



## Reengagement Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

##### 1.1 Applicant Provider

Registered Business/Trading Name:	IBEC Ltd. (Irish Business and Employers Confederation); IBEC Company Limited by Guarantee (IBEC CLG) trading as First Polymer Skillnet
Address:	7 Centre Court, Blyry Business and Commercial Park, Athlone, Co. Westmeath. Eircode: N37 RT29
Date of Application:	1 <sup>ST</sup> June 2020
Date of resubmission of application:	24 <sup>th</sup> March
Date of evaluation:	
Date of (virtual) site visit:	15th of July, 2020
Date of reconvened panel meeting:	6 <sup>th</sup> of May, 2021
Date of recommendation to the Programmes and Awards Executive Committee:	10 <sup>th</sup> September 2020 and 24 <sup>th</sup> June 2021



## 1.2 Profile of provider

First Polymer Training Skillnet was initiated by Polymer Technology Ireland, which is a representative body for the plastics industry in Ireland and a trade association within IBEC. FPTS, which was established in 1999, is managed by IBEC CLG, and is funded under the government’s Skillnet initiative. It is a not-for-profit organisation. FPTS provides training that is focused on the specific needs of the plastics industry, and aims to meet the needs of new and existing employees and employers in the sector.

FPTS operate from an administrative and course centre located in Athlone, which is equipped with a full range of plastics processing equipment. The provider has been delivering programmes leading to first FETAC and, subsequently, QQI awards since 2007, and has certified over 2,300 learners in the last decade. Currently, component awards at Levels 5 and 6 on the National Framework of Qualifications are offered in areas including: Injection Moulding, Plastic Extrusion, Mould Design, Materials Selection and Programmable Logic Controllers. FPTS also offers a range of non-accredited short courses and in-company training programmes that are designed to meet specific needs.

Learners are predominantly employees of FPTS’ 90+ member companies nationwide, and range in age from 18 - 65. The largest group of learners are in the 35 – 39 age range, working in practical roles in polymer processing (for example, plastic extrusion, blow moulding or machine setting). The majority of learners are male (95%) with higher female participation in specific courses, including Product and Process Validation.

## Part 2 Panel Membership

Name	Role of panel member	Organisation
Danny Brennan	Chair	Former Registrar, Letterkenny Institute of Technology; DNB Consulting.
Catherine Peck	Report Writer	Head of Teaching and Learning, Innopharma Education
Lorraine Halpin	Panel Member	Director of Quality and Academic Affairs, SQT Training
Andrew Finn	Panel Member	Registrar, Fastrack to IT



## Part 3 Findings of the Panel

### 3.1 Summary Findings

The panel would like to acknowledge the significant work undertaken by FPTS toward its submission for reengagement for QA. The commitment at FPTS to this process was evident to the panel during discussions with FPTS representatives that were conducted in the course of the evaluation. The panel also notes that due to the restrictions imposed by the COVID-19 pandemic, the site visit was also facilitated virtually by FPTS.

The panel is of the view that the programmes offered by FPTS meet a clear demand and a genuine education and training need. The panel acknowledge the strong support and endorsement of FPTS by the wider industry, and the active engagement of FPTS in the sector over the past 20 years. The provider's steering group is comprised of member company representatives as well as a representative of IBEC, this ensures that there is a close alignment of activities and developments within FPTS to industry needs.

During the course of the evaluation, the panel had the opportunity to engage in discussions with management, support and training staff, as well as a representative of the Steering Committee. These discussions were positive and informative, and provided the panel with insights into how the QA of FPTS has been developed across the organisation. The panel acknowledges, in particular, the positive input made to discussions by the Centre Manager.

Nonetheless, at the conclusion of the virtual site visit it was the view of the panel that the draft QA procedures presented for evaluation did not reflect sufficient alignment with QQI's Core Statutory Quality Assurance Guidelines (2016). Based on the constructive nature of discussions with FPTS during the site visit, the panel was confident that with sufficient time to address the issues identified, FPTS would be able to progress its application. The panel therefore recommended that QQI refuse approval of FPTS' draft QA procedures pending *Mandatory Changes*. Those *Mandatory Changes* are outlined in Section 7.1 of this report, and are discussed where relevant in subsections 5.1 – 5.12.

The panel reconvened to undertake a desk review of the revised quality assurance procedures of FPTS on the 6<sup>th</sup> of May, 2021. The panel noted the substantial work undertaken by FPTS in the interim period. Following this review, the panel was in a position to make a recommendation to QQI to approve the quality assurance procedures of FPTS with *Conditions of Approval*. The panel have also identified additional items of *Specific Advice*.

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

	Tick <u>one</u> as appropriate
<b>Approve</b> FPTS' draft QA procedures	<b>X</b>
<b>Refuse approval</b> of FPTS' draft QA procedures <b>pending mandatory changes</b> set out in Section 7.1 <small>(If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)</small>	
<b>Refuse to approve</b> FPTS' draft QA procedures	



## Part 4 Evaluation of provider capacity

### 4.1 Legal and compliance requirements:

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.1.1(a)</b>	<b>Criterion:</b> <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	<b>Yes</b>	The provider has submitted a Certificate of Incorporation on Change of Name (IBEC Ltd.) and a letter confirming that FPTS, which does not have its own legal status, is managed by IBEC CLG.
<b>4.1.2(a)</b>	<b>Criterion:</b> <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	<b>Yes</b>	FPTS has submitted appropriate evidence that it is a legal entity within the EU as per 4.1.1(a). The provider has delivered programmes leading to QQI awards since 2007, and has certified over 2,300 learners.
<b>4.1.3(a)</b>	<b>Criterion:</b> <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	<b>Yes</b>	A collaborative provision arrangement with IT Sligo (as second provider) is clearly specified within the application. A copy of the draft MOU has been provided.
<b>4.1.4(a)</b>	<b>Criterion:</b> <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	<b>Yes</b>	The existing collaborative provision relationship with IT Sligo is compatible with the scope of provision applied for.
<b>4.1.5(a)</b>	<b>Criterion:</b> <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	<b>Yes</b>	The evidence provided in support of the provider's application is indicative of compliance with Irish/EU legislation.
<b>4.1.6(a)</b>	<b>Criterion:</b> <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or</i>	<b>Yes</b>	FPTS has a track record of certification in Ireland, and has delivered validated education and training programmes since 2007.



	<p><i>enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i></p>		
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**Findings**

The panel is of the view that the evidence submitted by FPTs is wholly consistent with the provider meeting this criterion in full.

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

	<b>Criteria</b>	<b>Yes/No/Partially</b>	<b>Comments</b>
4.2.1(a)	<b>Criterion:</b> <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	<b>Yes</b>	IBEC Ltd. Has submitted a verification of tax clearance dated 28 <sup>th</sup> of April, 2020, and Independent Accountant’s Report, and a copy of the Public and Employer Liability Insurance cover for IBEC CLG & Associated Companies.
4.2.2(a)	<b>Criterion:</b> <i>Does the applicant have a reasonable business case for sustainable provision?</i>	<b>Yes</b>	FPTS serves an evident need for training in its domain.
4.2.3(a)	<b>Criterion:</b> <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	<b>Yes</b>	At the time of the virtual site visit, the panel were not satisfied that FPTs had governance structures in place that aligned to QQI’s guidelines. The panel issued a <i>Mandatory Change</i> (7.1.1) in relation to this. When the panel reconvened in May 2021 the panel was of the view that the actions taken by FPTs in the interim period had sufficiently addressed the panel’s concerns.
4.2.4(a)	<b>Criterion:</b> <i>Are there arrangements in place for</i>	<b>Yes</b>	FPTS has a track record of certification and communications with QQI.



	<i>providing required information to QQI?</i>		
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**Findings**

The panel was initially of the view that further development was needed at FPTs before the provider can demonstrate meeting this criterion in full. The panel's concerns are discussed in Section 5.1 of this report. Following the reconvened meeting of the panel in May 2021, the panel is satisfied that FPTs has met the criterion in Section 4.2.

**4.3 Programme development and provision requirements:**

	<b>Criteria</b>	<b>Yes/No/Partially</b>	<b>Comments</b>
<b>4.3.1(a)</b>	<b>Criterion:</b> <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	<b>Yes</b>	FPTS was established in 1999 and has delivered programmes of education and training leading to certification with QQI since 2007.
<b>4.3.2(a)</b>	<b>Criterion:</b> <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	<b>Yes</b>	FPTS has processes in place to ensure that contracted trainers are appropriately qualified. The panel identified a <i>Mandatory Change</i> (7.1.9) that encompasses staff development pertaining to blended learning. This has since been appropriately addressed by FPTs.
<b>4.3.3(a)</b>	<b>Criterion:</b> <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	<b>Yes</b>	The panel is satisfied that the provider's track record of certification, and its approach to the 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.
<b>4.3.4(a)</b>	<b>Criterion:</b> <i>Does the applicant have the fit-for-purpose</i>	<b>Yes</b>	Due to the Covid-19 pandemic, the site visit for this evaluation was conducted virtually,



	<i>premises, facilities and resources to meet the requirements of the provision proposed in place?</i>		and the panel members did not undertake a site visit to the premises where FPTS is located in Athlone. However, FPTS has outlined its facilities and equipment, and the panel are satisfied these are appropriate to the requirements of its proposed scope of provision.
<b>4.3.5(a)</b>	<b>Criterion:</b> <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	<b>Yes</b>	At the time of the virtual site visit, the panel were not satisfied that FPTS had sufficiently detailed or formalised processes in relation to RPL, and identified a <i>Mandatory Change</i> (7.1.4) associated with this. When the panel reconvened in May 2021 the panel noted the further development of these processes. The panel has identified a Condition of Approval pertaining to these in this report.
<b>4.3.6(a)</b>	<b>Criterion:</b> <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	<b>Yes</b>	At the time of the virtual site visit, the panel acknowledged discussions with the provider that were indicative of good practice at FPTS in relation to this dimension of QA. However, the panel was not satisfied that the overarching approach to assessment (linked to teaching and learning) and the regulations for the administration of examinations were sufficiently documented. When the panel reconvened in May 2021 the panel noted the further development of these processes. The panel has identified a Condition of Approval pertaining to Appeals processes for assessment in this report.
<b>4.3.7(a)</b>	<b>Criterion:</b> <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	<b>Yes</b>	PEL arrangements are not applicable to the suite of programmes FPTS offers or intends to offer.

**Findings**

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The panel was initially of the view that further development was needed at FPTS before the provider can demonstrate meeting this criterion in full. The panel's concerns are discussed in Sections 5.3 and 5.6 of this report. Following the reconvened meeting of the panel in May 2021, the panel is satisfied that FPTS has met the criterion in Section 4.3.

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

Following the virtual site visit, the panel was of the view that FPTS met the majority of the Criteria in Section 4, which relate to the provider's capacity to deliver sustainable education and training. Specific areas of concern identified by the panel fell under Governance and Management of QA, Programmes of Education and Training, and Assessment of Learners. These are discussed in Sections 5.1, 5.3 and 5.6 of this report. Following the reconvened meeting of the panel in May 2021, the panel is satisfied that FPTS has met the criterion in Section 4 sufficiently to proceed with a recommendation to QQI to approve the QA procedures of FPTS with conditions.



## Part 5 Evaluation of draft QA Procedures submitted by FPTs

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

### 1 GOVERNANCE AND MANAGEMENT OF QUALITY

#### **Panel Findings:**

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTs's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines under this dimension of QA require providers to have governance structures in place that enforce a separation of commercial and academic decision-making. The panel acknowledge that as a not-for-profit organisation FPTs does not operate within a purely commercial framework. However, the organisation's not-for-profit status does not negate its obligation to have structures in place that demonstrate a separation between corporate and academic decision-making.

Skillnet Ireland has a contractual relationship with IBEC CLG as a Network Contracting Organisation (NCO). As an NCO, IBEC CLG is accountable to Skillnet Ireland and is obliged to comply with the Training Networks Programme Operating Guidelines published by that body. IBEC CLG has established a Steering Group for FPTs Skillnet comprised of 11 representatives of member companies and 1 representative of IBEC. The Steering Group provides strategic direction and control for the network and oversees network performance. It also oversees and scores tenders received for the provision of services to the network. The steering group includes a member described as an independent academic representative, and the FPTs Centre Manager.

During the virtual site visit, the panel sought to understand how academic decision-making occurred in practice at FPTs, for example with regard to new programme development. It was clear from clarifications provided to the panel in writing and from discussions tracing decision-making processes during the virtual site visit that responsibility for decision-making and approvals was highly centralised. The Centre Manager, in consultation with the Steering Group, was ultimately responsible for decision-making across academic and corporate domains of operations. The panel acknowledged the statement by FPTs representatives that no undue influence had previously been exerted by corporate concerns over academic decision-making. However, the structure of the Steering Group at FPTs at the time of the initial virtual site visit, did not adequately enforce the separation of these dimensions of decision-making within the organisation. It therefore could not provide the required level of confidence that the possibility of undue influence occurring in the future had been appropriately mitigated. In addition, the panel had some concerns as regards the capacity of the Centre Manager to manage all of the decision-making accountabilities proposed within the reengagement application. The panel issued a *Mandatory Change* pertaining to this (7.1.1).



The panel also sought to understand how these capacity issues were addressed at FPTs, given the pivotal role of the Centre Manager. The application submitted by FPTs outlines that the provider has a Network Manager who performs the day-to-day operational, financial and quality assurance management duties of the network. A Network Administrator provides support in the areas of marketing, promotion, records keeping and learner support. External consultancy is used to support the development of QA processes and documentation.

FPTS representatives confirmed that the need for an additional human resource to support the Centre Manager had been identified, and an individual was due to commence employment shortly after the virtual site visit date. Additionally, the Centre Manager meets regularly with two other experienced network managers with a view to facilitating cover arrangements if required. Although the panel acknowledged these measures, the panel was of the view that further consideration needed to be given to management capacity at FPTs to fulfil the expectations of a revised QA system, as noted in *Mandatory Change 7.1.2*.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTs, the panel noted that substantive enhancements had been made in relation to this dimension of QA. During the interim period, FPTs had formed an Academic Council with an independent external chair and had expanded the human resources within its network management team.

## 2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

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

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTs's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel sought to understand how FPTs had developed the draft QA procedures submitted with its application for reengagement. The panel had some preliminary concerns regarding the ownership of the QA documentation, as this was submitted with a copyright symbol indicating ownership lay outside FPTs. During discussion, the panel received confirmation from the Centre Manager on behalf of FPTs that ownership of the documentation rested with the provider.

The panel were of the view that the documented QA procedures did not meet QQI's requirements of being "fully documented and available publicly (published); necessary information is available to staff and the public as required in usable formats" (CSQAG p.9). This was because the draft QA procedures presented for evaluation did not provide information regarding the implementation of procedures, and because a number of policy areas were insufficiently documented.

Specifically, as the format of the documentation did not include step by step procedures, this prevented the panel from tracing within a procedure who did what, when, under what circumstances or in what order. This lack of transparency within documented procedures meant that the panel was unable to ascertain whether their implementation upholds the principles governing what may occur in a situation,



which should be made clear within a provider's policy statements. The panel noted that policy statements within the documentation could usefully be reviewed to ensure they are adequately detailed. The panel identified a *Mandatory Change* pertaining to this (7.1.3).

The panel was of the view that FPTs would benefit from benchmarking the draft QA procedures presented against the published QA of providers that have successfully reengaged with QQI. Further, adopting a format more conventionally used to facilitate QA documentation in the education and training sector would enable FPTs to address the panel's concerns regarding transparency of procedures.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTs, the panel noted substantive enhancements had been made in relation to this dimension of QA. During the interim period, FPTs had undertaken a significant revision of its QA documentation and included additional information and processes. The panel have noted conditions of approval pertaining to the revision of some of these processes and included additional specific advice in relation to the ongoing development of FPTs's documented QA (see 7.3.1).



### 3 PROGRAMMES OF EDUCATION AND TRAINING

#### **Panel Findings:**

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTs's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel sought to understand how processes pertaining to access, transfer and progression were facilitated at FPTs. The panel noted that the documentation contained a commitment to facilitate RPL for learners who may not be able to meet the standard entry criteria. However, procedures for this were lacking. FPTs representatives acknowledged that while the option was available, the demand for RPL was infrequent, with the majority of prospective learners being leaving certificate holders. The panel noted that regardless of frequency of use, RPL processes must be appropriately and transparently documented by providers and identified a *Mandatory Change (7.1.4)* relevant to this.

The panel also explored how programmes were monitored and reviewed at FPTs. Provider representatives noted that Programme Improvement Plans are formal, carefully monitored and fully implemented. The Centre Manager tracks adjustments made, including minor adjustments that may be made immediately. The panel noted that there was a need for documented policies and procedures to include appropriate KPIs and metrics for ongoing monitoring and review at FPTs, including in relation to programmes, and identified a *Mandatory Change (7.1.5)* relevant to this.

New programme development processes also fall within this dimension of QA. The panel acknowledged a very clear graphic submitted by FPTs summarizing the stages of programme development. The panel sought to understand whether the stages indicated in boxes on the graphic were elaborated in more detailed text within a procedure. FPTs representatives confirmed that these stages were not further documented in the draft QA procedures, but that they had been implemented on multiple occasions. The panel noted that this is a key procedure, which usefully demonstrates how decision-making is mediated by a provider's governance structure. The procedure therefore needed to be presented inclusive of appropriate detail and intermediate stages of approval. The panel's commentary under Sections 5.1 and 5.2 is noted with reference to this.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTs, the panel noted substantive enhancements had been made in relation to this dimension of QA. During the interim period, FPTs had included draft procedures pertaining to RPL, had revised its procedures to include KPIs for monitoring and review and had revised its governance structures in a manner that would better facilitate appropriate approvals processes for new programme development. However, the panel has identified conditions of approval for FPTs in relation to this dimension of QA.



#### 4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

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

The panel is of the view that this aspect of FPTS' draft QA procedures has satisfied the requirements of QQI's Core Statutory Quality Assurance Guidelines.

FPTS engage contract tutors, most of whom are long term. Five tutors currently deliver accredited training. During the virtual site visit, the panel sought to understand how staff were managed and developed by the provider. FPTS has a four-year framework agreement in place which provides for yearly renewal. If issues were to arise or feedback on a trainer's performance was negative, FPTS could elect not to renew a contract. Training materials are retained by FPTS and training sessions are also recorded to facilitate cover and succession planning within the tutor pool.

Tutor attendance at seminars, technical events and conferences is encouraged, although not subsidised. FPTS provides access to free events or webinars hosted in house, and encourages a community of practice among the contracted tutoring staff.

The panel notes that the FPTS Tutor Handbook submitted for review contained information including an Appendix B on tutor responsibilities and a general overview of FPTS QA system. However, no links to the full suite of policies and procedures are contained within this. Following the implementation of *Mandatory Change 7.1.3*, the QA links could usefully be provided to tutors within this resource.

#### 5 TEACHING AND LEARNING

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

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTS's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel sought to understand what strategy or philosophy was in place at FPTS to guide practice in this area. A tutor representative and the Centre Manager outlined an emphasis on provision based on established industry needs. The panel acknowledges that FPTS is well-informed in this regard by its industry member representatives and wider network. In discussion, FPTS outlined strategies indicating that Learning Outcomes are approached systematically. An emphasis is placed on foundational theory in the initial stages of a programme, followed by the application of this to practice, and moving toward a more comprehensive view of processes or higher level understanding.

The panel were of the view that while good practice in teaching and learning was indicated at FPTS during the discussions, this was not adequately represented in the provider's public, learner or tutor facing documentation. The panel therefore identified a *Mandatory Change (7.1.6)* pertaining to this. The panel notes that a documented pedagogic approach will be particularly important to FPTS moving forward, given the provider's ambition to gain approval for blended learning within its scope of provision. When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted



by FPTS, the panel noted enhancements had been made in relation to this dimension of QA. FPTS had further developed documentation regarding its overall approach to teaching and learning. The panel has included additional specific advice pertaining to the integration of blended learning within this in this report.

## 6 ASSESSMENT OF LEARNERS

### **Panel Findings:**

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTS's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel explored how assessment and associated processes were conducted by FPTS. Discussions included assessment design, marking guidelines and criteria, moderation, engagement with external examiners, results approval and appeals. The panel noted that the documentation would benefit from inclusion of a clear graphic that mapped the stages of the assessment process, given how critical this area is to a provider's operations. During discussions, FPTS representatives stated that procedures for the conduct of exams were documented at course level. Acknowledging this, the panel identified a *Mandatory Change* requiring FPTS to include the regulations for administration of exams and assessment within the draft QA procedures (7.1.7).

The panel also explored how learners were educated about plagiarism and supported in avoiding forms of plagiarism or cheating at FPTS. Information is provided to learners within a learner pack and at induction. FPTS is working with an external company to identify what anti-plagiarism software will be best suited to the provider's needs, and to make this available via the provider's VLE (Moodle). The panel also queried whether procedures existed for dealing with cases of plagiarism, as these were not evident in the documentation the panel had reviewed. The panel acknowledged the response by FPTS that within assessment that entails skills demonstrations or invigilated on site examinations plagiarism is not a concern, and that instances of plagiarism were rare. However, the panel noted that regardless of frequency of use, sensitive processes such as these must be appropriately and transparently documented by providers. The panel's commentary under Section 5.2 is noted with reference to this.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTS, the panel noted enhancements had been made in relation to this dimension of QA. FPTS has purchased plagiarism detection software and had included processes related to academic misconduct in its QA documentation. Regulations for the administration of examinations and assessments was also included in the resubmission.

**7 SUPPORT FOR LEARNERS****Panel Findings:**

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTs's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

The panel are of the view that the learner supports offered at FPTs are contextually appropriate to the short-term, intensive nature of FPTs programmes. The learner handbook contains summary information on assessment, plagiarism, reasonable accommodations, compassionate consideration, the repeat policy, resits, rechecks, complaints and assessment appeals. Some information on online learning protocols is also included, alongside health & safety. During the virtual site visit, the panel also heard from FPTs representatives regarding the informal, practical supports offered to assist learners during their time at the training centre. The panel is of the view that the revision of the QA documentation discussed in Section 5.2, which will ensure policies and procedures are presented in transparent, accessible and user-friendly formats, will enhance this dimension of FPTs' QA system. The revision will ensure that learners who need to action a specific procedure will be able to navigate to and access this readily.

The panel discussed the approach to providing reasonable accommodations or additional support to learners with disabilities or specific learning differences at FPTs. Representatives of FPTs confirmed that reasonable accommodations are provided where requested and possible. The panel held some concerns regarding capacity and understanding of this area of learner support within FPTs. This was because in both the draft QA submitted for evaluation and discussions with the provider during the virtual site visit reasonable accommodations were conflated by FPTs with compassionate consideration. The panel has identified a *Mandatory Change (7.1.8)* in relation to this and encourages FPTs to liaise with other providers or engage with organisations such as AHEAD to develop capacity and facilitate knowledge sharing in this area.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTs, the panel noted enhancements had been made in relation to this dimension of QA. This was reflected in work undertaken to improve processes directly relevant to learner support.

**8 INFORMATION AND DATA MANAGEMENT*****Panel Findings:***

The panel is of the view that this aspect of FPTS' draft QA procedures has satisfied the requirements of QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit the panel explored how FPTS manages its obligations in relation to data protection. FPTS representatives confirmed that training had been provided to all staff pertaining to GDPR and data breaches. The provider has a privacy policy for GDPR in operation. Trainee data is not maintained longer than required by the provider, and hard copy assessments are retained in a fireproof, locked cabinet until shredding.

**9 PUBLIC INFORMATION AND COMMUNICATION*****Panel Findings:***

The panel is of the view that this aspect of FPTS' draft QA procedures has satisfied the requirements of QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit the panel explored what processes were in place to ensure that information on the FPTS website was approved before being published. FPTS representatives outlined a procedure whereby templates are used and information is agreed by the Centre Manager before being published by the Network Administrator. In addition to programme specific information, the website is used to provide updates on industry news, and to publish reports and evaluations.

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

The panel is of the view that this aspect of FPTS' draft QA procedures has satisfied the requirements of QQI's Core Statutory Quality Assurance Guidelines.

FPTS has a collaborative relationship with IT Sligo, in which capacity it is the second provider delivering an NFQ Level 6 Higher Certificate Programme in Polymer Technology. This is identified within the application for reengagement. There are no other collaborative provision arrangements in operation.



## 11 SELF-EVALUATION, MONITORING AND REVIEW

### **Panel Findings:**

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTS's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

The panel acknowledged the use of Programme Improvement Plans at FPTS and measures are in place to obtain feedback from learners. However, the panel was of the view that within the revision of policies and procedures discussed in Section 5.2 and 5.3 of this report, attention should be given to inclusion of KPIs and metrics within procedures that inform the self-evaluation, monitoring and review processes at the provider.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTS, the panel noted enhancements had been made in relation to this dimension of QA. These have been referenced under Section 5.3 of this report.

## 12 TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING

### **Panel Findings:**

At the time of the virtual site visit, the panel was of the view that further development of this aspect of FPTS's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel explored aspects of the Blended Learning Plan submitted by FPTS. Discussions included the rationale for adopting blended learning as a mode of delivery. Within the documentation submitted, blended learning was intended to facilitate development of learner's transversal skills. During discussions on the day, FPTS representatives indicated that this had shifted. The panel acknowledge that the COVID-19 pandemic has prompted changes in this area across the sector. However, QQI's guidelines for this area require providers to demonstrate the strategic alignment of blended learning to a provider's overall strategy, and further consideration therefore needs to be given to articulating how this will be positioned at FPTS.

The panel also held concerns that the draft Blended Learning Plan did not adequately account for the capacity and resource planning associated with implementing blended learning, and that it did not demonstrate that standards had been established in areas including the QA of online content or staff development. The panel identified a *Mandatory Change* (7.1.9) in relation to this.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTS, the panel noted enhancements had been made in relation to this dimension of QA. FPTS had revised and expanded its documentation in relation to Blended Learning and included a rationale for its adoption within the provider's programmes. The panel acknowledges that progress has been made



that is appropriate to the provider's scale and programme context. However, the panel includes a significant condition of approval pertaining to Section 3.4 of FPTs documentation on blended learning, which is concerned with Intellectual Property Rights. The panel also includes additional specific advice pertaining to this dimension of QA for FPTs to take into account moving forward (see 7.3.2). This additional specific advice is significant for FPTs as within applications for the validation of new programmes the provider will need to clearly demonstrate how the processes outlined are operationalised within the context of a programme. The panel also notes that approval of QA for blended learning does not entail retrospective approval for the delivery of existing programmes using blended learning.

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

As stated in Section 3.1 of this report, following the virtual site visit the panel was confident that with sufficient time to address the issues identified, FPTs would be able to progress its application.

When the panel reconvened on May 6<sup>th</sup> 2021 to undertake a desk review of the revised QA procedures submitted by FPTs, the panel noted the substantial work undertaken by the provider to address the Mandatory Changes identified in 2020. The panel has identified conditions of approval and additional items of specific advice in this report, and is recommending approval of FPTs's QA procedures with conditions to QQI.

The panel acknowledges the valuable contribution that FPTs makes to the education and training sector and encourages FPTs to continue the ongoing development of its QA system.



## **Part 6 Conditions of QA Approval**

### **6.1 Conditions of QA Approval**

6.1.1 FPTS must ensure that ownership of the IP for QQI validated programmes rests with the provider and not with individual tutors or staff. This must be clarified in relation to the current statement in Section 3.4 of FPTS's Blended Learning Strategic Plan documentation.

6.1.2 FPTS must revise procedures for assessment appeals, ensuring that processes for rechecks and reviews are identified and align to the definition of these within QQI's Assessment and Standards, Revised 2013. The revised procedure must also make explicit that no individual involved in any stage of the original decision is involved in adjudicating the appeal.

#### **6.1.3**

FPTS must adjust the final stage of its programme development process. This must reflect that after approval of a developed programme by the Academic Council, a final approval of that programme and its associated resource requirements must be provided by the corporate decision-making body within the organisation. This must occur prior to the programme's submission to QQI.

#### **6.1.4**

FPTS must revise the RPL policy and procedures in relation to credit exemptions for full awards, seeking guidance from QQI if required. FPTS is advised that there is no obligation for the provider to include this option within their QA procedures.

## **Part 7 Mandatory Changes to QA Procedures and Specific Advice**

### **7.1 Mandatory Changes**

#### **7.1.1**

FPTS must establish a separate unit, ideally with an independent external chair, that will serve the function of protecting, maintaining and developing the academic standards of the provider. This unit must take responsibility for academic approvals within processes including, but not limited to: New Programme Development; the development of documentation or strategy in relation to Teaching, Learning and Assessment and/or Blended Learning; the development and ongoing review and approval of QA policies and procedures. This unit must be composed in the main of academic representatives (i.e. tutors, a learner voice and external academic representatives) and have detailed Terms of Reference that include membership details, remit, quorum and frequency of meetings. FPTS must adapt the Terms of Reference and remit of the Steering Committee to account for the existence of the new unit of academic governance.

#### **7.1.2**

FPTS must review its management capacity to fulfil the expectations of a revised QA system.

#### **7.1.3**



FPTS must undertake a significant revision of its QA documentation. Policies and procedures need to transparently represent how policies are implemented in practice. To achieve this they must be presented in a format that includes key steps indicating how policies are implemented, by whom, when and in what order. The procedures presented by FPTS do not meet this requirement as they identify only what the objective is to be achieved, by whom and how achievement of the objective may be evidenced. Within the revision:

- The procedures must provide clear evidence of the alignment of practice to QQI's guidelines. The panel notes that this could most effectively be achieved by adopting a format that is more conventionally used for the documentation of QA in an education and training context.
- The revised Policies and Procedures must include a mechanism for ongoing review, update and approval.
- The QA system must include processes that are not currently documented, or documented sufficiently. These include, but are not limited to: Reasonable Accommodation, Plagiarism, Academic Misconduct and RPL.

#### **7.1.4**

FPTS must include, within a formalised RPL policy and procedure, explicit criteria for evaluating RPL applications for both access and advanced entry.

#### **7.1.5**

FPTS must include appropriate KPIs and metrics within the revised policies and procedures for ongoing review.

#### **7.1.6**

FPTS must document its overarching approach to Teaching, Learning and Assessment. This should be linked to or integrated with its approach to Blended Learning delivery.

#### **7.1.7**

FPTS must include regulations for the administration of examinations and assessment within the documented QA procedures it presents for evaluation.

#### **7.1.8**

FPTS must separate its process for Compassionate Consideration from its processes pertaining to Reasonable Accommodations in the documentation as these are very distinct areas of learner support.

#### **7.1.9**

FPTS must undertake a comprehensive revision of the blended learning plan/strategy. This should provide a sound rationale for adopting a blended delivery mode that is aligned to the overall strategy and approach to teaching, learning and assessment. The revised submission must:

- Demonstrate capacity and resource planning, including human resources and costs associated with investments in technology, increased IT capacity and IT support.
- Demonstrate that standards are in place for assuring the quality of online content.
- Demonstrate consideration of the pedagogic implications of implementing Blended Learning, including the implications of this at the programme design and development stage, and within this demonstrate that technology is used in the service of pedagogy.



- Demonstrate that staff development takes account of pedagogic as well as technical training for Blended Learning.

## **7.2 Specific Advice**

### **7.2.1**

FPTS is encouraged by the panel to pursue the option of redirecting or amalgamating the current academically oriented subcommittees of the steering group for the purpose of establishing an academic unit of governance as required in *Mandatory Change 6.1.1*. The panel notes that this course of action was under consideration by the Centre Manager on the day of the virtual site visit. If adopting this item of Specific Advice, FPTS should ensure that the membership of the newly established academic unit of governance is sufficiently distinct from the membership of the Steering Group to enable FPTS to demonstrate that academic decision-making “is independent of commercial considerations” (CSQAG p.6). FPTS is also encouraged to give consideration to how the membership of programme development teams will be sufficiently distinct from the membership of the new academic unit of governance, to demonstrate that FPTS “enforce a separation of responsibilities between those who produce/develop material and those who approve it” (CSQAG p.5).

### **7.2.2**

FPTS should document and evidence how it fosters, records and shares examples of good practice in teaching and learning in the domain.

### **7.2.3**

FPTS should develop an internal risk register, managed within the organisation.

### **7.2.4**

FPTS is advised that the documented procedures should include flow charts and graphics where appropriate, for example for the Assessment Process. Where such a flow chart exists, for example the New Programme Development Process, it should be accompanied by a detailed written procedure.

### **7.2.5**

FPTS is advised that it could usefully inform its revision activity by reviewing the published QA procedures of providers that have successfully reengaged with QQI.

### **7.2.6**

FPTS is advised to further develop its internal capacity in relation to supporting the diverse needs of learners. FPTS could usefully liaise with other providers to share best practice in this space or engage with AHEAD or similar organisations.



### 7.3 Additional Specific Advice

These items of Specific Advice are provided to guide FPTs in its ongoing development over the longer term. The panel does not require these to be addressed prior to recommending approval.

#### 7.3.1

FPTS is advised to continue to progress the enhancement of its QA procedures, ensuring ongoing development and cyclical review. This enhancement should focus on providing greater step by step clarity in procedures, specifically, procedures should in all instances make clear how policies are implemented, by whom, when and in what order.

#### 7.3.2

FPTS is advised to undertake a comprehensive review of the implications of blended learning for its overall QA procedures and ensure that Blended Learning is integrated within the overall QA prior to bringing a new programme forward for validation. The implications of blended learning should be visible across key policy areas, including, but not limited to, staff recruitment, management and development; teaching and learning; assessment; programmes of education and training; learner supports; information and data management.

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

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
5 - 6	Major and Minor	Engineering



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

## **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 First Polymer Training Skillnet.

Name:

Date: 14 May 2021



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

Document

Related to

No further documentation was submitted to the panel for evaluation in the course of the evaluation.
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## **Annexe 2: Provider staff met in the course of the Evaluation**

Name

Role/Position

Catherine Collins	Centre Manager
John Brennan	Steering Group Chairperson
Mark Taylor	Network Consultant
Elisha Kelly	Network Executive
Stephen O'Leary	Tutor
Edel Garavan	Network Administrator

*Appendix: Provider response to the Reengagement Panel Report*

Ms. Marie Cotter,  
Quality and Qualifications Ireland (QQI)  
26/27 Denzille Lane  
Dublin 2

Monday, May 31, 2021

Re: Reengagement Report - Response and Factual Accuracy

Dear Marie,

We would like to acknowledge receipt of the QQI panel re-engagement report and would also like to confirm that we did not identify any factual inaccuracies in the report.

We are very pleased that the panel has recommended approval of our draft QA Procedures. We would like to take this opportunity to thank the Reengagement Panel for their time, expertise and advice and to QQI for their support throughout this process.

We have also now reviewed the four Conditions of QA Approval and have attached evidence of how we have addressed these. We have also reviewed the additional specific advices and will move to implement these as soon as possible.

If you have any questions or need any further clarifications, please do not hesitate to contact me.

Kind Regards

*Catherine Collins*

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