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Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	EMS & Associates
Address:	Unit 8, East Coast Business Park, Matthews Lane South, Drogheda, Co. Louth, A92 P9EF
Date of application:	26 February 2020
Date of resubmission of application:	25 June 2021
Date of site visit (if applicable):	24 June, 2020
Date of reconvene meeting (if applicable)	15 July, 2021
Date of recommendation to the Programmes and Awards Executive Committee:	3 December 2020 and 9 September 2021

1.2 Profile of provider

EMS & Associates are Health & Safety Consultants, Auditors and Trainers who have been providing consultancy services and training courses since 1995. Having agreed their Quality Assurance with FETAC in September 2007, they have been offering minor awards in Workplace Safety (Level 4) Occupational First Aid (Level 5) Safety and Health at Work (Level 5) and Manual Handling Instruction (Level 6).

EMS & Associates cater for the following industries: Business Services, Childcare, Community and Voluntary, Construction, Education, Government Agencies, Healthcare and Wellbeing, Hospitality, Pharma and Biotech, Production Process, Transport, IT and Communications, encountering different types of learners from Operative Level through to Management, who wish to improve their knowledge and skills in Health and Safety.

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EMS & Associates process a relatively small number of learners each year (approx. 200), which has reduced with the transition of Occupational First Aid from QQI to PHECC (Pre-Hospital Emergency Care Council) First Aid Responder.

EMS & Associates are also a PHECC Recognised Institution, carrying out First Aid Responder and Cardiac First Responder courses. They are also an Irish Heart Foundation training site delivering Heartsaver AED and BLS training and a Solas Safe Pass Approved Training Organisation.

Additionally, they also carry out non-accredited, industry-specific training, which is driven by Health & Safety requirements. Finally, as Health & Safety consultants and auditors, they carry out audits, risk assessments and compile safety statements in line with the Safety, Health & Welfare at Work Act 2005.

EMS & Associates were very open, honest and engaged fully with the panel on the day. They showed a genuine commitment to continuous improvement and to the needs of their learners. It is obvious that the learner is at the centre of every decision.

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Part 2 Panel Membership

Name	Role of panel member	Organisation
David Denieffe	Chair	Institute of Technology Carlow
Joe Fitzgerald	Report Writer	TU Dublin
Aoife Comiskey Clifford	Panel Member	Kerry Education and Training Board
Liz Doran	Panel Member	Barrow Consultancy and Training
Matthew Hurley	Report Writer (Reconvene)	Bridge Mills Galway Language Centre

Part 3 Findings of the Panel

3.1 Summary Findings

EMS & Associates has been in operation for over 25 years. It was approved by FETAC in 2007 and has been offering programmes leading to FETAC / QQI awards since that time. Up to and until 2018, EMS & Associates submitted approximately 200 learners annually for certification. However, since 2019, these numbers have been significantly reduced. The provider offers the following minor awards: Workplace Safety (Level 4); Safety and Health at Work (Level 5) and Manual Handling Instruction (Level 6). It demonstrates a clear strategic purpose to provide a quality education experience for its learners. Through the panel discussions, it was clear that the provider has successfully done this over the years.

However, at the time of the virtual site visit with the panel, much of EMS & Associates' QA operations were informal and ad-hoc in nature. The panel found that the QA system needed to become more formalised and directed by clearly stated policies and procedures to guide academic operations.

The governance structure outlined needed to be further refined and clarified. On the day of the virtual site visit, EMS & Associates presented the panel with a detailed gap analysis report and a comprehensive plan to address the deficiencies identified therein (a Quality Assurance Plan [QAP]). The panel understands that this was a recent development compiled with external expertise and completed after the application for reengagement had been submitted. It was, therefore, not reflected in the documentation evaluated by the panel. The panel was satisfied, however, that the QAP, if implemented, would help address a number of the deficiencies and gaps in the documented QA procedures as submitted. This is reflected in the mandatory changes set out in Section 7.1 of this report. The QAP needed to be implemented by the provider as a matter of urgency, in addition to ensuring that all elements of QQI's Core Statutory QA Guidelines and other relevant policies and criteria were addressed. Failure to do so may have exposed the provider to the risk of a recommendation to refuse to approve QA procedures at the reconvene meeting of the panel.

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However, at the conclusion of the original virtual site visit, the panel recommended that QQI refuse to approve EMS & Associates' QA procedures pending mandatory changes, as the panel was presented with sufficient evidence at the virtual site visit to be reassured that the provider had the capacity and commitment to address the not insignificant deficits in its QA system within a six-month timeframe.

The panel reconvened for a desk review of EMS & Associates' revised documentation on 15 July, 2021. The panel also chose to meet again with a representative from EMS & Associates to provide some additional clarifications and insight on the intervening period of development. At the conclusion of the reconvene meeting, the panel was satisfied that EMS & Associates had sufficiently demonstrated its compliance with QQI's guidelines, as well as their commitment to ongoing quality enhancement.

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

	Tick <u>one</u> as appropriate
Approve EMS & Associates' draft QA procedures	✓
Refuse approval of EMS & Associates' 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 EMS & Associates' 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	Relevant evidence was submitted to confirm that the provider is an established legal entity with education/training as a principal function.
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	Relevant evidence was submitted to confirm that the provider is an established legal entity in the EU with a substantial presence in Ireland.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	EMS & Associates have not indicated their involvement in any form of collaborative provision in relation to programmes leading to QQI awards. The Panel had requested that the arrangement with Dulann be clarified within the documentation, setting out scope and practice. The panel is satisfied that this has been adequately addressed following a review of the revised documentation and further discussions with the provider during the reconvene meeting.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	As with 4.1.3(a) above, EMS & Associates have not indicated their involvement in any form of collaborative provision in relation to programmes leading to QQI awards. The Panel had requested that the arrangement with Dulann be clarified within the documentation,



			setting out scope and practice. The panel is satisfied that this has been adequately addressed following a review of the revised documentation and further discussions with the provider during the reconvene meeting.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	While the applicable regulations and legislation are complied with in all jurisdictions where the provider operates, there is an absence of any reference to legislation underpinning Core and Provider Specific QA Guidelines (Qualifications and Quality Assurance (Education and Training) Act 2012).
4.1.6(a)	Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>	Yes	The panel understands that EMS & Associates is in good standing in the education and training system in Ireland.

Findings

EMS has a well-established track record and has been in operation for a number of years. All legal and regulatory requirements appeared to be fully complied with.

The panel recommended that specific reference to applicable legislation be included in the QA documentation and that the relationship with Dulann would need to be clarified in terms of scope and practice.

This relationship was explored during the reconvene meeting, and the panel is satisfied that the information provided adequately addresses the original concern.

**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	Evidence submitted assures the panel that the applicant has a sufficient resource base and is stable and in good financial standing.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	EMS presented a reasonable business case for sustainable provision to the panel.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	<p>The governance structure outlined needed to be further refined and clarified. The panel advised that the plan for developing a comprehensive QA Manual ([hereafter the QAP], which would set out a documented approach to quality assuring programmes and associated services) presented by the provider at the virtual site visit, should be implemented.</p> <p>It was noted that a documented approach to QA would benefit from visual charts which make reference to the flow of reporting within the governance system such that clarity is provided on where reports are generated, where reports are considered and where decisions are made. Such visual/flow charts would also delineate between academic governance and operational management.</p> <p>While acknowledging the significant developments made to address the panel's concerns regarding EMS & Associates' governance and reporting structures, the panel noted some</p>

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			<p>ambiguity in the Terms of Reference between those who make recommendations and those who approve. Additionally, the organisational chart presented should be reviewed to more clearly articulate reporting lines to ensure internal consistency.</p> <p>Although otherwise satisfied with the revisions made by the provider in this area, the panel nonetheless identified a Condition of QA Approval in order to ensure the above concerns were appropriately addressed.</p>
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	The Operations and Training Director has been identified as the primary contact person for QQI engagement.

Findings

Given the partial addressing of criteria outlined above at the conclusion of the virtual site visit, the implementation of the plan presented for the improvement of quality assurance coupled with the advice above needed to be progressed as a matter of urgency.

While largely satisfied that EMS & Associates have adequately addressed the resource, governance and structural requirements set out in Section 4.2, the panel nonetheless identified two Conditions of QA Approval at the conclusion of the reconvene meetings. These are detailed in Section 6.1 of this report.

**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	EMS & Associates has been offering programmes leading to FETAC / QQI awards since 2007. Up to and including 2018, It submitted approximately 200 learners per year for certification. That number has reduced significantly since then. The provider currently offers the following minor awards: Workplace Safety (Level 4); Safety and Health at Work (Level 5) and Manual Handling Instruction (Level 6)
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	The provider has a core team of key staff for the management and quality assurance of programmes and their delivery and a number of contracted instructors.
4.3.3(a)	Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	<p>While up to and including 2018, certification figures were relatively high, there have been no recent validation applications. Given that the QA manual was in need of further development, the Panel was of the view that this criterion was only partially addressed at the conclusion of the virtual site visit.</p> <p>However, upon review of the revised documentation, the panel is satisfied that the updated QA Manual and supporting documentation, as well as further discussions with the provider at the reconvene meeting,</p>



			demonstrate EMS & Associates' compliance with the standard conditions for validations set out in Section 45(3) of the Qualifications and Quality Assurance Act (2012).
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	While the panel couldn't visit the premises, the provider gave reassurance that they operate out of long-term leased premises and also deliver programmes on customers' site renting space as required.
4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	<p>These policies needed to be more explicitly addressed in the provider's QA manual. Ideally, this would be in a distinct section to provide further clarity on the policy/procedure.</p> <p>The revised documentation submitted to the panel now includes a discrete policy statement and associated procedure.</p>
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	The panel had noted that it would be important for the provider's QAP to set out how outcomes from the assessment process (grade achievement, IV Reports, EA Reports, etc.) are monitored and feed forward into wider decision-making. The integration of monitoring outputs (reports) into the overall management of training provision within the organisation would be an important aspect of the provider's quality assurance system. Furthermore, the



			<p>provider's QAP should clarify where responsibility lies for the monitoring and management of assessment and standards. This might be achieved through a closer consideration of roles and responsibilities of the Quality Team, RAP and the provider Manager Team.</p> <p>The panel observed significant development of EMS & Associates' assessment framework. The QA Manual has been comprehensively expanded to include information pertaining to the panel's original concerns.</p>
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	N/A	No courses extend beyond three months duration.

Findings

With consideration of the revisions made to address the comments and concerns identified under 4.3.3(a), 4.3.5 (a) and 4.3.6 (a) above, the panel is satisfied that EMS & Associates have met the programme development and provision requirements set out in Section 4.3.

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Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

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

The provider has been in operation since 1995 and demonstrated a clear strategic purpose to provide a quality education experience for its learners. Through the panel discussions, it was clear that the provider has successfully done this over the years.

However, at the time of the original panel evaluation, much of its QA operations was informal and ad hoc in nature. The panel emphasised that this needed to become more formalised and directed by clearly stated policies and procedures to guide academic operations (for example, the provider mentioned that the Chief Executive sometimes sat on the Results Approval Panel and sometimes did not, but there did not appear to be a policy as to whether the Chief Executive should sit on this panel).

Following a thorough review of the revised documentation, the panel is satisfied that the concerns identified in respect of EMS & Associates' capacity to provide sustainable education and training and have been largely addressed, save for two other Conditions of QA Approval which were identified at the reconvene meeting and which must be promptly addressed by the provider.



Part 5 Evaluation of draft QA Procedures submitted by EMS & Associates

The following is the panel's findings following evaluation of EMS & Associates' 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 Panel found that there was a lack of clarity on academic governance and decision making within EMS & Associates. While 'core' personnel were identified as having responsibility for the education provision, and there was clear interaction with the CEO by these personnel — in particular, the Operations and Training Director — on commercial decision-making, the panel identified a need for enhanced externality and independence in the units of governance to ensure separation between commercial and academic decision making as required by the Core Statutory QA Guidelines. EMS & Associates noted their commitment to the use of an independent QA individual to advise and guide them, which was welcomed by the panel. However, it was emphasised that EMS & Associates would need to ensure that the details of this are set out in the QA procedures (e.g. flows of information, terms of reference for committees/individuals).

Specific points of clarity were required on:

- Who owns the Academic Quality role – is this an individual/group of people?
- RAP – What are / confirm / clarify the ToR and who sits on this?"
- The relationship between the Quality Team and RAP needed to be clarified. The separation between these committees was a little blurred as they largely have similar/the same members.

The management of quality in the organisation needed to be policy and process driven – a lot seemed to be informal / ad hoc at the time of the panel evaluation. In addition, the governance structure needed to include more detail to more clearly show the flows of communication/information in the organisation and to identify more clearly the system of oversight in operation (at the time of the evaluation, it was difficult to see oversight of academic decisions). These issues were reflected in the mandatory changes set out in Section 7.1 of this report.

The panel undertook a thorough review of the revised documentation at the reconvene meeting, and raised a number of other queries with the provider for clarification. The panel acknowledges the significant work undertaken to address the concerns which were identified at the conclusion of the original site visit.

This involved a sweeping rework to the organisation's policies and procedures, ensuring they were fully documented. This was achieved with the assistance of an independent QA expert. The separation of academic and commercial considerations was also given due attention and reflected within the revisions.

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Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

The panel commends the extensive developments to date to address the mandatory changes and revise the organisation's quality system, which now has increased externality with the assistance of the aforementioned independent QA expert.

Organisational Chart & Reporting Lines

Terms of Reference were provided for the various internal panels and committees (e.g. Training Committee, Quality Assurance Committee, RAP, Self-Evaluation Panel, and Programme Review Panel). Notwithstanding these positive developments, some confusion arose in relation to the organisational chart presented, with the panel noting a lack of clarity in areas of governance between those who make recommendations and those who make decision, as there was some ambiguity around this in the Terms of Reference. Furthermore, the organisational chart should clearly articulate reporting lines to ensure internal consistency. A Condition of QA Approval has been identified in respect of these concerns.

(6.1.1)

QA Manual

While recognising the comprehensive nature of the revised QA Manual, the panel queried whether all of the new panels and committees which had been established were, in fact, entirely necessary given the size of the organisation, or whether they may be overcomplicating things. The panel sought to clarify this via further discussion with EMS & Associates at the reconvene meeting, who noted that they were aiming to ensure all areas were sufficiently covered, but that they would welcome some simplification of this. The panel emphasised the importance of having a QA Manual that is fit-for-purpose and organisationally appropriate, and that it may be the case that ongoing development of their QA systems might open up opportunities to scale back in certain areas.

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2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

The documentation presented to the panel needed to be formalised and structured in a manner that is more cohesive and reflected the Core QA Guidelines set out by QQI. Also, the documentation needed to reference other relevant QQI policy documents (for example: the *Policies and criteria for the validation of programmes of education and training* document).

At the time of the virtual site visit, there was a general lack of cohesion between the provider's QA manual and the QQI policy documents, specifically the 2016 Core Statutory QA Guidelines (QQI). The need for this to be addressed was subsequently reflected in the mandatory changes detailed in Section 7.1. The panel was of the view that implementation of the QAP submitted at the virtual site visit would assist significantly in addressing these shortcomings. This was further reflected in the mandatory changes.

The panel commends the extensive work undertaken by EMS & Associates in the intervening period, which has produced a comprehensive QA Manual that demonstrates clear consideration of QQI's guidelines. A document control and monitoring system is present for each Policy and Procedure, and a linked documents section has been included. The panel welcomes the developments made to date, and further encourages EMS & Associates to ensure QQI policies are cross-referenced throughout the QA documentation.

The policy statements in the revised QA Manual now contain information on how often they are subject to cyclical review. The panel was of the view that it would benefit the organisation to establish a review schedule, prioritising policies and procedures which are learner-facing and ensuring that those that come into effect are included in such a review.

A Condition of QA Approval was identified in respect of this. **(6.1.2)**



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

The provider outlined clearly what it currently does with regards to the management and operation of its programmes. However, the documentation needed to detail this more clearly (e.g. state how the quality of the education provision is ensured).

However, the manner in which existing programmes would be reviewed was not considered sufficiently detailed in the QA manual, with the panel noting that a policy/procedure(s) should be included to outline how this will be conducted. Furthermore, the policy/procedure(s) should address the requirements set out in Section 3 of the Core QA Guidelines, the Policies and criteria for the validation of programmes of education and training, and the Policy and Procedures for Recognition of Prior Learning. Implementation of the QAP submitted to the panel at the virtual site visit was considered crucial in addressing these shortcomings. This was reflected in a mandatory change set out in Section 6.1 of this report.

Following a comprehensive review of the revised documentation, the panel is satisfied that EMS & Associates has adequately addressed the panel's concerns under this branch of QA.

The updated QA Manual now thoroughly charts the organisation's processes regarding the management and operation of its programmes, including needs assessment, design, approval, planning, delivery, ATP, RPL, monitoring and review. Discrete policies and procedures have been developed for these processes, and the provider also stepped the panel through some of these processes during a follow-up meeting at the Reconvene Panel. This also provided the panel with insight as to which panels are involved and at which stage.

The panel did, however, note a slight lack of clarity with regard to the role of the Managing Director in the programme development process, and emphasised the importance of ensuring this involvement is consistent with the organisation's commitment to maintain appropriate separation of commercial and academic decision-making.

RPL

Despite development of a detailed RPL policy, it was noted that EMS & Associates do not have any immediate intention to utilise this policy, as it is not relevant to their current programmes. However, it was further noted that the policy may be implemented in the future should the organisation choose to pursue validation of other programmes.

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4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

EMS & Associates detailed its approach to staff recruitment and how it orients and inducts new staff, as well as its staff development practices for its current staff.

However, the practices in this area needed to be more formally detailed in the QA documentation. For example, EMS & Associates needed to provide a policy on how/when and for what reason(s) staff development will occur. Such formal mechanisms in this regard were limited. This is reflected in the mandatory changes detailed in Section 7.1. The panel was of the view that implementation of the QAP submitted to the panel at the virtual site visit would assist significantly in addressing these shortcomings.

Following a comprehensive review of the revised documentation, the panel is satisfied that EMS & Associates has adequately addressed the panel's concerns under this branch of QA.

EMS & Associates' revised documentation states that the organisation discusses CPD with staff to ensure awareness of opportunities for internal and external training. Additionally, an 'open door' policy is in place in the organisation, whereby staff are welcome to discuss CPD opportunities with management at any time. More formal 'one-to-one' meetings and appraisals may also include discussion of future CPD opportunities.

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5 TEACHING AND LEARNING

Panel Findings:

The QA documentation pertaining to this criterion needed to have a more formalised teaching and learning policy that clearly articulated the approach adopted to teaching and learning in accordance with the Core Statutory QA Guidelines.

The panel had also advised that the approach to teaching and learning (Teaching and Learning Strategy) should give consideration to whether the provider is currently delivering, or will in the future deliver, programmes via blended learning, given that the provider stated that ‘the future is blended’ during panel discussions. If the provider determined that it would not operate a blended learning model, then the model to be utilised should be clearly outlined.

Following the provider’s given six-month period, the teaching and learning policy was updated in the revised QA Manual, detailing EMS & Associates’ holistic, learner-centred approach which aims to enable learner autonomy while respecting the diversity of learners.

Regarding the provider’s delivery of programmes via a blended or online framework, the Programme Delivery Procedure in the revised QA Manual (p. 86) states that “EMS & Associates adopt a blended learning approach, including online, classroom-based, and “on-the-job” learning.” A dedicated section on blended learning has also been included in the QA Manual. However, it should be noted that, at the time of the reconvene meeting, EMS & Associates were not approved for delivery of QQI programmes via blended learning, nor is the provider currently seeking an extension of its scope of provision to include blended learning.

The panel had noted that it would be important for the provider’s QAP to detail how the governance system (Quality Team and other sub-governance units) approaches monitoring issues relating to teaching methodologies (for example approaches to teaching and learning for programmes whose mode of delivery includes blended or whose mode of delivery shifts to on line learning).

EMS & Associates have aimed to address this concern of the panel via the formalisation of the Training and Quality Committee which will have oversight in this area, by documenting its approach to blended learning, and by updating its teaching and learning to reflect practice.

Finally, the panel noted that it would be important for the provider’s QAP to set out where discussion to capture issues arising takes place and where recommendations/actions feed forward into wider decision making. The panel had identified a mandatory change in respect of this which has been considered adequately addressed following the significant updates to the QA Manual.

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

The provider had initially presented detailed policies and procedures for the security of the data it retains, specifically through its data protection policy.

However, the broader assessment details, such as:

- how assessment can support effective learning and teaching,
- how learners are involved in the review of assessment instruments,
- the reviews / appeals process
- and the Policy for Plagiarism and Academic Integrity

lacked formal detailing in the QA manual. The panel emphasised that these should be detailed in a dedicated policy and procedure(s) for the assessment of learners. A mandatory change had been identified in respect of this.

The panel recognises the work which was conducted in the intervening period to revise both the QA Manual and the Learner Handbook to address the observed lack of details. These documents have received significant updates covering, among others, the highlighted areas above. The panel is satisfied that these developments will help to ensure greater fairness and consistency in EMS & Associates' assessment processes.

**QQI**Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

7 SUPPORT FOR LEARNERS

Panel Findings:

The provider demonstrated a strong student-centred approach to its education provision. During the panel sessions, the provider demonstrated strong pastoral care and a commitment to provide whatever supports it reasonably could to its learners. However, other sections within this policy area, such as how learner representation is ensured in units of governance, was less formally developed.

Thus, the detailing of these supports was less comprehensive in the documentation than discussed with the panel. The panel therefore identified a mandatory change in respect of this, requiring the provider to further detail these in the QA Manual and Learner Handbook as a means to ensure more formal mechanisms for identifying students who need supports and the provision of these supports.

Following a review of the revised documentation, the panel observed additional information regarding the above mandatory change in the updated Supports for Learners Policy in the QA Manual, and the Learner Handbook's section on Reasonable Accommodation. The panel further acknowledges the development of the Learner Handbook with the aim of making it more learner-friendly.

EMS & Associates have also made a clear effort to ensure representation of the learner voice across various internal units (i.e. panels, boards, committees). This includes the Training Committee, Quality Committee and Programme Review Panel.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The provider presented a detailed Information and Record Management policy and effective software for its LMS. This provided detailed information on how technology is used to manage important organisational information. However, the panel noted that the policy also needed to address areas of particular concern relevant to QQI's Core QA Guidelines, such as information on completion rates.

The panel highlighted the importance of detailing in the QAP how information on enrolment, retention, completion and achievement is captured and stored (e.g. MIS), as this data feeds forward into internal evaluations (monitoring and review) and external evaluation, and is an important tool in ensuring the effectiveness of a QA system.

A mandatory change was identified in respect of this, requiring the provider to amend its Information and Record Management policy to address the particular needs set out in Section 8 of the Core QA Guidelines.

The panel commends the significant and comprehensive policy development in this area, covering areas such as Information Systems, Data Collection, Learner Information System Management, Data Analysis, Records Maintenance and Retention, and Data Protection. The panel is satisfied that the areas of concern outlined above have been adequately addressed.

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Dearbhú Cáilíochta agus Cáilíochtaí Éireann

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The panel noted the development of the provider's website, which was ongoing at the time of the virtual site visit.

The provider had policies in place to ensure it handled information and data with due care and consideration, particularly sensitive information of its students – for example, subject access requests and providing information over the telephone. However, the panel held the view that these policies needed to more specifically address the requirements of Section 9 of QQI's Core QA Guidelines.

Furthermore, other requirements of Section 9 of the Core QA Guidelines, such as the publication of quality assurance evaluation reports, were not addressed. Thus, the panel set out a mandatory change requiring these area be included in the provider's QA manual.

At the reconvene meeting, the panel was pleased to see the developments which had taken place in this area. In addition to documented policy around the publication of programme information and communication with stakeholders, *Publication of Quality Assurance and Evaluation Reports* was also given its own discrete policy. The panel is therefore satisfied that QQI's guidelines under this branch of QA have been adequately addressed.

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

Panel Findings:

The provider did not identify its involvement with any other parties in regard to the provision of education and training programmes leading to QQI awards. However, clarification was needed on the relationship with Dulann.

This clarification was addressed in the revised documentation, in which it is stated that the Dulann.com LMS/SMS is available to learners for non-accredited programmes.

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Dearbhú Cáilíochta agus Cáilíochtaí Éireann

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

The provider outlined its intention for how it will self-evaluate its education provision. However, the draft QA documentation provided very little detail on the specific policy and procedure(s) in this area.

The panel therefore noted that the QA manual should include a dedicated section on Self-Evaluation, Monitoring and Review that meets the requirements set out in Section 11 of the core guidelines.

In reviewing the revised documentation, the panel observed clear commitment by the provider to address this initial omission in a manner that is consistent with and appropriately aligned to QQI's guidelines. The QA Manual now contains policy statements covering Self-Evaluation, Internal Monitoring, Internal Review, Internal Audits, and Enhancement.

Evaluation of draft QA Procedures - Overall panel findings

The provider has significant experience in the provision of the programmes it offers and demonstrated a deep commitment to student-centred learning. There was clear evidence of a good workplace culture, with an ethos of continuous improvement and the welfare and journey of the learner central to all decisions.

However, the formal documentation of policies and procedures needed to be more coherent and consistent with the requirements of the Core Guidelines (and other relevant QQI policy documents). In a number of policy areas, the implementation was overly informal. Thus, the panel required that the QA manual be further developed to include more specific detail on the policies and procedures of all the areas outlined in the Core QA Guidelines.

The Plan for Quality Improvement, compiled with external support and included in the documentation submitted by the provider, provided a roadmap to meeting the areas where information was lacking. The provider was advised to follow this roadmap to help address the vulnerabilities identified by the panel.

Therefore, at the conclusion of the virtual site visit, the panel recommended to QQI that the provider's QA procedures be refused pending mandatory changes.

In the six-month period which followed, EMS & Associates undertook extensive work to develop and enhance its QA from top to bottom, ensuring that all policies and procedures (as required by QQI's guidelines) were accounted for in the revised documentation. At the reconvene meeting, which took place on 15 July, 2021, the panel met with the provider once more to discuss some final clarifications, and gain insight on the development period. The panel was pleased with the clear commitment shown both in the documentation and during discussions, and is satisfied that EMS & Associates has both



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demonstrated it compliance with QQI guidelines, and made clear its commitment to ongoing QA enhancement.

The panel is therefore pleased to recommend to QQI Approval of EMS & Associates' draft QA procedures, albeit with two Conditions of QA Approval which must be promptly addressed by EMS & Associates in a given time period.



Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

At the conclusion of the Reconvene Meeting, the panel identified two Conditions of QA Approval which will aim to enhance and refine EMS & Associates' QA moving forward. They are:

- 6.1.1. EMS must modify and clarify the organisational chart to point to the areas of governance that have a recommendation role and an approval role. In this, EMS must ensure that the organisational chart is consistent and fully reflects the role and responsibilities set out in the QA Manual.
- 6.1.2. EMS must set out a schedule for the review of policies and procedures, prioritising those that are learner-facing and ensuring that those that come into effect are included in such a review.

Part 7 Mandatory Changes to QA Procedures and Specific Advice

7.1 Mandatory Changes

At the conclusion of the virtual site visit, the panel identified a number of mandatory changes, which needed to be addressed by EMS & Associates within a given six-month period. Upon review of the revised documentation, and further discussion with representatives from EMS & Associates during the reconvene meeting, the panel is of the view that these mandatory changes have been adequately addressed. They were:

1. The QA manual needs to be comprehensively updated as part of implementation of the Plan for Quality Improvement (QAP) submitted to the panel (which will provide a documented approach to quality assuring programme and associated services). Areas in which the QAP submitted needs to be further expanded include:
 - detail how the governance system (Quality Team and other sub-governance units) approaches monitoring issues relating to teaching methodologies (for example approaches to teaching and learning for programmes whose mode of delivery includes blended or whose mode of delivery shifts to on line learning).
 - set out where discussion to capture issues arising take place and where recommendations/actions feed forward into wider decision making.
 - further detail the formal mechanisms for identifying students who need supports and the provision of these supports
2. Ensure that all elements of the QQI Core Statutory QA Guidelines are met, as well as other relevant QQI criteria, and that there is a cross-referencing between the provider QA procedures

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and QQI's Quality Assurance Guidelines. Areas in which particular deficiencies were identified have been detailed in this report and should be paid particular attention by the provider.

3. Confirm that the governance structures and arrangements accord with the requirements in the Core Statutory QA Guidelines by ensuring that:
 - Terms of Reference for and membership of the Quality Team is clearly articulated.
 - Academic and commercial decision-making is clearly separated – this may involve use of external expertise in governance units; and
 - Learner and external stakeholder voices are captured and represented in relevant units of governance.
4. The Learner Handbook should be developed to function effectively as a mechanism to communicate with learners.

7.2 Specific Advice

At the conclusion of the virtual site visit, the panel also identified one item of specific advice. Following a review of the revised documentation, the panel is of the view that this advice was deeply considered and heeded in the development of the updated QA Manual.

1. The QA Manual should be structured to be more coherent with the sections in the Core Guidelines. This would help to ensure and demonstrate that the provider is compliant with all areas.

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 4 (min); Level 6 (max)	Minor Awards	Workplace Safety; Safety and Health at Work, Manual Handling Instructor

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Part 9 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 EMS & Associates.

Name:

Date:

18/8/2021



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

Document	Related to
Statutory Declaration	Legal and Compliance Requirements (Section 4.1)
CRO Documentation (Certificate of Incorporation and Certificate of Registration of Business Name)	Legal and Compliance Requirements (Section 4.1)
Insurance Documentation	Legal and Compliance Requirements (Section 4.1)
Tax Clearance Certificate	Legal and Compliance Requirements (Section 4.1) & Resource, Governance and Structural Requirements (Section 4.2)
Accountant's Report	Resource, Governance and Structural Requirements (Section 4.2)
Financial Statements	Resource, Governance and Structural Requirements (Section 4.2)
Organisational Chart	Governance and Management of Quality (Section 5.1)
Employee Handbook	Staff Recruitment, Management and Development (Section 5.4)
Learner Handbook	Supports for Learners (Section 5.7)
Application Form and Gap Analysis	All Sections
Draft Policy Document Manual	All Sections
Additional Clarifications	Various Sections
Revised Documentation (Including revised QA Manual, Learner Handbook, Quality Improvement Overview, GDPR and Privacy Overview, Organisational Chart, Insurance Note, and Tax Clearance Certificate)	Various Sections

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

Name	Role/Position
Niall Edwards	Managing Director
Carmel McCarthy	Operations and Training Director
Susan Kelly	Client Support and Training Manager

Appendix: Provider response to the Reengagement Panel Report

23rd August, 2021

Quality & Qualifications Ireland,
26/27 Denzille Lane,
Dublin 2 D02 P266

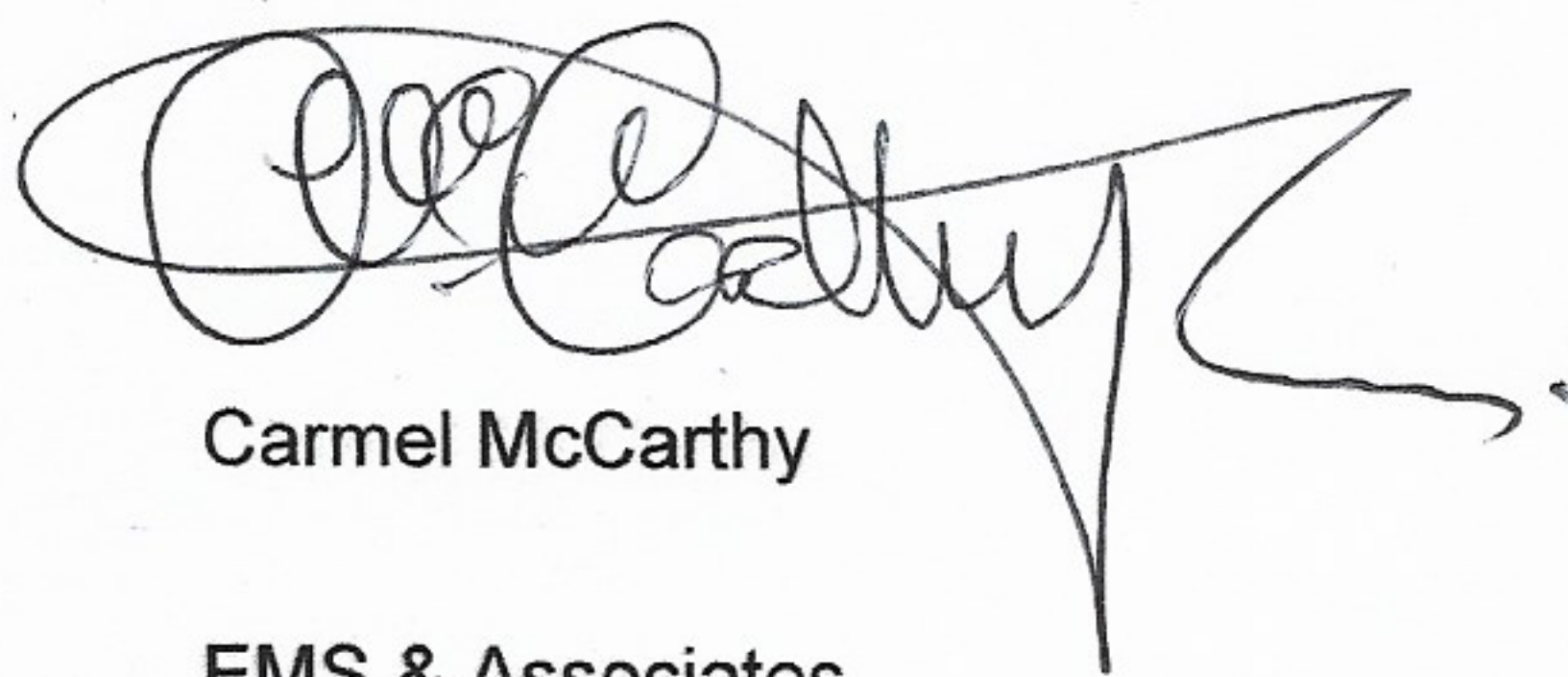
Dear Sir/Madam,

Reengagement with QQI

We would like to take this opportunity to thank all the team in QQI for their help and support during our reengagement process. We found the process both enlightening, and challenging, at times, but a very beneficial journey. The Panel were very fair and transparent in their observations, and we welcome their input, which helped to shape the development of our Quality Assurance Manual.

We have read through the Reengagement Report and could not find any factual inaccuracies and the conditions of QA approval are as we understand them.

Yours faithfully,



Carmel McCarthy

EMS & Associates