Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1   Details of provider

1.1   Applicant Provider

Registered Business/Trading Name:	ICD
Address:	Wicklow House, 84-88 South Great George's Street, Dublin
Date of Application:	2nd September 2019
Date of resubmission of application:	
Date of evaluation:	
Date of site visit (if applicable):	21st November, 2019
Date of reconvene meeting (if applicable)	21st January, 2020
Date of recommendation to the Programmes and Awards Executive Committee:	6th February 2020

1.2   Profile of provider

ICD Business school was established in 2001, and provides third-level qualifications in business and accounting to both EU and non-EU students. Located in premises in central Dublin, the provider has approximately 350 learners registered, and anticipates that approximately 90 learners will graduate in 2019. ICD has experienced consistent growth over the last five years, and caters to a diverse cohort of largely international learners.

ICD offers three QQI programmes leading to major awards at Levels 8 and 9 on the National Framework of Qualifications. These are a BA (Hons) in Accounting and Finance, a BA (Hons) in Business Studies and an MA in Accounting and Finance. Within the two undergraduate programmes, the college offers ACCA tuition. This allows for graduates to receive up to 9 exemptions for ACCA examination papers. ICD does not offer non-QQI programmes at the current time.

Part 2   Panel Membership

Name	Role of panel member	Organisation
Danny Brennan	Chair	Formerly Registrar, Letterkenny IT
Catherine Peck	Secretary	Independent Education Consultant
Sinead O'Connor	Panel Member	Director of Quality, NUI Galway
Steve Evans	Panel Member	Formerly Director of Validation, University of Law
Barry Clohessy	Learner Representative	Sligo IT

Part 3   Findings of the Panel

3.1   Summary Findings

At the outset of this report, the panel makes a number of commendations in relation to ICD's approach to the reengagement process.

Firstly, the panel would like to acknowledge the open and constructive dialogue that ICD representatives engaged in with the panel on the day of the site visit. The ICD team's responsiveness to the panel's requests for additional information in the period leading up to the site visit is also noted. The ICD team were receptive to the panel's input and actively sought advice and feedback from the panel's experts in relation to areas of ongoing QA development. Interactions during the site visit were at all times characterised by collegiality and mutual respect.

Secondly, the panel commends ICD for the learner-centred orientation of its operations. It is evident that a focus on and commitment to the learner underpins the organisation's development of QA. During the site visit, the responses of provider staff to queries from the panel consistently referenced the needs and preferences of learners in informing decision-making and practices at ICD.

Further, the panel would like to highlight ICD's provision of a free psychological counselling service for learners, and make a specific commendation to the provider with regard to this initiative. This service reflects a genuine commitment at ICD to the welfare of learners, and a keen awareness of the experience of international learners in Ireland, who may be undertaking studies at a distance from their families or social support networks.

These strengths notwithstanding, it was the view of the panel at the conclusion of the site visit that several areas of ICD's draft QA needed to be addressed before the panel could proceed to make a recommendation to QQI. Specifically, the panel had concerns pertaining to the dimensions of Governance and Management of QA, Documented Approach to QA and Staff Management and

Development. These were outlined specifically as proposed mandatory changes and specific advice in Section 6.1 and 6.2 of this report.

As these issues were discrete, and in the panel's view could be addressed quickly by ICD, the provider was granted 6 weeks in which to submit evidence to the panel that the changes had been satisfactorily addressed, after which time the Panel reconvened and make a recommendation to QQI.

The panel reconvened on January 21st, 2020 to undertake a desk review of the evidence submitted by ICD that it had attended to the panel's concerns. It was the panel's view that ICD had comprehensively addressed the proposed mandatory changes and specific advice. Consequently, the panel's recommendation is to *approve* ICD's draft QA procedures.

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

	Tick <u>one</u> as appropriate
Approve ICD's draft QA procedures	X
Refuse approval of ICD's 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 ICD's draft QA procedures	

Part 4　Evaluation of provider capacity

4.1　Legal and compliance requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.1.1(a)	*Criterion: Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?*	**Yes**	ICD's Certificate of Incorporation accompanied its application, dated 28/06/2002. QQI documentation indicates ICD has certified 436 learners since 2010.
4.1.2(a)	*Criterion: Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*	**Yes**	As per 4.1.1(a) ICD has provided a Certificate of Incorporation. The provider has been established in Ireland since 2001, and previously had its QA procedures approved by HETAC in 2007.
4.1.3(a)	**Criterion:** *Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*	**Yes**	ICD's application indicates that there are no collaborative relationships with other providers.
4.1.4(a)	**Criterion:** *Are any third-party relationships and partnerships compatible with the scope of access sought?*	**Yes**	ICD's application does not reflect any partnerships or relationships of significance to the scope of access sought.
4.1.5(a)	**Criterion:** *Are the applicable regulations and legislation complied with in all jurisdictions where it operates?*	**Yes**	The evidence provided in support of the provider's application is indicative of compliance with Irish/EU legislation.
4.1.6(a)	**Criterion:** *Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities,*	**Yes**	ICD was established in 2001 and has a track record of certification. ICD previously had its QA approved by HETAC in 2007. In addition to engaging with QQI, ICD has relationships and affiliations with professional accreditation bodies such as

			ACCA, but currently does not offer non-QQI programmes.
	ministries of education and training, professional bodies and regulators.		

Findings

The panel is satisfied that ICD meets the legal and compliance requirements of the sub-criteria within 4.1. ICD has been an established legal entity in Ireland since 2001, and has a track record of certification with QQI (and formerly HETAC).

4.2   Resource, governance and structural requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.2.1(a)	**Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*	**Yes**	Evidence submitted is indicative that this is the case. ICD's application was accompanied by: • Tax Clearance Certificate • Auditor's letter pertaining to 2016, 2017 & 2018 accounts • Summary of Insurance Policy Cover The panel defers to QQI for more detailed evaluation of this criterion if required.
4.2.2(a)	**Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*	**Yes**	ICD has a track record in the sector and a five year strategic plan in draft. The panel saw no evidence of indications to the contrary.
4.2.3(a)	**Criterion:** *Are fit-for-purpose governance, management and decision making structures in place?*	**Yes**	The panel initially identified a number of changes required in relation to this criterion. These are discussed in Section 5.1 and listed in Sections 6.1 and 6.2 of this report. The panel is of the view that ICD had satisfactorily addressed these issues in the revised QA submitted prior to the panel reconvening on the 21st of January, 2020.
4.2.4(a)	**Criterion:** *Are there arrangements in place for providing required information to QQI?*	**Yes**	ICD has sufficient administrative support and has recently expanded its capacity with the appointment of a QA officer.

Findings

The panel is satisfied that ICD meets the resource and structural requirements of Criteria 4.2.

However, with regard to Criterion 4.2.3(a) the panel held a number of concerns. These are discussed in Section 5.1, and were also reflected as proposed mandatory changes and items of specific advice in Sections 6.1 and 6.2 of this report. The Panel is satisfied that these issues have been satisfactorily addressed by the provider.

4.3 Programme development and provision requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.3.1(a)	**Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*	**Yes**	ICD has a track record of certification with QQI from 2010.
4.3.2(a)	Criterion: *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*	Yes	ICD has a track record of delivering training and education programmes, and employs full-time and part-time staff. However, at the conclusion of the site visit the panel held concerns that policies and procedures for staff management and development were underdeveloped. The panel identified addressing this gap as a mandatory change, discussed in Section 5.4 and listed in Section 6.1 of this report. The panel is of the view that ICD had satisfactorily addressed these issues in the revised QA submitted prior to the panel reconvening on the 21st of January, 2020.
4.3.3(a)	**Criterion:** *Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?*	**Yes**	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.

4.3.4(a)	**Criterion:** *Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?*	**Yes**	ICD holds a 10 year lease for its premises in central Dublin, which have been fitted out to meet ICD's operational requirements. ICD has an appropriately resourced online learning environment as well as administrative and learner support resources in place.
4.3.5(a)	**Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*	**Yes**	ICD has procedures in place to facilitate Access, Transfer and Progression; these are outlined in the provider's documentation.
4.3.6(a)	**Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*	**Yes**	ICD has invested substantial resources to the development of its assessment strategy, and to the promotion of academic integrity among learners.
4.3.7(a)	**Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*	**Yes**	Section 7 of ICD's QA policy document outlines the learner protection insurance policy that ICD purchases for all of its students with O'Driscoll O'Neill DAC. Responsibility for reviewing PEL arrangements, ensuring they are adequate and notifying QQI with regard to these rests with ICD's registrar and Academic Council.

Findings

The panel is satisfied that ICD meets the programme development and provision requirements of the sub-criteria within 4.3.

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

Overall, the panel is satisfied that ICD has the capacity to provide sustainable education and training.

Part 5   Evaluation of draft QA Procedures submitted by ICD Business School

The following is the panel's findings following evaluation of ICD's 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:

At the conclusion of the site visit, the panel found that QQI's guidelines under this dimension of QA had not yet been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require a system of governance to be in place that protects the integrity of academic processes and standards. ICD had identified in a gap analysis exercise undertaken prior to its reengagement submission that governance was an area of vulnerability, and that a much more formal structure was needed. The panel noted that in dialogue with the provider during the site visit it was evident that ICD had given thorough consideration to how the Academic Council would interact with the Governing Body, and how academic decision-making would occur without undue commercial influence.

However, QQI's guidelines also require that the groups or units responsible for the oversight of education and training, research and related activities are identified in the provider's documented procedures, and that the terms of reference for these groups or units are documented and published. During the site visit, the emerging structure of governance and management presented to the panel had been updated since ICD's initial submission of its application. ICD representatives invited feedback and advice in relation to this, and engaged in constructive and open dialogue with the panel. Several aspects of the proposed system of governance were discussed in detail, including the profile of an individual invited to serve as a potential independent member of Academic Council. The panel was of the view that ICD's proposal to appoint an academic with significant experience in education and governance was entirely appropriate. That individual was also proposed by ICD to sit on the governing body. ICD informed the panel during the discussion that since its initial documentation had been submitted, a further decision had been taken to invite greater externality through the appointment of an external chair to the governing body.

Given the ongoing development at ICD, the panel was of the view that the composition of the Academic Council and the Governing Body needed to be reviewed and finalised prior to recommendation for QA approval. Several proposed mandatory changes identified by the panel therefore pertain to this, and relate to themes including levels of externality, the manner in which learner representation and the learner voice is included in decision-making, and the representation of the relationship between the Governing Body and the Board of Directors. The panel also identified that ICD's management team should be expanded. These points were outlined in detail in Section 6.1 (see 6.1.1 – 6.1.5).

QQI's guidelines also require QA systems to consider risk. During the site visit, the panel sought to understand processes for the identification of risk at ICD. Provider representatives indicated that this may stem from the registrar's reporting, and that otherwise members of the Academic Council or Governing Body could propose agenda items in relation to risks that individuals in the organisation had identified. The panel noted that reengagement for QA was an omission from the register submitted alongside the application. The panel was of the view that ICD's management of risk could be better represented in its documentation through some adjustment to the current risk register format. This was reflected as a proposed mandatory change (see 6.1.6) in this report.

Following the six week interim period allocated, ICD submitted evidence to the panel indicating it had undertaken measures to address these concerns.

2   DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

At the conclusion of the site visit, the panel found that QQI's guidelines under this dimension of QA had not yet been fully addressed.

QQI's guidelines require the provider's quality assurance policies and procedures to be fully documented, published and available as required in usable formats. Moreover, procedures must be effective and fit for purpose. During the site visit, the panel noted that areas of the QA documentation submitted for reengagement were still in development (for example, the teaching and learning strategy), and that some processes (for example, programme development) were presented in a descriptive or narrative style that did not efficiently convey ICD's procedures in that area. Consequently, the panel has included a proposed mandatory change in relation to this (see 6.1.8) in this report. Following the six week interim period allocated, ICD submitted evidence to the panel indicating it had undertaken significant revisions and editing to address these concerns.

However, the panel also acknowledged that ICD had undertaken substantial work on its documentation prior to reengagement. ICD representatives identified that the requirement to have a documented QA in place, which required previously informal procedures to be formalised, entailed a significant culture shift. ICD consider informal dialogue and open door policies as characteristic of their ways of working. The panel recognizes the value of this, and supports ICD's commitment to maintaining its learner-centred, personal atmosphere as it continues to refine the formal elements of the draft QA system.

During the site visit, the panel also had the opportunity to view the access provided to ICD's students to key policies and procedures within the provider's virtual learning environment (Moodle). The panel noted that these were significantly easier to identify and navigate to in the relevant section of Moodle than they were in the current learner handbook. ICD staff discussed proposals under discussion for developing this further, for example an interactive element.

3   PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

The panel finds that ICD has addressed QQI's guidelines under this dimension of QA.

During the site visit, the panel discussed processes for programme development and approval with provider representatives. ICD confirmed that proposals for new programmes could originate from anywhere in the institution. The stages of programme development followed at ICD, which are to be further documented (see discussion in Section 5.2) include the development of a business case, the gathering of input from stakeholders and the delegation of responsibility for development of programme documentation and materials by a subcommittee of the Academic Council. New programmes are subject to formal internal approvals prior to their submission to QQI.

ICD has fit for purpose admission, recognition and completion procedures. Potential learners are interviewed, and learners are accepted by transfer into ICD programmes with advanced entry. A distinctive feature of ICD's programmes is the inclusion of a mandatory but non-credit bearing induction module. This has been introduced to ICD's programmes following consultation with QQI, and a process of consultation internally, including consultation with ICD learners. The module introduces the foundational academic skills learners require to advance in third level education in Ireland, and includes a significant focus on academic integrity and avoiding plagiarism. Learners at ICD are not able to progress to the second stage of ICD's programmes without having first passed the two pieces of assessment within that module. ICD view the module as responsive to the needs of the provider's largely international cohort, in that it facilitates socialisation into the academic culture of higher education in Ireland and is complementary to pastoral care in this regard.

Programme Boards are represented in the ICD structure, and activities that facilitate programme monitoring and review are included within the terms of reference of these boards. The panel was of the view that learner representation could be increased at Programme Boards, and is reflected in a proposed mandatory change (see 6.1.3) discussed in Section 5.1 of this report. Following the six week interim period allocated, ICD submitted evidence to the panel indicating it had adjusted its learner representation at Programme Boards and sufficiently addressed this issue.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

At the conclusion of the site visit, the panel found that QQI's guidelines under this dimension of QA had not yet been fully addressed.

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

ICD clearly outlines the requisite qualifications for teaching staff in its module documentation. The provider employs full-time and part-time faculty, and has identified a need to increase its numbers of part-time faculty to assist in teaching and second-marking duties. ICD is in the process of formalising the induction process for new staff, which the provider acknowledged had been relatively informal to date, in part due to the low numbers of new staff coming in to the organisation.

The panel noted that opportunities for staff development exist at ICD, both internally and through support of staff pursuing formal studies at other institutions. ICD representatives outlined recent training workshops that had been facilitated at ICD for all staff by an external consultant. Teaching staff at ICD also indicated that opportunities for continuing professional development were supported by the provider. ICD representatives noted an intent to continue to engage such expertise externally, where feasible, in the future.

However, at the time of the site visit, the processes for handling performance management remained under discussion at ICD, and while the provider indicated plans existed to formalise practices in this area, these were not yet available for the panel to review. As a systematic process for both enhancing the pedagogic standards of teaching staff and managing performance in this area are requirements within QQI's guidelines, the panel has issued a proposed mandatory change (see 6.1.7) in relation to this. The panel has also offered a further item of specific advice (see 6.2.2). The panel notes that learner feedback is obtained at regular intervals throughout module delivery at ICD, and views this as a valuable resource for informing this area of the provider's practices. Following the six week interim period allocated, ICD submitted evidence to the panel indicating it had undertaken appropriate measures to address these issues.

5	TEACHING AND LEARNING

Panel Findings:

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

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

During the site visit, the panel's discussions with ICD covered a range of learning and teaching strategies that are employed as appropriate within programme delivery. These included some use of lecture capture to enable learners to review and access in-class delivery, the use of flipped classroom models and the employment of technology to facilitate instant feedback for learners on quiz items. ICD representatives outlined an overall approach that was learner centred and focused on preparing learners for the contemporary workplace by equipping them with the capacity to think critically and learn independently.

Work based learning is also a feature of ICD's programmes, and QQI's guidelines require a provider to ensure that learning off-campus is appropriate, quality assured and contributes to achievement of learning outcomes. Consequently, the panel discussed the processes surrounding work placements at ICD with the provider's representatives. Learners at ICD are able to source their own placements, but these must be approved by ICD. The process for approval involves both a desk review and a site visit prior to a placement opportunity being approved. In general, the ICD sources placements for learners and ensures they are appropriately matched. Employers must have a designated workplace coordinator in place who will cooperate with ICD and observe ICD's guidelines for employers. In addition two site visits occur by ICD staff to the workplace during the placement period. Prior to going on placement, learners undertake a 10ECT module focused on workplace preparation. This covers a range of topics, including CV workshops, interview workshops, staff handbook reviews, relevant legislation, health & safety and analysis of real life scenarios.

QQI's guidelines also require a provider to have procedures in place for dealing with learner complaints and learner appeals. During the site visit, the panel was able to review how learners could access these online within the provider's Moodle platform.

The panel noted that ICD's learning and teaching strategy was in draft at the time of the site visit, and has discussed this within Section 5.2 of this report. The need to refine this was noted within a mandatory change pertaining to the dimension of a Documented Approach to QA. Following the six week interim period allocated, ICD submitted evidence to the panel indicating it had undertaken significant revisions of the learning and teaching strategy to address these concerns.

6   ASSESSMENT OF LEARNERS

Panel Findings:

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

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

ICD has invested significantly in its development of internal practices pertaining to assessment. ICD has provided professional development for staff in relation to assessment, and has adopted anti-plagiarism software that allows for learners to receive some formative feedback on the originality of their work prior to submission. These practices are complemented by the development of a mandatory induction module, discussed in Section 5.3 of this report, which provides support and education for learners in relation to academic integrity.

Staff at ICD participate in a process of internally verifying all assignment briefs, as well as a formal process of second marking. ICD representatives noted that this facilitated a positive process of peer feedback between faculty members, and that any discrepancies were dealt with by consensus where possible. In addition to external examiner reports, ICD also received an external review by ACCA of its papers.

QQI also requires that processes for assessment, complaints and appeals meet the same standards of fairness, consistency and fitness for purpose as assessment in general, and that they be straightforward, efficient, timely and transparent. At ICD, the Registrar chairs the examination board. In the case of an appeal, the registrar coordinates a committee but does not sit on the committee or contribute in any way to deliberations. During discussions with ICD, the panel noted that the provider currently entertains assessment appeals on grades, rather than on the basis of procedural errors. The panel has identified reconsideration of this practice as a proposed mandatory change for ICD, to better align its processes to standard practice in the sector (see 6.1.9). Following the six week interim period allocated, ICD submitted evidence to the panel indicating it had addressed this concern.

7	SUPPORT FOR LEARNERS

Panel Findings:

The panel is satisfied that QQI's guidelines under this dimension of QA have been addressed, and has offered commendations to ICD in relation to its practices in this area in Section 3.1 of this report.

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

As previously noted, ICD offers a free psychological counselling service to its learners, which the provider views as an important support for learners who may be remote from their families and experience social isolation. The panel noted that despite the provision of this service, ICD offers a non-discriminatory pricing model that allows international learners to pay the same fees as domestic learners. During discussions at the site visit, ICD representatives affirmed that the provider's commitment to the welfare of its learners, and its expenditure on students, was a key to the success and sustainability of its operations.

As nearly all of ICD's learners are international students, the provider places an emphasis on learner supports that meet particular needs for this cohort. One example of this is a cultural diversity awareness and communication seminar for ICD learners facilitated by the Irish Council for International Students, with a focus on levels of student engagement in this context comparative to other contexts. The introduction of a mandatory non-credit bearing induction module (discussed in Section 5.3 of this report) represents a formalisation of pre-existing support services that learners were able to uptake on an optional basis. Refresher training in the elements of the module is also offered to all students each semester.

Relevant extracts of key policies and procedures for learners are available within the Moodle platform, for example those relating to complaints, assessment review, recheck or appeal, feedback and grades. The document store also contains a link to the full QA manual.

Notably, QQI's guidelines also require that there are mechanisms for learners to make representations to the provider about matters of general concern to the learner body. Learner representation has been included within ICD's draft governance structure, and the panel's feedback on this discussed in Section 5.1 of this report and reflected in proposed mandatory change 6.1.3.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

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

QQI's 2016 Core Statutory Quality Assurance Guidelines require that reliable information and data are available for informed decision-making. A bespoke data management system is being designed for ICD. The new database is anticipated to facilitate enhancement in this area.

ICD confirmed that the provider adheres to GDPR legislation, and that students sign declarations of consent for the college to retain their records for a specified period. Documented procedures are in place in relation to the processing of data that cover what is processed and why. All staff have received GDPR training. Lecturers are not able to take exam scripts home for marking.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

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

QQI's 2016 Core Statutory Quality Assurance Guidelines require that policies and procedures are in place to ensure information published is clear, accurate, objective, up to date and easily accessible. ICD launched a new website in November 2019, to positive feedback from learners. All staff and students have access to policies and procedures in Moodle, via email or hard copy in ICD's offices.

During the site visit, the panel noted that the learner handbook is a large, and potentially unwieldy document that could usefully be reduced to bring key information to the fore. ICD representatives engaged constructively with this feedback, and were able to provide a rationale for current practices. ICD staff also noted that a social media and marketing consultant had been engaged to enhance this aspect of the provider's operations.

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

Panel Findings:

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

QQI's 2016 Core Statutory Quality Assurance Guidelines require that QA procedures include provision for external partnerships and second providers. ICD's application does not reflect any such relationships, but is appropriately detailed in relation to its relationship with professional bodies, including ACCA.

11	SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

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

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

ICD's QA documentation includes information pertaining to programmatic review (Section 4.1.1 of that document) that includes provision for faculty and learner voices in that process. Self-evaluation and monitoring activities are within the remit of the Academic Council and Programme Boards, and learner feedback is collected at regular intervals to inform this on a continual basis. A copy of the form used for student feedback surveys is included in the Appendices.

Evaluation of draft QA Procedures - Overall panel findings

The panel acknowledges the established track record and good standing of ICD. The reengagement process involves a comprehensive review of a provider's QA policies and procedures, as well as a site visit to the provider's premises that facilitates a full day of discussions between the panel and the provider. Throughout this robust process, ICD representatives have engaged in a consistently constructive and open manner with the panel, and been highly responsive to requests for additional information as well as to the panel's suggestions and observations.

In Section 3.1 of this report, the panel has offered a number of well-deserved commendations to ICD. Nonetheless, at the conclusion of the site visit the panel was of the view that a number of discrete proposed mandatory changes required implementation prior to a recommendation for approval of ICD's QA, and these are listed in the following sections of this report.

As these issues were considered discrete, and the panel was of the view they could be addressed relatively quickly by the ICD, the panel elected to defer its decision for six weeks.

The panel reconvened on the 21st of January, 2020 to evaluate the evidence submitted by ICD that it had implemented the required changes. The panel was satisfied at that time that ICD had adequately addressed the issues set out in Sections 6.1 and 6.2 of this report in relation to Governance and Management of QA. The panel also took the opportunity to make minor clarifications directly with ICD representatives during this meeting.

The revised documentation was found to be significantly improved. The general recasting of the QA Manual, and the more concisely presented Teaching, Learning and Assessment strategy were more accessible, and the panel is of the view these documents will be easier to navigate for staff and learners at ICD. ICD's responses to the interim report from the panel were appropriate and addressed the issues

raised. Moreover, the panel was of the view that ICD had taken an open and receptive approach to the panel's feedback, and used the feedback constructively to strengthen aspects of ICD's QA system.

The panel noted some additional items of Specific Advice as an outcome of the 21st of January, 2020 meeting, and has included these at the foot of this report. The panel commends the enthusiasm and energy that ICD committed to implementing the changes initially required.

Part 6   Mandatory Changes to QA Procedures and Specific Advice

The following proposed mandatory changes were identified at the conclusion of the site visit on 21 November 2019 by the panel. The panel availed of the option to defer its decision to allow ICD an opportunity to address these issues within a six-week period.

The panel reconvened on 21 January 2020 to evaluate evidence submitted by ICD in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that ICD has adequately addressed the issues set out in Section 6.1 below.

6.1 Proposed Mandatory Changes following November 21st, 2019 site visit

6.1.1	ICD to move forward with the appointment of an appropriately qualified external chair to the Governing Body to enhance the principle of externality. The roles of chair and secretary to the Governing Body should be separated.
6.1.2	The panel advises that the management team at ICD must be expanded to address current gaps, for example in relation to Human Resource Management. The management team could, for example, be augmented by the addition of the Head of Quality Assurance and Head of Academic Development. The panel notes that it is not necessary for either of these staff members to sit on the Governing Body.
6.1.3	The current proposal to include three learner representatives at Academic Council should be reviewed. The panel advises that balance of learner representation in the currently proposed governance structure should be shifted to enhance the learner voice on Programme Boards. The learner representatives on Academic Council and Governing Body should be full members, invited to all meetings. The panel advises that consideration could be given to the potential for introduction of a learner voice, as opposed to a learner representative, to the Governing Body, for example a graduate. This may be beneficial in expanding the diversity of opinions at this level.
6.1.4	The visibility of the Board of Directors within the governance structure needs to be made clear within the documentation, and the delegation of responsibilities to the Governing Body should be formalised.
6.1.5	The external member of the Academic Council, who is also a member of the Governing Body, must be a full member of each and invited to all meetings.

6.1.6   The panel advises that the organisation's current risk register format should be expanded to represent the potential consequences of identified risks, to ensure the document is appropriately informative to all members of the Governing Body. To ensure the document has practical value and is not unwieldy, risks identified in the document should be articulated directly and succinctly, and a system for representing the level of a risk (i.e. acceptable, severe) should be used, for example, traffic lights. The process of risk identification should be further formalised, and reflected within the responsibilities of the college management team.

6.1.7   The panel advises that policies and procedures relating to both staff development and the performance management of teaching staff must be formalised within the QA. This should encompass the enhancement of a performance management and development system and be applied to all current and new members of teaching staff.

6.1.8   The panel advises that further development is needed in relation to ICD's documentation of QA. Some policies and procedures require further documenting, for example, in relation to programme development and approval. The existing text serves to state priorities and principles in this area without tracing how these will be translated into a step by step design and approval process. Some key documents require refinement, for example the Teaching & Learning strategy. The documentation overall could benefit from restructuring. The panel advises this process should focus on ensuring that policy statements and associated procedures are readily accessible and easy to navigate to within the main QA document. A move away from descriptive content in places and toward a more procedural tone in the document would facilitate this.

6.1.9   The panel advises that ICD reconsider its current process in relation to appeals, taking into account that standard practice in the sector is to only entertain appeals on the grounds of procedural errors and not on the basis of dissatisfaction with grades.

6.2 Specific Advice following November 21st, 2019 site visit

6.2.1   ICD should consider expanding the membership of the GB to introduce further externality

6.2.2   ICD should explore opportunities to for staff development within established Communities of Practice in the sector, availing of national projects and initiatives, for example the National Forum.

6.2.3   The panel recommends that the registrar is appointed to the role of secretary to the Academic Council, with appropriate administrative support provided at meetings.

6.3 Additional Specific Advice following January 21st, 2020 panel meeting.

6.3.1   The panel recommends that ICD adjust the quorum for the exam board.

6.3.2   The panel recommends that ICD adjust the frequency of meetings of the Governing Authority.

6.3.3   The panel recommends that within the diagrams of units of governance, ICD makes the chair more visible. This could be achieved by using a more conventional hierarchical diagram.

Part 7   Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
8 – 9	Major	Business, Accounting & Finance

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 <Provider Name>.

Name:

Date: 29 November 2019

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

Document	Related to
Reengagement Presentation	General QA
Updated governance structure chart	Governance and Management of QA

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

Name	Role/Position
Ms Joyce Zhao	Registrar
Prof Darach Turley	Director of Academic Affairs
Dr Derek Dodd	Head of Quality Assurance
Dr Jason Healy	Head of Academic Development
Mr Vincent Barry	Managing Director
Mr Stephen Fennell	Programme Director BA Hons & MA in Accounting & Finance
Mrs Grainne Fitzpatrick	Librarian
Ms June Shannon	Student Liaison Manager
Ms Fei Feng	Student Support & Administration Office
Ms Janette Hamill	Quality Assurance Officer
Ms Aileen Manto	Lecturer
Mr Gerry Fahy	Lecturer
Mr James O'Leary	Lecturer

Dr Jason Healy

ICD Business School

Wicklow House

84-88 South Great George's Street

Dublin 2

Tel: +353872441854

Email: jason@email.icd.ie

28 Jan 2020

Re: QQI Reengagement Panel Final Report January 2020

Dear Dr Stritch

Thank you very much for providing us with the final report from our QQI reengagement panel visit. We are extremely grateful to the external panel for their constructive feedback and to QQI for assisting us through this process.

We do not have any points of clarification from the point of view of factual accuracy.

We have carried out the final three changes to our QA Policy as per the panel's final report. We are happy to attach the newest QA Policy to this email/letter along with a brief summary of the changes we have made.

If you have any questions or require any further information then please do not hesitate to get in touch with me.

Kind regards

Dr Jason Healy

Head of Academic Development