



Re-engagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	International Centre for Security Excellence (ICSE)
Address:	2 nd Floor 7, St. Francis Street, Galway.
Date of application:	26 th June 2019
Date of resubmission of application:	14 th January 2021
Date of site visit:	4 th February 2020
Date of reconvene meeting:	12 th April 2021
Date of recommendation to the Programmes and Awards Executive Committee:	1 st April 2020 and 24 th June 2021

1.2 Profile of provider

International Centre for Security Excellence (ICSE) is a nationwide training and development provider based in Galway with other training centres in Dublin and Cork. The company was formed in 2006 and since then ICSE has developed and delivered QQI certified programmes to learners in both the public and private sectors. The company is registered as a limited company with two directors, one of whom is the owner. The company offers 12 programmes validated by QQI, with all of these programmes leading to minor or special purpose awards up to Level 6 on the NFQ. It has been delivering NFQ Level 4 security and security-related modules since its foundation and in recent years has offered two Level 6 CAS minor awards in Supervisory Security Management and Conflict Management. It has also recently developed a new Level 4 programme, a Hotel Reception Skills course which targets the growing hospitality sector in Ireland.

In addition, ICSE provides non-certified, bespoke, specialist conflict management training programmes specifically designed to meet the needs of the clients in areas such as Healthcare, Education, Green Light



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Services and Transport and Utilities sectors. The company plans to significantly increase its presence in this particular market segment in the coming five years.

ICSE trains approximately 1800 learners a year with on average 1000 learners undertaking QQI certified programmes. The company's motto is "We Change Lives" and its stated goal is to have a life changing impact on every learner who attends one of its training programmes.



Part 2 Panel Membership

Name	Role of panel member	Organisation
David Treacy	Chair	Former Director of Further Education and Training, City of Dublin ETB (CDETB)
Rory Byrne	Secretary (for original evaluation)	Former Director of Academic Operations / Deputy Managing Director, Dorset College
Pam Skerritt	QA Expert	Former Head of Learning and Development, the CPL Institute
Pat Flynn	QA Expert	Academic Standards Quality Officer NCU Ltd.
Clodagh Beare	QA Expert	QA Development Officer DDLETB (unable to attend)
Matthew Hurley	Secretary (for reconvene panel)	Quality Officer, Bridge Mills Galway Language Centre

Part 3 Findings of the Panel

3.1 Summary Findings

The panel wish to firstly acknowledge the warm welcome and the open discussion which formed the basis of much of the site visit. The company's approach to the importance of quality assurance procedures resulted in the potential for the panel to further probe several areas that it was particularly interested in. It was clear to the panel that the provider was interested in any feedback the Panel presented on the day of the site visit. All additional materials requested were provided before the visit and further additional material such as sample EA reports were provided on the day when requested by the panel.

The panel was pleased to note the commitment of ICSE to the delivery of education and training programmes to a range of different market segments. Many of these segments are currently playing a key role in the growth of the Irish economy.

ICSE is careful both in its focus and in its product development focus to ensure its product offering is relevant to the demands of the marketplaces that it operates within. The panel recognised the fact that the programmes it delivers are carefully selected in line with industry requirements. At the time of the original site visit, ICSE's licence from the Private Security Authority (PSA) was pending. This has since been approved.

Nonetheless, at the conclusion of the site visit, the panel collectively formed the view that a number of key concerns existed relating to separate and specific areas in the provider's quality assurance policies



and procedures. The concerns were based on clear and identifiable differences between certain elements of the provider's quality assurance procedures and processes and the requirements of QQI's 2016 Core Statutory Quality Assurance Guidelines.

The panel reconvened in April 2021 to perform a desk review of ICSE's revised documentation and were pleased with the developments which had taken place in the interim period. While the panel did identify some areas for continued enhancement, the panel was overall satisfied with the progress which had been made, as well as the positive forward trajectory ICSE is on as a result of the developments. The panel is therefore delighted to be able to recommend QQI *Approval of ICSE's QA Procedures with Conditions*.

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

	Tick <u>one</u> as appropriate
Approve ICSE's draft QA procedures	✓
Refuse approval of ICSE's draft QA procedures pending mandatory changes set out in Section 6.1 <small>(If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)</small>	
Refuse to approve ICSE's draft QA procedures	

Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

	Criteria	Yes/No/Partially	Comments
4.1.1(a)	Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	ICSE is an established legal entity which operates in the education sector in Ireland.
4.1.2(a)	Criterion: <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	Yes	ICSE is established in the European Union and has demonstrated a substantial presence, both domestically and internationally.



4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	N/A	At the time of evaluation, ICSE was not engaged in collaborative provision arrangements with other relevant stakeholders. Information in relation to its own structure was provided and accepted by the Panel.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	N/A	There are no third-party relationships and/or partnerships of relevance to this application.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	ICSE has demonstrated that it complies with applicable regulations and legislation in the EU jurisdictions in which it operates.
4.1.6(a)	Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>	Yes	ICSE has a good standing in the qualifications systems it operates in across several distinct market segments. The company is also recognised by the Private Security Authority as a Training Organisation.

Findings

The Panel received various documentation from ICSE prior to the site visit, such as a Certificate of Incorporation, Company Registration details, audited accounts and budget projections, and on this basis, the Panel was satisfied that ICSE meets the legal and compliance requirements for re-engagement. The Panel is pleased to confirm that ICSE has fully met Criteria 4.1. Relevant evidence demonstrating compliance of same was provided to the Panel.

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

	Criteria	Yes/No/ Partially	Comments
4.2.1(a)	Criterion: <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	Yes	The panel recognise that ICSE is a stable operation and that it is in good financial standing.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	ICSE presents as a dynamic organisation with significant experience in the sectors it operates in. These sectors are relevant to the overall growth of the Irish economy.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision-making structures in place?</i>	Yes	<p>The panel had concerns that the Academic and Management Structures were not sufficiently embedded and identified mandatory changes for ICSE in relation to this specific sub-criterion.</p> <p>Following a comprehensive desk review of ICSE's revised documentation, the panel is satisfied that its initial concerns have been adequately addressed. Notwithstanding this, a number of <i>Conditions of Approval</i> were identified which seek to assist ICSE in its ongoing enhancement of its organisational and academic governance structures. These are detailed in Section 6.1 of this report.</p>
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	ICSE has proven communication channels in place with QQI.

Findings

The panel is satisfied that ICSE has met Criterion 4.2.1(a), 4.2.2(a) and 4.2.4(a). Given the above, the panel considers that ICSE has a sufficient resource base and is stable and in good financial standing. It also considers that there is strong evidence that ICSE has a reasonable business case for sustainable provision.

At the conclusion of the site visit, the panel held concerns that ICSE had not sufficiently demonstrated its fulfilment of Criterion 4.2.3(a). However, as outlined above, the panel is satisfied that ICSE has addressed the original concerns under this criterion following submission of its revised QA documentation.

**4.3 Programme development and provision requirements:**

	Criteria	Yes/No/ Partially	Comments
4.3.1(a)	Criterion: <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	Yes	ICSE has experience and a track record in providing programmes in the hospitality and security sectors, and where applicable, offering bespoke product ranges to its potential customer base. The latter in particular demonstrates to the panel a history of quality provision to the relevant clients who have requested said courses.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	The panel was impressed with the staffing structure presented. Information provided by one of the lecturing team matched the information presented from the management team.
4.3.3(a)	Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	The panel is fully satisfied that ICSE is in a position to continue to comply with the requirements of this Act.
4.3.4(a)	Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i>	Yes	ICSE operates from owned premises in Galway, Cork and Dublin. It also uses rented premises for the delivery of certain training programmes. The panel had a concern in relation to the stated lack of a risk management matrix being in existence and the potential implications this may have on the resourcing of the programmes. In the intervening period following the site visit, ICSE worked extensively on a risk register which was reviewed by



			<p>the panel as part of the reconvene meeting. The panel was impressed and heartened by the clear importance placed upon the development of the register by ICSE. The panel is therefore satisfied that ICSE has addressed the concerns originally identified by comprehensively formalising and documenting its risk management practices.</p>
4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	<p>The panel had concerns around ICSE's strategy relating to the assessment of the English language capabilities of students. Additionally, the lack of a clear and documented system for the Recognition of Prior Learners (RPL) was also identified as a matter of concern.</p> <p>In relation to the first concern, the panel was encouraged by the guidelines and provisions which have been implemented by ICSE since the site visit. ICSE has also consulted external subject-matter experts in respect of these developments.</p> <p>In relation to RPL, ICSE undertook a mapping exercise of its RPL needs as advised by the panel at the conclusion of the site visit. This was still in progress at the time of resubmission, and the panel encourages further development in this area.</p>
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	<p>At the conclusions of the site visit, the panel was not satisfied that the approach taken by ICSE to assessment and learning met QQI requirements. Additionally, the panel had concerns</p>



			around the consistency of assessment across ICSE's training centres. While acknowledging the work undertaken to date to address the original concerns, the panel would like to emphasise the importance of ensuring that the main assessment centre retains oversight of the entire assessment process. This oversight should be appropriately documented.
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	Yes	ICSE's QQI validated programmes are of short duration and therefore exempt.

Findings

The panel is satisfied that ICSE has met Criterion 4.3.1(a), 4.3.2(a), 4.3.3(a) and 4.3.7(a). However, at the conclusion of the site visit, the panel held concerns that ICSE had not sufficiently demonstrated its fulfilment of Criterion 4.3.5(a) and 4.3.6 (a) whilst having only partially demonstrated its fulfilment to Criterion 4.3.1.4(a). Specifically, the Panel was of the view that ICSE needed to place considerable focus on its QA documentation in order to fully meet Criterion 4.3.5(a). Following a comprehensive review of the revised documentation, the panel is satisfied that the above concerns have been adequately addressed.

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

Following the site visit, the panel was satisfied that ICSE had met most of the criteria in Section 4, with relevant evidence provided in relation to the same, the majority of which related to ICSE's legal and resource requirements.

The panel had, however, identified distinct and separate areas of immediate concern, largely pertaining to the requirements of QQI's guidelines in relation to Governance and Management of Quality and Documented Approach to QA, Risk Management, and in relation to Learner Admission, Progression and Recognition.

The panel is cognisant of the significant investment of time and resources into addressing the vulnerabilities highlighted at the site visit and would like to commend ICSE on the work it has carried out to date. The panel is pleased that its primary concerns, as outlined above, have been addressed and encourage ICSE's ongoing enhancement of its QA procedures.



Part 5 Evaluation of draft QA Procedures submitted by ICSE

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

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

At the conclusion of the site visit, the panel found that the core statutory guidelines relating to this key area of quality assurance had not been fully considered.

The open discussions referred to in Section 3.1 of the report covered, in particular, the dynamic nature of the markets which ICSE operates in and the opportunities that the CEO and his team see in terms of delivering relevant, career-focused educational programmes to address what they identify as significant gaps in the marketplace. As a result of this particular discussion, the panel had a strong understanding of ICSE's existing internal government and management structures. An outcome of this dialogue is that the panel notes and commends the obvious commitment of ICSE's representatives to their learners and their focus and ethos on "We Change Lives".

Notwithstanding this, the panel identified significant gaps between ICSE's draft QA procedures and QQI's Guidelines and identified a number of mandatory changes for ICSE to enable the provider to address these issues, keeping in mind the principles of proportionality and the contextual particularities of the provider's operations. The panel also made several recommendations in Section 7.2, which were set out as "Specific Advice".

The panel emphasised the following points for particular consideration and reflection by ICSE:

5.1.1 QQI requires providers to have a quality assurance system which is owned by the provider.

The panel noted consistent crossover between commercial areas and academic areas, with final decisions for both areas appearing to clearly sit with the Managing Director. The core decision-making processes appeared to be aligned to the commercial business needs of the organisation. The panel did not get a sense of a clear delineation or separation between academic and commercial decision-making authority; nor did it get a sense of any quality assurance procedure being in place to protect against an over-reliance on a very small number of senior management making, in effect, every decision for the provider.

Following a review of the revised documentation, the panel encourages ICSE's continued development in this area and has identified some Conditions of Approval to assist ICSE moving forward, namely that ICSE must clarify the language throughout its QA Manual to confirm that the Academic Committee has final responsibility for QA, and that ICSE must appoint an external chair to the Academic Committee with the aim of ensuring an appropriate separation of decision-making responsibility between the Academic Committee and Management.



5.1.2 QQI requires providers to ensure that the governance structure enforces separation of responsibilities between those who produce/develop material and those who approve it.

As indicated in 5.1.1, this aspect of QQI's guidelines requires academic decision-making to be demonstrably independent of corporate decision-making within a provider's governance structure. However, the role of ICSE's Academic Committee was not initially clear. Reference was made in the original QAP document to the fact that the Academic Committee developed policies and procedures (QAP, Section 4.1.1, p.84). However, no indication was given as to where these key policies and procedures would be approved. This presented a concern from a quality assurance perspective. Separately, in the same QAP document, reference was made to the Academic Committee endorsing frameworks and procedures for programmes, appeals and assessment offences. The Panel advised ICSE to clearly set out the separation of responsibilities. Duality of roles is a natural occurrence in SME type organisations such as ICSE. However, it would not be appropriate to have one person in effect carrying out functions where, for example, an Academic Manager may be reporting directly into the Managing Director in relation to the signing off on academic-related decisions. ICSE has continued its enhancement in this area with the aim to ensure a clear separation of responsibilities.

A specific guideline identified as particularly relevant by the panel relates to a system of governance that considers risk.

The area of risk management and the implementation of a risk matrix model was raised by the panel during the site visit. Whilst commending the openness of the staff members in advising that there was no risk management policy in place, the panel had concerns around this. It appeared that there were no formal risk management processes in place, no identification of vulnerabilities and corrective actions identified. The panel advised that this should be mapped to all three centres and included in the limited cases of contracted provision for trainers.

There was reference to a risk-matrix style document being worked on in due course, but in the event of an immediate risk-related matter taking place, the panel had concerns as to the impact this could have on both learners and staff of ICSE, and separately on the reputation of the company.

Following the site visit, ICSE spent considerable time developing an impressive and comprehensive risk register, inclusive of strategic, financial and compliance, operational, and reputational risks. The panel sees this development as being of great benefit to the organisation and commends ICSE on the work carried out to produce such a document, which reflects an understanding of the importance it holds.



2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

ICSE provided a QA manual (referred to as a “QA document”) as part of its application. Following the site visit, the panel found that the core statutory guidelines relating to this key area of quality assurance had not been fully considered.

The QQI Guidelines require that the provider’s quality assurance system is fully documented and that there are robust, documented policies and associated procedures for the assurance of the quality and standards of the provision.

This area of the QQI Guidelines had not been sufficiently adhered to by the provider in its documented procedures. The panel noted from discussions held during the site visit that processes and procedures which fully adhered to QQI criteria were undertaken but these were not identified in the draft QA documentation presented both in advance and on the day of the site visit. The provider accepted this guidance and recognised the challenges involved in producing a relevant, viable and updated set of QA procedures and processes. It also committed to take on board any relevant feedback the panel was willing to provide in this key area.

In reviewing the revised documentation, the panel notes the extensive revisions, amendments and additions to the QA Manual to ensure processes are adequately documented. The updated QA Manual now contains more detail in areas such as programme development, learner admission and plagiarism, to be reflective of the work carried out in practice.

The panel also identified a significant issue in the QAP relating to role titles. Certain staff members had differing versions of the same role referred to throughout the document. Separately, a small number of staff members appeared to be undertaking a large number of roles within the organisation.

In an effort to address the mandatory change noted in respect of the above concern, ICSE undertook a review of its documentation to ensure job titles and responsibilities are used correctly and consistently throughout the documentation. The panel was pleased to see this and is happy to deem the matter resolved.

The panel is of the view that the changes effected by ICSE in response to the panel’s concerns under this dimension of QA allow for a practical and implementable QA system.



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

During the site visit, the panel discussed processes at ICSE pertaining to programme development and approval. The panel also discussed procedures for admissions, English language suitability and assessment of same, access, transfer and progression with ICSE's representatives.

Following the site visit, the panel was not fully satisfied that the core statutory guidelines relating to this key area of quality assurance had been fully considered. QQI's guidelines require that policies and procedures for programme design and approval are designed with overall programme objectives and programme strategies that are in line with the provider strategy and have explicit intended learning outcomes.

The panel noted that the submitted process chart did not map to the activity of ICSE, and suggested it would be advisable to redesign the chart to reflect the narrative discussed on the day of the site visit (which was positive and open), to enable a simpler process to be put in place to reflect the resources available within ICSE.

QQI's guidelines require policies and procedures for learner admission, progression and recognition to be fit-for-purpose. The guidelines also require that fair learning of education and training qualifications, periods of study and prior learning must be included in this process.

The panel had concerns in the above areas due to there being no evidence of an effective system being in place or documented approach to the area of Recognised Prior Learning (RPL). Clarity was therefore required relating to the information available to any stakeholder, and in particular, a public stakeholder.

At the time of the reconvene meeting, ICSE had noted that a mapping exercise of its RPL needs was currently underway and was due for completion in the near future.

Separately, the panel noted that the provider highlighted that many of their learners have English as their second language and the panel raised the issue of English language assessment and the handling of the same. In particular, it was noted that entry to the course required applicants to be competent at B1 level. It was also noted that the applicants were referred to a fact sheet describing what Level B1 is but that the language level required to understand the factsheet was higher than B1 level, so learners quite plausibly may not understand the expectations that they must have attained a B1 level.

At the time of the reconvened meeting, ICSE's English language guidelines were in place at the point of booking and at the pre-course interview stage. ICSE also noted that it had its language guidelines independently assessed to be at the appropriate level, in respect of the issue identified above by the panel.

Page 50 of the original QAP document referred to administrative staff asking appropriate questions to assess reading and writing skills of potential learners. The panel requested ICSE review how administrative staff assess reading and writing skills properly over the phone and what procedures were in place should the learner wish to appeal a decision to refuse them entry based on this particular assessment?

The revised documentation submitted by ICSE contains more detailed information on the pre-course interview as well as the English language guidelines. ICSE has noted that pre-course interviews are



conducted by appropriately trained tutors, and that learners can appeal an unsatisfactory outcome to the Managing Director.

The panel recommended that ICSE make available its online tool for potential learners to assess their own language level before making an application, given that the terms and conditions set out by ICSE require learners without the necessary language skills to leave the programme with no refund available.

In response to the panel's request, ICSE has made available its online assessment tool for potential learners. English language ability is also tested at the pre-course interview. ICSE has also stated that its Terms and Conditions have been amended to ensure that any learner required to leave a course due to English language difficulties will be entitled to receive a refund.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

At the conclusion of the site visit, the panel found that the core statutory guidelines relating to this key area of quality assurance had been fully considered.

The panel is satisfied that ICSE employs suitably qualified staff to deliver its programmes. A telephone conversation held with a part-time tutor re-affirmed the answers provided previously by ICSE management.

The provider gave a clear and comprehensive account of the approach taken by ICSE to staff recruitment and development, notwithstanding that it is a relatively small organisation with limited resources in this regard. This account provided was borne out in discussions with staff.

**5 TEACHING AND LEARNING****Panel Findings:**

The panel is satisfied that QQI's criteria in relation to this dimension of QA have been addressed.

The panel welcomed the open discussion which took place around this area and noted, in particular, the importance placed by the provider on the requirement to have a quality teaching and learning strategy in place. It was clear to the panel from talking to staff (some by telephone) that the optimal management of teaching and learning strategies and associated supports required is a key priority for the provider.

The panel had a sense that the training delivery ethos is also learner friendly and that learner satisfaction is of importance to the provider and that the currency of content is a priority for teachers to manage. The panel also had a sense that informal but professional relationships existed between the teaching staff and the learners.

The panel was presented with evidence during the site visit that the learning ethos is a capstone of the delivery teaching and learning strategy of ICSE.

6 ASSESSMENT OF LEARNERS**Panel Findings:**

The panel was of the view that the core statutory guidelines relating to this key area of quality assurance had not been fully considered.

QQI's guidelines require providers to ensure that the assessment framework incorporates procedures and systems for the security and integrity of the assessment process. They also require that assessment is fair and consistent.

The panel spent some time during the site visit discussing this key area. Whilst it felt that the provider recognised the importance of a proper-functioning assessment policy, it identified certain areas where a robust quality assurance mechanism needed to be implemented.

Consistency of assessment: No measurable mechanism was in place to ensure that the assessment strategy is applied consistently across the three locations where programmes are usually delivered. Whilst it may well be the case that marks awarded are consistent, there was, at the time, no QA mechanism in place to validate the same.

ICSE's QA Manual underwent significant revisions in an effort to expand upon the original documentation and more accurately reflect the matters raised by the panel. However, despite the expansion / amendment of sections such as that on plagiarism and internal verification, the panel felt that there was still room for further development regarding consistency of assessment across all three centres and the



understanding that the main centre should be in primary control of the assessment process. A *Condition of Approval* was identified in respect of this.

The panel noted and welcomed the provider's continued use of external authenticators and recommends that this approach continues. In relation to internal verification strategies, the panel is keen to see a formalised structure in place to ensure a representative set of assessments from all three locations are reviewed to ensure relevant learning outcomes are being assessed in a systematic and consistent manner.

In the original QAP document, p.56, Section 9.9 advised that the Business Manager conducted the Internal Verification process. This led the panel to have a concern once again in relation to the issue of governance (as referred to in section 5.1) being a live issue in the day-to-day running of the provider's operations.

This has since been amended in the revised documentation to reflect the concerns outlined by the panel. The Administrator has now been appointed to the role of Internal Verifier.

7 SUPPORT FOR LEARNERS

Panel Findings:

At the site visit, the panel explored this dimension of ICSE's QA by inviting training and administration staff to step the panel through the learner journey at ICSE. The subsequent discussion charted the learner's personal interaction with a trainer prior to enrolling on a programme, and the processes that would be enacted if the trainer had concerns or doubts regarding the learner's capabilities, for example, English proficiency.

The panel focused particularly on the learner experience and the learner journey in its discussions with the provider. The provider was requested to discuss the typical profile of the learners who apply for programmes; the level of expectation these learners tend to present with; the level of interaction the learners will expect and the level of one-to-one support the learners may expect. Areas of academic and non-academic support were also discussed with the provider. The panel welcomed clarifications in relation to the actual support "on the ground" which was being provided to learners.

The concern of the panel was that the information provided by the staff on the day of the site visit did not align with the information presented in the QAP or in the marketing-related material on the provider's website. In addition, certain terms and conditions on the website further contradicted what was communicated to the panel on the day of the site visit.

It was clear to the panel that the provider has what appears to be a genuine interest in supporting its learners. This was welcomed by the panel.

Separate to the above concern, repeated references were made in the original QAP document to "processes are used to monitor learning experiences on an ongoing basis". The practicality of how any identified support can be applied to a course of say 3 or 5 days is not explained. In section 8.7.1 of the



current QAP document, access to learners supports references to the Learner Handbooks. However, there was no reference in either of the Learner Handbooks to learner support.

At the time of the reconvene meeting, ICSE noted that the Learner Handbook was under review to address the concerns identified by the panel, as well as to ensure they are presented in plain English. The panel acknowledges and welcomes these important developments and, furthermore, feels that they would benefit from the inclusion of more sequential, step-by-step guides and processes. An item of *Specific Advice* has been noted in respect of this.

In relation to the area of plagiarism, there initially appeared to be no clear policy or procedure in place to identify or address the same. This was comprehensively addressed in the revised documentation, which now contains extensive information on plagiarism, including the process for the investigation of suspected cases. The panel recommends further development of this policy to account for all areas of academic misconduct, and to document where assessment marks can be lost due to submission of plagiarised material. Another item of *Specific Advice* has been noted in respect of this.

The panel is overall satisfied that the revised documentation submitted by ICSE addresses the mandatory changes originally identified under this branch of QA.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed. ICSE took the panel through the steps it applies in relation to ensuring information and data management practices are in line with industry norms. Due to the level of data that the provider has on file for each learner enrolled with it, it clearly understands the importance of this area from both a data integrity perspective and also from a GDPR perspective. The panel is satisfied that the processes it applies are designed to ensure that its management of various types of information is sufficient and cost-efficient.

At the conclusion of the site visit, the panel identified an item of *Specific Advice*, emphasising the importance of publishing policies, as required by the 2012 Education Act. ICSE has noted that it has reserved an area of its website specifically for these policies, once approved by QQI.

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

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed. Any changes and updates to the provider's quality assurance procedures and processes, in relation to both the mandatory changes identified by the panel and separately in relation to changes required will need to be provided on all of the provider's information outlets.

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

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed. ICSE does not engage in any collaborative or transnational provision. Whilst the PSA is not a collaborative partner, discussions took place throughout the site visit of the importance of the PSA to the security industry. The need for providers such as ICSE to engage with the same in a proactive and forward-thinking manner was clearly explained. The panel recognised the importance of the same and welcomed the clarification provided by various ICSE representatives in relation to this point.

11 SELF-EVALUATION, MONITORING AND REVIEW***Panel Findings:***

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed. The area of self-evaluation, monitoring and review was discussed. The panel identified concerns relating to the relatively high pass/progression rates which were identified in the ATP documentation provided to it in advance of the visit. The provider recognised that the progression rates identified, particularly for the security-based programmes, were high. However, they were clear in their discussion with the panel that the courses were practical in nature and also that high progression rates were common in this sector. The area of feedback collection and interpretation was discussed in some detail. The provider referred to several forms of informal feedback mechanisms such as one-on-one feedback provided at the end of a lecture or through a comment being placed on social media. There was an acceptance from the provider that they have found it challenging to undertake formalised feedback due to the short-term nature of most of its programmes. The panel noted the honesty in which this area was discussed. It has referred to a Specific Advice guidance point in Section 6.2.9 of this report.



Since the site visit, ICSE has invested heavily in the Arlo training management system, which allows for the collection of learner feedback throughout a given programme. The panel views this as a very positive development.

Evaluation of draft QA Procedures - Overall panel findings

At the conclusion of the site visit, the panel was of the view that the programmes provided are well developed and delivered to a satisfactory standard. The recommendations of the external authenticators are implemented by the management team as they arise. However, the panel was concerned that the draft QA Manual was not sufficiently developed and further work was necessary to fully document, in detail, procedures and strengthen their practice. Changes to governance structures to ensure effective separation of academic and commercial decision making were also required. The panel thus recommended that QQI refuse to approve ICSE's QA procedures pending mandatory changes.

The panel reconvened on 12 April, 2021 to perform a desk review of ICSE's revised documentation. The panel unanimously agreed that clear and significant work had been conducted in the intervening period to address the mandatory changes which had been previously identified. Investment of time and resources, as well as a commitment to quality, was evident. While the panel identified some further *Conditions of Approval* and items of *Specific Advice* to assist ICSE moving forward, the panel is nonetheless pleased with the developments to date and encourages ICSE on the continued enhancement of its quality framework.



Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

The following *Conditions of QA Approval* were identified at the panel reconvene meeting, which took place on 12th April 2021:

6.1.1 ICSE should ensure that a broader range of stakeholders including tutors and industry experts are consulted in the programme development process.

6.1.2 ICSE must clarify the language throughout the QA Manual to confirm that the Academic Committee has final responsibility for QA.

6.1.3 ICSE must appoint an external chair to the Academic Committee.

6.1.4 ICSE must ensure that the main assessment centre retains oversight of the entire assessment process to ensure consistency of assessment between centres.

Part 7 Mandatory Changes to QA Procedures and Specific Advice

7.1 Mandatory Changes

The following *Mandatory Changes* were identified at the conclusion of the original site visit, which took place on 4th February 2020:

7.1.1 An extensive review of the provider's QA policies, procedures and processes is required in order to ensure that they are written in accordance with QQI guidelines and reflect the internal processes followed by the company.

7.1.2 Terminology to be correctly and consistently used in all resubmitted content. This particularly applies to the area of Staff Titles, Roles and Responsibilities.

7.1.3 Governance – Clarity of separation of academic and commercial decisions needs to be better defined in line with the provider's Strategy and Vision. Clarity is also required in relation to the roles and responsibilities of the academic committee and in relation to who has genuine involvement in the decision-making process. To assist, the panel suggests there should be detailed terms of reference for all units of governance, outlining membership, quorum, frequency of meetings, and be accompanied by a clear visual presentation of the overall governance and structure.

7.1.4 English Language provision and associated guidance for learners – documentation relating to learner supports and reasonable accommodation needs to be further developed. Inconsistencies in relation to processes, terms and conditions are to be addressed. An effective mapping of English Language requirements is required to avoid any misunderstandings between learners and the provider upon the commencement of the relevant course.

7.1.5 A risk management process is to be implemented. ICSE must formalise and document its current risk management practices. This should, at a minimum, include producing and maintaining a documented risk register, and identifying within role descriptions and Terms of Reference for various



committees or boards where responsibility for identifying, managing and reviewing risk lies within the organisation.

7.1.6 Consistency of module delivery and module assessments to be prioritised, due to the fact that ICSE operate in several locations. Specific focus to be placed on addressing and expanding with accurate content sections 6.5 and 9.8 of the provider's current QA Handbook.

The panel is satisfied that ICSE's developments in the interim period, which are documented and evidenced in its revised documentation, adequately address the mandatory changes noted by the panel at the original site visit. The panel also encourages continued enhancement in the identified areas. The panel is therefore pleased to recommend to QQI *Approval of ICSE's QA Procedures with Conditions*.

7.2 Specific Advice

The following items of *Specific Advice* were identified at the conclusion of the original site visit, which took place on 4th February 2020:

7.2.1 It is recommended that ICSE put in place their online tool for potential learners to assess their own language level before making an application, given that the terms and conditions set out by ICSE is that if the learner enrolls and does not have the required level of language ability they will be asked to leave the course with no refund available.

7.2.2 ICSE is advised to review their Learner Handbooks so that they are presented in plain English. It is also advised that they are made relevant to the learners for the courses they are undertaking presently.

7.2.3 ICSE is advised that policies relating to Information Management and Public Information should be either published or made accessible to relevant stakeholders. This is a requirement of the 2012 Education Act.

7.2.4 ICSE is advised to undertake a mapping exercise of its RPL needs. This exercise should include core elements of Authenticity, Efficiency and Sufficiency.

7.2.5 ICSE is encouraged to produce, in plain English, a clear policy and procedure relating to the concept and impact of plagiarism. Specific reference should be provided to the learner in terms of how this item will be measured and assessed. Cultural variations relating to this important area need to be communicated to learners as not being a reason to undertake this action.

7.2.6 ICSE is encouraged to source an external advocate of the learner experience for their Academic Committee membership.

7.2.7 ICSE is encouraged to continually focus on the learner pathway and learner journey when marketing their suite of courses. The panel felt reference to these two areas was specifically lacking in the documentation reviewed as part of this process.

7.2.8 ICSE is encouraged to facilitate the scheduling of tutor group meetings as a matter of priority. This will assist with dealing with any communication issues which may arise in the absence of an established channel of communication being in place.

7.2.9 ICSE is strongly advised to introduce some form of learner feedback mechanism whilst the course is actually live and running. The panel accepts that many of the courses offered are particularly short in



duration. Notwithstanding this, the panel is of the view that relying solely on feedback gathered post-completion of the programme may result in opportunities to address service delivery issues being missed. The impact of this may result in reputational concerns for the ICSE being created unnecessarily.

7.2.10 Whilst the issue of course postponement is not a preferred situation to be in, the Panel wishes to commend the communication (to learner) processes used by ICSE when a course needs to be postponed. The Panel recommends that these processes are continued.

7.2.11 The panel suggests that the existing ICSE Strategy and Vision visual is overly complex and may result in confusion being created in terms of communication channels. The panel suggests this be reviewed and perhaps simplified.

Additional Specific Advice Identified in April 2021

The panel is satisfied with the progress made by ICSE to address the items of specific advice identified at the conclusion of the original site visit. A number of other items of *Specific Advice* were identified at the panel reconvene meeting, which took place on 12th April 2021:

7.2.12 The panel encourages the ongoing enhancement of its English language provision.

7.2.13 The panel encourages the ongoing enhancement of the learner handbook. To this end, the panel is of the view that the learner handbook would benefit from the inclusion of more sequential, step-by-step guides and process. (For example, step-by-step guides for learners on how to enact the appeals process or access supports).

7.2.14 The panel encourages the continued development of RPL processes.

7.2.15 ICSE should expand its plagiarism policy to ensure that all areas of academic misconduct are included. ICSE should ensure that these revised policies are full documented and consistent across all documentation, in particular, the QA Manual and Learner Handbook. The panel recommends that ICSE reference the *FESS* handbook, *Academic Writing for Learners in the Further Education and Training Sector*. ([Layout 1 \(fess.ie\)](http://fess.ie)) Specifically, ICSE should document where assessment marks can be lost due to the submission of plagiarised material.

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 4 to Level 6	Minor	Security Hospitality



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Part 9 Approval by Chair of the Panel

This report of the panel is approved and submitted to QQI for its decision on the approval of the draft Quality Assurance Procedures of ICSE.

Name: _____ David Treacy _____

Date: 17th May 2021



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

Document	Related to
Application for Reengagement	Organisational information and capacity
Quality Assurance Manual	Quality Assurance policies and procedures
Certificate of Incorporation	Organisational information
Organisational Chart	Organisational information
Audited Accounts for 2017, 2018	Organisational information and capacity
ICSE Strategy and Vision	Organisational information
Terms of Reference for Management Committee	Organisational information and capacity
Revised Quality Assurance Manual	Quality Assurance policies and procedures
Risk Register	Organisational information and capacity / Quality Assurance policies and procedures

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

Name	Role/Position
Mark Toner	Managing Director and Owner
Tony O'Brien	Quality Assurance Manager
Martha Quart	Business Manager
Cuchalainn Morrissey	Tutor (by phone)

Appendix: Provider response to the Reengagement Panel Report



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

28.05.2021

ICSE Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

ICSE would like to express its gratitude to the panel (Mr. David Treacy, Ms. Pam Skerritt, Mr. Pat Flynn, Mr. Rory Byrne & Mr. Matthew Hurley) for conducting the virtual site visit. This made the process engaging and rewarding for the team and we are grateful for their professionalism and their attention to detail.

We have no hesitation in taking on board and implementing the Additional Specific Advice identified in April 2021 and we accept the findings of the panel

Kindest Regards

A handwritten signature in black ink, appearing to read 'Mark Toner', is written over a horizontal line.

Mark Toner
MD ICSE