

## Reengagement Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

##### 1.1 Applicant Provider

Registered Business/Trading Name:	Independent College Dublin
Address:	The Steelworks, Foley Street, Dublin 1 D01 X997
Date of Application:	8 <sup>th</sup> October 2019
Date of resubmission of application:	5 <sup>th</sup> June 2020
Date of evaluation:	
Date of site visit (if applicable):	10 <sup>th</sup> December 2019
Date of Reconvened Panel Meeting (if applicable)	16 <sup>th</sup> June 2020
Date of recommendation to the Programmes and Awards Executive Committee:	16 <sup>th</sup> July 2020

##### 1.2 Profile of provider

Independent College Dublin was established in 2007 as a wholly owned subsidiary of INM Plc., operating from premises in Dawson Street in Dublin. The College's first HETAC validated undergraduate programmes commenced in 2008. In 2014 the College came under new ownership, with day to day management and processes continuing uninterrupted. Independent College Dublin moved to its current premises, a custom-fitted building in Foley St shared with a commonly owned ELE provider, in 2015.

To date, programmes have been offered at NFQ Levels 6 – 9 by Independent College Dublin. Currently, approximately 600 learners are enrolled in the provider's four QQI validated programmes, all of which are within the Law and Business domains. Non QQI programmes are also offered; approximately 300 learners are currently enrolled in these courses, which include Law, Business and Radio Production. The learner profile for Independent College Dublin's QQI validated programmes is largely international, with over 95% of learners coming from non-EEA countries. Learners are typically between 24 – 29 years of age.



## Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr Joseph Ryan	Chairperson	Director General, THEA
Dr Catherine Peck	Report Writer	Independent Education Consultant
Dr Eric Derr	Panel Member	Quality Assurance Officer, Carlow College
Dr Louise Gorman	Panel Member	Lecturer, TU Dublin
Amy Ní Mhurchú	Learner Representative	IADT

## Part 3 Findings of the Panel

### 3.1 Summary Findings

At the outset of this report, the panel makes a number of commendations to Independent College Dublin. These arise from a comprehensive review of the provider's documented QA processes, and from the panel's dialogue with the provider's leadership and staff during the site visit.

Firstly, the panel commends Independent College Dublin on its openness toward the reengagement process. It was evident to the panel throughout the site visit that there is a positive disposition at Independent College Dublin toward continuous improvement, which is in turn conducive to embedding a quality culture across the organisation. Throughout the site visit, the panel engaged directly with personnel employed in academic, administrative, operational and learner support roles at the provider, and gained valuable insight into how QA is lived within Independent College Dublin. All of the provider's representatives engaged with the panel collegially. A specific commendation is noted with regard to the work of the quality office at the provider. The commitment and contribution of the Quality Officer and team to on-going work was evident to the panel.

The panel makes a further commendation in relation to the teaching staff at Independent College Dublin, who participated actively in dialogues about their practice with the panel members. The panel notes the positive impact of Independent College Dublin's commitment to Continuing Professional Development (CPD) in relation to pedagogic skills. The benefits of this were evident, for example, in relation to the depth of understanding displayed by teaching staff regarding the role of assessment design in supporting academic integrity. Many of the provider's teaching staff also maintain practice in industry, which directly benefits the currency and industry relevance of Independent College Dublin's curriculum. Finally, the panel would like to acknowledge and commend the Independent College Dublin on the awareness it has fostered among staff at all levels regarding the particular needs of its learner cohort.

At the conclusion of the site visit the panel held a number of specific concerns in relation to areas of on-going development in the provider's QA. These related, in the main, to the dimensions of Governance and Management of Quality, and a Documented Approach to QA. These are outlined by the panel in Sections 5.1 – 5.11 of this report, and were specified as mandatory changes and items of specific advice in Sections 6.1 and 6.2.

The panel was of the view that the team at Independent College Dublin was capable of implementing the required changes within an allocated period of six months. The panel reconvened in June 2020 to undertake a desk review of evidence resubmitted by the provider. It was the view of the panel that Independent College Dublin had undertaken significant work in the interim period, and had achieved the required enhancements to its QA. The panel notes that this was

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accomplished by the team at Independent College Dublin in a timely and professional manner, despite coinciding with the significant disruption of the Covid-19 pandemic to the sector.

The panel is therefore pleased to issue a final recommendation to QQI to approve Independent College Dublin's QA procedures. The panel has confidence that Independent College Dublin has both the capacity and capability to engage effectively with a process of continual QA enhancement as it moves forward.

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

	Tick <u>one</u> as appropriate
Approve Independent College Dublin draft QA procedures	X
Refuse approval of Independent College Dublin 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 Independent College Dublin 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: Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</b>	Yes	The provider has submitted a Certificate of Incorporation (2006) and subsequent Registration of change of name. The provider has a track record of certification and operations in the education sector in Ireland.
<b>4.1.2(a)</b>	<b>Criterion: Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</b>	Yes	As per the evidence cited in relation to Criterion 4.1.1(a) the provider is a legal entity with a substantial presence in Ireland.
<b>4.1.3(a)</b>	<b>Criterion: Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</b>	Yes	The provider does not currently have any collaborative provision arrangements in place. Independent College Dublin has provided relevant information pertaining to the common ownership and corporate governance of the College and International House, an English Language Education Provider.
<b>4.1.4(a)</b>	<b>Criterion: Are any third-party relationships and partnerships compatible with the scope of access sought?</b>	Yes	The relationship between Independent College Dublin and International House does not impact the scope of access sought by the provider.
<b>4.1.5(a)</b>	<b>Criterion: Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</b>	Yes	The evidence provided in support of Independent College Dublin's application is indicative of compliance with Irish/EU legislation.
<b>4.1.6(a)</b>	<b>Criterion: Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it</b>	Yes	Independent College Dublin was established in 2007, and has a track record of validation and certification, formerly with HETAC and currently with QQI.

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<i>operates (or where its parents or subsidiaries operate) or enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>		
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### **Findings**

The panel is of the view that the evidence submitted by Independent College Dublin is wholly consistent with the provider meeting this Criteria 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: Does the applicant have a sufficient resource base and is it stable and in good financial standing?</b>	<b>Yes</b>	The provider has submitted a tax clearance certificate, an auditor's letter and financial projections for 2019 – 22.
4.2.2(a)	<b>Criterion: Does the applicant have a reasonable business case for sustainable provision?</b>	<b>Yes</b>	Independent College Dublin has enjoyed growth in numbers on its QQI validated programmes since its relocation to the current premises in 2015. The provider had indicated an intent to diversify its learner cohort and reduce dependency on particular markets in coming years.
4.2.3(a)	<b>Criterion: Are fit-for-purpose governance, management and decision making structures in place?</b>	<b>Yes</b>	At the time of the initial site visit, the panel was of the view that further development in relation to this Criterion was required. Subsequent to a review of the changes made by Independent College Dublin in the interim period, the panel was satisfied that this criterion had been met.
4.2.4(a)	<b>Criterion: Are there arrangements in place for providing required information to QQI?</b>	<b>Yes</b>	Independent College Dublin has a track record of engagement and certification with QQI, and formerly with HETAC. A quality officer is in place at the provider, supported by an appropriate administrative infrastructure.

#### Findings

The panel is of the view that Independent College Dublin's resource, governance and structural requirements meet criteria 4.1. Independent College Dublin made appropriate adjustments to its governance structure during the interim period, enabling the panel to recommend that these are fit-for-purpose.



#### 4.3 Programme development and provision requirements:

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
4.3.1(a)	<b>Criterion: Does the applicant have experience and a track record in providing education and training programmes?</b>	Yes	Independent College Dublin has a track record of delivering programmes of education and training in Ireland.
4.3.2(a)	<b>Criterion: Does the applicant have a fit-for-purpose and stable complement of education and training staff?</b>	Yes	Independent College Dublin employs appropriately qualified teaching staff, and supports CPD. This includes the facilitation of in house training.
4.3.3(a)	<b>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)?</b>	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)	<b>Criterion: Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</b>	Yes	The premises at Foley St have capacity for current provision needs. A substantial investment has been made in IT infrastructure as well as custom-fitting of the premises.
4.3.5(a)	<b>Criterion: Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</b>	Yes	The panel is satisfied that the arrangements presented are in line with QQI's criteria.
4.3.6(a)	<b>Criterion: Are structures and resources to underpin fair and consistent assessment of learners in place?</b>	Yes	The panel initially noted that there was evidence of good practice at Independent College Dublin in relation to assessment, including the promotion of academic integrity and provision of reasonable accommodations. However, the panel identified a mandatory change in relation to the policy and procedure pertaining to rechecks, reviews and appeals, and the provision of information about these

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			processes to learners. This was addressed by Independent College Dublin to the panel's satisfaction in the interim period.
<b>4.3.7(a)</b>	<b>Criterion: Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</b>	<b>Yes</b>	The provider has submitted a letter confirming cover for all learners on programmes which lead to QQI awards and for which arrangements under Part 6 of the 2012 Act are required. This arrangement is with the O'Driscoll O'Neil Learner Protection Programme.

### **Findings**

The panel is of the view that Independent College Dublin has met with the Criteria listed in Section 4.3. Independent College Dublin made appropriate adjustments to its assessment procedures pertaining to rechecks, reviews and appeals during the interim period, enabling the panel to recommend that these are fit-for-purpose.

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

The panel is satisfied that Independent College Dublin has met the Criteria in Section 4 pertaining to the College's capacity to provide sustainable education and training. Appropriate evidence was submitted as part of the provider's application. This evidence was indicative of Independent College Dublin complying with legal requirements, having a sufficient resource base and appropriate staffing.



## Part 5 Evaluation of draft QA Procedures submitted by Independent College Dublin

The following is the panel's findings following evaluation of Independent College Dublin 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:**

Following discussions with the President and senior management team at Independent College Dublin on the day of the site visit, the panel was of the view that further development was required in relation to this dimension of QA.

Independent College Dublin presented a governance structure in its draft QA that reflected general awareness of QQI's criteria and guidelines in relation to governance and management of quality. However, the panel held concerns that an appropriate distance between academic and commercial decision making was not consistently evident in the draft QA. QQI requires that academic decision-making "*is independent of commercial considerations*" (Core Statutory Quality Assurance Guidelines, QQI, 2016, p.6). This was not always apparent in relation to committee membership. For example, on p. 42 of the draft QA Manual, the Group Commercial Director was listed as a member of the Academic Council. There was also a lack of clarity in relation to how the required distance was enacted in decision-making processes. For example, p. 29 of the draft QA Processes Manual stated that final approval (post interview) of recommendations for new staff recruitment was made by both the Academic Council and the Management Committee. However, the flowchart AP0601 on p. 30 omitted any reference to approval by the Management Committee, despite this being a decision typically made within a management structure. Importantly, the examples identified here were indicative, not exhaustive. Subsequently, the panel identified a mandatory change (see 6.1.1) in relation to this aspect of Independent College Dublin's QA.

The panel also held concerns that, given the size of Independent College Dublin, the structure set out in the draft QA procedures may have lacked sustainability. For example, the draft QA identified a relatively high number of academic committees. QQI's guidelines in this area are guided by the principle of proportionality, stating that "*The scope and complexity of the quality assurance procedures to be established by voluntary providers is typically linked to, and influenced by, the provider's context, overall goals and scope of provision*" (Independent/Private Statutory Quality Assurance Guidelines, QQI, 2016, p.1). During the site visit, representatives of Independent College Dublin acknowledged the challenges of staffing the committee structure as per the draft QA procedures, and invited the panel to make input on this area. The panel identified a mandatory change (see 6.1.2) pertaining to this, and encouraged Independent College Dublin to work toward a somewhat leaner structure by rationalising the number of academic committees it supported. A further mandatory change (see 6.1.6) required additional clarity in relation to the terms of reference for the Ethics and Research Committee.

Independent College Dublin representatives identified during the site visit that the provider is well advanced toward completion of its renewed strategic plan. An awareness of risk to the provider associated with over reliance on a non-EEA cohort was evident in the provider's strategy, which included the objective to diversify Independent College Dublin's target markets. Discussions between provider representatives and the panel during the site visit further indicated awareness at Independent College Dublin of the resource and capacity implications of the provider's plans for expansion through validation of additional programmes at NFQ Level 9. The panel therefore noted two items of specific advice in relation to strategic planning and associated resource implications (see 6.2.1 and 6.2.2), which it understood to be supportive of the College's intentions in these areas.



When the panel reconvened in June 2020 to undertake a desk review of Independent College Dublin's enhancements in this area, the panel were of the view that the significant work undertaken by the provider had addressed their initial concerns. In the interim period, the College had revised and rationalised the governance structure. Appropriate terms of reference for committees were provided, and the distinction between academic and commercial decision-making was appropriately reflected in the membership of these.

## **2 DOCUMENTED APPROACH TO QUALITY ASSURANCE**

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

Following a comprehensive review of Independent College Dublin's QA documentation in advance of the site visit, and further discussion of the provider's documentation on the day, the panel was of the view that further development was required in relation to this dimension of QA.

The draft QA submitted by Independent College Dublin separated QA procedures (presented in the draft QA Processes Manual or QAPM) from QA policies (presented in the draft Quality Assurance Manual or QAM). QA processes are also included in staff and learner handbooks.

In its review of the documentation, the panel observed that navigation between these documents was impeded by inconsistencies in the naming/identification of policy areas across them. For example, the area of academic integrity is dealt with through reference to (Avoiding) Plagiarism in the learner handbook, but is identified as Academic Impropriety in the draft QAM, and Academic Misconduct in the draft QAPM. It was the view of the panel that overall coherence could be improved through greater consistency in names/titles. In addition, the inclusion of hyperlinks or other navigation tools would better facilitate the reader attempting to locate relevant procedural information subsequent to reviewing a policy.

The panel noted that the learner and staff handbooks submitted by Independent College Dublin did not contain links to the information in the draft QAM and draft QAPM. These instead contained versions of selected procedures and policies that were considered by the provider to be particularly relevant to the intended audience for each document. In the case of the learner handbook, Independent College Dublin representatives stated that process information had been truncated or summarized in an attempt to support its intelligibility to learners for whom English is a foreign language. However, the panel held concerns that this practice had resulted in omissions of key information. For example, page 37 of the learner handbook outlined how exam results may be appealed, but no information was provided that outlined the related processes of recheck and review. Appendices 13 and 14 of the draft QAPM contained both recheck and appeals request forms, yet there was no equivalent form for requesting a grade review. Process information was also lacking in relation to the submission, review and approval of applications for ethics approval to the Ethics and Research Committee (see mandatory change 6.1.6).

The panel acknowledged the supportive intent underlying the provider's variable presentation of its processes across these documents. However, QQI's guidelines require that a provider's QA policies and procedures "*are fully documented and available publicly (published); necessary information is available to staff and the public as required in usable formats*" (Core Statutory Quality Assurance Guidelines, QQI, 2016, p. 9). The panel was of the view that the current variability/inconsistency of QA documentation was a vulnerability for Independent College Dublin. The panel felt a revision of the QA procedures could usefully be guided by the objective of presenting singular versions of policies and procedures. These could be written in plain language and presented in formats that are comprehensible for all potential users. They could then be linked to from the various handbooks and manuals, and presented in their entirety for all audiences.



The panel noted three mandatory changes (see 6.1.3, 6.1.4 & 6.1.5) pertaining to these concerns. These focused on addressing inconsistencies, maintaining transparency and improving navigability in the draft QA documentation.

When the panel reconvened in June 2020 to undertake a desk review of Independent College Dublin's enhancements in this area, the panel were satisfied that the work undertaken by the provider had addressed their initial concerns. In the interim period, the College had revised the structure, consistency and transparency of its documentation. At the conclusion of the process, the panel offers one further item of specific advice in relation to this in section 6.3.

### **3 PROGRAMMES OF EDUCATION AND TRAINING**

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

The panel was largely satisfied that Independent College Dublin has addressed QQI's guidelines in relation to this dimension of QA.

QQI's guidelines require that the development of new programmes is conducted systematically, that they are designed with the involvement of various stakeholders, and that the process benefits from external expertise and reference points to ensure vocational needs are fulfilled appropriately. During the site visit, Independent College Dublin indicated its strategic intent to expand its current programme offerings at NFQ Level 9, noting that this was in part a response to feedback from current learners on potential progression routes. The panel explored how external expertise was sought in the development of new programmes at the provider. Independent College Dublin has formed an industry advisory group, which has made input to programme validation and revalidation processes. The composition of the advisory group, and their relationship to the governance structure was discussed, alongside the other sources of information that inform processes in this area. Given the large proportion of international learners undertaking programmes at Independent College Dublin, the panel noted an item of specific advice (see 6.2.3) pertaining to the use of, where possible, international as well as national sources of data on skills shortages and labour market trends. When the panel reconvened in June 2020 to undertake a desk review of Independent College Dublin's enhancements in this area, the panel were satisfied that this has been considered and responded to appropriately by the provider.

Within this dimension of QA, QQI also require that access policies, admission processes and criteria are established and implemented consistently and in a transparent manner. The panel discussed access procedures with Independent College Dublin in some detail. Independent College Dublin representatives stated that their philosophy is to recruit students who can be retained and be successful. All potential learners are interviewed. Learners for whom English is not the first language are required to provide evidence of achievement of the requisite level of competence on the CEFR. Where necessary, prospective learners are assisted in registering for an IELTS test to meet this admission criterion.

QQI's guidelines require that programme monitoring and review is both ongoing and periodic, and that these processes are taken as an opportunity to ensure that programmes remain effective. The draft QA documentation outlined appropriate mechanisms for gathering learner and staff feedback to inform this process. Provider representatives also



noted that a recent cycle of programme review and revalidation events had been useful learning opportunities in relation to this dimension of QA.

## 4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

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

The panel noted a number of areas of strength at Independent College Dublin in relation to this dimension of QA, and also identified one area where further development was required.

QQI's guidelines require a provider to assure itself as to the competence of its staff, and that the approach used in a provider's recruitment of staff be clearly stated and transparent. Independent College Dublin has outlined processes pertaining to staff recruitment within its draft QA. While some refinement of these is needed (see discussion in Section 5.1), the panel is satisfied that Independent College Dublin has a sufficient complement of appropriately qualified education and training staff, and that processes are established to maintain this.

As discussed in Section 3.1 of this report, the panel has offered a commendation to Independent College Dublin in relation to its teaching staff. During the site visit, lecturers at Independent College Dublin discussed their approaches to learning, teaching and assessment at length. It was evident that the teaching staff were committed to maintaining practitioner profiles alongside their roles as educators, and that this was advantageous to Independent College Dublin's learners, as they benefited from their lecturer's current perspectives and awareness.

The panel also noted the visible benefits of the provider's provision of CPD focused on pedagogic skills for its teaching staff. QQI's guidelines require a provider environment to be enhancement-focused, and to "*offer opportunities for and promote the professional development of teaching staff*" in addition to encouraging "*innovation in teaching methods and the use of new technologies*" (Core Statutory Quality Assurance Guidelines, QQI, 2016, p.13). Practices at Independent College Dublin reflect this. The provider has an active internal CPD programme (which external colleagues are routinely invited to participate in), and support teaching staff to pursue development and scholarly activity externally, for example through further studies or conference attendance. Induction for new teaching staff is provided every semester, and lecturers indicated that they felt well-supported in their roles. Currently, Independent College Dublin is not a member of HECA, and does not participate in activities facilitate by the National Forum for the Enhancement of Teaching and Learning, although this is under consideration.

Independent College Dublin's draft QA processes make provision for annual performance reviews for all staff members. A programme of routine observation of teaching by the Head of School and/or Quality Officer is also in the early stages of implementation.

The panel identified one mandatory change in relation to this dimension of QA (see 6.1.7). QQI requires that "*staff members have access to support and opportunities for development based on a systematic approach to the identification of their continuing professional training and development needs*" (Core Statutory Quality Assurance Guidelines, QQI, 2016, p.13). At the time of the site visit, processes that guide decision-making in this area, and relevant procedures for staff who wish to apply for support, were absent from the draft QA documentation. The panel was of the view that developing these would strengthen Independent College Dublin's QA in this area. When the panel reconvened in June 2020 to undertake a

desk review of Independent College Dublin's enhancements in this area, the panel were satisfied that this had been addressed and that the renewed procedure, including explicit criteria to guide decision-making, addressed this concern.

***Panel Findings:***

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

As discussed in Section 3.1 and 5.4 of this report, the panel has made a commendation to Independent College Dublin in relation to its teaching staff. During the site visit, a representative group of lecturers engaged actively with the panel members, discussing approaches to teaching, learning and assessment.

Teaching staff stated that the overall emphasis at Independent College Dublin was on learner-centred approaches. The role of continuous assessment, group work and formative feedback was discussed, alongside the efforts made by teaching staff to bring current and internationally relevant examples and case studies into the classroom. During discussions with the panel, staff cited participation in CPD focused on student engagement and moving beyond traditional models of assessment as having enhanced their practice.

Independent College Dublin has invested substantially in the physical learning environment, specifically the custom-fitted premises and equipment available for learners at its Foley St campus. During the site visit, provider representatives indicated that vacant classrooms were routinely made available to learners for group study, and that the library hours had been extended to accommodate learners looking for quiet study spaces. A Wi-Fi upgrade had recently been made to support learners using their own devices and laptops throughout the premises, and a lab fitted with 25 computers was also available.

QQI's guidelines under this dimension of QA require providers to have procedures in place for dealing with learner complaints and appeals. These are evident within the draft QA documentation submitted by Independent College Dublin. However, the panel notes these will require some refinement as per discussion in Section 6.3 of this report.

### **Panel Findings:**

The panel was of the view that despite good practices being evidenced, further development was required in relation to this dimension of QA.

During the site visit, the panel explored the implementation of assessment strategies at both provider and programme level with Independent College Dublin representatives. It was evident to the panel that the credibility of assessment procedures is taken seriously at Independent College Dublin. The provider's draft QA documentation included information relating to plagiarism in the learner handbook. Teaching staff discussed assessment design, the use of Turnitin software and formative feedback in promoting academic integrity. The Quality Officer also maintains an assessment calendar designed to ensure learners do not experience unnecessary overlaps in the scheduling of assessment and exams. Reasonable accommodations are available at Independent College Dublin for learners with learning differences or disabilities. During the site visit, the Quality Officer and Student Experience & Careers Officer outlined a number of specific reasonable accommodation measures supported, for example, printing on colour paper, use of particular fonts, scribes and extra time. Provider representatives noted that few learners disclosed needs for additional support, but that Independent College Dublin was committed to providing support in this area.

With regard to the above, the panel offered an item of specific advice to the provider (see 6.2.4). The panel observed during its review of the provider's draft QA documentation (in particular, the learner handbook) that information and processes pertaining to assessment at Independent College Dublin were not presented in a manner that effectively showcased the provider's genuine commitment to supporting its learners. For example, considerable space was given in the learner handbook to processes for providing evidence of a disability, but minimal information was provided regarding the supports available. Similarly, emphasis was placed on avoiding plagiarism rather than demonstrating academic integrity. The panel felt that this type of information could usefully be reframed to reflect the supportive intent of the provider. When the panel reconvened in June 2020 to undertake a desk review of Independent College Dublin's enhancements in this area, the panel were satisfied that this has been considered and responded to appropriately by the provider. This was reflected in the renewed learner handbook and the revisions of linked processes.

Within the dimension of assessment, the panel was not satisfied that as per QQI Guidelines the processes for recheck, reviews and appeals were, as per QQI's requirements, "*straightforward, efficient, timely and transparent*" (QQI 2016 Core Statutory Quality Assurance Guidelines, p. 15). This has also been discussed in Section 5.2 of this report. Subsequently, the panel issued a mandatory change (see 6.1.9) pertaining to this. When the panel reconvened, the panel were satisfied that the work undertaken by the provider had addressed their initial concerns. In the interim period, the College had aligned the definitions and processes appropriately to QQI's Assessment and Standards, Revised 2013.

***Panel Findings:***

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

Learners at Independent College Dublin are able to access a range of learning resources and supports. These include access to a social programme, cultural tours, host family accommodation, library facilities (both physical and digital) and a 24 hour emergency phone line. The library hours at Independent College Dublin have been extended to facilitate learner study hours, and the exam timetable also highlights empty rooms available for group study. Learners experiencing mental health challenges are referred out to a counselling service. No medical supports or services are available on site.

Given the relatively small scale of the provider's operations, and the multi-dimensional role of the Student Experience & Careers Officer, the supports offered are effectively integrated. The Quality Officer and Librarian are additionally engaged in various aspects of learner support.

Learners at Independent College Dublin are offered a one day induction, which is offered twice at the start of each semester to facilitate choice of days. The first week includes training in Harvard referencing, and an introduction to reference management software is given by the librarian. Training sessions have been recorded and embedded in Moodle for ongoing access by students. Reminder emails regarding these resources are sent to students, including links to presentations, and ad hoc support is available to students as required. The Independent College Dublin library provides students with access to a range of databases, as well as over 1000 hard copy texts. Weekly workshops are offered with variable foci, for example careers or academic support.

QQI's guidelines under this dimension of QA require mechanisms to be in place for learners to make representations to the provider about matters of general concern to the learner body. Independent College Dublin's draft QA reflected an intent to engage learner representation in its governance and decision-making. During the site visit, the panel discussed how learners' skills in this area may be enhanced to ensure their contribution is maximised. Independent College Dublin was exploring the possibility of working with NStEP Ireland for this. The panel strongly encouraged Independent College Dublin in this proposed course of action, and included an item of specific advice in relation to this in this report (see 6.2.6). When the panel reconvened in June 2020 to undertake a desk review of Independent College Dublin's enhancements in this area, the panel were satisfied that this has been considered and responded to appropriately by the provider. Training sessions facilitated by NStEP had been organised and a commitment made to this being an ongoing service. Additional guidance for learner representatives had been developed, and this was intended to take the form of a handbook in due course.

***Panel Findings:***

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

During the site visit, the panel discussed practices for data management at Independent College Dublin with the provider's representatives. Independent College Dublin currently uses Quercus, and the Quality Officer is an active member of

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Ireland's Quercus user group. Alternative systems are also being scoped by Independent College Dublin. This will ensure that if the current system is found to be insufficient to the institution's needs moving forward, alternatives will be pre-identified. The provider is actively engaged in a plan to integrate some data currently captured in spreadsheets, and views this integration as complementary to GDPR compliance. The Group Operations and People Director is the data controller for the organisation.

## 9 PUBLIC INFORMATION AND COMMUNICATION

### **Panel Findings:**

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

Independent College Dublin works with agents to recruit students. However, the number of agent relationships the provider maintains is limited, and caution is exercised at the provider in relation to how agents represent the provider's programmes and services to prospective students. During the site visit, Independent College Dublin representatives outlined their criteria for forming a relationship with an agent to the panel. This is dependent on their reputation for operating ethically, and adherence to the *Statement of Principles for the Ethical Recruitment of International Students by Education Consultants and Agents* contained in the London Statement (2012).

The panel notes that mandatory changes 6.1.3, 6.1.4 and 6.1.5 pertaining to the guidelines for a Documented Approach to QA are also relevant in relation to this criterion. The panel's discussion of further development required in that regard and Independent College Dublin's response to it can be found in Section 6.3, page 20) of this report.

## 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.

Independent College Dublin does not currently engage in any collaborative provisions with external partners or second providers. The relationship between Independent College Dublin and International House was clarified by the provider prior to and during the site visit, and does not impact on or conflict with the scope of provision sought by Independent College Dublin.

## 11 SELF-EVALUATION, MONITORING AND REVIEW

### **Panel Findings:**

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

Independent College Dublin's draft QA processes include appropriate detail on the provider's processes for internal self-monitoring. During the site visit, provider staff referred on several occasions to the valuable learning that had occurred as an outcome of programmatic review and revalidation cycles recently completed. The provider's openness to the reengagement process, and interactions with the panel also reflected a disposition among staff at Independent College Dublin to identify and address areas for improvement in a proactive manner.

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

The panel acknowledges the genuine commitment that Independent College Dublin has demonstrated to developing its QA processes alongside its overall expansion since moving into the current premises. Section 3.1 of this report contains a number of commendations on areas of evident strength at Independent College Dublin.

The panel is of the view that the work undertaken by Independent College Dublin to address the mandatory changes issued following the site visit is significant. Further, this work will support Independent College Dublin in its ambitions to establish sustainable structures and processes that will both comply with QQI's guidelines and facilitate best practice.

The panel also notes that the significant work undertaken by the provider in the interim period reflects positively on capabilities of the team at Independent College Dublin, given that this work was undertaken concurrent to the provider's management of the disruption caused by the Covid-19 pandemic.

In this report, the panel offers some further items of Specific Advice (section 6.3), which it advises Independent College Dublin could usefully integrate into its continuous quality improvement plan.

## Part 6 Mandatory Changes to QA Procedures and Specific Advice

### 6.1 Mandatory Changes

The following mandatory changes were identified at the conclusion of the site visit on 10<sup>th</sup> December, 2019 by the Panel. The Panel reconvened in June 2020 to evaluate evidence submitted by Independent College Dublin in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that Independent College Dublin has addressed the issues set out in Section 6.1 below.

- 6.1.1 The College must revise its current governance structure to ensure that a consistent and clear separation of academic and commercial decision-making is evident. This should include a review of membership of the Academic Council, and clearly distinct roles for the Management Committee and Academic Council in the various processes of the College.
- 6.1.2 The College must revise its current governance structure, with a view to designing a more sustainable architecture. This should involve rationalising the academic committee structure to ensure that decision-making processes are clear, and revising terms of reference for the remaining committees.
- 6.1.3 The College must comprehensively review its documentation to address inconsistencies in the naming of policy areas and ensure policy ownership is clear. One example of this pertains to the plagiarism/academic impropriety policy.
- 6.1.4 The College must revise its policy documentation in relation to version control and information to learners. Full transparency requires that all students and staff have access to all relevant policies and procedures. These should be written in plain language inclusive of all stakeholders.
- 6.1.5 The College must revise its documentation to improve its accessibility and navigability for staff and students, to ensure the QAM and associated handbooks/appendices can effectively support the everyday operations and functions of the College.
- 6.1.6 The Terms of Reference for the Ethics & Research Committee should be revised to ensure the committee's role in approving research ethics applications is explicit. The processes relating to submission, review and approval of applications should be clearly set out and included within the QAM.
- 6.1.7 A policy and procedure that sets out the process for applications and decision-making in relation to staff development, including the criteria for support/refusal of applications needs to be drafted and included in the QAM.
- 6.1.8 The information and processes pertaining to recheck, review and appeal must be presented clearly and unambiguously in the learner and staff handbooks as well as the QAM. These should align to the requirements in Assessment and Standards 2013.

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## 6.2 Specific Advice

The following items of specific advice were identified at the conclusion of the site visit on 10<sup>th</sup> December, 2019 by the panel. The Panel reconvened in June 2020 to evaluate evidence submitted by Independent College Dublin in support of the proposed changes. The panel was pleased to note at that time that these had been given appropriate consideration by the provider, and in several cases had been actioned.

- 6.2.1 The College is strongly encouraged to further develop its strategy in relation to diversification of the learner cohort, to reduce the risks associated with over-dependence on particular markets.
- 6.2.2 The College is encouraged to continue focusing on resourcing and capacity issues, including staff profiles, as it implements its plans for expansion of postgraduate programme offerings and growth in student numbers.
- 6.2.3 In the development of new programmes, the College is advised to ensure it engages with relevant domestic and international stakeholders and data.
- 6.2.4 Review the presentation of some information relating to learner supports, for example in relation to plagiarism and disability/reasonable accommodations. This could usefully be presented with a greater emphasis on the development and positive supports that the College offers its learners.
- 6.2.5 Consider establishing an academic writing support service to more systematically support the needs of the College's international cohort.
- 6.2.6 The College is encouraged to outsource its training of learner representatives to an appropriate body.

## 6.3 Further Specific Advice

The following items of specific advice were offered to Independent College Dublin by the panel at the conclusion of its meeting in June 2020.

- 6.3.1 The College is encouraged to continue its efforts to refine the navigability and accessibility of its QA documentation for different users, and to regularly test this from a user perspective.
- 6.3.2 The College is encouraged to give further consideration to its Ethics & Research approval processes. Specifically, to ensuring that referrals to the Ethics & Research Committee are made on a consistent and principled basis by various module or programme leaders. Further, given that the Ethics & Research Committee is scheduled to meet three times per year, to ensuring that applications can be reviewed and responded to by the committee in a timely manner.

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

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
6 – 9	Major, Minor	Business and Law

## 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: \_\_\_\_\_

Dr. Joseph Ryan

Date:

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

Document	Related to
Flow Chart - Ethical Guidelines for Research with Human Participants	Documented Approach to QA
Events Calendar	Learner Supports
BA (Hons) Marketing Year One, Semester One Schedule	Programmes of Education and Training
MA (Hons) Dispute Resolution Year One, Semester One	Programmes of Education and Training
Analysis of Staff (FTE & Total Numbers)	Resourcing and Capacity
Copy of Provider Presentation to Panel at Site Visit	Quality Assurance

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

Name	Role/Position
Padraig Hourigan	President
Denis Lally	Group Operations and People Director
Andrew Deegan	Registrar
Lisa-Nicole Dunne	Group Commercial Director
Mark Byrne	Head of School
Fanahan Barry	Exams and QA Officer
Gillian Connors	Librarian
Lu Chaluat	Admissions Officer
Niamh Halpenny	Learner Experience and Careers Officer

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Anastasia Ward	Programme Leader
Dan O'Sullivan	Programme Leader
Carol Partridge	Lecturer
Dermot O'Toole	Lecturer
Declan Faughey	Lecturer
Paul McGloughlin	Lecturer
Liz Gardner	Lecturer
Paul Lydon	Lecturer
Paul McGloughlin	Lecturer
Vera Toal	Lecturer
Aisling Stalley	Lecturer

**Appendix: Provider response to the Reengagement Panel Report**

Ms Marie Cotter  
Quality and Qualifications Ireland (QQI)  
26/27 Denzille Lane  
Dublin 2, D02 P266  
Ireland

Dear Marie

**Engagement Report – Independent College Dublin**

Many thanks for your email of 16/6/2020 regarding the above. We wish to again thank the panel for their efforts and acknowledge receipt and accept the findings of the report. We look forward to the report being considered at PAEC in July 2020.

Best regards  
  
Padraig Hourigan  
President  
Independent College Dublin