QQI
Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Provider Access to Initial Validation of Programmes leading to QQI Awards
Report of the Quality and Capacity Evaluation Panel

Stage 1
Assessment of Capacity and Approval of QA Procedures

Part 1 Details of applicant provider and its proposed education and training provision

1.1 Applicant Provider

Registered Business/Trading Name:	Innopharma Labs Ltd / Innopharma Education
Address:	Ravenscourt Campus, Three Rock Road, Sandyford, Dublin 18
Date of Application:	29 June 2020
Date of resubmission of application:	4 September 2020
Date of evaluation:	24 September 2020
Date of site visit (if applicable):	23 July 2020
Date of recommendation to the Approvals and Reviews Committee:	27 August 2020 and 12 October 2020

1.2 Profile of applicant provider

Since 2010, Innopharma Education has delivered quality assured programmes in collaboration with the Institute of Technology Tallaght (ITTD), now the Technological University Dublin, and Griffith College. These programmes, at Levels 6 to 9 on the National Framework of Qualifications (NFQ), have focused on the areas of Biopharma, MedTech, ICT and the FoodTech industries. The current suite of programmes includes:

TU Dublin – Tallaght

- (Level 9) MSc in Pharmaceutical Manufacturing and Process Technology
- (Level 9) MSc in Food Science and Technology
- (Level 8) Higher Diploma in (Bio) Pharmaceutical and Medical Device Manufacturing
- (Level 7) BSc in Process Technology
- (Level 6) Higher Certificate in Process Technologies
- (Level 6) Certificate in Pharmaceutical and Medical Device Operations (Minor Award)
- (Level 6) Certificate in Food Science and Technology (Minor Award)

Griffith College

- (Level 9) MSc in Pharmaceutical Business and Technology
- (Level 9) PGDip in Science in Medical Device Technology and Business
- (Level 8) Bachelor of Arts in Pharmaceutical Business Operations
- (Level 7) Bachelor of Arts in Pharmaceutical Business Operations

These programmes have met a demand for higher education and training across multiple regional locations and have offered regionally based learners the additional flexibility of online learning options. Innopharma Education has also supported national labour market activation initiatives through the provision of publicly funded strategic programmes (e.g. Labour Market Activation Fund, Springboard, Momentum and Springboard+).

Innopharma Education plans to leverage its ten years of research and practice to develop programmes in the emerging areas of Digital Data Analytics, Advanced Manufacturing, Automation, Industrial Internet of Things, Cloud Computing and Smart Sensors. The organisational aim is to meet an increasingly urgent need in industry and position their graduates at the vanguard of the Industry 4.0 revolution.

1.3 Proposed education and training provision

NFQ Level	Award Class	QQI Award / Proposed Programme Title
Level 8	Major	BSc (Honours) in Advanced Manufacturing and Data Analytics

Part 2 The Quality and Capacity Panel Membership

Name	Role of panel member	Organisation
Dr Joseph Ryan*	Chair	CEO, Technological Higher Education Association
Dr Eric Derr	Report Writer	Quality Assurance Officer / Lecturer, Carlow College, St. Patrick's
Dr Astrid Sasse	Subject Matter Expert	Associate Professor in Pharmaceutical Chemistry, Trinity College Dublin
Naomi Jackson	QA Expert	Dean of Academic Affairs, CCT College Dublin
Naomi Algeo	Student Representative	PhD student in Occupational Therapy, Trinity College Dublin
Mary Butler	Industry Expert	Lecturer in the School of Science, IT Sligo

*Due to an unforeseen, last minute scheduling conflict, the designated Chair of the Panel, Dr Joseph Ryan, was unable to attend the virtual site visit that took place on Thursday,23 July 2020. In his absence, Panel member Naomi Jackson stepped in as Chair; this was agreed in advance with QQI and Innopharma Education.

**Shortly prior to the virtual site visit, an undeclared conflict of interest between a Panel member and the Non-Executive Director of Innopharma Education was identified and reported. It was agreed between the Panel, QQI and Innopharma Education that the Non-Executive Director would not participate in the virtual site visit.

Part 3 Findings of the Panel

3.1 Summary Findings

Following a review of the documents submitted by Innopharma Education for Initial Access to Validation of Programmes Leading to QQI Awards, and a virtual site visit that was conducted on Thursday, 23 July 2020, the Panel initially recommended to the Approvals and Review Committee of QQI to refuse approval of Innopharma Education's draft quality assurance procedures pending mandatory changes set out in Section 7.1 of this Report. In addition to these mandatory changes, the Panel provided Innopharma Education with longer-term specific advice to enhance its quality assurance framework (see Section 7.2).

During the virtual site visit, the Panel had the opportunity to meet with staff members of Innopharma Education to further examine its capacity to deliver the scope of provision sought and evaluate its quality assurance procedures against *QQI's Core Statutory Quality Assurance Guidelines* (2016). The Panel commended Innopharma Education on its engagement with external stakeholders, both for the career development of its learners and the development of academic provision within the institution. The Panel further acknowledged the positive efforts of the Innopharma Education staff and their clear commitment to engage with this process. The Panel particularly saw the benefit of the workflows in the development of Innopharma Education's *Quality Assurance Manual* and recommended that the concept of workflows be fully integrated into the quality assurance framework.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel notes that initial access to validation under QQI is a two-stage process comprising of the approval of capacity and quality assurance arrangements in stage one and the recommendation for validation of a programme in stage two. In this context, the Panel notes Innopharma Education's intentions to extend the timeframe for submission of a validation. The Panel commends Innopharma Education for the self-reflection that has informed its decision. It is the view of the Panel that this additional time will serve the provider well in enhancing its preparedness for the independent management and operation of a programme leading to a QQI award and the management and support of learners on that programme. The Panel further reminds Innopharma Education that under the initial access process, the provider must submit a programme for validation within 6 months of receiving QA approval.

Having reviewed the revised submission from Innopharma Education, the Panel recommends approval, with conditions, of the draft quality assurance procedures of Innopharma Education.

3.2 Recommendation of the panel to Approvals and Review Committee of QQI

	Tick one as appropriate
Approve [the provider's – insert name] draft QA procedures	✓
Refuse approval of **Innopharma Education** 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 [the provider's – insert name] draft QA procedures	

Part 4 Evaluation of the capacity of the applicant to provide quality education and training to learners

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**	Innopharma Education provided a Certificate of Incorporation (2009).
4.1.2(a)	***Criterion:*** *Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*	**Yes**	Innopharma Education is a legal entity in the EU and is based in Dublin.
4.1.3(a)	**Criterion:** *Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*	**Yes**	Innopharma Labs Ltd, trading as Innopharma Education, is an autonomous company within a group structure of Innopharma Holdings Ltd. Innopharma Education provided copies of existing MOUs with TUD (ITTD) and Griffith College.
4.1.4(a)	***Criterion:*** *Are any third-party relationships and partnerships compatible with the scope of access sought?*	**Yes**	Innopharma Education provided full details of all third-party relationships and partnerships compatible with 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**	Innopharma Education evidenced a commitment to compliance with legislative requirements in Ireland, including in respect of health and safety legislation, equality legislation and employment legislation. The Panel identified Innopharma Education's statutory requirements to comply fully with GDPR (see Section 5.8) and PEL (see Section 5.3) as

			required mandatory changes (see Section 7.1). The Panel reconvened 24 September 2020 and note the revisions made by Innopharma Education. The Panel further advises Innopharma Education of a Condition of Approval (see Section 6.1).
4.1.6(a)	**Criterion:** *Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.*	**Yes**	Innopharma Education has confirmed that it is in good standing in the qualifications and education and training system in Ireland.

Findings

The Panel is satisfied that Innopharma Education met the sub-criteria in 4.1, apart from criterion 4.1.5(a). At the time of the initial site visit, the Panel found that Innopharma Education should provide greater clarity on compliance with legislative obligations pertaining to both the Protection of Enrolled Learners (PEL) and GDPR. Specifically, Innopharma Education should outline the proposed mechanisms by which they will ensure the lawful transfer of learner data to QQI in the case of a PEL triggered event; identify the data that will be collected, processed, retained and shared in respect of different stakeholders, outlining the legal bases for the collection, processing and sharing and the potential bodies / organisations with whom data is shared; and provide a records retention schedule.

Innopharma was advised that in addressing this, due consideration should be given to the specific elements of personal data in the online learning context.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. In particular, the Panel reviewed Innopharma Education's Records Retention Schedule. Whilst the Panel is satisfied that the mandatory changes have been satisfactorily addressed, it advises Innopharma Education to be mindful of the different types of records it retains (i.e. image, voice, text-based contributions and records common to the virtual learning environment). Moreover, there should be a single Records Retention Schedule in operation and it should

detail the final disposition of data that is not retained indefinitely, recognising that in some instances electronic archiving is the only means of removal from the record (see Section 6.1).

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**	Innopharma Education provided documentary evidence that it is in good financial standing. However, the Panel finds that Innopharma Education requires additional learner supports to fully enable the proposed scope of provision sought (see 4.3.4(a).
4.2.2(a)	**Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*	**Yes**	Innopharma Education has a proven track-record of delivering academic programmes as a second provider. The Panel is satisfied that Innopharma Education has a reasonable business case for sustainable provision.
4.2.3(a)	**Criterion:** *Are fit-for-purpose governance, management and decision making structures in place?*	**Yes**	At the time of the initial site visit, the Panel found that Innopharma Education had some areas that required mandatory changes (see Sections 5.1 and 7.1). The Panel found that Innopharma Education should provide transparency in the identification of all individuals holding a position of responsibility in management and governance. The Panel reconvened on 24 September 2020 and noted the revisions made by Innopharma Education to satisfactorily address this issue. The Panel further advises Innopharma Education of a Condition of Approval (see Section 6.1).
4.2.4(a)	**Criterion:** *Are there arrangements in place for providing required information to QQI?*	**Yes**	The Panel finds that there are arrangements in place for providing required information to QQI. However, the Panel finds that the *Quality Assurance Manual* should provide greater clarity on the primary

			contact person within the organisation to engage with QQI.

Findings

The Panel is satisfied that Innopharma Education fully complies with criterion 4.2.1(a) 4.2.2(a) and 4.2.4(a). In relation to criterion 4.2.1(a), the panel noted, at the time of the initial site visit, that there were outstanding questions related to the provision of adequate learner supports to fully enable the scope of provision sought. The Panel requested that Innopharma Education provide a resourcing plan indicating the timeframe for the recruitment of these roles, and the timelines for acquisition of any further additional resources, both human and physical, intended to support the initial access and programme validation for the proposed scope of provision.

At the time of the initial site visit, the Panel found that criterion 4.2.3(a) was not fully met as there were lacunae in the presentation of its governance structures and the description of the components therein (see Sections 5.1 and 7.1). The Panel further found that Innopharma Education should provide transparency in identification of all individuals holding position of responsibility in management and governance and specifically the identities of the company secretary, the non-executive director, the external chair of the Academic Council and the external Chair of the Strategic Advisory Board.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel notes the revisions made by Innopharma Education related to its governance arrangements and is satisfied that the mandatory changes in these areas have been addressed. The Panel further advises Innopharma Education to review its governance arrangements to: extend the membership of the Academic Council to include greater externality with expertise in higher education to act as designated Deputy Chair in the event of the absence of the Chair (this should include confirmation of the period of tenure for the Chair and Deputy Chair); detail the workflow teams more fully in the *Quality Assurance Manual* and the arrangements for quorum of Examination Boards should be further clarified and the requirement for the attendance of an External Examiner at progression boards be stipulated (see Section 6.1).

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**	Since 2010, Innopharma Education has delivered education and training programmes as a second provider at Levels 6, 7, 8 and 9 on the NFQ; the providers that it has collaborated with are Griffith College and ITTD (now TUD).
4.3.2(a)	**Criterion:** *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*	**Yes**	Innopharma Education has a stable complement of education and training staff to deliver the scope of provision sought.
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 Innopharma Education has the capacity to comply with the standard conditions for validation subject to satisfaction of the requirements for transfer of data to QQI in a PEL context as referred to at 4.1.5(a). The Panel reconvened 24 September 2020 and accept the revisions made by Innopharma Education in this regard.
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**	The Innopharma Education campus at Sandyford is fit-for-purpose and has the required facilities to support the provision sought. Innopharma Education also outlined its virtual education platform which will be evaluated more fully as part of any future programme validations. At the time of the initial site visit, the Panel found that the library resources were not sufficient and requested

			Innopharma Education to provide a resourcing plan on this to the Panel. The Panel reconvened 24 September 2020 and accept the revisions made by Innopharma Education.
4.3.5(a)	**Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*	**Yes**	Innopharma Education meets QQI's criteria regarding access, transfer and progression; these are detailed in Sections 5.7 – 5.10 of the *Quality Assurance Manual*.
4.3.6(a)	**Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*	**Yes**	Innopharma Education evidenced that it has the capacity to meet this criterion but, at the time of the initial site visit, structures and resources related to assessment required further alignment (see Section 5.6). The Panel reconvened 24 September 2020 and accept the revisions made by Innopharma Education.
4.3.7(a)	**Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*	**Yes**	Innopharma Education is aware of its obligations in this regard and articulated its intentions. At the time of the initial site visit, additional clarification was required regarding the transfer of data to QQI in the event of a PEL trigger event (see Section 5.3). The Panel reconvened 24 September 2020 and accept the revisions made by Innopharma Education.

Findings

The Panel is satisfied that Innopharma Education fully complies with criterion 4.3.1(a), 4.3.2 (a) and 4.3.5 (a). At the time of the initial site visit, the Panel found that criterion 4.3.3(a) and 4.3.7(a) were partially satisfied owing to further mandatory changes related to the PEL (see Section 5.3). The Panel found that criterion 4.3.4(a) was partially satisfied as the library resources required further development. Innopharma Education committed in writing (Section 10.2.5) within the *Quality Assurance Manual* to recruit a qualified librarian to its staff as the number of programmes offered by the College increases. The Panel required Innopharma Education to bring the recruitment process forward to ensure a qualified librarian is in place prior to delivery of its initial Level 8 programme. Innopharma Education was required by the Panel to provide a resourcing plan indicating the timeframe for the recruitment of this role and the

timeline for acquisition of any further additional resources, both human and physical, intended to support the initial access and programme validation for the scope of provision sought. At the time of the initial site visit, the Panel found that criterion 4.3.6(a) was partially satisfied as the quality assurance framework around assessment required further alignment to ensure that this framework is cohesive and individual policies support / complement each other (see Section 5.6).

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel is of the view that Innopharma Education has made the necessary revisions to fully satisfy the criterion for programme development and provision requirements.

4.4 Evaluation of capacity to provide the proposed education and training provision - Overall finding:

At the time of the initial site visit, the Panel found that Innopharma Education had the capacity, pending mandatory changes, to provide the proposed education and training provision sought (see Section 7.1). On the day of the virtual site visit, the Panel sought clarity on the scope of provision sought. Innopharma Education clarified that it plans to put forward a BSc (Honours) in Advanced Manufacturing and Data Analytics (Level 8) programme at its first validation application. Innopharma Education further stated that it had always sought scope of provision up to Level 8, but also wants to develop short-term and long-term programmes. The proposed Level 8 programme would achieve this by having exit awards. The Panel noted this clarification and the report presented here reflects an institution seeking Access to Initial Validation of Programmes Leading to QQI Awards, specifically a Level 8 programme.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel is satisfied that the mandatory changes identified have been satisfactorily addressed and recommends approval of Innopharma Education's QA procedures. The Panel notes three conditions of QA Approval in Section 6.1 of this report and three additional specific advice identified in Section 7.2.

Part 5 Evaluation of draft QA Procedures submitted by Innopharma Education

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

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

Innopharma Education has a Board of Directors, chaired by the Chief Executive, that is responsible for corporate governance of the provider. The Academic Council, independently chaired, has delegated-authority from the Board of Directors for academic decision-making and the Executive Management Team, chaired by the VP for Strategic Development, has delegated-authority from the Board of Directors for the day-to-day management of the provider. The Strategic Advisory Board was established by the Board of Directors by formal resolution and its central remit is to advise the above listed bodies on strategic issues that may impact on the work of the provider. As this is an application for Initial Access to Validation, the provider currently has two constituted sub-committees of the Academic Council: the Programme Development Committee and the Student Services Committee. The College has indicated that as it develops more programmes, it plans to add additional constituted sub-committees of the Academic Council, namely a Teaching and Learning Committee, Quality Enhancement Committee and Library Committee. A Programme Board, reporting to the Academic Council, will be established for each programme that leads to an award.

During the virtual site visit, the Panel discussed the presentation of the governance structure and the description of the components therein with Innopharma Education. The Panel sought clarity on the roles, and how they relate, of the Chief Executive and the President; currently, the Chief Executive is the acting President. Innopharma Education reported that although they are two distinct roles, they are synergetic. The Panel further noted that there was a lacuna in the identification of all individuals holding a position of responsibility in management and governance, specifically the roles and responsibilities of the three external independent chairs / directors. For instance, can these be held by one individual or more than one individual? The documentation was not clear and needed to be amended accordingly. As a mandatory change, Innopharma Education was required to provide transparency in the identification of the company secretary, the non-executive director, the external chair of Academic Council and the external Chair of the Strategic Advisory Board.

Additionally, the Panel sought clarity on the role and purpose of the Strategic Advisory Board and its relationship with the decision-making bodies within the governance structure. Innopharma Education confirmed that this is an advisory body that provides the Board of Directors, the Academic Council and the Executive Management Team exposure to 'what is happening externally' through engagement with external stakeholders and industry experts. The Panel found this clarification satisfactory but, as a special advice, recommends Innopharma Education increase this Board's membership to include greater representation of industry stakeholders.

Another area of discussion centred on academic governance, both in terms of the roles and responsibilities of key personnel and in terms of remit for specified committees. The Panel sought

clarification on the delineation of the roles and responsibilities for the Director of Academic Affairs and Registrar and the Director of Academic Programmes / Head of Faculty. Specifically, the Panel wanted clarity on where resources for academic provision are discussed and approved. Innopharma Education reported that the Director for Academic Affairs and Registrar is responsible for academic standards and governance (e.g. exams, programmatic reviews, student life-cycle, staff development and learner records) and the Director for Academic Programmes / Head of Faculty is responsible for academic leadership (e.g. teaching and learning, revalidation and programme evaluation). Moreover, both functions have responsibility over the allocation of resources, but neither function has an allocated budget; the discussions regarding resources for academic provision take place at the meetings of the Executive Management Team. A key requirement of *QQI's Core Statutory Quality Assurance Guidelines* (2016) is that 'academic decision-making reflects the interests of learners and maintenance of standards [and] is independence of commercial considerations.' As a mandatory change, it was required that the documentation clearly present the decision-making processes and approval regarding the responsibility for the approval of resources to ensure that there is appropriate separation between academic and commercial decision-making. Another mandatory change was that Innopharma Education provide greater clarity on the primary contact person within the organisation to engage with QQI - the application documentation was ambiguous on this and needed to be clarified.

The Panel sought further clarification on the remit for specified committees. In particular, the presentation of academic governance (2.4.6) needed to be reviewed as it appeard to indicate that the Academic Council is not an independent body within the academic governance structure. The question of the Academic Council's independence was further highlighted in the area of programme development (see Section 5.3). Moreover, the Panel noted that the terms of references for the committees were not always complete. For example, they did not always reflect the responsibilities as articulated in quality assurance policies (e.g. the Academic Council's responsibility for the appointment of External Examiners and the role of the Board of Directors regarding programme development) or sufficiently detail committee quorums and chair arrangements for deputising. The Panel further questioned why there was only one learner representative on the Academic Council given the demographic of the prospective learner cohort. The Panel find Innopharma Education's explanation satisfactory, but the Panel recommends that learner membership on the Academic Council is increased in the more immediate term and kept under review as the student body increases and diversifies.

A key requirement of QQI's *Core Statutory Quality Assurance Guidelines* (2016) is that 'there are procedures in place for the identification, assessment and management of risk.' The Panel discussed with Innopharma Education the risk assessment undertaken by the College in its decision to become a QQI Provider. Innopharma Education detailed that it had identified costs / gaps related to infrastructure and resources, consulted with industry and believe that it can successfully market and deliver academic programmes as a QQI Provider. The Panel further explored risk with Innopharma Education in the context of responsibilities and decision-making in respect of risk identification and mitigation. The *Quality Assurance Manual* indicates that the Board of Directors "is responsible for the identification and evaluation of risks to the College and for monitoring, managing and mitigating risk through the use of the risk register, or other process"; both the Academic Council and the Executive Management Team have risk as a standing agenda item at their meetings. The Panel was provided with Innopharma Education's *Overview of Risk Management, Analysis and Mitigation Processes* on the day of the virtual site visit. However, the Panel identified as a mandatory change that Innopharma Education provide greater clarity in the articulation of the responsibilities and decision-making in respect of risk identification and mitigation in determining academic and financial viability and sustainability of programmes.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to governance and management of quality. The Panel further advises Innopharma Education to review its governance arrangements to: extend the membership of the Academic Council to include greater externality with expertise in higher education to act as designated Deputy Chair in the event of the absence of the Chair (this should include confirmation of the period of tenure for the Chair and Deputy Chair); detail the workflow teams more fully in the *Quality Assurance Manual* and the arrangements for quorum of Examination Boards should be further clarified and the requirement for the attendance of an External Examiner at progression boards be stipulated (see Section 6.1).

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

The Panel acknowledges the extensive engagement by Innopharma Education to develop a comprehensive quality assurance framework. During the virtual site visit, Innopharma Education highlighted the internal / external expertise they have sourced to ensure that arrangements are in place for the internal evaluation / review and continuous improvement of its quality assurance framework. Moreover, Innopharma Education highlighted the importance that workflows have had in the development and enhancement of the quality assurance framework; this was particularly noticeable in the development of the teaching and learning strategy. The Panel is cognisant that Innopharma Education plans to use the workflows as the basis for the establishment of future constituted sub-committees of the Academic Council. The Panel endorses this approach and advises that the *Quality Assurance Manual* is updated to formalise this approach into its existing quality assurance framework.

QQI's Core Statutory Quality Assurance Guidelines (2016) mandate that the provider's "quality assurance policies, procedures and systems are designed as a comprehensive system." In the evaluation of the documentation prior to the virtual site visit, the Panel found that there were some inconsistencies within the policy framework. During the virtual site visit, many of these inconsistencies were noted by the Panel, particularly in the areas of teaching, learning and assessment (see Sections 5.5 and 5.6). As a mandatory change, the Panel required Innopharma Education to review and revise the proposed quality assurance policies and procedures in the context of presenting a cohesive quality assurance framework within which individual policies support or complement one another, avoiding potentially conflicting policy positions or potential conflicts of interest in escalation or progression of procedures.

Additionally, as a mandatory change, the Panel required Innopharma Education to review and revise, as applicable, individual quality assurance policies to ensure they are fit-for-purpose. During the virtual site visit, the Panel specifically drew attention to the following policies and procedures: Programme Development (see Section 5.3); Academic Misconduct; Review, Re-Check and Appeal; Complaint and Disciplinary; Conflict of Interest and Blended Learning (see Sections 5.5 and 5.6). This mandatory change related to the escalation of processes within the quality assurance framework (e.g. clear articulation of the investigation stage (in respect of an allegation or grounds) and separation of the investigation and the decision-making body / personnel). In particular, the policy framework should outline how matters will progress in cases where stakeholders exercise their right to legal representation in situations where the policy precludes this. The policy framework should also detail the full breadth of stakeholders to whom

the policy may apply (e.g. disciplinary matters arising from contact by a member of the public and the processing of the personal data of external examiners or panel members).

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to documenting its approach to quality assurance. The Panel further advises Innopharma Education that it must articulate the separation of an investigating individual / group and the body responsible for determining the finding and imposition of any penalty / ruling resulting from this. While the Panel notes Innopharma Education's reference to practice in other providers, the Panel advises that this requirement is in the interest of Innopharma Education to ensure the provider is protected in the event of a legal challenge. In reviewing the policy and procedure, the Panel further advises Innopharma Education to reconsider the approach to the involvement by a third-party of a legal representative. It is the view of the Panel that terminating the formal complaint process and moving to appeal (*Quality Assurance Manual*, Section 3.5.4) is irregular and has the potential to compromise the process. The Panel advises Innopharma Education to consider how to proceed with legal representation present, allowing for revision of timelines, to facilitate Innopharma Education including its own legal representation.

3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

The *Qualifications and Quality Assurance (Education and Training) Act 2012*, Section 65, mandates that institutions have sufficient arrangements in place for the Protection of Enrolled Learners (PEL). Innopharma Education articulated a clear intention to participate in an alternate provider arrangement or avail of insurance, as required. The Panel sought further clarity on the mechanisms in place to identify and mitigate against factors that may prevent the continuity of a programme and the arrangements in place to ensure the lawful transfer of learner data to QQI should a PEL trigger event occur. Innopharma Education outlined the approach to risk management and issued the Panel with a copy of its *Overview of Risk Management, Analysis and Mitigation Processes*. Arrangements for the transfer of data to QQI, in compliance with data protection legislation, and including in instances where the provider's access to its records may be impeded physically or legally, need to be reflected within the *Quality Assurance Manual*.

QQI's Core Statutory Quality Assurance Guidelines (2016) stress the importance of stakeholder engagement (both internal and external) in the development of new programmes. These Statutory Guidelines state that new programme development and evaluation of new programmes are discussed / developed / approved by the "appropriate internal decision-making structures, allowing for consideration of new programmes by both management and governance." The *Quality Assurance Manual* states that the Academic Council has delegated authority from the Board of Directors for academic decision-making (Section 2.3.7). The Manual further states that the "Academic Council shall ensure that there is no undue influence exercised by commercial decision-makers over academic decision-making" (Section 2.4.4). However, new programmes are approved by the Academic Council and then submitted to the Board of Directors for final approval before being submitted for validation. During the virtual site visit, the Panel queried this process and were advised by Innopharma Education that the additional step of bringing the new programme to the Board of Directors for approval was from a resource point of view. The Panel advised Innopharma Education that the question of resource should be discussed / approved earlier in the process, rather than at the end of the process. As a mandatory change, the Panel required that the

allocated responsibilities and authority of the Executive Management Team, the Academic Council and the Board of Directors in the context of programme development and validation should be revised with a view to providing consistency and clarity. Additionally, the decision-making responsibility and the decision-making outcomes available to the applicable authority at each stage of the programme development and validation process should be reviewed and revised.

Regarding the area of access, transfer and progression, the Panel noted that there was an inconsistency related to the sign-off and appeal for decisions related to the Recognition of Prior Learning (RPL). The role of the Director of Academic Affairs and Registrar signed-off on all RPL decision (5.10.10) and also the appeal of an RPL decision (5.10.9); the Panel advised Innopharma Education that this must be changed. Moreover, the Panel queried the process around determining programme viability and the notice given to learners. Innopharma Education indicated that this had not been a problem with its current programmes as a second provider as there is a strong demand for these programmes. However, the Panel advised Innopharma Education to provide a provisional timeline in the documentation to provide transparency for potential applicants.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to its programmes of education and training.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

The Panel is satisfied that Innopharma Education takes responsibility for its staff and for providing them with a supportive environment that allows them to carry out their work effectively, in particular, in the areas of staff recruitment and staff communication. During the virtual site visit, the Panel sought clarity on the arrangements Innopharma Education had in place to support CPD. Innopharma Education indicated that staff are supported in CPD opportunities that may occur both internally or externally (e.g. progression of education; opportunities that align with institutional strategy; seminars and workshops). Innopharma Education further noted that staff across the provider are strongly encouraged to engage with CPD opportunities across the provider; these opportunities are not limited to academic staff. The Panel found this satisfactory and encourages Innopharma Education to continue formalising CPD opportunities across the institution.

The Panel sought further clarification on the management of academic staff, specifically as it relates to workload allocation. Innopharma Education indicated that many of the full-time academic staff have a workload of between 20 – 25 hours, inclusive of teaching, assessments and other institutional contributions. It further noted that the workload for part-time members of staff are monitored to ensure that they adhere to the *Organisation of Working Time Act 1997*; this was confirmed by the *Overview of Risk Management, Analysis and Mitigation Processes* provided to the Panel on the day of the virtual site visit. The Panel recommends that Innopharma Education examine workload across the institution and draft guidelines for workload allocation to ensure equity and transparency.

5 TEACHING AND LEARNING

Panel Findings:

The core mission of Innopharma Education is to "contribute value to our society by re-skilling, up-skilling and life-skilling our learners, enabling them to grow personally and professionally and build a better future for all." The Teaching, Learning and Assessment (TLA) Strategy detailed in the *Quality Assurance Manual*, and articulated by Innopharma Education on the day of the virtual site visit, is rooted in this mission and the Innopharma Education *Strategic Plan, 2020 – 2025*. The TLA Strategy detailed four priority areas: approaches to learning, teaching and assessment; learning design and learning technologies; lifelong learning and staff training and development.

The Panel initially focused on where responsibility for teaching and learning is held within the institution and the rationale behind Innopharma Education not having the Teaching and Learning Committee as a constituted sub-committee of the Academic Council. Innopharma Education indicated that as part of the initial development of its quality assurance framework, it had intended to constitute more committees but through external feedback chose to instead scale back to match its current size; the proposed scalability of the committee structure is represented on graph 2.4.6 of the *Quality Assurance Manual*.

In addition to providing the Panel with more context on how it developed the teaching and learning strategy, Innopharma Education indicated that its approach to teaching and learning was informed by the work of the Teaching and Learning Workflow Team; a Team that included both academic and non-academic staff members. An area of focus was blended learning and the development of a blended learning strategy that was directed to their audience. Innopharma Education stressed that the blended learning strategy, integrated into the TLA Strategy, has the learner 'front-and-centre' and is always forward looking and cognisant of development in industry.

The Panel sought further clarification on the role of the Learning Designer and the Online Learning Support Team. Innopharma Education stated that the primary function of the Learning Designer is to provide guidance to the institution and lecturers to support / promote the TLA Strategy in academic provision; this role is not currently filled and the timeline for filling this role is immediate. The Panel asked for clarification on the identified role of the Online Learning Support Team. Innopharma Education indicated that the Online Learning Support Team is a distinct role but is carried out by staff across the organisation. Every module has an online support member for every class to ensure that learners have all the necessary supports, both IT support and non-IT support. Currently there are six such staff with additional capacity to expand.

As Innopharma Education is applying for scope of provision in the area of blended learning, the Panel probed Innopharma Education on its capacity to deliver blended learning programmes. Innopharma Education stated that lecturers are thoroughly vetted in the area of IT proficiency and that there are contingency plans in place should a technical issue prevent a class from running. It further pointed to its adaptability during COVID-19 as an illustration of its ability to successfully deliver online provision. The Panel further asked how online content is developed (regarding programme content) and which roles within the organisation are involved in this process. Innopharma Education went through the process of both internal / external stakeholder engagement and stressed that the aim is that this is a continuous, not stagnant, process.

The Panel advised Innopharma Education to review its standards for online content and learning resources to ensure that the quality assurance framework in the area of teaching and learning and blended learning

are reflective of practice. The Panel find there are instances of disconnect in this regard and that roles and responsibilities in this area are not clearly defined.

6 ASSESSMENT OF LEARNERS

Panel Findings:

QQI's Core Statutory Quality Assurance Guidelines (2016) state that "the assessment framework incorporates procedures and systems for the security and integrity of the assessment process." The Panel sought clarity from Innopharma Education on its approach to the management of assessment and the division of responsibilities within the assessment process as assigned to the Director of Academic Programmes / Head of Faculty, the Director of Academic Affairs and Registrar and the Programme Lead. Innopharma Education outlined the operation of the moderation process, reflecting practice across the sector. The operation of more traditional modes of assessment as well as assessment in the online environment were discussed and Innopharma Education described the measures in place to protect the integrity and maintain security of the assessment process. The Panel noted the good practice in group assessment, and adherence to QQI policy in assigning individual marks, as described in the *Quality Assurance Manual* and communicated to the Panel during the virtual site visit.

The Panel acknowledged the inclusion of a procedure for the reviewing of examination scripts and advises Innopharma Education to consider the application of this in the context of an examination script being considered personal data. Detailed discussion took place in relation to the approach to review, re-check and appeal as the Panel sought clarification on responsibilities and procedural matters. The feasibility of the Programme Lead being responsible for re-checks was discussed in the context of right of access to final broadsheets. While it was acknowledged that the Programme Lead and Examiner would have a role to play in confirming the accuracy of computation and transfer of marks in the early stage of the process, the Panel advises that responsibility for the completion of the re-check process should reside within the administrative unit responsible for maintaining the academic record.

The Panel further noted the provider's interpretation of an 'assessment decision' being the decision of the Examination Board in the context of a review being 'the re-consideration of the assessment decision, either by the original assessor or by other competent persons'. The Panel urged caution to ensure that such an interpretation did not result in a situation whereby procedural irregularities arising from actions of the original examiner did not get disregarded as a result of this interpretation. The Panel was satisfied that the grounds, as documented, allowed for a review on such a basis. Continued discussion of the Procedures for Reviewing an Exam Board Decision highlighted the need for clarity in respect of learner dissatisfaction. The flow diagram on page 164 in the *Quality Assurance Manual*, along with the information in section 9.18.4, suggest dissatisfaction with a review outcome is basis for an appeal; information in section 9.18.5 rules this out.

In respect of reviews and appeals (in relation to assessment as well as other matters), the Panel advises the provider to clearly articulate the process and responsibility for the investigative stages of the procedure, and the separation of this from the consideration / hearing of evidence to determine the outcome of the process. The role of the Director of Academic Affairs and Registrar as Chair of an Assessment Review (9.18.4) and also the right of the Director of Academic Affairs and Registrar to request an appeal of any review outcome (9.18.5) requires clarification as the Panel is unsure why the Director of Academic Affairs and Registrar would request such an appeal given their prior involvement in the review process.

Innopharma Education submitted the *Academic Misconduct Policy* as part of the *Quality Assurance Manual* but further advised the panel of its intentions to revise this. The Panel supports the intentions in this regard and encourages the provider to ensure revisions reflect the wider context of academic misconduct, particularly in the online context where false representation or use of essay mills may be an issue. Further to this, the Panel required Innopharma Education to consider matters within the Policy relating to stage two of the procedure vis-à-vis the potential absence of penalty for minor or moderate plagiarism and the inability to identify repeat offenders due to Innopharma Education not retaining minor or moderate offences on the learner record. The process and responsibility for the investigative stages of the procedure, and the separation of this from the consideration / hearing of evidence to determine the outcome of the process, should also be clearly documented.

Innopharma Education explained its intentions relating to the use of External Examiners and detailed how access to assessments and student submissions is managed; it further explained the management of the moderation process prior to External Examining. The Panel recognises this aligns with practice across the sector and is a process Innopharma Education is familiar with through its collaborative programme partnerships. The Panel notes that the *Conflict of Interest Policy* provided appears limited to Innopharma Education personnel engaged in assessment. The *External Examiner Policy* is reasonably expected to connect with the *Conflict of Interest Policy* and while the *External Examiner Policy* does cross reference the *Conflict of Interest Policy*, the latter is predominantly focused on staff engagement in assessment. The Policy, including the nature of actual or perceived conflicts of interest, should reflect the wider range of stakeholders to whom the Policy will apply, including External Examiners and evaluation panel members.

Discussions pertaining to governance acknowledged the membership and quorum arrangements for Boards of Examiners which Innopharma Education outline as 'a sufficient number of the programme's assessors present to deliberate competently upon the assessment findings presented and at least one External Examiner present where awards are to be decided.' The Panel advises Innopharma Education to revisit this to more clearly articulate what constitutes a sufficient number of assessors and to further consider the requirement for the presence of an External Examiner when determining progression decisions.

The Panel sought clarification on the intentions for repeat assessments and Innopharma Education advised that re-assessments are not the same as the original in the case of unseen assessments such as exams or in such circumstances where the original assessment cannot be continued or replicated (e.g. group assessment being replaced by an individual assessment). The Panel advises this is clarified within the *Quality Assurance Manual* where page 157 states re-assessments are not the same as the original, appearing to have no exception to this.

No discussion took place in relation to placements and assessment of placement as the application clearly articulated that no placement will take place on proposed programmes in the short term (Application Form, page 34). Innopharma Education are advised that should this position change, the quality assurance procedures for placement learning will require approval from QQI.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to its processes around the assessment of learners. The previous Panel Report noted the suggestion of the Panel that the arrangements for quorum of Examination Boards be further clarified and that requirement for the attendance of an External Examiner at progression Boards be stipulated. The

Panel notes this was not a mandatory change or specific advice but is again drawing it to the attention of the provider as Innopharma Education may feel this is an opportune moment to address this.

7 SUPPORT FOR LEARNERS

Panel Findings:

The *Quality Assurance Manual* clearly articulates Innopharma Education's commitment to providing all its learners with a fair, accessible learning environment. The Panel welcomes Innopharma Education's efforts to expand institutional links to enhance learner supports, most notably the leveraging of current collaborations to source NStEP Training for class representatives and the membership to the Association for Higher Education Access and Disability (AHEAD). The Panel encourages Innopharma Education to continue these engagements with a view to broadening the approach to reasonable accommodation and the range of supports available.

At the virtual site visit, the Panel asked Innopharma Education to expand upon the physical supports available to learners. Innopharma Education noted that it has a *Policy for Reasonable Accommodation and Additional Supports*. This Policy states that learners are to disclose a disability at the application stage so that Innopharma Education can assess whether it has the necessary resources to facilitate reasonable accommodation. It further noted that the Sandyford Campus is completely accessible, and learners have access to a number of assistive technology devices (e.g. Lunar Software and NaturalReader). Innopharma Education further stressed that requests for reasonable accommodation are processed by the Learner Support Coordinator and reviewed in collaboration with the Director for Academic Affairs and Registrar; it provided the Panel with examples of how it is able to provide reasonable accommodation to learners and demonstrated the high-level of care and empathy that is taken when such applications are considered. The Panel advised Innopharma Education that more clarity is required in the quality assurance policies and procedures vis-á-vis the separation of reasonable accommodations to support learners with specific needs and the more temporary support needs generally addressed under mitigating circumstances, recognising the latter may not solely be health related issues.

The Panel spent considerable time engaging with Innopharma Education on the library supports that will be available to registered learners. In particular, the Panel noted that since Innopharma Education plans to seek validation for a QQI Major Award at Level 8, library supports should be an institutional priority. The Panel asked Innopharma Education whether it intended to appoint a librarian and, if so, what the timeline for having a librarian *in situ* was. Innopharma Education indicated that the initial focus regarding library resourcing would be the provision of online resources with the brief for this initially residing with the Learner Support Coordinator; as the institution's academic provision expands this will be reviewed. The Panel expressed serious reservations with this approach and, as a mandatory change, required Innopharma Education to bring the planned recruitment of a librarian as per Section 10.2.5 of the *Quality Assurance Manual* forward to support the proposed scope of provision of the application. Innopharma Education was required to provide a resourcing plan indicating the timeframes for recruitment of these roles, and the timelines for acquisition of any further additional resources, both human and physical, intended to support the initial access and programme validation for the proposed scope of provision.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their

concerns related to learner supports. The Panel specifically welcomes the recruitment plan for the role of librarian but advises Innopharma Education that this function does not need to be *in situ* prior to its submission for programme validation but prior to its first intake of learners.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

QQI's Core Statutory Quality Assurance Guidelines (2016) state that the provider's "information system is designed to enable compliance with data protection legislation [including] the establishment of data access controls, data backup systems and ensuring learner information material makes clear what personal data will be collected, for what purpose and with home it will be shared." Innopharma Education provided detailed policies demonstrating that the structures are in place to ensure the satisfaction of data protection requirements. However, information on the nature, use and retention of data collected for a full range of stakeholders was not provided. The Panel noted that Innopharma Education has affiliations with many institutions and queried what data is shared with these institutions. Innopharma Education stated that it has Service Level Agreements (SLAs) in place and makes learners aware of what data is shared; it further stressed that data is controlled tightly within the institution.

The Panel advised Innopharma Education that it may have to share data without the consent of the learner. As such, Innopharma Education was advised to conduct a detailed audit to identify the data that will be collected, processed, retained and shared in respect of different stakeholders. Furthermore, Innopharma Education was advised to outline the legal bases for the collection, processing and sharing and the potential bodies / organisations with whom data is shared. On this last point, the Panel specifically noted that arrangements for the transfer of data to QQI, in compliance with data protection legislation, and including in instances where the provider's access to its records may be impeded physically or legally, need to be reflected within the *Quality Assurance Manual*.

At various points throughout the virtual site visit, Innopharma Education indicated that its information technology platforms are centred on enterprise systems and that future growth would also include enterprise systems; an area of immediate focus is the implementation of a Student Records Management System (SRMS). Innopharma Education believe that it has the necessary available internal expertise to implement an SRMS. Related to records management (broadly), the Panel advised Innopharma Education to develop and provide a records retention schedule across the institution.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to information and data management. The Panel further advises Innopharma Education to review and update the Records Retention Schedule to better reflect the extent of records retained by Innopharma Education. The Panel advises the provider to be mindful of the nature of records, including image and voice but also text-based contributions, which may form part of premises records such as CCTV but in particular are common to the virtual learning environment. The Panel further advises that a single retention schedule is in operation reflecting records pertaining to all aspects of Innopharma Education operations, including corporate, legal, financial, HR, teaching, learning and assessment matters and the wide range of stakeholders whose personal data may be retained. The schedule should also detail the

final disposition of data that is not retained indefinitely, recognising that in some instances electronic archiving is the only means of removal from the record.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The Panel finds that Innopharma Education's policies and procedures regarding published information complies with the spirit of the *Qualifications and Quality Assurance (Education and Training) Act 2012*. The Panel noted that the website of Innopharma Education has a section dedicated to international learners, but the application for initial access to programme validation stated that it would not recruit international learners. The Panel further acknowledged that different agencies have different definitions of who is classified as an international learner, but stated that the Panel was looking at it from a quality assurance perspective. Innopharma Education stated that its programmes, as part of the existing collaborative provision, do admit international learners and it has experience in processing learner's classified as such. However, it further stressed that it does not plan to actively recruit international learners as an independent QQI provider and that it does not intend to apply to the Department of Justice for inclusion of Innopharma Education programmes leading to QQI Awards on the Interim List of Eligible Programmes (ILEP) to facilitate recruitment of visa holding learners. It further indicated that the Admissions Workflow is currently examining the website to make it is more learner-centric and that website development is on-going; the question around international admissions for QQI Awards will be clearly articulated on the revised website.

The Panel recommend that Innopharma Education gives consideration to the specific needs of the wider demographic of international learners including those that do not require a visa. Should Innopharma Education change its decision regarding inclusion of programmes on the ILEP, the provision of supports and expansion of quality assurance documentation should be undertaken to reflect this in line with the QQI publication *Code of Practice for Provision of Programmes of Education and Training for International Learners* (2015).

The Panel further noted that quality assurance evaluation reports are to be published online, as stipulated by *QQI's Core Statutory Quality Assurance Guidelines* (2016). Specifically, page 207 of the *Quality Assurance Manual* does not comprehensively reflect all the information that is provided to learners in the area of blended learning and should be amended accordingly; this point was acknowledged by Innopharma Education.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to public information and communication.

10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING

Panel Findings:

Innopharma Education has extensive experience delivering programmes validated by QQI as a second provider; these programmes were delivered showing regard to the established quality assurance policies and procedures of the collaborative partners (i.e. Griffith College and ITTD [now TUD]). The Panel specifically queried the rationale behind the application for Initial Validation of Programmes Leading to QQI Awards and the risk / mitigation analysis Innopharma Education completed prior to submitting its application to become a QQI Provider. Innopharma Education outlined the process it undertook to arrive at this application (e.g. identified costs / gaps related to infrastructure and resources and engagement with industry experts); it stressed that it completed a full and robust SWOT analysis and has the resources in place to accomplish this new development. Innopharma Education indicated that it will maintain its current collaborations and continue to 'nurture these valuable relationships'. As an independent QQI provider, programme development will centre on meeting the increasingly urgent need in industry to position its graduates at the vanguard of the Industry 4.0 revolution. The Panel sees strong potential in the links established by Innopharma Education within industry and recommends that Innopharma Education continue to develop these links. In particular, these links will not only aid in the development of the teaching and learning strategy but will underpin the strong commitment to the career development of its learners.

QQI's Core Statutory Quality Assurance Guidelines (2016) state that "the quality assurance procedures include explicit criteria and procedures for the recruitment and engagement of external, independent, national and international experts (where appropriate), including the selection and recruitment of expert panel members." The Panel commends Innopharma Education on its engagement with external stakeholders but advised Innopharma Education that quality assurance policies and procedures concerning external stakeholders are not always clear (e.g. there is a lacuna in the identification of all individuals holding a position of responsibility in management and governance, specifically the roles and responsibilities of the three external independent chairs / directors, the Academic Council's responsibility for the appointment of External Examiners and the application of quality assurance policies to External Examiners and evaluation panel members).

Placement opportunities are not currently proposed in the short term. The Panel advised Innopharma Education that should this position change, the quality assurance procedures for placement learning will require approval from QQI.

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

The Panel notes the high-level of internal and external expertise Innopharma Education has sourced to deliver on their commitment to self-evaluation, monitoring and review. Furthermore, the Panel acknowledges that the approach taken by Innopharma Education to date is one rooted in developing a quality assurance framework that is focused on scalability. To enhance self-evaluation, monitoring and review within the organisation, the Panel advised Innopharma Education to formalise the practice of workflows into the quality assurance framework.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel notes that the workflow teams are now referenced in the *Quality Assurance Manual*. However, it is the view of the Panel that the workflow teams *in situ*, and planned, should be more fully embedded in the quality assurance framework by providing a much clearer articulation of their purpose and membership.

12 TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING

Panel Findings:

The Panel reviewed the blended learning standards submitted by Innopharma Education; these standards are found in Section 7.3 of the *Quality Assurance Manual* and align to *the Topic Specific Statutory Quality Assurance Guidelines for Providers of Blended Learning Programme* (2018). During the virtual site visit, the Panel asked Innopharma Education to identify vulnerabilities within the blended learning infrastructure. Innopharma Education noted that it had undertaken a comprehensive review and has incorporated the findings of this review into the quality assurance framework and believe that its blended learning capacity is fit-for-purpose and robust. Moreover, it stressed that this capacity is appropriate for the size / scale and the approach is one of scalability. A specific vulnerability that Innopharma Education had identified was in the area of IT, specifically related to the SRMS. It is consulting with external consultants and developing a learner supports infrastructure that will be available to learners 24 / 7. The Panel advised that it is important for institutions to know their vulnerabilities so that they are mitigated.

Regarding the blended learning procedures, the Panel asked Innopharma Education what steps it took to mitigate vulnerabilities related these procedures. Innopharma Education stated that it reviewed the blended learning quality assurance framework and recognised that its blended learning strategy should be 'blended' into the teaching and learning strategy. By integrating these strategies together Innopharma Education hoped that it could maximise its compliance with the QQI guidelines.

The Panel sought clarity from Innopharma Education on public information provided to learners pertaining to blended learning; specifically, page 207 of the Quality Assurance Manual does not adequately capture this information. Innopharma Education acknowledged that this is captured elsewhere in the *Quality Assurance Manual* and that this specific section should be revised to provide a more complete account of blended learning requirements.

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to blended learning.

Evaluation of draft QA Procedures - Overall panel findings

During the virtual site visit, the Panel engaged with every aspect of Innopharma Education's quality assurance framework. The Panel advised Innopharma Education to ensure that the quality assurance framework is well-integrated and cohesively structured. In particular, all roles and responsibilities within

the institution should be clearly defined, both from a management / governance standpoint and within the institutional policy framework. The Panel found that although there is a strong commitment to quality enhancement within Innopharma Education, and Innopharma Education has engaged with both internal and external stakeholders to develop a robust *Quality Assurance Manual*, there were still several areas that required immediate attention; these are detailed in Section 7.1. The Panel further identified four areas of special advice (see Section 7.2).

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel is satisfied that the mandatory changes detailed in Section 7.1 and the areas of special advice identified in Section 7.2 were addressed by Innopharma Education. The Panel, therefore, recommends approval of Innopharma Education's QA procedures. The Panel notes three conditions of QA Approval in Section 6.1 of this report and three additional specific advice identified in Section 7.2.

Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

The Panel is mindful of Innopharma Education's experience as a higher education provider in collaborative arrangements, but is nonetheless aware that operating as an independent provider of programmes leading to QQI awards is a new departure and one which will represent a journey of learning and development for the provider. The quality assurance policies and procedures put forward have been reviewed in the context of them being forward facing. The Panel is satisfied that as presented, the policies and procedures address the QQI guidelines (core, sector and topic specific) applicable to the application.

The panel proposes the following conditions of QA Approval to ensure the procedures continue to be fit for purpose and further strengthen and safeguard Innopharma Education's position as an independent provider going forward:

Condition 1:

Review governance arrangements to:

- extend the membership of the Academic Council to include greater externality with expertise in higher education to act as designated Deputy Chair in the event of the absence of the Chair. This is to protect the provider, its learners and QQI awards while Innopharma Education matures as an independent provider of programmes leading to QQI awards. These revised arrangements should include confirmation of the period of tenure for the Chair and Deputy Chair; and
- ensure that the workflow teams *in situ*, and planned, are more fully embedded in the quality assurance framework by providing a much clearer articulation of their purpose and membership.

Innopharma Education should notify QQI of the revised arrangements not later than the point of the first application for programme validation.

Condition 2:

Review and revise documented procedures pertaining to complaints and data protection to ensure adequate legal protection of Innopharma Education and its stakeholders. Specifically:

- regarding the complaints procedure, the provider must articulate the separation of an investigating individual / group and the body responsible for determining the finding and imposition of any penalty / ruling resulting from this (see Section 5.2); and
- review and update the Records Retention Schedule to better reflect the extent of records retained by Innopharma Education (see Section 5.8).

Innopharma Education should notify QQI of the revised arrangements not later than the point of the first application for programme validation.

Condition 3:

Undertake a comprehensive review of governance arrangements and quality assurance policies and procedures after 12 months of programme operation to ensure that the approved procedures continue to be fit-for-purpose and to identify and address any conflicts or inconsistencies that may have arisen between policies and between policies and practice.

Innopharma Education must provide a report and action plan to QQI outlining the findings of the review detailing proposed amendments and enhancements.

Part 7 Mandatory Changes to QA Procedures and Specific Advice

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. It is the view of the Panel that the mandatory changes detailed in Section 7.1 have been addressed by Innopharma Education. The Panel has documented three conditions of QA approval in Section 6.1.

7.1 Mandatory Changes

1. Roles / responsibility and decision-making relationships within governance

Review the presentation of the governance structure, and the description of the components therein, and revise with a view to providing consistency and clarity in respect of, *inter alia*:

- the allocated responsibilities and authority of the Executive Management Team, the Academic Council and the Board of Directors in the context of programme development and validation;
- the graphic presentation of Academic Governance (2.4.6);
- the completeness of terms of reference in reflecting responsibilities as articulated in quality assurance policies (e.g. Academic Council responsibility for appointment of External Examiners);
- confirmation of Chair arrangements to ensure quorum (i.e. arrangements for deputising);
- the relationship between Innopharma Education and QQI;
- responsibility for the approval of resources, recognising the requirement for appropriate separation between academic and commercial decision-making; and
- the responsibilities and decision-making in respect of risk identification and mitigation in determining academic and financial viability and sustainability of programmes.

In presenting the revised documentation, Innopharma Education should provide transparency in identification of all individuals holding a position of responsibility in management and governance and specifically the identities of the company secretary, the non-executive director, the external chair of the Academic Council and the external Chair of the Strategic Advisory Board.

2. Interconnectivity of quality assurance procedures

Review and revise the proposed quality assurance policies and procedures in the context of presenting a cohesive quality assurance framework within which individual policies support or complement one

another, avoiding potentially conflicting policy positions or potential conflicts of interest in escalation or progression of procedures. Examples include:

- the role of the Director of Academic Affairs and Registrar in signing off on all RPL decisions (5.10.10) and also in the appeal of an RPL decision (5.10.9);
- the role of the Director of Academic Affairs and Registrar as Chair of an Assessment Review (9.18.4) and also the right of the Director of Academic Affairs and Registrar to request an appeal of any review outcome (9.18.5);
- the role of Director of Academic Programmes and Head of Programmes in the potential scenario of a complaint progressing to a disciplinary matter; and
- the recognition of an exam script as personal data and the policy for reviewing an examination script.

3. Arrangements for PEL and GDPR

Provide greater clarity on compliance with legislative obligations pertaining to both the protection of enrolled numbers and data protection. Specifically:

- outline the proposed mechanisms by which Innopharma Education will ensure the lawful transfer of learner data to QQI in the case of a PEL trigger event;
- identify the data that will be collected, processed, retained and shared in respect of different stakeholders, outlining the legal bases for the collection, processing and sharing and the potential bodies/organisations with whom data is shared; and
- provide a records retention schedule.

In addressing this, due consideration should be given to the specific elements of personal data in the online learning context.

4. Review / revise quality assurance policies to ensure they are fit-for-purpose

Review and revise, as applicable, individual quality assurance policies to ensure they are fit-for-purpose. In doing so, consider matters such as:

- the decision-making responsibility and the decision-making outcomes available to the applicable authority at each stage of the programme development and validation process;
- detailing the new practices now implemented such as the workflow teams which the Panel interpreted to be working well but need to be formalised;
- the full breadth of stakeholders that the policy may apply to (e.g. disciplinary matters arising from contact by a member of the public, personal data of external examiners or panel members, conflict of interest in respect of External Examiners, Panel Members, employees (beyond in their role as assessors));
- clear articulation of the investigation stage (in respect of an allegation or grounds) and separation of the investigation and the decision-making body / personnel;
- outlining how matters will progress in cases where a stakeholder exercises their right to legal representation in matters where the policy precludes this;

- provision of clear procedures to reflect application to the Innopharma Education context (e.g. the who, how and when in terms of Standards for Online Content and Learning Resources);
- recording of matters of minor or moderate academic misconduct on learner records;
- specific requirements pertaining to blended learning in the context of the *Policy for Public Information and Communication* (page 207);
- ensure consistency between assessment policies and information contained within the marks and standards;
- clarity vis-á-vis separation of reasonable accommodations to support learners with specific needs and the more temporary support needs generally addressed under mitigating circumstances, recognising the latter may not solely be health related issues;
- the appropriate individual(s) for the completion of an assessment review, notwithstanding the requirement to engage the examiner and Programme Lead; and
- the conflicting information pertaining to the appeal of an assessment review decision where section 9.18.4 suggests dissatisfaction is basis for an appeal but 9.18.5 rules this out.

5. Resources: Library

Reflecting the verbal commitment given to the recruitment of a librarian to support the proposed scope of provision, and the intention to appoint a learning designer, Innopharma Education are requested to provide a resourcing plan indicating the timeframe for the recruitment of these roles, and the timelines for acquisition of any further additional resources, both human and physical, intended to support the initial access and programme validation for the proposed scope of provision.

7.2 Specific Advice

The Panel reconvened on 24 September 2020 and conducted a desk review of the revised *Quality Assurance Manual* of Innopharma Education. The Panel notes the absence of fullness of response to specific advices provided in the report and the intention for Innopharma Education to consider these matters carefully. The Panel advises that Innopharma Education considers these advices in detail as part of the review and provides a comprehensive response to same. In particular, the Panel notes it advised Innopharma Education to increase employer representation on the Strategic Advisory Board. While acknowledging this is not a condition in itself, the Panel strongly encourages Innopharma Education to act upon this advice in the interest of Innopharma Education.

The Panel advises that Innopharma Education agree the terms of reference of this review with QQI and in doing so agree a timeframe for completion.

1. Reasonable Accommodation

The Panel welcomes Innopharma Education's more recent engagements with AHEAD and encourages Innopharma Education to continue such engagements with a view to broadening the approach to reasonable accommodation and the range of supports available.

2. Increase learner representation on the Academic Council

The Panel recommends that student membership on the Academic Council is increased in the more immediate term and kept under review as the student body increases and diversifies.

3. Supports for International learners

The Panel accepts that Innopharma Education does not intend to apply to the Department of Justice for the inclusion of Innopharma Education programmes leading to QQI awards on the Interim List of Eligible Programmes (ILEP) to facilitate recruitment of visa holding students. Nonetheless, the Panel suggests Innopharma Education gives consideration to the specific support needs of the wider demographic of international learners including those that do not require a visa. Should Innopharma Education change its decision regarding inclusion of programmes on the ILEP, the provision of supports and expansion of quality assurance documentation should be undertaken to reflect this in line with the QQI publication *Code of Practice for Provision of Programmes of Education and Training for International Learners (2015).*

4. Increase employer representation on the Strategic Advisory Board

The Panel noted Innopharma Education's significant engagement with industry through the wider Innopharma group and existing programmes. Notwithstanding this, to secure the benefit of a Strategic Advisory Board as articulated to the Panel, the Panel recommends membership is increased to include greater representation of industry stakeholders.

Moreover, after conducting its desk review of the revised *Quality Assurance Manual* submitted by Innopharma Education, the Panel submits additional specific advice:

5. Arrangements for quorum of Examination Boards

The Panel report previously noted the suggestion of the Panel that the arrangements for quorum of Examination Boards be further clarified and that requirement for the attendance of an External Examiner at progression Boards be stipulated. The Panel notes this was not a mandatory change or specific advice but is again drawing it to the attention of the provider as Innopharma Education may feel this is an opportune moment to address this.

6. Involvement by a third-party of a legal representative

The Panel further advises Innopharma Education to reconsider the approach to the involvement by a third-party of a legal representative. It is the view of the Panel that terminating the formal complaint process and moving to appeal (*Quality Assurance Manual*, Section 3.5.4) is irregular and has the potential to compromise the process. The Panel advises Innopharma Education to consider how to proceed with legal representation present, allowing for revision of timelines, to facilitate Innopharma Education including its own legal representation.

7. Development of a single retention schedule

The Panel further advises that a single retention schedule is in operation reflecting records pertaining to all aspects of Innopharma Education operations, including corporate, legal, financial, HR, teaching, learning and assessment matters and the wide range of stakeholders whose personal data may be retained. The schedule should also detail the final disposition of data that is not retained indefinitely, recognising that in some instances electronic archiving is the only means of removal from the record.

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
6 – 8	Major, SPA, Minor	Life Science, Data Analytics, ICT, Advanced Manufacturing

Part 9 Approval by Chair of the Panel

This report of the Quality and Capacity Panel is approved and submitted to QQI for its decision on the recommendation to approve subject to conditions the draft quality assurance procedures of Innopharma Education.

Name: _____

Date: 5 October 2020

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

Document	Related to
Application and Gap Analysis	All Sections
Quality Assurance Manual	All Sections
Innopharma Education Strategic Plan	All Sections
Certificate of Incorporation	Evidence of the type of legal entity (1.2)
Finance Cover Letter and Profit and Loss Account	Financial Viability and Resources (3.1)
Insurance Policy Documentation	Public Liability Insurance (3.2)
Tax Clearance Certificate	Current Tax Clearance Certificate (3.3)
Griffith College MOU	Collaborations Currently in Place (2.1c)
ITTD MOU	Collaborations Currently in Place (2.1c)
Document – Innopharma Education Information Required in Advance of the Site Visit	Section 1 (Governance and Management); Section 6 (Assessment); Section 8 (Data and Information Management)
Document – Errata	Section 6 (Assessment)
Document – Contingency Procedure for Online Examination and Assessment	Section 6 (Assessment)
Document – Initial Pre-Programme Feasibility Proposal (BSc (Hons) in Advanced Manufacturing and Data Analytics	Scope of Provision (4.2)
Document – Overview of Risk Management, Analysis & Mitigation Processes	Risk Management (2.2b)
PowerPoint – Evaluation of Initial Access to Validation	All Sections

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

Name	Role/Position
Ian Jones	CEO & President
Kevin Delaney	VP for Strategic Development
Finbarr Sheehy	Director of Academic Programmes / Head of Faculty
Orla Callan	Director of Academic Affairs and Registrar
Sandra Mooney	Head of Quality Assurance & Enhancement
Michelle McCoy	Head of Assessment
Ann Ryan	Lecturer
Paula Kearney	Lecturer
Orla McKiernan	Programme Lead
Alexandra Anton	Learner Support Coordinator
Peter Jones	IT Manager

Appendix: Provider Response to the Initial Access to Validation Report

Innopharma education

Response to the Report of QQI's

Quality and Capacity Evaluation Panel

Stage 1

Assessment of Capacity and Approval of QA Procedures

October 5th, 2020

Contents

Introduction

Innopharma Education welcomes the final report of the Independent Quality and Capacity Evaluation Panel (hereafter the Panel), received October 2nd, 2020 and the recommendation of the panel to approve, with conditions, the draft quality assurance procedures of the College. We particularly welcome the following commendation and acknowledgement from the panel.

- "The Panel commends Innopharma Education on its engagement with external stakeholders, both for the career development of its learners and the development of academic provision within the institution" (p.4)
- "The Panel further acknowledges the positive efforts of the Innopharma Education staff and their clear commitment to engage with this process" (p.4)
- "The Panel acknowledges the extensive engagement by Innopharma Education to develop a comprehensive quality assurance framework" (p.17)
- "Innopharma Education further noted that staff across the provider are strongly encouraged to engage with CPD opportunities across the provider; these opportunities are not limited to academic staff" (p.19)
- "Innopharma Education takes responsibility for its staff and for providing them with a supportive environment that allows them to carry out their work effectively" (p.19)
- "The Teaching, Learning and Assessment (TLA) Strategy detailed in the *Quality Assurance Manual*, and articulated by Innopharma Education on the day of the virtual site visit, is rooted in this mission and the Innopharma Education *Strategic Plan, 2020 – 2025*" (p.20)
- "The College's Quality Assurance Manual clearly articulates Innopharma Education's commitment to providing all its learners with a fair, accessible learning environment" (p.23)
- The College's industry links "will not only aid in the development of the teaching and learning strategy but will underpin the strong commitment to the career development of its learners" (p.26)
- "The panel notes the high-level of internal and external expertise Innopharma Education has sourced to deliver on their commitment to self-evaluation, monitoring and review" (p.26)
- "…the approach taken by Innopharma Education to date is one rooted in developing a quality assurance framework that is focused on scalability" (p.26)
- The College has developed "a robust Quality Assurance Manual" (p.27)

The team at Innopharma Education extends sincere thanks to the members of the Panel for their delivery of a detailed, rigorous and comprehensive evaluation. The team further note and appreciate the collegiate and professional interaction of the Panel with Innopharma Education staff throughout the process.

Minor Issues to be resolved

The College team appreciate the significant work undertaken by the panel in drafting and updating the Panel report. The College note that the report received leaves three items unresolved, and requests that these be appropriately closed off by the Panel prior to finalisation.

1. On page 21 (Section 5.5) the Panel state that Innopharma Education was advised to review its standards for online content and learning resources to ensure that the quality assurance framework in the area of teaching and learning and blended learning were reflective of practice. The panel found there were instances of disconnect in this regard and that the roles and responsibilities were not clearly defined. This was addressed by the College in its response to the panel's previous report. The College request this be made clear in the final report with a statement worded similarly to the Panel's update at the end of Section 5.7, which reads:

   The Panel reconvened on 24 September 2020 and conducted a desk review of the revised Quality Assurance Manual of Innopharma Education. The Panel finds that Innopharma Education addressed their concerns related to XXX

2. On page 25 (Section 5.9) the Panel state that p. 207 of the Quality Assurance Manual did not comprehensively reflect all the information that is provided to learners in the area of blended learning (N.B. *in Section 5.12 it is noted that this information was captured elsewhere in the Quality Assurance Manual*). This was addressed by the College in its response to the Panel's previous report. The College therefore request, as per previous, that this be made clear in the final report.

3. On page 27 (Section 5.12) the Panel again state that p.207 of the Quality Assurance Manual did not capture all the public information provided to learners. This was addressed by the College in its response to the Panel's previous report. The College therefore request, as per previous, that this be made clear in the final report.

Response to Condition 1

Review governance arrangements to:

- *extend the membership of the Academic Council to include greater externality with expertise in higher education to act as designated Deputy Chair in the event of the absence of the Chair. This is to protect the provider, its learners and QQI awards while Innopharma Education matures as an independent provider of programmes leading to QQI awards. These revised arrangements should include confirmation of the period of tenure for the Chair and Deputy Chair; and*

- *ensure that the workflow teams in situ, and planned, are more fully embedded in the quality assurance framework by providing a much clearer articulation of their purpose and membership.*

Innopharma Education should notify QQI of the revised arrangements not later than the point of the first application for programme validation.

The College values and actively pursues informed externality at all levels of decision-making and development across the organisation. The College therefore see great merit in expanding the membership of the Academic Council as required within this condition and will notify QQI of this revised arrangement not later than the point of the first application for programme validation. The College will further document the purpose and membership of workflow teams, which are responsible for the implementation of tasks, projects and processes, and concurrently submit information pertaining to these to QQI.

Response to Condition 2

Review and revise documented procedures pertaining to complaints and data protection to ensure adequate legal protection of Innopharma Education and its stakeholders. Specifically:

- *regarding the complaints procedure, the provider must articulate the separation of an investigating individual / group and the body responsible for determining the finding and imposition of any penalty / ruling resulting from this (see Section 5.2); and*

- *review and update the Records Retention Schedule to better reflect the extent of records retained by Innopharma Education (see Section 5.8).*

Innopharma Education should notify QQI of the revised arrangements not later than the point of the first application for programme validation.

The College recognises the importance of this condition, the focus of which is to ensure adequate legal protection of the College and its stakeholders. The College will proceed to seek advice from legal counsel in relation to the specifics of the first bullet point and return to QQI in relation to this prior to the first application for programme validation. With regard to the Records Retention Schedule, the College has committed to engaging external expert consultancy to undertake a full audit of the College's processes in relation to data management and retention. This will be completed and the Records Retention Schedule updated accordingly prior to the first application for programme validation.

Response to Condition 3

Undertake a comprehensive review of governance arrangements and quality assurance policies and procedures after 12 months of programme operation to ensure that the approved procedures continue to be fit-for-purpose and to identify and address any conflicts or inconsistencies that may have arisen between policies and between policies and practice.

Innopharma Education must provide a report and action plan to QQI outlining the findings of the review detailing proposed amendments and enhancements.

The College welcomes this opportunity to engage with QQI directly following annual review of its governance and quality assurance policies and procedures.

Response to Specific Advice

The College acknowledges the items of Specific Advice provided by the Panel within the report and thank the Panel for the consideration given to the specific areas of the College's processes these items concern. The College intends to give careful consideration to these, and will provide QQI with information pertaining to how this advice has been actioned and implemented within the report required to address Condition 3.

Concluding Remarks

As stated at the outset of this response, Innopharma Education appreciates the significant amount of work undertaken by the Panel in the course of this evaluation, and values the feedback, insights and advice provided. It is our view that the rigor of the evaluation process has contributed to our development of a more robust, practicable and accessible QA. Further, it has significantly enhanced our processes for capacity and implementation planning.

Innopharma Education look forward to responding to the Conditions of Approval outlined in the Panel's report, and engaging actively with communities of practice, organisations and sectoral bodies as well as with QQI in the years ahead.