Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1   Details of provider

1.1   Applicant Provider

Registered Business/Trading Name:	CPL Learning and Development Ltd. Trading as the CPL Institute
Address:	5 St Fintan's North Street, Swords, Co. Dublin
Date of Application:	19th March 2019
Date of resubmission of application:	
Date of evaluation:	
Date of site visit (if applicable):	24th July 2019
Date of reconvene meeting (if applicable)	15th June and 25th June 2020
Date of recommendation to the Programmes and Awards Executive Committee:	16th July 2020

1.2   Profile of provider

The Cpl Institute (formerly NIFAST) was initially established as a Health & Safety training and consultancy company in 1989. NIFAST gained FETAC accreditation in 2006. In July 2009, NIFAST was acquired by The Cpl Group, and is now the only training branch within the group. The legal entity applying for reengagement with QQI is therefore Cpl Learning & Development Ltd, trading as The Cpl Institute.

The Cpl Institute delivers full-time and part-time courses in the domains of Professional Development, Healthcare, Childcare, Health and Safety, Business Support and IT to diverse cohorts. These include early school leavers, employed and unemployed learners. Courses are delivered flexibly, including weekend and evening schedules. Delivery of public courses takes place in The Cpl Institute offices in Dublin, Naas and Cork. Courses delivered for employers may be delivered within the employer's own premises. To date, The Cpl Institute has certified over 20,000 learners on QQI validated programmes.

In addition to QQI accreditation, The Cpl Institute is a PHECC recognised training institution, a City & Guilds registered provider, an IOSH approved training provider and an RSA approved training provider.

Part 2   Panel Membership

Name	Role of panel member	Organisation
Billy Bennett	**Chair**	Letterkenny Institute of Technology
Cathy Peck	**Secretary**	Independent Education Consultant
Aoife Prendergast	Panel Member	Limerick Institute of Technology
Cecilia Munro	Panel Member	Ballyfermot College of Further Education
Rachel Tucker	Panel Member	CTEC Wexford

Part 3   Findings of the Panel

3.1   Summary Findings

The panel commends staff at The Cpl Institute for their open and honest engagement with the panel during the site visit. The provider's discussions with the panel throughout the day were constructive, and reflective of a genuine commitment to continual improvement within The Cpl Institute. The dedication of staff to their work in supporting learners was readily apparent. The panel also notes that The Cpl Institute delivers its programmes in flexible and accessible part-time modes, for which there is an obvious demand. Programme manuals, submitted to the panel as part of the provider's application for reengagement, were of a high standard. Additionally, The Cpl Institute's application provided a high level of clarity with regard to the tutor role, and to GDPR and data management processes.

At the conclusion of the site visit the panel held a number of specific concerns in relation to the provider's QA. These are outlined by the panel in Sections 5.1 – 5.11 of this report, and were specified as mandatory changes and items of specific advice in Sections 6.1 and 6.2.

It was the panel's view that the positive disposition of staff at The Cpl Institute to a quality ethos would facilitate implementation of necessary revisions to the Draft QA procedures within a six month period.The panel reconvened in June 2020 to undertake a desk review of evidence resubmitted by the provider, at which point some minor additional clarifications were sought. It was the view of the panel that The Cpl Institute had undertaken significant work in the interim period, and had achieved the required enhancements to its QA procedures. The panel also acknowledges that this was accomplished by the team at The Cpl Institute during a period of significant disruption to the sector due to the Covid-19 pandemic.

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

	Tick <u>one</u> as appropriate
Approve The Cpl Institute Institute's draft QA procedures	X
Refuse approval of The Cpl Institute Institute's draft QA procedures **with 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 Cpl Institute Institute's draft QA procedures	

Part 4   Evaluation of provider capacity

4.1   Legal and compliance requirements:

	Criteria	Yes/No/ Partially	Comments
4.1.1(a)	Criterion: Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?	Yes	CPL Learning and Development Ltd., trading as The Cpl Institute is registered as a limited company in Ireland. The provider has submitted a certificate of registration of this business name with its application.
4.1.2(a)	Criterion: Is the legal entity established in the European Union and does it have a substantial presence in Ireland?	Yes	The Cpl Institute is a legal entity established in the EU (see comment 4.1.1(a). The provider has a substantial presence in Ireland.
4.1.3(a)	Criterion: Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?	Yes	At the time of the initial site visit, the panel indicated a mandatory change in Section 6.1 of this report in relation to the need for the provider to provide evidence of its formal collaborative agreements with other providers. When the panel reconvened in June 2020 to review changes made by The Cpl Institute in the interim period, the panel were satisfied this criterion had been met.
4.1.4(a)	Criterion: Are any third-party relationships and partnerships compatible with the scope of access sought?	Yes	At the time of the initial site visit, the panel indicated a mandatory change in Section 6.1 of this report pertaining to this. The Cpl Institute had outlined compatible collaborative provision partnerships to the panel during the site visit. However, formal documentation/evidence of these was lacking. This was addressed by The Cpl Institute in the interim period, and

			appropriate documentation was provided for the panel's review in June 2020.
4.1.5(a)	**Criterion:** *Are the applicable regulations and legislation complied with in all jurisdictions where it operates?*	Yes	The evidence provided in support of The Cpl Institute's application is indicative of compliance with Irish/EU legislation. A Statutory Declaration signed by the Head of Operation accompanies the provider's application. The panel has identified two areas of vulnerability in relation to this and indicated these as mandatory changes in this report, see 6.1.8 and 6.1.9.
4.1.6(a)	**Criterion:** *Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.*	Yes	The Cpl Institute was established in 1989 and has a track record of certification with QQI, as well as other accrediting bodies.

Findings

The panel is generally satisfied that The Cpl Institute's legal and compliance requirements meet criteria 4.1. The Cpl Institute has been operating since 1989, and has a track record of certification. The provider submitted documentation with its application for reengagement that is indicative of its adherence to the legal and compliance requirements. The Cpl Institute addressed the panel's concerns regarding collaborations and partnerships in the interim period.

4.2   Resource, governance and structural requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.2.1(a)	**Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*	**Yes**	Evidence submitted is indicative that this is the case. This includes a tax clearance certificate for 2018 and a 2018 letter from the company's auditors.
4.2.2(a)	**Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*	**Yes**	The Cpl Institute is a well-established provider in the sector, and delivers programmes in areas where demand is evident.
4.2.3(a)	**Criterion:** *Are fit-for-purpose governance, management and decision making structures in place?*	**Yes**	At the time of the initial site visit, the panel identified a lack of clarity in The Cpl Institute's current documentation in relation to this criterion. The panel identified Mandatory Changes and items of Specific Advice in relation to this. The panel were satisfied that this was addressed by The Cpl Institute satisfactorily in the interim period.
4.2.4(a)	**Criterion:** *Are there arrangements in place for providing required information to QQI?*	**Yes**	There is evidence of processes in place to provide QQI with information as required.

Findings

The panel is satisfied that The Cpl Institute's resource, governance and structural requirements meet criteria 4.2.1(a), 4.2.2(a) and 4.2.4(a). Following the changes implemented by The Cpl Institute in the six month interim period, the panel is satisfied that the governance and decision-making structures are fit-for-purpose.

4.3   Programme development and provision requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.3.1(a)	**Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*	**Yes**	The Cpl Institute has a 30 year track record of provision in 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?*	**Yes**	The Cpl Institute employs appropriately qualified tutoring staff and provides financial supports to these staff for CPD.
4.3.3(a)	**Criterion:** *Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?*	**Yes**	The panel is satisfied that The Cpl Institute's track record of certification, and its approach to the re-engagement process reflects its capacity to co-operate with and assist QQI and provide QQI with information as specified in Section 45(3) of the 2012 Qualifications and Quality Assurance (Education and Training) Act.
4.3.4(a)	**Criterion:** *Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?*	**Yes**	The provider has appropriate processes in place to ensure premises and facilities used for training are fit-for-purpose.
4.3.5(a)	**Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*	**Yes**	At the time of the initial site visit, the panel was of the view that further development of ATP policies, which clearly articulate rules and procedures, was required. This was satisfactorily addressed by The Cpl Institute in the interim period.
4.3.6(a)	**Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*	**Yes**	At the time of the initial site visit, the panel was of the view that further development of recheck, review and appeal policies and procedures was required, as well as a policy for academic integrity and plagiarism. This was

			satisfactorily addressed by The Cpl Institute in the interim period.
4.3.7(a)	**Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*	**Yes**	The provider has submitted confirmation of arrangements for the protection of enrolled learners in Appendix 2.4 of its application documentation.

Findings

The panel is generally satisfied that The Cpl Institute's legal and compliance requirements meet criteria 4.3.

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

At the time of the initial site visit, The Cpl Institute was required to address several criterion in Section 4 prior to the panel recommending approval of its draft QA. These were specified as Mandatory Changes in Section 6.1 of this report, and were discussed with the provider during the panel's site visit. These pertained to areas in which documentation needed to be provided and in which policies and procedures needed to be further developed or refined. However, the panel was of the view that the provider had the capacity to address these issues within the allocated six month period. When the panel reconvened in June, 2020, the panel were satisfied that the required changes had been implemented and significant progress had been made.

Part 5   Evaluation of draft QA Procedures submitted by The Cpl Institute.

The following is the panel's findings following evaluation of The Cpl Institute 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 time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require a governance system to be in place to oversee the activities of the provider and to ensure its quality. The guidelines require the governance structure to enforce a separation of responsibilities between those who produce/develop material, and those who approve it. This system must also protect the integrity of academic decision making from undue commercial influence. In addition, guidelines for the management of QA require QA processes to be clearly described, and roles and positions to be clearly described and designated.

Prior to the site visit, the panel reviewed The Cpl Institute's draft QAM and supporting documentation. The panel held concerns that The Cpl Institute's documentation lacked clarity with regard to governance, and was insufficiently detailed in relation to QA processes as well as the responsibilities associated with specific roles. Following discussion with The Cpl Institute representatives, the panel was of the view that The Cpl Institute did not yet have sufficient clarity with regard to its academic governance and decision-making structures. The panel acknowledged that this was in part due to The Cpl Institute's transition to a new structure, and that the transition was a proactive response to The Cpl Institute's gap analysis (undertaken as part of the reengagement process). With regard to management of QA, the panel noted that relationships and processes were frequently demonstrated through the discussion to be clear internally to The Cpl Institute staff. However, this clarity was not reflected in the provider's documentation. Subsequently, the panel identified *Mandatory Changes* and items of *Specific Advice* that relating to this dimension of QA in Section 6.1 (see 6.1.3 & 6.1.4) and Section 6.2 (see 6.2.4 & 6.2.5).

A further aspect of this dimension of QA is a system of governance that considers risk. During the reengagement process, the panel identified areas where The Cpl Institute's current policy and practice in relation to garda vetting of staff and protection of children & vulnerable adults exposed the provider to unnecessary risk. The panel therefore noted two further *Mandatory Changes* for the provider pertaining to this in Section 6.1 (see 6.1.8 & 6.1.9).

When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's progress in this area, the panel were satisfied that the work undertaken had addressed their initial concerns. In the allocated six month interim period, The Cpl Institute had clarified its academic governance and decision-making structures, and developed appropriate formal processes in relation to garda vetting and safeguarding and protection of children and vulnerable adults.

2   DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

At the time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require a provider's QA to be fully documented, to be informed by QQI QA guidelines, to have formal standing within the provider and to cover any elements of a provider's activities that are carried out by other parties.

Prior to the site visit, the panel held concerns that the QAM and supporting documentation lacked clarity and precision. The panel also noted that key documentation (for example a formal Teaching, Learning & Assessment Strategy and a Work Placement Strategy) was absent. Following discussions during the site visit, the panel maintained this view. The panel acknowledged that The Cpl Institute was leveraging effective internal communications to guide processes in lieu of formal procedures. During the discussion, provider representatives also noted that in some areas policies and procedures were undergoing development or were not yet in existence. This was attributed in several instances to the provider not yet having encountered the circumstances in which those policies and procedures would be needed. However, to move forward, the provider required a more comprehensive, detailed and fit for purpose set of policies and procedures to be formalised, included in the QAM and embedded within practice at the organisation.

During the site visit, the panel discussed with The Cpl Institute representatives that the current documentation needed to be standardised, and that attention should be paid to version control and tracking, as well as consistency and precision of terms. The majority of the Mandatory Changes and items of Specific Advice listed in Sections 6.1 and 6.2 are therefore relevant to guidelines for a documented approach to QA, although they may also be indicated and discussed under other dimensions of QA in this report.

When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's progress in this area, the panel were satisfied that the work undertaken had addressed their initial concerns, as discussed in the relevant sections of this report.

3   PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

At the time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require a provider to have procedures in place for the systematic development and monitoring of programmes. Discussion during the site visit, the panel discussed current practice at the provider in relation to programme development, monitoring and review with The Cpl Institute representatives. The panel was of the view that this area needed to be documented in more detail in the QAM, and that the roles of the Quality Committee and Academic Council needed to be more clearly specified. The panel identified a *Mandatory Change* (see 6.1.5) and a related item of *Specific Advice* (see 6.2.3) in relation to this. When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's progress in this area, the panel were satisfied that The Cpl Institute's development in this area was appropriate and addressed its initial concerns.

QQI guidelines also require that access policies, admission processes and criteria are established and implemented consistently and transparently. Prior to the site visit, the panel held concerns that the rules and procedures pertaining to Access, Transfer and Progression (ATP) were not sufficiently clear in The Cpl Institute's draft QAM. During the site visit, the panel had the opportunity to discuss these procedures with The Cpl Institute staff. This discussion also focused on The Cpl Institute's practice in relation to recognition of prior learning and prior experiential learning. The panel acknowledges that current procedures are well understood internally by The Cpl Institute staff. However, these are not sufficiently comprehensive or detailed, and subsequently do not provide for all eventualities. The panel has therefore identified two *Mandatory Changes* (see 6.1.6 & 6.1.7) relevant to these areas. When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's progress in this area, the panel noted substantial enhancements had been made in this area. Some further details were requested from The Cpl Institute at that time, and following a review of those details the panel felt satisfied that the QA documentation in this area complied with QQI's requirements and was fit-for-purpose.

4   STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

At the time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require a provider to assure itself as to the competence of its staff. Procedures for recruitment must address pedagogical standards for teaching staff, and the maintenance and enhancement of these.

The Cpl Institute's application for reengagement and draft QAM outlined financial support allocated to the Continuing Professional Development (CPD) of staff. During the site visit, the panel explored how The Cpl Institute supports tutors to be effective in teaching and learning, and whether any recruitment criteria pertained to teaching and learning qualifications. The Cpl Institute representatives noted while some

tutors were pursuing qualifications in learning and teaching, this was not currently specified as a requirement, and was under review. The panel have therefore included an item of *Specific Advice* in relation to this within this dimension of QA (see 6.2.4). Also of relevance to this dimension of QA is the *Mandatory Change* requiring garda vetting of all staff, previously discussed in Section 5.1 of this report. When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's revised QA, the panel were pleased to note that the Specific Advice had been acted upon, and the Mandatory Change addressed.

5   TEACHING AND LEARNING

Panel Findings:

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

QQI's 2016 Core Statutory Quality Assurance Guidelines require a provider ethos that promotes learning, takes account of effective practice, and ensures that each programme's learning environment (inclusive of practice and work placements) is appropriate.

During the site visit, the panel queried whether documentation outlining the overall approach to teaching and learning at The Cpl Institute currently existed, as this was largely absent from the documentation reviewed. The Cpl Institute representatives stated that the philosophy underpinning teaching and learning at The Cpl Institute was geared toward the learner, and the promotion of a comfortable learning environment. The provider also noted in that tutors at The Cpl Institute are closely monitored, and that a high standard of delivery is expected. Acknowledging this, the panel notes that such remedial or reactive action would be more effective if it were explicitly guided by a clearly stated institutional approach or strategy. An item of *Specific Advice* has been included in Section 6.2 of this report pertaining to this (see 6.2.5).

The panel also explored the management of work placements within The Cpl Institute programmes. This discussion encompassed the securing of work placements by learners, the supervisor's role in assessing competencies and completing a competency logbook, the relationship of The Cpl Institute to the work supervisor and the process for getting feedback from supervisors (currently informal). Noting that work placements are a critical aspect of the learning experience within The Cpl Institute programmes, the panel has included an item of *Specific Advice* in this report recommending greater formalisation and specificity in this area of The Cpl Institute's QA (see section 6.2.6).

When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's revised QA, the panel were pleased to note that the Specific Advice had been given due consideration by the provider. The panel encourages The Cpl Institute to focus attention on these areas moving forward.

6 ASSESSMENT OF LEARNERS

Panel Findings:

At the time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require processes for assessment, complaints and appeals to be straightforward, efficient, timely and transparent. Prior to the site visit, the panel held concerns that The Cpl Institute's documentation lacked clarity in relation to policy and procedure pertaining to rechecks, reviews and appeals. Following discussion with the provider during the site visit, the panel has included a *Mandatory Change* in relation to this (see 6.1.10). The panel advises that in addressing this mandatory change, The Cpl Institute make explicit reference to QQI's Assessment and Standards, Revised 2013, and adhere to the definitions of these terms indicated in Section 4.10 of that document.

QQI's guidelines also indicate that policies and procedures must address the credibility and security of assessment procedures. During the site visit, the panel explored how issues pertaining to academic integrity and plagiarism are communicated to learners at The Cpl Institute and what procedures are in place to deal with academic misconduct. The Cpl Institute noted that some support is provided during induction on some programmes, including guidance in relation to referencing. Following this discussion, the panel has identified a further *Mandatory Change* (see 6.1.11) required to more effectively formalise the provider's practices in this area.

The panel noted that The Cpl Institute had submitted two sample assessment briefs with its application for reengagement. These briefs were not consistent in quality. The panel encourages The Cpl Institute to address the need for consistency and standards in this area. The panel has noted a further piece of *Specific Advice* (6.2.11) relevant to this dimension of QA, pertaining to examination regulations.

When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's revised QA, the panel were of the view that The Cpl Institute had satisfactorily addressed its concerns under this dimension of QA. Rechecks, reviews and appeals were defined appropriately, and a policy had been developed for dealing with issues of academic integrity and plagiarism. One further point of clarification was sought in relation to the existence or otherwise of a Results Approval Panel, and this was also satisfactorily addressed by The Cpl Institute in a documentation update.

7   SUPPORT FOR LEARNERS

Panel Findings:

At the time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require learners to be informed about the full range of services available to them, and that the needs of a diverse learner population be taken into account when planning and providing learning resources and supports.

The panel discussed a range of learner supports with The Cpl Institute representatives during the site visit. This discussion encompassed e-learning resources and English language requirements for The Cpl Institute programmes, as well as reasonable accommodations for learners with disabilities or specific learning needs. The Cpl Institute provided support for learners with additional needs, and absorbed costs related to this where learners were enrolled on an individual basis. The panel acknowledged the support The Cpl Institute was offering, but required the provider to formalise and document in greater detail its procedures in relation to this and ensure they were made available to all learners. This was listed as a Mandatory Change in this document (see 6.1.12).

When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's revised QA, the panel were of the view that The Cpl Institute had satisfactorily addressed its concerns under this dimension of QA, and was pleased to note this progress.

8   INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel was generally satisfied that QQI's guidelines under this dimension of QA had been addressed.

The panel noted that The Cpl Institute's documentation contained comprehensive and clear information pertaining to this dimension of QA. During the site visit, the panel discussed with the provider's representatives the changes made internally to ensure GDPR compliance. The panel commended the provider's documentation in this area.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

At the time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require policies and procedures to ensure that information published is clear, accurate, objective, up to date and easily accessible. Information pertaining to programmes of education and training should include procedures for access, transfer and progression.

During the site visit, the panel sought to understand how The Cpl Institute ensured all learners had access to the policies and procedures that may be relevant to them, including updates to those previously published. The Cpl Institute representatives discussed modes of communication with learners. These included email and Facebook. The Cpl Institute also noted that the new website would have a learner support section listing all policies. During this discussion, The Cpl Institute indicated their intent to publish the QAM pending successful completion of the reengagement process. With respect to this dimension of QA, the panel required a *Mandatory Change* (see 6.1.13), which was intended to ensure that all relevant policies be published on The Cpl Institute website, or alternatively on an intranet accessible to learners.

When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's revised QA, the panel noted this had been accomplished.

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

Panel Findings:

At the time of the initial site visit, the panel was not satisfied that QQI's guidelines under this dimension of QA had been fully addressed.

QQI's 2016 Core Statutory Quality Assurance Guidelines require that QA procedures include provision for engagement with second providers, and that these procedures cover all arrangements, including sub-contracting of provision.

During the site visit, the panel explored how The Cpl Institute's collaborative provision arrangements with other providers were managed. In particular, the panel sought to understand how The Cpl Institute ensured second providers in collaborative provision arrangements were compliant with The Cpl Institute QA policies and procedures. At the time of the site visit, this was directly relevant to The Cpl Institute's agreement with Private Homecare, in which The Cpl Institute is the primary provider.

The provider outlined that Private Homecare tutors reported directly to The Cpl Institute in relation to student issues or complaints on these programmes, and that The Cpl Institute also provided training days and CPD for tutoring staff on those programmes. The panel acknowledged these good practices, but noted that documented QA outlining processes and procedures relevant to collaborative provision was missing from the provider's QAM. Evidence of formal, collaborative agreements between The Cpl Institute and collaborative provision partners which detailed this was also missing from the documentation submitted for reengagement. Subsequently, the panel has identified two *Mandatory Changes* pertaining to this dimension of QA, listed in Section 6.1 of this report (see 6.1.1 and 6.1.2).

When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's revised QA, the panel were satisfied that this area of the provider's QA had been sufficiently developed, and that appropriate evidence of the collaborative agreement had been provided.

11	SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

> The panel is generally satisfied that QQI's guidelines under this dimension of QA have been addressed.
>
> QQI's 2016 Core Statutory Quality Assurance Guidelines require that internal self-monitoring procedures be in place which include a system of appropriate quality measures and gather evidence of achievement of objectives, and that these are used to produce quality improvement plans. During the site visit, the panel explored how The Cpl Institute conducted formal reviews and reported on self-evaluation. Following this discussion, the panel noted an item of *Specific Advice* in Section 6.2 of this report (see 6.2.8) with regard to this dimension of QA. This pertained to the need to document processes in this area, and include a schedule of audits and reviews within the QAM.
>
> When the panel reconvened in June 2020 to undertake a desk review of The Cpl Institute's revised QA, the panel felt this had been adequately addressed.

Evaluation of draft QA Procedures - Overall panel findings

> In this report, the panel has noted and commended the constructive approach The Cpl Institute took during its interactions with the panel members on the day of the site visit.
>
> Through the reengagement process the panel had opportunity to explore dimensions of the draft QA submitted by The Cpl Institute in depth with the provider's representatives. The panel is of the view that The Cpl Institute have fostered a workplace culture characterised by an ethos of continuous improvement.
>
> The panel noted that at the time of the initial site visit the provider had a number of areas of vulnerability in its draft QA. The panel was of the view that the provider had the capacity to address these within a six month period. These were reflected in this report as *Mandatory Changes*. The panel additionally noted items of *Specific Advice*. Although not mandatory, it was the panel's view that these recommendations would support and strengthen internal processes at The Cpl Institute moving forward.
>
> The panel reconvened in June 2020 to review the evidence submitted by The Cpl Institute that it had adequately addressed the panel's concerns. The panel noted the substantial progress that had been made in the interim period. The panel was pleased to be able to make a recommendation to QQI to approve The Cpl Institute's draft QA procedures at that time. The panel has included some further items of Specific Advice in Section 6.3 of this report, which are intended to support the provider as it moves forward in implementing and embedding its QA processes across its operations.

Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following mandatory changes were identified at the conclusion of the site visit on 24th July 2019 by the Panel. The Panel reconvened in June 2020 to evaluate evidence submitted by The Cpl Institute in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that The Cpl Institute has addressed the issues set out in Section 6.1 below.

6.1 Mandatory Changes

6.1.1 Document formal collaborative provision procedures in the QAM, to include selection criteria, governance, QA, roles and responsibilities, due diligence processes etc. This is required to provide for situations where The Cpl Institute is the primary provider (current or future).

6.1.2 Establish, and provide evidence of, formal collaborative agreements between The Cpl Institute and any collaborative provision partner.

6.1.3 Clarify in the QAM the academic governance and decision making structures within the organisation, preferably in diagrammatic format. Formally document the Terms of Reference/Standing orders for Academic Council (including composition, remit, frequency of meetings, standing committees and the role of the Secretary and Chair).

6.1.4 The QAM must be substantially redrafted to reflect the conditions and recommendations of the panel and be written with greater precision and detail. In addition this must include:

    I. Clear responsibilities attached to a named role

    II. Reference to relevant QQI policies

    III. Approval and version control

6.1.5 Document in detail the programme development and monitoring processes in the QAM. A detailed flowchart of the processes is recommended, including the formal roles of the quality committee and academic council.

6.1.6 Develop formal Access, Transfer & Progression policies, clearly articulating the rules and procedures governing ATP as a separate section of the QAM

6.1.7 Develop a more detailed policy and procedures for RPL, with separate processes and regulations for recognition and assessment of prior certified and prior experiential learning.

6.1.8 Put in place formal processes within The Cpl Institute for garda vetting of all staff, including full-time and contract.

6.1.9 Develop a more detailed child safeguarding and protection policy to address protection of children and vulnerable adults.

6.1.10 Review the assessment regulations to document in detail separate review and appeals processes, including the composition of relevant panels.

6.1.11 Develop a policy for academic integrity and plagiarism, including guidelines for academic referencing, definitions of plagiarism, and processes for dealing with cases of alleged plagiarism.

6.1.12 Document and publish detailed procedures for supporting learners with additional needs and for making reasonable accommodations for learners.

6.1.13   Publish the final QAM and all relevant policies and procedures on The Cpl Institute website or intranet.

6.2 Specific Advice

The following items of specific advice were identified at the conclusion of the site visit on 24th July 2019 by the panel. The Panel reconvened in June 2020 to evaluate evidence submitted by The Cpl Institute in support of the proposed changes. The panel was pleased to note at that time that these had been given appropriate consideration by the provider, and in several cases had been actioned.

6.2.1   Clarify in the QAM where The Cpl Institute sits within The Cpl Institute group, and how it relates to other subsidiaries. The panel recommends the use of a single trading name or title.

6.2.2   Ensure that the Academic Council meets a minimum of 4 times per annum and has a minimum of 10 members, including academic tutors and learner representatives.

6.2.3   Establish a separate programmes committee as a sub-committee of the Academic Council to have oversight of programme development and monitoring.

6.2.4   Develop a more detailed staff development policy to address staff recruitment processes, minimum selection criteria and the Continuous Professional Development (CPD) of staff.

6.2.5   Develop a formal Teaching, Learning & Assessment Strategy for The Cpl Institute. This should inform Teaching, Learning & Assessment Strategies for the individual programmes. For example, including requirements for assessment schedules, marking schemes, feedback on assessment etc.

6.2.6   Develop a formal Work Placement Policy and associated procedures. This should include work placement manuals that clearly articulate the roles and responsibilities of learners, placement providers and supervisors.

6.2.7   Develop a set of examination regulations for The Cpl Institute to complement the marks and standards of the awarding body.

6.2.8   Document processes for formal review and reporting on self-evaluation. These should include the named committee or entity which has responsibility for reporting and review. Produce a schedule of internal audits and reviews.

6.3 Additional Specific Advice

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

6.3.1   The Cpl Institute is advised to undertake a comprehensive review of the effectiveness of its QA processes within the next 12 – 18 month period. This will enable The Cpl Institute to ensure that its approved QA procedures continue to be fit for purpose and appropriately embedded within the organisation.

6.3.2 The Cpl Institute is advised to ensure it maintains the currency of its policies on child safeguarding by referencing the most recent national policies.

6.3.3 The Cpl Institute is advised to ensure that there is a strong representation of academic voices at the Academic Council as it moves forward.

Part 7   Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
5 – 6	Major, SPA, Minor	Professional Development, Healthcare, Childcare, Health and Safety, Business Support and IT

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 Cpl Institute.

Name: _____

Date:

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

Document	Related to
Updated Org Chart with Staff Names	Governance & Management
Appendix 4.15 Work Experience General Guidelines	Teaching & Learning
Memorandum of Understanding Template for Second Providers	Other Parties Involved in Education & Training
Provider's Presentation to Panel	General QA

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

Name	Role/Position
Conor Loughran	Operations Manager
Patrick Toye	Training & Quality Manager
Rebecca Walls	Quality & Audit Manager
Derek Donohoe	Marketing Manager
Ciara Mason	Training Co-ordinator
Roisin Dyas	Training Co-ordinator
Laura Magee	Healthcare & PHECC A/c Manager

Appendix: Provider response to the Reengagement Panel Report

M/s Marie Cotter
Quality and Qualifications Ireland (QQI)
26-27 Denzille Lane
Dublin 2
D02 P266
Ireland

3rd July 2020

Re: The Cpl Institute – Reengagement Panel Draft Report

Dear Marie,

I would like to thank you for the opportunity to review the Re-engagement Panel Report for any inaccuracies.

Please find attached, completed Factual Accuracy Feedback Form with a few minor requested changes and this does not really impact on the factual content of the report.

The Cpl Institute are very pleased that the review panel have indicated that all Mandatory Requirements and specific advice/recommendations have been satisfactorily addressed by the reconvened panel in June 2020 and reflected in the updated report received. We feel that the Re-engagement Panel Report is an accurate reflection of what has been addressed and updated in 2020.

The Cpl Institute acknowledges and notes the Additional Specific Advice in section 6.3 of Panel Re-engagement Report post the reconvened panel in June 2020.

Again, thank you for the opportunity to review the report for any inaccuracies before the report is submitted to the Programme and Awards Executive Committee for the meeting on 16th July 2020.

Should you have any queries regarding above, please do not hesitate to contact me.

Kind regards

Patrick Toye

Patrick Toye
Training & Quality Manager

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