms of the cohort of learner, where, when and will then arrange to collect all the relevant materials from New Links or access online. This was confirmed by management.

Risks in this area were discussed in relation to relying on independent contractors mainly for programme delivery. Although many have been with the company for some time this also presents the risk in relation to employment law compliance. The company did bring in an HR expert to go through good practice, and the provider advised that due to the nature of their business of short courses most of the contractors have other jobs and don't have regular hours with the company. Also, some of the core members would only work approximately 9 days per month and work elsewhere outside of this. The provider is of the view that they are clearly independent contractors.

The other risk discussed was in relation to losing key contractors or contractors becoming ill or unable to attend a session. The concept of a cover panel was discussed and increasing the panel of tutors/trainers. The provider advised that this is a priority area for them after re-engagement which has been time consuming. It is envisaged that they will be recruiting more tutors/trainers to their panel going forward and are in a good position to identify and recruit talent from their graduate pools from the Train the Trainer programme.

From the information the provider has furnished, the panel is satisfied that this area under QQI's Quality Assurance Guidelines has been addressed. The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address issues in other areas within a defined period. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the *proposed mandatory changes* had been addressed and was satisfied that this had been achieved. A follow-up meeting was conducted with the provider on the same day also and the provider advised that the ad hoc team meetings have been formalised into a formal programme management governance unit with programme leads having been appointed in key programme areas that contribute to the regular management, review and monitoring of programme delivery across all areas. This is considered a positive development as it involves appropriate delegation of responsibility to suitable candidates who can develop further in these new roles, while enhancing the layer of programme management as part of the governance system within the provider.

Panel Findings:

Multiple examples of good practice in teaching and learning were provided by management and training staff during the meeting and site visit with the provider. The provider's teaching staff outlined practices that were indicative of learner-centred pedagogy. The passion of management and training staff in terms of supporting the development of their learners and facilitating progression really shone through in the discussions. The provider uses platforms such as SharePoint to compile and share teaching and learning resources and there is a tutor handbook.

As part of teaching and learning strategies, emphasis is placed on experiential learning as part of teaching practice to ensure programmes are enjoyable, examples of learners work from programme areas such as retail design was indicative of this. The provider is keen to promote a sense of equality on their programmes, trainers/tutors are encouraged to develop real connections with learners, while learners are also encouraged to use tutors/trainers first names. This ethos is particularly important for learners returning to education, who may have not have had particularly positive experiences within the education system previously.

There is also strong emphasis on formative feedback which is promoted across all programmes. Learners can send in draft work and receive feedback from tutors/trainers. During the site visit, there was a discussion in relation to formative feedback, which is recognised as being a very positive element in supporting the learner. However, there is a difference between giving overly detailed feedback and empowering the learner through constructive feedback. The Training Manager articulated the approach as being that of not specifying what the learner needs to change or redrafting for them but, rather, advising them. For example, a learner on the Training the Trainer programme could be advised 'to redraft their content referring to Blooms Taxonomy' sign posting the area that needs to be worked on and what sources they should refer to, to aid this. The provider was questioned on how this approach was standardized across all programmes. As part of inducting new tutors/trainers, the importance of formative feedback is emphasised, and the expected approach to providing it is also set out. This promotes consistency in terms of the approach to teaching and learning across programmes This approach was commended; however, the panel took the view that it would be useful to articulate this good practice in the relevant sections of their QA documentation including the Tutor Handbook.

The provider is experiencing success in terms of supporting businesses within their region to facilitate their employees' professional development. This newer area of delivery involves a different cohort of learners. Emphasis is placed on research based practice, and the provider cited useful sources such as the Harvard Business Review for keeping up to date especially in the area of leadership. Learners in employment are keen to utilize their learning to improve professional practice.

During the site visit, the panel interviewed a member of the provider's training staff with regard to teaching and learning approaches. The staff member interviewed favoured the approach of being fully resourced, and would not consider making changes to course delivery/content as part of her role. She stated that if she was of the opinion that a change was needed she would alert the Training Manager but that she would not change anything unilaterally .Feedback is taken from tutors at the end of course delivery and changes can be proposed then.

From the information the provider has furnished, the panel is satisfied that this area under QQI's Quality Assurance Guidelines has been addressed. The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address issues in other areas. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the proposed mandatory changes had been addressed and was satisfied that this had been achieved. A follow-up meeting was conducted with the provider on the same day also and the provider advised that the ad hoc team meetings have been formalised into a formal programme management governance unit with programme leads having been appointed in key programme areas that contribute to the regular management, review and monitoring of programme delivery across all areas. This is considered a positive development as it involves appropriate delegation of responsibility to suitable candidates who can develop further in these new roles, while enhancing the layer of programme management as part of the governance system within the provider, which will take in a more formal and collective approach to enhancement of teaching and learning strategies and the development of teaching and learning resources.

6   ASSESSMENT OF LEARNERS

Panel Findings:

New Links Training Solutions provided a Learner Portfolio and a copy of an External Authentication report prior to the site visit in relation to level 6 Training and Development programme. The provider has a good track record in terms of External Authentication reports. Policies and procedures on fair and consistent assessment of learners are set out in the QA manual and in Tutor and Learner Handbooks.

The approach to devising assessment instruments is that they are centrally devised with marking schemes and these are provided to tutors/trainers as part of their resource material. The updating of assessments occurs centrally, where necessary. New tutors are mentored and do not mark assessments on their own to begin with. Selected assignments are put through a plagiarism checker.

For QQI programmes, Internal Verification (IV) occurs and the relevant forms are distributed to the internally appointed verifiers. In general, more experienced members of the training team are selected to conduct these activities. Current processes reflect standard practices within the FET Sector. The training staff member interviewed conducts I.V and was trained to carry out this activity by the Training Centre manager.

Learners must put requests for deadline extensions and resubmissions in writing and there is a team meeting to make decisions in relation to these. The Training Manager emphasised that she does not make these decisions on her own. Tutors cannot make the decision on their own either, but consultation occurs. There are fees for such requests, and this was discussed at length, including the need to have clear grounds for the granting of extensions. The prospect of waiving such fees in cases of hardship was discussed. However, it was accepted that there were additional costs to the provider to have late assignments collected and marked. Responsibilities in relation to the submission of course work are set out in the learner contract and this is gone through with learners at induction. The requirement that all additional fees which may arise should be brought to the attention of the learner prior to taking up place on any course was emphasized. The provider did advise that they do not tend to get many requests for deadline extensions or resubmissions. The provider doesn't allow resubmissions unless the learner has failed.

External authenticators (EA) are selected for examination of learner evidence at the end of a programme cycle. There are 6 certification periods. The provider has a results approval panel (RAP) which examines EA reports and affirms that learners have met the required standards through assessment to be put forward for the relevant award. For learner appeals an external subject expert is selected usually from the relevant approved External Authenticator list. Fees apply to applications for an appeal. It was emphasised by the panel that where a learner appeal is successful the fee paid should be refunded, regardless that there is a cost to the business to have the learner evidence examined.

From the information the provider has furnished, the panel is satisfied this area under QQI's Quality Assurance Guidelines has been addressed. *Proposed mandatory changes* were identified in line with the analysis as outlined above and issued in writing to the provider post the site visit (set out in Section 6.1 below). The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address these issues within a defined period. The Panel reconvened on 23rd July 2019 to evaluate

documentation submitted by the provider evidencing how the *mandatory proposed changes* had been addressed and was satisfied that this had been achieved. The provider has made fees more transparent. Additional specific advices given to the provider as part of the follow up meeting held on the 23rd July 2019 via video link that statements in relation to additional fees and refunds of same which may arise during the course of a programme should be included in the learner contract to be given prior to the learner taking up their place on the course. These specific advices are set out in more detail in Section 6.2 and were discussed with the provider, who agreed to implement same.

Panel Findings:

It was very clear from the site visit and meeting the management team and trainers that the ethos for programme delivery is learner centred. A strong commitment to supporting learners across all the provider's programmes was evident from the team. The approach is for tutors to make themselves available to learners including after sessions are concluded, and learners are also encouraged to submit draft work for formative feedback. There are dedicated email addresses for learners to submit queries remotely. Tutors do not give out personal email addresses to learners.

The panel explored the area of supports for learners with special needs with New Links Training Solution's staff during the site visit, in particular how reasonable accommodation is identified. Assessing learners for reasonable accommodation has not occurred a lot in practice, and the provider has not encountered many learners that required specialist supports or accommodations. It was emphasised that a provider should facilitate an applicant as early as possible to disclose that they may need reasonable accommodation to take part on a course. The provider agreed to relook at their application form to allow provision for this. Equally, the accommodations must be reasonable and what is reasonable for a small provider is not necessarily what is considered reasonable for a larger provider. As part of referral schemes often the learners will not complete an application form. There is a vulnerability in the area of the referral schemes as the provider still must ensure they are in a position to assess the suitability of applicants but also assess any reasonable accommodations that may need to be put in place at the application stage. This is also an issues in relation to information to learners. Collaborating partners should be advised of entry requirements, notifications in relation to reasonable accommodation, that the provider reserves the right to assess learners for entry to their programmes and is also obligated to do so.

From the information the provider has furnished, the panel is satisfied that this area under QQI's Quality Assurance Guidelines has been addressed. *Proposed mandatory changes* were identified in line with the analysis as outlined above and issued in writing to the provider post the site visit (set out in Section 6.1 below). The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address these issues within a defined period. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the *mandatory proposed changes* had been addressed and was satisfied that this had been achieved. *Specific advices* in certain areas where additional improvements should be made which included additional procedures to be expressed in the QA manual in relation to information to learners as part of collaborative arrangements, including the provider reserving their right to assess the suitability of all applicants to its programmes, and their obligations related to same. These *specific advices* are set out in more detail in Section 6.2 and were discussed with the provider, who agreed to implement same.

8   INFORMATION AND DATA MANAGEMENT

Panel Findings:

The provider has a dedicated section in their QA manual on information and data management. As part of their self-evaluation process, they prioritised updating documents to reflect changes in legislation including GDPR and managing data release. The provider also has a policy and mechanism for dealing with version control of their QA documentation to ensure staff are accessing the most up to date information.

The panel were satisfied that New Links Training Solutions are working effectively in the area of data management. The provider is capturing and utilising data sets as part of monitoring and review. Staff in this area are well-informed regarding developments in this field and their potential for the organisation and this should be monitored. An area of potential vulnerability is that contracted tutors/trainers use their own laptops; however, when questioned on their access to data protection policies, these contracted tutors/trainers were confident that they were aware of them and knew how to access to them. The suggestion was also made by the panel that it could be part of the role of a programme lead to compile data for their programme area for consideration at both the Programme Management and Programme Review Committees.

The panel finds this area under QQI's Quality Assurance Guidelines has been addressed. The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address issues in other areas. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the proposed mandatory changes had been addressed and was satisfied that this had been achieved

9   PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The provider has a public website and provides brochures on their courses. The provider also worked with business development consultants in relation to their website and had pared back information following advice from the consultants that there was too much information and that this could be off putting to the general public that might not readily understand it. The panel were concerned that entry criteria and requirements in relation to English language proficiency and testing were not clear on the website. It was acknowledged that a balance had to be struck in this regard; however the panel advised that compliance in relation to information to learners had to be achieved first and foremost. It was also pointed out to the provider that information regarding certain fees which pertained to deadline extensions and resubmissions (fees which were not insignificant) was not in the learner handbook, on the website or in the learner contract. Furthermore, the panel advised that it should be made clear to the learner that fees for appeals are refundable where the appeal is successful. The panel emphasised that these fees should be reviewed and all fees which may arise during the programme should be set out clearly and in an upfront fashion to learners before taking up a place on the course.

From the information the provider has furnished, the panel is satisfied that this area under QQI's Quality Assurance Guidelines has been addressed. Proposed mandatory changes were identified in line with the analysis as outlined above and issued in writing to the provider post the site visit (set out in Section 6.1 below). The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address these issues within a defined period. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the *mandatory proposed changes* had been

addressed and was satisfied that this had been achieved. The provider has produced one page course brochures accessible through links on their course pages on their website, with the necessary information for potential learners on matters such as entry criteria and additional fees now more transparent. The provider is commended for their good work and progress made.

Additional specific advices were also given in relation to updating the collaborative arrangements section to include i) statements to the effect that New Links Training Solutions reserves the right to assess the suitability of all applicants and has an obligation to do so and ii) to ensure in terms of procedures that brochures with entry criteria are disseminated to collaborative partners that refer learners. It should also be reflected in the information to learners section. In addition, it should be clear that reasonable accommodation is available and that requests for same will be assessed on a case by case basis. Lastly all fees which may be charged should be reflected in the learner contract to be issued prior to the learner taking up a place and it should be clear that fees for appeals will be refunded where the appeal is upheld. The provider undertook to implement these improvements as part of the follow-up meeting via video link on the 23rd July 2019.

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

Panel Findings:

There is a section on collaborating provision and external partnership arrangements is now included in the QA Manual. The provider is not delivering programmes collaboratively with other providers or formally with industry.

From the information the provider has furnished, the panel is satisfied that QQI's QA guidelines in this area have been addressed.

11	SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

During the site visit the panel sought to explore how learner engagement was measured, and how information on actions taken in response to learner feedback was circulated. The provider did advise that learner feedback can be more limited with shorter course offerings but that it does consider learner feedback to be vital and that learner feedback is sought at the end of courses. Themes are then identified and then addressed in order of priority. Examples were given such as the supervisory management programme delivered to shop managers for a national charity, where the contact hours were increased to being over more than one day in response to learner feedback.

Some programmes have to be evaluated at the end as part of public funding requirements and corporate clients often request evaluations at the end each course, so that the findings can go to their HR departments for further planning purposes.

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

From the information the provider has furnished, the panel is satisfied this area under QQI's Quality Assurance Guidelines has been addressed. Proposed mandatory changes were identified in line with the analysis as outlined in Section 5.1 above and issued in writing to the provider post the site visit (set out in Section 6.1 below). The panel availed of the option to defer its decision to allow New Links Solutions an opportunity to address these issues within a defined period. The Panel reconvened on 23rd July 2019 to evaluate documentation submitted by the provider evidencing how the mandatory proposed changes had been addressed and was satisfied that this had been achieved. This was achieved through the appointment to the Quality Committee of

i)   an independent chair (replacing the Operations Director) and

ii)   additional independent members. Sub-committees were formed at programme level to manage, monitor and review programmes on a regular basis, with programme leads feeding into this and a programme review Committee charged with more in depth programme evaluations in accordance with a clear schedule.

iii)   A quality subcommittee was also formed charged with examining quality assurance policies and procedures.

All sub-committees have detailed Terms of Reference and reporting requirements. Specific advices were given to the provider

i)   to ensure all sub-committees activities were reported to the Quality Committee, which is the governance unit with organisational level oversight and decision making, so as to ensure connectivity was maintained, and

ii)   to ensure the Quality Committee is charged with approving programmes prior to submission for validation to QQI or amendments to legacy programmes permitted under validation agreements, and that this is expressly provided for. The panel commends the progress made by the provider with regard to establishing their governance system.

To aid monitoring and review of quality assurance policies and procedures significantly the panel proposed mandatory changes to the QA manual to make it more clearly in line with the Statutory QA Guidelines and more user friendly. Again, the panel commends the progress made by the provider with regard to establishing their governance system.

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

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

Panel Findings:

During the site visit the provider confirmed that there is currently no blended delivery of programmes leading to QQI awards. The provider did note to the panel that some blended learning approaches are currently used in non-accredited courses. The long term plan is to develop in this area as there is demand from industry but capacity and capability would need to be developed along with underpinning QA procedures in line with QQI QA Guidelines on Blended Learning.

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 31st May 2019 by the panel and were subsequently issued to the provider in writing. The panel availed of the option to defer its decision to allow the provider an opportunity to address these issues. The Panel reconvened on 23rd July 2019 to evaluate evidence submitted by Training Links Solution in support of the proposed changes. Following an evaluation of the evidence submitted, from the information the provider has furnished, the panel is satisfied that the provider has adequately addressed the issues set out in Section 6.1 below.

6.1 Proposed Mandatory Changes

6.1.1 Governance
the applicant provider's governance structures need to be reviewed to:
   i.   increase externality/independence within the governance units, in particular those at the higher level i.e. centre level
   ii.   provide for a clear separation between academic and commercial decision making e.g. having a governance unit making academic decision only and feeding it up to a higher level governance unit where the commercial element may also be represented.
   iii. provide for a clear separation between those that engage in programme modification/development and those that approve proposals in relation to same
   iv.   Illustrate governance structures with a clear diagram/flow chart, and include Terms of References (TORs) for each of the relevant governance units setting out, *inter alia,* a) clear roles and responsibilities for members of those governance units and how the units are connected to one another e.g. Quality Committee, RAP, Programme Management Committee, Programme Review Committee
   v.   provide clear reporting requirements for each unit i.e. what will be reported, who will report and the form it will take i.e. EA reports

6.1.2 Documented Approach to Quality Assurance (QA)
The QA manual should be restructured as it is not user friendly. This is compounded by the fact that it was a document developed under the old FETAC QA Guidelines and has been adapted to meet the new QA Guidelines while still using the old themes as its sections. The accessibility of the information in the manual for new and existing staff is important, and equally for subsequent reviews by QQI.

The mapping exercise conducted in the application to demonstrate compliance with the new QA Guidelines needs to be reflected somewhere in the Manual for ease of reference. However, it is preferable that New Links Training Solutions would take the next step and actually use the mapping exercise to restructure the manual to the new themes instead of still using the old FETAC themes. Alternatively, if they wish they could restructure in accordance with another format e.g. learner cycle with policies and procedures from recruitment through to progression while still ensuring compliance by mapping it to the Statutory QA Guidelines.

6.1.3 Information to the Learner – to ensure a 'no surprises' approach is taken and the prospective learner is in the position to make a fully informed decision prior to enrolling with New Links the following should be implemented:

i.   all additional charges to the enrolment fee should be reviewed in line with QQI guidelines/legislation and other relevant regulation i.e. consumer protection and equality to ensure they are permissible and proportionate.

ii.   information on all charges which may be levied during the course of a programme must be communicated to the learner prior to enrolment e.g. via New Links Solutions' website, brochures etc.

iii. information on entry requirements, reasonable accommodation, assessment processes including appeals must be communicated to learner prior to enrolment e.g. via New Links Solutions' website, brochures etc.

6.2 Specific Advice

6.2.1   The panel advises that the activities of all sub-committees should be reported to the Quality Committee as the most senior unit charged with maintaining organisational oversight in terms of quality assurance, and advising on and approving significant decisions in relation to the quality assurance system. In particular, there needs to be express provision for the activities of both the Programme Management Committee and the Programme Review Committee to be reported to it. There should also be express provision within the TOR's of the most appropriate sub-committee(s) that proposed amendments to legacy programmes and the development and submission of new programmes for validation should be approved by the Quality Committee.

6.2.2   To ensure a systematic approach to monitoring and review of QA, the panel advises assigning and policy owner and review date for each QA policy and procedural area.

6.2.3   The panel advises that the provider should update their quality assurance policy and procedures in relation to recruitment and selection to formalise:

i.   minimum selection criteria for new training/tutoring staff in programme areas e.g. qualifications and experience and

ii.   the requirement of using subject experts as part of interviews in selection process, in particular for the appointment of new training/tutoring staff.

6.2.4   The panel advises that regardless of whether a learner is self-referred or has been referred to New Links Training Solutions by other bodies including employers, New Links Training Solutions reserves the right to, and has an obligation to assess the suitability of the applicant, including English language proficiency testing where appropriate and to provide reasonable accommodation, requests for the latter to be assessed on a case by case basis. All bodies referring learners to New Links Training Solutions should be provided with the information on entry criteria and the availability of reasonable accommodation for all relevant courses and this information should be passed on to the learners at the earliest stage. The QA manual should be updated to expressly provide for these policies and procedures in the relevant sections on collaborations with third parties and on information and supports to learners.

6.2.5   The panel advises, that all additional Fees which may arise during the course of a programme e.g.

extension deadline request should be expressly provided for within the learner contract and this document should be furnished to the applicant prior to them taking up a place on a course with the provider. In addition, It should also be expressly provided for in all relevant documentation including the Learner Contract that where an appeal is successful the fee paid will be refunded to the learner.

Evaluation of draft QA Procedures - Overall panel findings

The panel commends New Links Training Solutions on its full engagement and open dialogue with the panel and on its responsive approach. Through the reengagement process the panel had opportunity to explore with the provider all the relevant areas of quality assurance as set out in the QQI QA Statutory Guidelines. These discussions have illuminated the nature of the provider's provision, their culture, ethos and systematic approach to quality in the interests of learners.

The panel notes that the provider has self-identified areas of vulnerability in relation to governance and decision-making processes. The panel also acknowledges that the provider has completed significant work in documenting and formalizing quality assurance processes to promote excellence.

Based on the information provided, the panel confirms from the information that New Links Training Solutions has effectively addressed, and provided evidence of making the *proposed mandatory changes* outlined in Section 6.1 within the time allocated, and has agreed to implement additional *specific advices* outlined in Section 6.2 provided. As a consequence, the panel recommends that QQI approves QA procedures.

Part 7   Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Classes	Discipline areas
4-6	Major Special Purpose Minor	Education, Business Administration and Law Services General Learning

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 New Links Training Solutions Ltd.

Name:

Date: 2 September 2019

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

Document	Related to Section
QA Manual and related Documentation	5.2
Certificate of Incorporation, Financial and Tax Information	4
Learner Portfolio and EA report	5.6
Organisational Chart	5.1
Terms of Reference of Governance Units	5.1
Risk Register	5.1
Presentation – QQI Re-engagement – Panel Visit	General
Evidence Submitted Post Site Visit to Address Proposed Mandatory Changes	
Updated Organisational Chart	5.1, 6.1.1, 6.1.2
Updated Membership and TORs of Governance Units	5.1, 5.11
Updated QA Manual	5.2, 5.11
Updated Course Brochures	5.3, 5.9
Response to Reengagement Report	General, 6.1, 6.2

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

Name	Role/Position
Janet Tumulty	Centre Manager with responsibility for Quality Assurance
Jim Tumulty	Operations Director with responsibility for sales and new business development
Jacintha Cloney	Contracted Trainer/Tutor
Martina Harte	Contracted Trainer/Tutor

Appendix: Provider response to the Reengagement Panel Report

NEW LINKS
TRAINING SOLUTIONS
Linking People, Ideas, Networks

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Dublin: 01 5397234

www.newlinkstraining.com

info@newlinkstraining.com

facebook   **Linked** in

21st August 2019

Reference: Response to Reengagement Panel Report

Dear Panel Members,

The management of New Links Training Solutions would like to take this opportunity to express our sincere gratitude for your professional oversights and advice during the process of the examination of our Quality Assurance Procedures/application for re-engagement to QQI.

From our perspective, the journey was both challenging (as expected) and illuminating. We found the communication channels both from our QQI liaison/s and with the examining panel to be highly responsive and at each stage of the process we felt supported and in possession of all the information needed to progress our application. The re-engagement process afforded us an opportunity to carry out a much needed critical analysis of the business as a whole both from an academic and commercial perspective. One of the key outcomes of the entire process was the development of a quality committee with a strong independent academic decision-making structure which clearly separates the commercial and academic units of the business going forward.
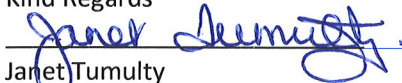
In preparation for the site visit, we identified the main areas of vulnerability from our internal viewpoint and hoped that the visiting panel would drill deeper to identify inevitable blind spots during the site visit. The panel was more than accommodating in their sensitive delivery of critical feedback and in sharing their combined professional insights which were much appreciated as we entered the revision phase of the process. We were given adequate time to address the mandatory requirements as outlined in the final reengagement panel report page 32 part 6. We were in full agreement with the panel's findings and indeed coming out of this phase of the process we now have:

- A well-defined governance structure with external professionals and expertise which will enhance the decision making and academic practices of the business.
- A well-developed Operations Manual which is fit for purpose and designed to support the business moving forward.
- A fully revised method of public information strongly linked to QQI policies & procedures

Having completed the mandatory recommendations to the satisfaction of the panel we also plan to reshape the other areas of 'specific advice' as identified in section 6:2 of the panel report. This process has already started and will reflect our ongoing commitment to continuous improvement.

Many thanks to the panel and to the wider support network within QQI who provided the necessary resources and thorough two-way communication throughout the entire process. We are very proud to be associated with such a respected organization and we look forward to maintaining ongoing professional relationships with you throughout the coming months and years.

Kind Regards

Janet Tumulty
Director of Training and Quality Assurance

2nd Floor, 1 Boeing Ave, Airport Business Park, Co. Waterford, Ireland.

Reg. No.: 566822