



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Guide to Reading this Report

The re-engagement panel site visit to Open Training College (OTC) took place on 5th December 2018. The outcome of that process was a recommendation by the panel to refuse to approve the provider's QA procedures with 2 mandatory changes in the area of governance – see Part 6 Mandatory Changes to QA Procedures and Specific Advice.

6.1.1 The independence of Academic Governance needs to be made more transparent and

6.1.2 Appoint one person at senior management level who will be responsible for Quality Assurance in the academic management structure

Following this, a draft panel report was produced and submitted to OTC for response. OTC formally noted to QQI its surprise and confusion at the outcome in the report, as it had understood that its QA procedures have been recommended for approval. Furthermore, the two mandatory changes identified by the panel had already been addressed or were almost addressed by the provider.

In late March 2019, detailed discussions took place involving OTC, QQI and the panel chairperson. While there was consensus that OTC is in a good position overall and there had been a very positive engagement between OTC and the panel at the site visit, there was also panel consensus that the mandatory changes originally identified needed to be addressed. As a way of moving forward the Chair proposed that if OTC had already or would shortly have addressed the two mandatory actions and could provide evidence of same for the panel, the panel would evaluate that evidence and update its report accordingly. This was agreed.

The documentary evidence (see Annex 1) submitted by OTC was circulated to the panel members on 5th April 2019. On 13th April, the Chair confirmed on behalf of the Panel that the outstanding issues had been addressed in full or in part and the Panel now recommends that QQI approve OTC's QA procedures.

The panel notes that QQI has now amended the reengagement process to formally allow the following step:

10. Where a panel at a site visit identifies that a provider has a mandatory change to make, but this change is limited in scale and can be made speedily, a reengagement can be 'paused' for a maximum of six weeks to allow the provider to address the issue at hand. After six weeks, the process will recommence at the point at which it was paused i.e. at end of site visit. The panel will reconvene (virtually, if necessary) to complete the process and in so doing, determine whether the issue identified at the previous site visit



*has been satisfactorily addressed and make an overall recommendation to QQI.
(Reengagement Application Guide May 2019 V 3.0, p. 5)*

This report sets out the Panel's overall findings, but for clarity and transparency notes, in italics at the end of each section, the original findings of the Panel in that area. Where no change was made to the original finding, it has been retained.

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	The Open Training College (OTC) (St. Michael's House)
Address:	Prospect House, Willowfield Park, Goatstown, Dublin 14
Date of Application:	9th November 2018
Date of resubmission of application:	
Date of panel meeting:	5 th December 2018
Date of recommendation to the Programmes and Awards Executive Committee:	13 June 2019

1.2 Profile of provider

The Open Training College (OTC), is a section of St. Michael's House (SMH), Dublin offering programmes of education and training to staff who work in the disability, health-related, non-profit, community and voluntary sectors nationally. St. Michael's House operates under the auspices of the Health Services Executive (HSE) and is directly funded by it through an annual service plan.

The OTC was established in 1992 as the operational mechanism for the delivery of accredited training. The College administration offices are located in Goatstown, Dublin 14 and programme delivery is national (through online and regional locations). The College employs 14 core staff and 15 associate/contract teaching staff plus a range of workshop presenters, consultants, module/topic authors and specialist topic experts. The College's budget is generated through student fees, project work, work for St. Michael's House and tender activity.

To date, the College has worked with circa 220 agencies nationally (disability, HSE, community and voluntary) and has educated/trained approximately 10,000 staff. At any given time, the College has circa 600 students registered.



The OTC offers a range of QQI accredited programmes, both Further Education (FE) and Higher Education (HE), at levels 5 to 8 on the NFQ.

Part 2 Panel Membership

Name	Role of panel member	Organisation
Jack O’Herlihy	Chair	Former Head of Development in Letterkenny IT
Naomi Jackson	Member	Dean of Academic Affairs, CCT College, Dublin
Michael Hall	Member	Head of Department and former Registrar, IT Tralee
Linda Coone	Member	Head of Quality Assurance & Improvement – Rehab Group
Deborah Butler	Report writer (for original draft report arising from 5 th December meeting only)	Former Registrar, Respond! College
Marianne Vaughan	Member	Learner representative, KARE

Part 3 Findings of the Panel

3.1 Summary Findings

The purpose of the Re-engagement process is to evaluate the institutional capacity and quality assurance procedures of the provider against QQI QA guidelines with a view to a QQI decision on their approval.

The Panel is satisfied that The Open Training College’s QA policies and procedures are fit-for-purpose and recommend that QQI approve same.

Based on the information provided via the application and the site visit, the panel found that while much work has been done on the OTC Quality Assurance document that reflects its commendable blended learning system through which it provides its programmes, further enhancement is required for parts of the quality assurance system.

Accordingly, the panel recommends that, subject to OTC implementing the advised modifications within



a period of six months, the quality assurance procedures established by the Open Training College be approved. The panel is satisfied that OTC has both the capacity and willingness to make the required appropriate enhancements in the areas highlighted and to complete the process within this timeframe. The panel recommend that QA documentation revised to address the issues identified be submitted by the provider for documentary review by the panel. It is not envisaged that a further site visit or full panel meeting be required.

The panel had some specific feedback on issues to be addressed regarding the following:

- * strengthening the procedural detail of many of the policies included in the QA manual,*
- * the independence of academic governance, and*
- * overall responsibility for quality assurance.*

More detail on the findings of the panel is outlined in Section 6.2 of this document.

The panel commended the OTC personnel for their obvious professional commitment to their learners and thanked them for their open engagement with the panel.

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

	Tick <u>one</u> as appropriate
Approve Open Training College's draft QA procedures	✓
Refuse approval of [the provider's – insert name] 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	

Please see the guide to reading this document



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

- 4.1.1(a) **Criterion:** *Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?*
- 4.1.2(a) **Criterion:** *Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*
- 4.1.3(a) **Criterion:** *Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*
- 4.1.4(a) **Criterion:** *Are any 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?*
- 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 enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.*

Findings

The provider is a section of St. Michaels' House which is funded by the Health Service Executive.

The panel was satisfied that the legal and compliance requirements outlined in Section 4.1. have been broadly addressed by the Open Training College (OTC) in the application.

4.2 Resource, governance and structural requirements:

- 4.2.1(a) **Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*
- 4.2.2(a) **Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*
- 4.2.3(a) **Criterion:** *Are fit-for-purpose governance, management and decision-making structures in place?*
- 4.2.4(a) **Criterion:** *Are there arrangements in place for providing required information to QQI?*

Findings

The panel is satisfied that these criteria have been broadly addressed in this application.

Following the receipt of the additional documentation and evidence of OTC addressing issues previously raised, the panel is satisfied with the progress made.

However, there is some specific feedback pertinent to this section:

4.2.2 (a) It is noted that there is no current Strategic plan for the OTC in place and that a plan is currently being developed. This Strategic Plan needs to be developed and approved by the Board of Management



as soon as possible to provide clear direction for the future operations of the OTC, and provide the context within which the final approved QA system is operating. One example of the lack of clarity about the future direction is on page 17 of the “Self-Assessment document” when it mentions that 14 programmes have never been delivered but that OTC plan to do so. The timeframes involved and resource implications must be drafted and approved by appropriate governance structures before students are recruited for these programmes.

The new Strategic Plan should include an operational budget for QA and related activities.

4.2.3 (a) Following receipt of additional documentation and evidence the Panel is satisfied that the criteria have been met.

While the panel is satisfied that these criteria have been broadly addressed in this application, there is some specific feedback pertinent to this section later in the report.

In the Management Structure diagram represented in Figure 2 of the application there is no mention of the Manager of Academic Affairs. This needs to be clarified.

There is a need for a person to be appointed, or identified, at a senior level with overall responsibility for quality assurance.

4.3 Programme development and provision requirements:

- 4.3.1(a) **Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*
- 4.3.2(a) **Criterion:** *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*
- 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)?*
- 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?*
- 4.3.5(a) **Criterion:** *Are there access, transfer and progression arrangements that meet QQI’s criteria for approval in place?*
- 4.3.6(a) **Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*
- 4.3.7(a) **Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*

Findings



The OTC has experience and a track record in providing education and training programmes. It appears to have a fit-for purpose complement of teaching staff.

The Panel was satisfied that the criteria in Section 4.3 have been met.

Some of the advice given to the OTC in the sections below will enable it to demonstrate more clearly its compliance with these criteria.

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

The development of Quality Assurance Document (QuAD) Policies and Procedures V.3.1 April 2019 shows significant progress has been made and the panel is satisfied that OTC has the capacity to provide sustainable education and training.

Tutors appear to be well qualified for the job and OTC has considerable experience regarding staff recruitment and learner assessment.

The OTC is a long-established provider and appears to have a strong commitment to quality assurance. The application is well presented and comprehensive giving a good insight into the activities of the OTC and where it fits in the wider SMH structure. The ethos and values of the organisation appear to be student-centred with a significant focus on the needs of the individual.

There is ample experience and documented procedures around staff recruitment.

The development of a Strategic Plan will be vital in shaping the future training provided by the OTC and ensuring that it has the future capacity and resources to meet all formal education and training requirements.

However, on a micro level, the Quality Assurance Document (QuAD) is generally accompanied by a lack of specific detail that might reasonably be expected of a provider of this maturity if the QA manual is to be a useful tool to all stakeholders. Accordingly, the OTC team should address this item as a matter of priority.

Furthermore, from reading the self-evaluation it is not easy to identify the OTC as a blended learning provider. The QA procedures include some areas where blended learning specific matters are addressed but it does not appear to be integrated through all areas of QA as might be expected of a blended learning provider.



Part 5 Evaluation of draft QA Procedures submitted by The Open Training College

The following is the panel's findings following evaluation of The Open Training College's quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016). This section of the report follows the structure and referencing of the guidelines.

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

Following receipt of OTC's additional QA documentation the panel is satisfied that their concerns have been substantially addressed. However, while the main concern of the panel, namely, the separation of academic and commercial governance, has been addressed further articulation is required to clarify the relationship between the academic and commercial governance.

The Board of Saint Michael's House (SMH) is responsible for the direction and control of the SMH Company which includes the Open Training College. A code of conduct for Directors outlines their responsibilities to the organisation.

Directors are non-executive and offer their services on a voluntary basis. All academic quality control and quality assurance functions are designed, implemented and monitored through a structure of committees, which are overseen by the Academic Council which meets three times a year. The Open Training College is portrayed as an extremely efficient, centralised, tightly controlled operation delivering a range of programmes to agencies and students that appear to be well satisfied with the services provided.

The working relationship between St Michaels House (SMH) and the Open Training College appears to be one in which major decision-making functions rest with the Board of SMH. The relationship between the SMH Board and the Academic Council needs further clarity. There needs to be an explicit separation of commercial and academic functions.

Overall, the representation of the operating and academic structures seems imprecise. Some Course Directors report to the Assistant College Director while the Course Director for Social Care and e-Learning reports to the College Director. It is not clear to the panel what the nature of this reporting is or why it differs.

Academic Council appears to monitor outcomes from validation and review but is not clear what role it plays in improvement planning and objective setting outside of this. It was not clear to the panel how the governance structure was evaluated and what findings informed the changes put forward.

The governance structure appears overly complex for the size of the organisation. Overall a review of the Governance Structure is required as there is repeated membership on multiple committees on somewhat related matters e.g. Assessment Committee and Teaching and Learning Committee. The diagram in Appendix 5 on QA Structures is conceptual only and is insufficient. It needs to reflect the actual, operating structures, processes and communications between groups. This review should seek to reflect the blended learning nature of the provider's activity in the governance structure and terms of reference of boards and committees. This should reflect a published blended learning strategy of the provider.



A clear diagram of Academic Governance and structures is needed.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

Following receipt of the additional documentation and evidence that OTC has addressed issues raised, the Panel is satisfied with the progress made

There is a broad Quality Assurance document (QuAD) setting out the quality assurance systems of the organisation. It shows a commitment to the implementation of a comprehensive approach to quality assurance. The QuAD follows the format of QQI documentation and there are sections dealing with the self-evaluation and review of systems. The QuAD is a common document for all HET and FET programmes with some exceptions in relation to the Grading Schemes, Penalties and External Authentication. There is a Student Handbook which provides assistance and guidance to learners in the context of the overall QA system.

However, within the QuAD accessibility may be an issue for new staff and students as there is an absence of detail regarding specific steps, decision-makers, potential decisions and outcomes in a number of the policies and procedures put forward. They are largely designed as summary statements of stages in a process. This is useful to those who know the specific detail behind the process, but may be challenging to others. Some policies cross reference to others within the text but the policy cover page does not include any relationship details and this may be problematic when updating takes place if this is done in isolation.

In general, current policies include a generic statement outlining roles and responsibilities for quality assurance. These should be developed to clarify the responsibilities of individual staff, committees or stakeholders in the policy implementation for the specific policy.

From the site visit, the panel were confident that OTC staff know the steps and responsibilities in policy implementation. However, the documentation lacks this detail including the decision-making authority in each procedure.



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

Following the receipt of additional information and, in particular, The development of Quality Assurance Document (QuAD) Policies and Procedures V.3.1 April 2019 shows significant progress has been made and the panel is satisfied with the outcome.

The Open Training College has track record of providing education and training programmes and has a range of External Examiner reports to validate their work to date. The QuAD sets out regulations covering access, transfer and progression. All applicants are interviewed to ensure suitability for the course. There is an appeals process for unsuccessful applicants.

There is little information provided on learner progression to other courses.

Progression should be a mandatory section in programme related documentation.

The documented process of getting a new programme from idea to validation needs further elucidation. The policy shows that a new programme proposal is presented to the college team, SMH management team and Academic Council but it is not clear what role each of these bodies play in decision-making and how any difference of opinion is resolved. The QuAD refers to a new programme development committee, programme review team, and course review team but it is not clear what the membership of these different teams are or if they are the same staff.

The requirement for a provider to undertake an evaluation of a new programme against the validation criteria before application for validation is not apparent in the validation policy. Hence operational detail on new programme proposals is required.

The process of Programme review is more fully documented but would benefit from further clarity of responsibilities and detail of the internal QA processes to be applied prior to submission. It is not clear what role the Academic Council and/ or the management team play in the approval of a proposed response to a panel and approval of an action plan.

There is no reference within validation or review to the blended learning context. The Blended Learning Guidelines provided by QQI suggest appropriate representation of education technologies, instructional design etc. should be present within development teams. It is not clear if this is the case or a requirement in the OTC. Similarly, it is not clear to the panel whether OTC requires its programme content to be fully designed before being offered to learners, as per QQI blended learning guidelines.

OTC outlined the admissions process to the panel as part of the site visit. The QuAD would benefit from greater clarity on the IT requirements, expectations and capacity of learners that are essential parts of admissions decision-making. The QuAD outlines the role of the Programme Board in ratifying decisions in relation to quality improvement. It is not clear what role, if any, the Academic Council plays in this process or how the Programme Board ensures that such decisions are appropriate, align to the college mission, and are affordable.

In summary, as in other parts of the Quality Assurance document, more detail and procedures are required in this section.

**4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT****Panel Findings:**

Following the review of the additional information/documentation provided by OTC, the Panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been broadly met by the provider.

The Panel compliments the Open Training College on its high retention rate of qualified staff, in both course delivery and administration. The expertise and commitment of staff who met the panel was evident. There are 14 Core and 15 Associate Tutors.

The panel recommended that the OTC consider the following advice:

**The QuAD references the SMH recruitment and selection policies, but it was not clear what these were or how they ensured minimum standards for academic posts were implemented consistently or how the requirements of the blended learning context were addressed. Inclusion of the policies and procedures might address this. As in other sections the information provided here are factual statements rather than policies and procedures. More detail is required.*

The panel were informed of the minimum qualifications and experience requirements for teaching staff. OTC further advised the panel of the requirement for all lecturers to have completed a Train the Trainer qualification or equivalent. The panel recognises the value this brings to discipline experts but suggests OTC considers alternative programmes for those lecturers involved in teaching and assessment in higher education.

The panel were informed of the structured induction and staff development arrangements in place to develop the blended learning capacity of lecturing staff. The QuAD would be strengthened by the inclusion of the policy and procedure for ensuring staff capacity to deliver blended learning programmes.

OTC outlined the different types of staff development that they provide, support and engage in both on request from management or in response to a request from a staff member. Support for staff development is provided to part time lecturers also.

**Policies on CPD, appraisal and Performance management would benefit from greater clarity on the specifics of timeframes, individual responsibilities, potential decisions and outcomes. It would be helpful to have details on the staff training and development budget and how decisions are made in using these funds.*

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

From the documentation supplied, feedback on the learning experience from both tutors and learners appears to be encouraged. The tutors who provided an input during the panel visit were enthusiastic and passionate about their work with their respective groups. They source regular feedback-both formal and informal- with a view to improvement of their course delivery and have a high level of engagement with appropriate ICT programs that will assist to quantify their data into meaningful information.

There appears to be a strong ethos of respect and support for learners' diverse needs. The Student Handbook is clear and written in plain language.

OTC advised the panel of the QA procedures that online content must go through before being uploaded to the online environment. The panel advise that this is documented and included in the QuAD. The panel were given a demonstration of the online learning environment and informed of the approaches to identifying and overcoming any issues relating to technical error or unplanned downtime and how to prevent these in the future. An explanation of the technical support systems in place and the out of hours contact arrangements and response times were also provided to the panel as part of the site visit. The OTC policy and procedures for the monitoring and enhancement of the learning environment should be included in the QuAD.

An analysis of the grade distribution between the OTC and the national would provide valuable information in any future planning exercises. If this information is not picked up by the External Authenticator how is it incorporated into future plans and decisions on what is being taught and how modules are delivered?

Tutors and Course Directors that met with the panel described their shared vision and approach to teaching that is applied to the sector and is learner-centred. The panel were given a demonstration of the online learning environment and the blended approach was explained as part of this. The panel were informed of the in-house meetings and developing sessions that all tutors participate in to ensure consistency in approach and sharing of ideas. Engagement with the National Forum for the Enhancement of Teaching and Learning was also identified. In particular, the participation in the learner analytics project was highlighted and the panel acknowledge the positive steps in implementing this project within the Social Care programme. The dissemination of learning from higher education practice externally was less apparent, although membership of the HECA Academic Quality Enhancement Forum was noted.

Given the size and ethos of the OTC they would perhaps benefit from collaboration with other colleges of Further and Higher Education in the areas of teaching and learning.

**6 ASSESSMENT OF LEARNERS****Panel Findings:**

While the Panel accepts that OTC has addressed what was recommended, it is still advisable to stick to the wording used in the Assessment and Standards 2013 document, as it isn't about using an already assigned mark but being able to assign a grade fairly and consistently.

Current practice is that Exam Boards are scheduled for once per year, allowing for initial and repeat results to be ratified in this sitting. The panel recommends that OTC revisits its arrangements for the management and operation of Boards of Examiners and repeat assessment to ensure timely ratification of results and recommendations for repeat, progression or award in line with QQI Marks and Standards. The establishment of a more traditional examination session – examination board – repeat examination session – examination board may resolve this particular matter and allow for a more formal structure of examination result review / recheck following each examination board meeting.

The QuAd outlines the role of Exam Boards in monitoring assessment techniques. It is not clear how this is then communicated to the Programme Board and informs programme enhancements.

The Appeals process is clear, but it is not clear how the learner is assessed fairly in the first instance. More detail is required here.

There is a limited amount of information on the programme level assessment strategy. How is this considered/developed? This will be of further importance in the development of future major awards.

OTC outlined the approach to capped marking for repeat assessments. The maximum capped mark should be documented consistently in the QuAD. The Panel recommends that OTC continues to monitor their assessment policies in light of new developments from QQI and, in particular, considers whether capping marks in award stage modules is a double penalty for a student who is limited to a pass award due to the no repeat for honours convention.

OTC explained the process for a student seeking an extension or consideration or personal circumstances. The panel noted the reliance on individual decision-makers in a number of processes and urges caution to ensure consistency in decision-making where different individuals are responsible for decisions such as extension requests based on personal circumstances.

OTC explained the processes for review, recheck and appeal. The panel recommends the OTC revisits this as part of the consideration of the Board of Examiner procedures. Clear differentiation between each of these and the entitlement to additional feedback should be made explicit. The panel further suggests the OTC reflects the investigative element of such procedures and any right to representation, within the QuAD.

At the site visit the OTC clarified the procedures for communication of results to QQI. The process for ensuring the accuracy and security of this communication in a timely manner should be included in the QuAD.

The OTC explained the RPL procedure. The panel recommends this is revisited to facilitate the acceptance of marks from other providers for the purpose of exemptions in cases where OTC can verify the equivalence of the grade awarded. Including external assessment or review of RPL decisions should also be considered.



7 SUPPORT FOR LEARNERS

Panel Findings:

The panel was of the opinion the documentation provided by the Open Training College in the QuAD was not a true reflection of the high quality of the work being done in this area. The OTC team described a competent and commendable system, albeit incompletely documented, of student support. There is a clear commitment to the support of learners in all aspects of their engagement with the OTC.

A strong feature of the work of OTC is how they support students with additional needs, the effort being made to develop the confidence of students in their IT capability. In particular, the panel wishes to recognise the quality of online induction and pastoral and academic support being provided for students.

Each learner is interviewed individually before enrolment of the programme. This enables the OTC to plan in advance and provide special supports where needed. At the commencement of each programme there is an induction session and a student handbook is given to each learner.

Furthermore, due to the relatively small size of the OTC, regular informal meetings between staff and tutors allow any immediate issues to be resolved and/or addressed in a timely manner.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel acknowledged the work commissioned by OTC to address the requirements of GDPR and recognise that this project is still ongoing. In undertaking the remainder of the project, the panel suggests that OTC gives consideration to:

- the legal basis upon which they process and share personal data.
- the publication of a records retention policy, a data subject access policy,
- the retention of learner records, including examination papers and records, in the instance of a dispute.

The panel were advised of the challenges OTC face in identifying suitable providers to benchmark against. Notwithstanding this, the panel recommends that OTC consider alternative requirements for identification of providers, nationally or internationally, which may assist them in drawing comparisons and identifying enhancement opportunities specific to the nature of their provision and the subject discipline, the mode of their delivery, types of awards. It is acknowledged that identifying an identical provider is somewhat unlikely but benchmarking particular areas or approaches will still be of benefit.



9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The OTC has policies that ensure that information published is clear, accurate, objective, up to date and easily accessible. All relevant programme and award information is made available to prospective and current learners on the website. The panel recommends this is extended to include specific requirements pertaining to blended learning requirements.

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

Panel Findings:

While comprehensive information on collaboration with the sectors with whom the OTC engage was provided in discussions with the panel, it needs to be more fully documented.

There is a Memorandum of Understanding in place with one other provider but the future logistics of the agreement are still to be finalised.

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

Having evaluated the additional documentation, the Panel is satisfied the issues raised previously have been considered

From the site visit, the panel is assured that the OTC engage in regular monitoring and review activity and engage outside agencies for aspects of this where the need is identified.

Moving forward more detail on the self-evaluation, monitoring and review processes is required. This should include what are the indicators of effectiveness for each of the policies and procedures within the QA document, how frequently are they evaluated and the mechanism for carrying out this evaluation and review.



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann



Evaluation of draft QA Procedures - Overall panel findings

Having considered the additional information provided, the Panel is satisfied that the governance issues pertaining to this dimension of QA have been broadly met by the provider.

The panel has concluded that the provider, the Open Training College (OTC), has established an internal quality system within which they are already actively working and which has potential to be effective for the provider's scope of provision. The panel feel that its recommendations will be enhance the QA system and make it more appropriate to context.

The panel has arrived at this conclusion based on a review of a well organised set of documents presented by the provider. The established track record of the provider with QQI provides additional reassurance.

The panel is of the view however that there are some deficiencies within the current system, specifically related to Governance, which do need to be addressed before a recommendation to Approve can be made. These are listed in 6.1 below. The panel is confident of the OTC's capacity to address the issues.

The panel makes the following commendations:

- *The volume of work in preparation for the re-engagement process is acknowledged.*
- *The panel's engagement with the staff of the OTC confirmed the provider's commitment to an open and transparent quality assurance regime.*
- *The high level of dedication which the staff involved in the OTC demonstrate is admirable and their willingness to engage with the panel re the enhancement of their Quality Assurance systems is praiseworthy.*
- *There is a strong commitment to learners and this is evidenced throughout. The Open Training College demonstrates a strong learner-centred approach.*

The Panel wishes to thank the Open Training College for the vibrancy and honesty that it brought to the reengagement process.



Part 6 Mandatory Changes to QA Procedures and Specific Advice

6.1 Mandatory Changes

In light of the additional materials provided to the Panel, there are no mandatory changes recommended.

The Re-engagement panel is of the view that the following areas need to be addressed before it can recommend to QQI that the OTC's procedures be approved:

1. *The independence of Academic governance needs to be made more transparent. The OTC should review the membership of the Academic Council to:*
 - *consider appointing an independent Chair to the Academic Council*
 - *demonstrate the separation between Senior Management and Academic Management*
 - *include tutors/associated tutors*
 - *simplify the number of sub committees required.*
2. *Appoint one person at Senior Manager level who will be responsible for Quality Assurance in the academic management structure.*

6.2 Specific Advice

1. Develop clearer *step-by-step* procedures for ALL policies mentioned in the Quality Assurance document.
2. Consider having separate sections in the QA document for Further Education and Higher Education
3. Review the timing and operation of Assessment Boards and the appeals process.
4. Review the legal basis for collecting data on students and amend all appropriate documentation to reflect this.
5. Review and update the policy on RPL as required.
6. Publish a Blended Learning Strategy.

Part 7 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Levels 5 to 8	Major, Special Purpose and minor awards.	Social Care, Applied Management



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Part 8 Approval by Chair of the Panel

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

Name: _____

Date: _____



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

Document	Related to
QA Document and Appendices November 2018	
Reengagement Application Form	
Self-Assessment Report on QA System v QQI QA Guidelines	
Student Handbook	
QA Review of Administration Function (Procedures–V5.2)	
Job Descriptions booklet	
Power point Presentation	Session 1: Presentation of Application
“Traffic Light” document	Policy development
<p><i>The following is a list of documentation provided by OTC in March 2019:</i></p> <ol style="list-style-type: none">1. Response to Mandatory Changes – Re-Engagement Panel Report – OTC<ol style="list-style-type: none">i. Overview of responseii. Changes to Terms of Reference for AC and subcommitteesiii. Three updated diagrammes - to correspond with changes above2. Minutes of Academic Council Meeting (Extract) - 25th January 2019 [Discussion of changes]3. Minutes of Academic Council Meeting - 29th March 2019 [Agreeing changes]	



<p>4. Nomination form for Tutor Representative on Academic Council (AC) - [Ballot currently underway]</p> <p>5. Update Quality Assurance Document (QuAD V3.1, to be published April 2019)</p> <p>6. Updated RPL policy</p> <p>7. Updated GDPR policy</p> <p>The last two items (6 and 7) relate to 'specific advice' rather than 'mandatory changes' from the Panel's original draft report; OTC has taken the opportunity to update the policies, following relevant advice, at this juncture, for publication of the updated QuAD in April. A further version, QuAD V3.2 will be published in December 2019.</p>	
--	--

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

<p>Dr Karen Finnerty-College Director</p> <p>Áine Melinn – Assistant College Director</p> <p>Conor Murray – Corporate Services Manager</p> <p>Dr Noelín Fox – Course Director (Social Care)</p> <p>Brendan Collins - Course Director (Applied Management)</p> <p>Claire Hopkins - Course Director (FET and Short HET Courses)</p> <p>Raymond Watson – Head of E-Learning</p> <p>Ronnie Harrison – Academic Affairs Manager</p> <p>Niav McEvoy – Core Tutor and E-learning team</p> <p>Fiona Colclough – Associate Tutor and former AAM</p> <p>Alacoque McAuley Savage – Associate Tutor and former Course Director</p> <p>Eileen Costello Connelly – Associate Tutor</p>	
--	--

Appendix: Provider response to the Reengagement Panel Report



Prospect Hall, Willowfield Park, Goatstown, Dublin 14. Tel: 01 2988544
Email: info@opentrainingcollege.com Web: opentrainingcollege.com

Walter Balfe
Head of Provider Approval
QQI
26-27 Denzille Lane
Dublin 2

28th May 2019

Dear Walter,

Please find attached the Open Training College's (OTC's) response to the re-engagement panel report of 21st May. The College wishes to thank both the panel and QQI for a very constructive process and in particular to both for being receptive to matters raised by the College in March.

OTC would also like to thank the panel for its full and collegial engagement in the process and for the commendations and recommendations offered through the initial feedback and through the final report. As noted in the response, below, College is happy to accept the resulting content of the report, with some clarifications noted.

The re-engagement process has been one of great value to the OTC and has greatly helped to focus on the enhancement of QA, which is in part evidenced through the Quality Improvement Plan (QIP) also attached to this response. We are happy to address the outcomes of the re-engagement process as outlined in this document and the QIP and look forward to the resulting ongoing enhancement of the OTC's Quality systems and processes over the coming years.

Yours sincerely,

Dr Karen Finnerty
College Director

College Director: Dr Karen Finnerty

A division of St. Michael's House. Chair: Mr. M Lyes. Directors: Mr. J. Cuddy, Mr. D. O'Beirne, Mr. M. O'Farrell, Mr. D. Hughes, Ms. B. Dunne, Mr. R. Brett, Ms. L. Beauseng, Ms. E. Hennessy. Chief Executive: Anna Shakespeare. A company limited by guarantee, registered in Ireland No. 27628. Registered Office: Willowfield Park, Goatstown, Dublin 14.



Response to Panel Report – Re-Engagement: The Open Training College (OTC)

Date of Report: 21st May 2019

Date of OTC response: 28th May 2019

Response to individual sections of the report

Re. 3.1 Summary Findings

The College accepts the panel statement that “further enhancement is required for parts of the Quality Assurance system”. Some of these planned enhancements had already been identified through the re-engagement process and the College thanks the panel for highlighting other areas which could benefit from further attention. This type of feedback is seen as one of the most constructively positive aspects of the process as a whole.

The College also acknowledges and thanks the panel for the following commendation:

“The panel commended the OTC personnel for their obvious professional commitment to their learners and thanked them for their open engagement with the panel.”

The OTC is also appreciative of the panel's open and constructive interaction with the College.

Re. 4.1 Legal and compliance requirements:

The College accepts the findings and thanks the panel for their comment.

Re. 4.2 Resource, governance and structural requirements:

The College accepts the findings and thanks the panel for their comments. It is noted that OTC is currently undergoing external strategic review, which will impact on the College's forthcoming strategic plan, which will in turn be informed by the findings of this review.

In relation to:

“In the Management Structure diagram represented in Figure 2 of the application there is no mention of the Manager of Academic Affairs. This needs to be clarified.”;

In response the College wishes to offer the following clarification:

The Manager of Academic Affairs is not mentioned in this specific diagramme, as it relates to the “Corporate” reporting structure rather than the “Academic” reporting structure. It is intentional, that in seeking to separate corporate and academic decision-making, different roles relate to different structures. Both Academic and Corporate Governance diagrammes were presented on the

day of the visit. The College accepts, however, that this could perhaps have been made more explicit and will address this going forward.

Other comments which are made in this section of the report relate to the response in Part 6, below. Therefore, response to these elements is not presented here.

Re. 4.3 Programme development and provision requirements:

The College accepts the findings and thanks the panel for their comment.

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

The College accepts the findings and thanks the panel for their comments. It is noted that the procedural detail and provision of a blended learning strategy, referred to here, have been prioritised by OTC, in response to the panel findings, and form part of the response at Part 6, below.

Re. Part 5:

1. GOVERNANCE AND MANAGEMENT OF QUALITY

The College accepts the findings and thanks the panel for their comments. The following statement is particularly welcomed:

“The Open Training College is portrayed as an extremely efficient, centralised, tightly controlled operation delivering a range of programmes to agencies and students that appear to be well satisfied with the services provided.”

It is noted that the Governance issues referred to here have already been dealt with, in response to the panel’s report.

2. DOCUMENTED APPROACH TO QUALITY ASSURANCE

The College accepts the findings and thanks the panel for their comments.

3. PROGRAMMES OF EDUCATION AND TRAINING

The College thanks the panel for their comments but does not fully agree that the general lack of clarity cited in the report in relation to programme review and re/validation is a reality. We wish to comment on the following statement in particular:

“The requirement for a provider to undertake an evaluation of a new programme against the validation criteria before application for validation is not apparent in the validation policy.”

It is stated in the OTC QuAD that:

“Ultimately, programme approval depends on an application for re-validation/validation meeting all the Criteria and Sub-Criteria of QQI’s Validation policy. A full case must be presented.”

We believe this addresses the matter - essentially, under College QA it is not possible to submit for validation without all criteria being addressed as part of the development of the submission.

4. STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

The College accepts the findings and thanks the panel for their comments.

5. TEACHING AND LEARNING

The College accepts the findings and thanks the panel for their comments.

6. ASSESSMENT OF LEARNERS

Re. p.13, paragraph 4:

“The Appeals process is clear, but it is not clear how the learner is assessed fairly in the first instance. More detail is required here.”

The mechanisms for fair assessment, in line with Assessment and Standards (QQI, revised 2013) and incorporating internal and external checks are clearly outlined in Section 6 of the QuAD and in Student Handbooks (an example of which was supplied to the panel).

Specific elements include:

- Assessment strategy as part of validation;
- Formative assessment;
- Copious feedback and supply of rubrics to students (praised by multiple External Examiners);
- Tutorial Support;
- Tutor training for standardisation;
- Cross-marking (min. 10%);
- Assessment of all Learning Outcomes (LOs);
- Plagiarism policy;
- Use of Turnitin;
- Internal verification;
- Exam boards;
- External Examiners/Authenticators;
- Pass by compensation (HET);
- Assessment regulations;
- Examination regulations;
- Extenuating circumstances;
- Appeals.

Other comments which are made in this section of the report relate to the response in Part 6, below. Therefore, response to these elements is not presented here.

7. SUPPORT FOR LEARNERS

The College accepts the findings and thanks the panel for their comments. It is noted that the following items formed part of the presentation of documentation for re-engagement:

1. *Student Learning Support and Pastoral Care Policy;*
2. *Guide to Learning Support and Pastoral Care Services;*
3. *Procedures for the Provision of Supports to Students with Disabilities and Specific Learning Difficulties.*

In addition, it is noted that the panel commends the College on the following:

“There is a strong commitment to learners and this is evidenced throughout. The Open Training College demonstrates a strong learner-centred approach.”

8. INFORMATION AND DATA MANAGEMENT

The College accepts the findings and thanks the panel for their comments.

9. PUBLIC INFORMATION AND COMMUNICATION

The College accepts the findings and thanks the panel for their comments.

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

The College accepts the findings and thanks the panel for their comments.

11. SELF-EVALUATION, MONITORING AND REVIEW

The College accepts the findings and thanks the panel for their comments.

Re. Evaluation of draft QA Procedures - Overall panel findings

The College accepts the findings and thanks the panel for their comments. In particular, College is grateful for the following commendations and positive feedback:

“The panel makes the following commendations:

- The volume of work in preparation for the re-engagement process is acknowledged.
- The panel’s engagement with the staff of the OTC confirmed the provider’s commitment to an open and transparent quality assurance regime.
- The high level of dedication which the staff involved in the OTC demonstrate is admirable and their willingness to engage with the panel re the enhancement of their Quality Assurance systems is praiseworthy.
- There is a strong commitment to learners and this is evidenced throughout. The Open Training College demonstrates a strong learner-centred approach.

The Panel wishes to thank the Open Training College for the vibrancy and honesty that it brought to the reengagement process.”

Re. Part 6 Mandatory Changes to QA Procedures and Specific Advice

(Quality Improvement Plan - QIP)

“Mandatory Changes”	Response
<p><i>The Re-engagement panel is of the view that the following areas need to be addressed before it can recommend to QQI that the OTC’s procedures be approved:</i></p>	<p><i>*Gray shading shows action has already been completed; no shading shows that the action is ongoing and has a planned time for completion.</i></p>
<p>1. The independence of Academic governance needs to be made more transparent. The OTC should review the membership of the Academic Council to:</p> <ul style="list-style-type: none"> • consider appointing an independent Chair to the Academic Council • demonstrate the separation between Senior Management and Academic Management • include tutors/associated tutors • simplify the number of sub committees required 	<p>In response to the panel recommendations OTC has already met the relevant requirements, as stated in the panel’s report of 21st May 2019.</p> <p>All items have been updated in V3.1 of the Quality Assurance Document (QuAD, April 2019), which is published on the College’s website: www.opentrainingcollege.com .</p>
<p>2. Appoint one person at Senior Manager level who will be responsible for Quality Assurance in the academic management structure.</p>	<p>In response to the panel recommendation OTC has already met the relevant requirement, as stated in the panel’s report of 21st May 2019.</p> <p>This has been updated in V3.1 of the Quality Assurance Document (QuAD, April 2019), which is published on the College’s website: www.opentrainingcollege.com .</p>

"Specific Advice"	Response
<p>1. Develop clearer step-by-step procedures for ALL policies mentioned in the Quality Assurance document.</p>	<p>OTC had already identified some areas in need of development regarding procedures, as part of the re-engagement process. Other areas as identified by the panel in consultation and in the re-engagement report have been noted for development.</p> <p>Some development of standard operating procedures has already been undertaken. Full development of all procedures will be an ongoing process in 2019 and will form part of the second updated iteration of the QuAD, post re-engagement, planned for Q4 of 2019 (QuAD V3.2, December 2019).</p>
<p>2. Consider having separate sections in the QA document for Further Education and Higher Education</p>	<p>OTC consulted with QQI on this development as part of the re-engagement process and QQI has been most supportive of this initiative of combining the College's overarching QA for both FET and HET programmes.</p> <p>Therefore, the College will proceed in implementing the QA as planned, with certain mechanisms such as Programme Board for FET programmes already having commenced under current College QA (with identified derogations for FET, as presented to the panel).</p>
<p>3. Review the timing and operation of Assessment Boards and the appeals process.</p>	<p>The Teaching, Learning & Assessment Committee has identified updated timings for the holding of Examination Boards, which are designed to ensure that any of the panel's concerns in this area have been addressed.</p>
<p>4. Review the legal basis for collecting data on students and amend all appropriate documentation to reflect this.</p>	<p>The legal basis has been reviewed to reflect the reliance on completion of contract as the primary basis on which data is collected in relation to learner details.</p> <p>The GDPR Policy has been updated to reflect this and is published in the QuAD (V3.1 - April 2019).</p>
<p>5. Review and update the policy on RPL as required.</p>	<p>The RPL policy has been updated to include specific recommendations from the panel.</p>

	The updated version is included in V3.1 of the QuAD (April 2019).
6. Publish a Blended Learning Strategy.	<p>The Blended Learning Strategy statement is currently being developed by the E-learning team, in conjunction with Course Directors and the Manager of Academic Affairs.</p> <p>This strategy will be published on the website in Q3 of 2019 and included in V3.2 of the QuAD to be published in December 2019.</p>

Planned Development of Quality Assurance Document (QuAD):

QuAD Version	Planned Date
V3.1	April 2019 (published)
V3.2	December 2019