

**QQI**Quality and Qualifications Ireland
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Provider Access to Initial Validation of Programmes leading to QQI Awards

Report of the Quality and Capacity Evaluation Panel

Stage 1

Assessment of Capacity and Approval of QA Procedures

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

1.1 Applicant Provider

Registered Business/Trading Name:	Western Management Centre
Address:	Galway Business Park, Dangan, Galway, Ireland, H91 P78R
Date of Application:	12 February 2021
Date of resubmission of application:	26 May 2021
Date of site visit (if applicable):	12 April 2021 (virtual event via MS Teams)
Date of reconvene meeting (if applicable):	04 June 2021 (virtual event via MS Teams, panel only) 22 June 2021 (virtual event via MS Teams, meeting with the provider)
Date of recommendation to the Approvals and Reviews Committee:	19 August 2021

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1.2 Profile of applicant provider

Western Management Centre (WMC) has been operating for over 30 years. In 2018, the Centre was purchased by ICE Group. ICE Group itself is an award-winning recruitment, training and outsourced Human Resources and Payroll Business partner to leading Irish and multinational organisations.

The purchase of WMC was in alignment with one of ICE Group's long-term objectives, to augment its current product offering with a suite of compatible programmes and enhance its ability to meet the changing demands in a learner-driven marketplace.

ICE Group has been successfully delivering training since 1982. The organisation is a supplier to four Education and Training Boards and has been a provider of training to these organisations as a contracted training provider since 2018. The Group also provided training under FÁS from 2008 and is currently a training provider to SOLAS. In addition, ICE Group participated in the Momentum 1 and Momentum 2 programmes.

WMC had existed from 2008 until recently as an accredited QQI further education (FE) provider and has delivered courses in the areas of business management, health & safety and manual handling (up to Level 6 (FE) on the National Framework of Qualifications). Its change of ownership to ICE Group, and related changes in staffing necessitated an application for QA approval as a new provider under the Initial Access to Validation process.

1.3 Proposed education and training provision

NFQ Level	Award Class	QQI Award / Proposed Programme Title
Level 5	Minor	Safety & Health at Work (5N1794)
Level 6	Minor	Training Delivery & Evaluation (6N3326)
Level 6	Minor	Manual Handling Instruction (6N0233)
Level 6	Minor	Project Management (6N4090)
Level 6	Minor	Business Management (6N985)
Level 6	Minor	Team Leadership (6N1948)

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Part 2 The Quality and Capacity Panel Membership

Name	Role of panel member	Organisation
Dr Áine Ní Shé	Chair	Registrar and Vice President for Academic Affairs, MTU (Cork)
Mary Doyle	Report Writer/ Subject Matter Expert (QA)	Programme Development - Project Manager, QAE Department, Griffith College
Dr David McCarthy	QA Expert	Quality Officer, National College of Ireland
Janet Tumulty	QA Expert	Head of Training & Quality Assurance Director, New Links Training Solutions

Part 3 Findings of the Panel

3.1 Summary Findings

In considering its overall findings the panel commended Western Management Centre on the openness of its team, their willingness to accept constructive feedback, and their consistency of message. This supported engagement on the day of the panel site visit, in which the panel evidenced an articulation of strengths, and an openness to sharing weaknesses, by a proud FE provider with a passionate and committed leader. This positive engagement was embodied right across the WMC team, which articulated a clear vision and a considered approach, grounded in reality (including its strategies for major award consideration and blended learning).

The organisation demonstrated the strength and capacity to navigate ongoing challenges, including QA review processes, new ownership, and senior management changes. Organisational continuity, the engagement of a consultant/external expertise to support its QQI QA approval process and the implications of the pandemic have all been navigated very effectively by the team.

Western Management Centre, with support from its parent ICE Group, has indicated an openness to technology and its use. This will support future activity and growth and will further enhance the staff and learner experience.

Nonetheless, at the conclusion of the site visit, which was held on 12 April 2021, the panel had concerns around:

- the compliance, consistency and user-friendliness of the Learner and Tutor Handbooks with the wider QA documentation (and the QA Manual in particular).

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- the compliance of the QA documents and identified processes with FE requirements and processes.
- the appropriateness and scale of the academic governance structure for the organisation's size (including communication and reporting lines).
- the extent of externality in and across the committee and decision-making structures.
- the defined role of QA gate-keeper as required to support the FET framework, and the distribution/delegation of decision-making through the organisation (to facilitate escalation in relation to academic decisions).

These are outlined in section 7.1 of this report and identified as proposed mandatory changes. There was no specific advice that was not aligned with (included in) the proposed mandatory changes identified in section 7.1.

Given that these issues were discreet, and in the Panel's view could be addressed quickly by the provider, the Panel availed of the option to defer its overall decision for a period of six weeks, and allowed Western Management Centre this time to submit evidence to the panel that the changes identified have been satisfactorily addressed.

The panel reconvened on 04 June 2021 to undertake a desk review of the evidence subsequently submitted by WMC. At this meeting the panel determined that they would like further detail on the documentation provided, supported by a meeting with WMC key personnel. This meeting was held on 22 June 2021. The panel noted WMC's responses to the proposed mandatory changes, as outlined in section 7.1 of this report. It is the Panel's view that WMC has satisfactorily addressed the proposed mandatory changes and therefore, the Panel recommends that QQI approves the draft quality assurance procedures of Western Management Centre and approve its progression to Stage 2 of the initial programme validation process.

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

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



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

4.1 Legal and compliance requirements:

	Criteria	Yes/No/Partially	Comments
4.1.1(a)	Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	The provider has submitted an auditors' letter confirming its status as an established legal entity.
4.1.2(a)	Criterion: <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	Yes	The provider is an established legal entity in the EU, based in Galway.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	<p>The company is a wholly-owned subsidiary of the ICE Group. This is not immediately clear from the provided documentation, but was detailed to the panel during the site visit.</p> <p>The provider has not indicated its involvement in any form of collaborative provision.</p>
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	<p>As per the QA manual, WMC currently engages with its parent company to access supplemental resources and supports. That company currently carries ISO 9000 accreditation.</p> <p>The provider does not avail of external partnerships, second providers or subcontractors for the provision of programmes and has no plans to so do.</p> <p>There is no indication that its relationships with other awarding bodies and external agencies (e.g. ACCA, APEX, GMIT, ILM, Pitmann</p>



			Training, RTITB, SOLAS) will impact on the delivery of its programmes leading to QQI awards.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	Based on the evidence presented by the provider, including a signed declaration from the MD, the panel is satisfied that the provider is in compliance with all relevant regulations and legislation in Ireland.
4.1.6(a)	Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>	Yes	<p>This application is for an initial validation access application.</p> <p>Based on the evidence, including a signed declaration from the MD, presented by the provider, the panel is satisfied that the provider is 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.</p>

Findings

The panel is satisfied that Western Management Centre is in compliance with all legal and regulatory requirements, as outlined in Section 4.1.

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

	Criteria	Yes/No/Partially	Comments
4.2.1(a)	Criterion: <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	Yes	The provider has supplied filed accounts for the most recent and two previous years, a tax clearance certificate, insurance documentation and an accountant's letter reaffirming the provider's stable financial standing, sufficient resource base and conformance with Irish company law.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	The panel is satisfied from the evidence submitted that the provider has a reasonable business case for sustainable provision.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	<p>At the conclusion of the virtual site visit (on 12 April 2021), the panel identified the following proposed mandatory changes, requiring the provider to review the Terms of Reference of both its Academic Council and the sub-committees, to ensure an appropriate level of oversight is maintained, by the former over the latter.</p> <p>The panel felt that clarity was required in relation to governance structures. In addition, the overall responsibility for the QA processes needed to be set out, and the distribution/delegation of decision making within the organisation needed to be reconsidered to facilitate escalation of appeals to those independent of the initial decision.</p> <p>All relevant issues have been noted as items of proposed <i>Mandatory Changes</i> in Section 7.1 of this report.</p>

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			The Panel reconvened on 04 / 22 June 2021 and noted that the governance, management and decision-making structures were significantly revised, and clearly documented in the QA Manual (and their independence and externality enhanced).
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	There is evidence of processes in place to provide QQI with information as required (with the Registrar being the primary contact person for this communication).

Findings

While acknowledging significant strengths within Western Management Centre's draft QA procedures pertaining to Resource, Governance and Structural requirements, the panel, at its meeting on 12 April 2021, identified vulnerabilities which warranted immediate review. Specific issues identified by the panel in relation to WMC's Governance are identified as proposed Mandatory Changes in section 7.1.

The panel was of the view that these concerns could be promptly addressed by the provider, on the basis of the openness and willingness of the team to accept constructive feedback during the site visit.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021. The Panel noted that WMC submitted a revised QA Manual which described a revised governance structure, the separation of decision-making structures, the facilitation of escalation procedures within the academic decision-making processes, and defined key roles and responsibilities of those decision makers. The panel are satisfied that WMC have addressed the proposed Mandatory Changes identified in section 7.1.

The panel noted that there was still some overlap regarding the Registrar's role in both the results approval panel (RAP) process and the appeals board – this needs to be addressed. This is noted as a specific advice, in section 7.2, with the panel recommending that its implementation be reviewed by the first validation panel when exploring the planned academic processes for the proposed programme.

**4.3 Programme development and provision requirements:**

	Criteria	Yes/No/Partially	Comments
4.3.1(a)	Criterion: <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	Yes	WMC has been delivering programmes for many years. Recent changes in ownership and concurrent significant staff changes in the interim resulted in the provider pursuing initial access to validation.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	<p>There have been significant staff changes since WMC's acquisition by ICE Group. The documentation, and the panel's discussion with staff during the site visit, identified a complement of suitably qualified staff, plus a commitment to ongoing recruitment to meet future requirements.</p> <p>In addition, professional development opportunities are also available for staff through the ICE Group shared resources.</p>
4.3.3(a)	Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	The panel is satisfied that WMC has the capacity to comply with standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012).
4.3.4(a)	Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i>	Yes	<p>The panel event was conducted virtually, as a result of the COVID-19 pandemic. As a supplementary option the panel was provided with a short video of the premises.</p> <p>WCM primarily operates out of a purpose-built, wheelchair-accessible training centre in Galway. Recent developments include the creation of a</p>



			<p>recording suite for COVID-19 contingency online delivery, and investments in IT systems, to support operational and academic processes.</p> <p>The panel is satisfied that WMC has a sufficient resource base, and appropriate development plans in place, to meet the requirements of the provision proposed.</p>
4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	<p>The provider's policy and procedures relating to access, transfer and progression are detailed in section 4.2 of the Draft QA Manual. The panel is satisfied that these are in line with QQI's guidelines.</p>
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	<p>The provider has clear and up to date assessment policies and procedures in place including internal verification and external authentication processes.</p> <p>However, at the time of the site visit, the panel identified the need for the provider to build-in escalation options through the delegation and/or independence of decision making, to allow for subsequent appeals processes.</p> <p>In addition, the learners' handbook needs review to ensure its language is level-appropriate for the provider's learners. This should be aligned with the required review of all the QA documents by a FET QA expert to ensure their consistency and compliance with FE requirements, processes and terminologies.</p> <p>All relevant issues have been noted as items of proposed <i>Mandatory Changes</i> in Section 7.1 of this report.</p> <p>The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation submitted by WMC.</p>



			<p>The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021. While the revised QA Manual describes a revised governance structure, the separation of decision-making structures, the facilitation of escalation procedures within the academic-decision processes, and defined key roles and responsibilities of those decision makers, the panel noted that there was still some overlap regarding the Registrar's role in both the results approval panel (RAP) process and the appeals board – this needs to be addressed. This is listed as a specific advice, in section 7.2, with the panel recommending that its implementation be reviewed by the first validation panel when exploring the planned academic processes for the proposed programme.</p> <p>The panel are satisfied that WMC have addressed the proposed Mandatory Changes identified in section 7.1 in relation to the learner handbook content and level-appropriate language.</p>
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	N/a	N/a - The provider does not currently plan to offer programmes longer than three months in duration.

Findings

The panel is of the view that WMC has satisfactorily addressed QQI's requirements relating to programme development and provision. The panel however, proposed Mandatory Changes, which are detailed in Section 7.1. These were intended to ensure that WMC meets the Core QA requirements, particularly in relation to its assessment procedures.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation submitted by WMC.

The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 in relation to Governance, the Learner Handbook content and level-appropriate language.

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

While the panel was satisfied with the provider's capacity to provide sustainable education and training within its proposed scope of provision, some areas were also identified as being in need of further development. WMC is building on the success of an established education and training provider, which offers programmes through several accrediting bodies, and incorporating several quality systems.

The panel noted WMC's commitment to the QQI processes, and the current intention to try merge processes where possible, but to retain critical processes as appropriate, and evidenced through the developed QA Manual. As noted, following the site visit on 12 April 2021, the panel recommended that WMC complete a thorough review to address the deficiencies identified in the governance and decision-making processes.

The panel identified some areas where proposed mandatory changes were necessary and these issues have been noted in Section 7.1 of this report.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021. The QA Manual describes a revised governance structure, the separation of decision-making structures, the facilitation of escalation procedures within the academic decision-making processes, and defined key roles and responsibilities of those decision makers. The panel noted that there was still some overlap regarding the Registrar's role in both the results approval panel (RAP) process and the appeals board – this needs to be addressed. This is noted as a specific advice, in section 7.2, with the panel recommending that its implementation be reviewed by the first QQI validation panel when exploring the planned academic processes for the proposed programme.

The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 and consequently recommend WMC's QA procedures to QQI for approval.

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Part 5 Evaluation of draft QA Procedures submitted by Western Management Centre

The following is the panel's findings following evaluation of Western Management Centre 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:

QQI's Core Guidelines (2016) require a provider's system of academic governance to be independent of commercial considerations. (CSQAG, p.6).

At the site visit on 12 April 2021, the openness of the Western Management Centre team, their willingness to accept constructive feedback, and their consistency of message was particularly remarked on by the panel. This supported an open engagement on the day of the panel site visit, in which the panel evidenced an articulation of strengths, and an openness to sharing weaknesses, by a proud FE provider with a passionate and committed leader. This positive engagement was embodied right across the team.

The panel found that the documentation provided indicated a clear separation of commercial and academic decision-making. However, in doing so, WMC has sought the involvement of significant external contribution and oversight. The panel determined that WMC should review the current proposed academic governance structure to ensure that it is appropriate and proportionate to the organisation's size, while reflecting on the lines of communication between the various committees.

The panel found that the terms of reference (ToRs) for the academic committees, which were contained in a supplementary document, should be included in the QA manual (to solidify it as the single source of institutional information). The panel advised that the clarity of the overall process would be enhanced by the generation of a schema, which would serve to further clarify the roles and the independence of decisions.

When reviewing the academic governance structure, the panel determined that WMC should check if the level of externality it currently has in place is 'really' required to ensure independence in and across the committee and decision-making structures. This review should also consider the possible engagement of an FET QA expert to review (proof) all QA documents and enclosed terminologies to ensure their consistency, and compliance with FE requirements and processes.

Finally, the panel considered that WMC has not adequately identified the holder of the role of QA gate-keeper. A review of the executive/senior management roles should be completed to ensure that that role is defined as required to support the FET framework. WMC should then distribute/delegate decision-making through the organisation, to facilitate escalation in relation to academic decisions within the governance framework.

All relevant issues were noted as items of proposed *Mandatory Changes* in Section 7.1 of this report.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

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The QA Manual describes a revised governance structure (including ToRs), communication lines (via a schema), the separation and delegation of decision-making structures, the facilitation of escalation procedures within the academic-decision processes, and defined key roles and responsibilities of those decision makers, including that of QA gate-keeper. The panel noted that while independence and externality have been further developed in the documentation, there was still some overlap regarding the Registrar's role in both the results approval panel (RAP) process and the appeals board – this needs to be addressed. This is noted as a specific advice, in section 7.2, with the panel recommending that its implementation be reviewed by the first QQI validation panel when exploring the planned academic processes for the proposed programme.

The panel are satisfied that WMC have addressed the proposed Mandatory Changes identified in section 7.1 in relation to the tutor handbook and learner handbook content and level-appropriate language, to ensure consistency, and compliance with FET requirements and processes, and terminology.

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2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

QQI's Core Guidelines (2016, p.9) require a provider's QA system to be fully documented. It is clear that WMC is committed to embedding quality assurance and improvement across the organisation. While agreeing that the documentation submitted by WMC meets this requirement and was overall well-structured, comprehensive, and of a high standard, the panel was of the view that the identified responsibility section needed to distinguish between the 'owner' of the policy for review, and the implementer.

The panel commended the clarity and template-format of the QA manual's style and that of the academic forms provided for learner use. The panel indicated that when the governance review is being undertaken (under criterion 1), WMC should also engage an FET QA expert to review (proof) all QA documents to ensure their consistency, and compliance with FE requirements, processes, and terminology. WMC had indicated that it had started 'from fresh' under its new ownership. The panel recommended that, with a legacy of QQI-validated programme provision, the team at WMC should retain the strengths of the previous QA framework, while introducing new processes, systems and developments, as necessary.

WMC representatives identified that an electronic document control system was in place within the provider. Staff documents and information was provided through a dedicated portal (WWICEDO), and learners could access their support information and documentation via Microsoft Forms. The provider noted its increasing reliance on the use of these e-resources in providing access to forms and other important information, and their intention to continue to maintain this process.

A number of discrepancies between the information presented in the Learner Handbook and the Tutor Handbook, and that in the QA Manual, were identified by the panel. The Panel found that WMC should reconsider and review both the Learner and Tutor Handbooks to ensure their compliance and consistency with the QA manual and wider QA documentation. In addition, the language within the Learner Handbook needed to be reconsidered to reflect an appropriate level for proposed learners. The panel further found that this should be integrated with the FET QA expert review of its consistency, and compliance with FE requirements and processes (and terminology). WMC representatives indicated that they would address them appropriately.

All relevant issues were noted as items of proposed *Mandatory Changes* in Section 7.1 of this report.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 in relation to the tutor handbook and learner handbook content and their consistency, and compliance with FE requirements, processes, and terminology. The language within the Learner Handbook is at an appropriate level for proposed learners. The information presented in the Learner Handbook and the Tutor Handbook, are consistent with that in the QA Manual.

3 PROGRAMMES OF EDUCATION AND TRAINING

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Panel Findings:

QQI's Core Guidelines (2016, p.11) require a provider's policies and procedures for learner admission, progression and recognition to include "fair recognition of education and training qualifications, periods of study and prior learning, including the recognition of non-formal and informal learning." Additionally, recognition procedures must be developed in line with national policy and European guidelines.

The panel explored how the programme's admission criteria would be applied for those completing programmes in-company. These discussions focused on the range of learners coming onto the programmes, and given that many of the learners will be internal company candidates, the need for WMC to take responsibility for assuring that the admission criteria are being applied in a fair and consistent manner, and assuring that requirements are being met.

The panel discussed the process for new programme development and approval with WMC representatives, who talked through the provider's process and the decision-making steps for this area of activity. The panel were of the opinion that WMC needed to revisit this process, within the context of a revised academic governance and distributed decision process, to ensure that the proposed process discussed is appropriate and aligned to QQI's guidelines, in that it reflected an appropriate interaction of academic and corporate decision-making. However, the panel noted that clarity was needed within the documented process with regard to the sequence and interaction of approvals at distinct stages from the Quality Enhancement and Risk Management Committee, the Finance Committee, the Academic Council, and the Board of Directors.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

The QA Manual describes a revised governance structure which has been rationalised to reduce the overall number of committees. While the activities of the programme board were not identified as having been subsumed into another committee, in discussions with the panel WMC clarified that this was the case. The separation and delegation of decision-making structures with regard to the sequence and interaction of programme considerations and approvals at distinct stages has been developed, and key roles and responsibilities of the decision makers defined. The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 in relation to this criterion. As per the QA Manual, appropriate admission procedures need to be considered as new programmes are developed.

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4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

In accordance with QQI's Core Guidelines (2016, p.12), a provider must "assure itself as to the competence of its staff," and ensure "there is a systematic approach to the fair and transparent recruitment and further professional development of people engaged in programme and service delivery."

WMC's QA Manual, and the tutors who attended the panel event, confirm that there are clearly defined processes in place regarding staff recruitment (full-time and part-time); staff induction; staff performance review; feedback on teaching staff; staff communication; and identify a culture of commitment to transparent staff recruitment and development practices. The panel also identified a substantial amount of training and induction for new training staff, which was facilitated through the ICE Group parent company.

The panel had the opportunity to speak to members of staff, including tutors, who identified their own induction and ongoing training process. The panel were of the view that these discussions consistently reflected the documented processes.

WMC's documentation outlines the organisation's provision and facilitation of continuing professional development opportunities for staff, including funding and contributory support for or towards training events, training courses, and seminars.

The panel was satisfied that the provider's staff recruitment, management and development processes support its capacity to provide sustainable education and training.

5 TEACHING AND LEARNING

Panel Findings:

The panel noted that WMC is a very learner centred organisation and this ethos is embedded and permeates throughout the organisation.

The panel is satisfied that QQI's criteria in relation to teaching and learning have been appropriately addressed and well documented. Notwithstanding, the panel were of the opinion that WMC's current scale does not support a requirement for a Teaching and Learning Committee.

WMC's documentation, along with the panel's discussions with staff during the virtual site visit, consistently reflected a serious commitment to learners. Learning and teaching activity is undertaken with an emphasis on constructive alignment, which ensures that assessment and learning activities directly support the achievement of intended learning outcomes.

Critical self-reflection and monitoring are deeply valued within the organisation, and learner feedback is sought to improve the quality of programmes.

A comprehensive set of supporting documents and forms were also submitted and reviewed by the panel.

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6 ASSESSMENT OF LEARNERS

Panel Findings:

QQI's 2016 Core Statutory Quality Assurance Guidelines require that a provider will have quality assurance procedures, structures and resources to underpin fair and consistent assessment of learners that comply with QQI policy protocols, conventions and guidelines on assessment.

Both formative and summative assessment methods are used within WMC.

Internal verification and external authentication processes have been applied by WMC to support completion of legacy programmes within the provider.

The panel discussed WMC's assessment framework, with a particular focus on:

• Academic Integrity

QQI's Core Guidelines (2016) require a provider's assessment framework to be developed in such a way that it ensures the security and integrity of the assessment process. The panel noted the comprehensive safeguarding processes which are in place to ensure the security of assessments, and to address problems if and when they arise. WMC staff confirmed during the site visit that learner awareness of expectations in relation to academic integrity was raised at induction and reinforced throughout programmes.

The panel were of the view that the language used to describe WMC's existing processes, particularly those included in the learner handbook, was overly complex for the proposed target learners (based on identified proposed scope of provision). This issue was noted as a proposed *Mandatory Change* in Section 7.1 of this report.

• Recheck, Review and Appeals

Following the panel's initial planning meeting, clarifications were sought in relation to WMC's policies and procedures for Recheck, Review and Appeals. These included definition of the WMC staff involved at each decision-making step of the assessment processes. The panel felt that there needed to be some internal distribution of decision-making authority within WMC to facilitate subsequent escalation of appeals processes within WMC.

The fees for these processes while alluded to in the documentation, needed to be defined for the learners.

The panel recommended that WMC conduct a review of its assessment practices and academic governance to ensure their alignment with QQI's Assessments and Standards (2013). WMC should review (proof) all QA documents by a FET QA expert to ensure consistency, and compliance with FE requirements and processes. This issue has been noted as an item of proposed *Mandatory Change* in Section 7.1 of this report.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

The QA Manual describes a revised governance structure (including ToRs), communication lines (via a schema), the separation and delegation of decision-making structures, the facilitation of escalation

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procedures within the academic-decision processes, and defined key roles and responsibilities of those decision makers, including that of QA gate-keeper.

The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 in relation to the learner handbook content and level-appropriate language, to ensure consistency, and compliance with FET requirements and processes, and terminology.

7 SUPPORT FOR LEARNERS

Panel Findings:

Discussions under this dimension of QA encompassed the provider's process for facilitating learners with diverse needs, including those that may request reasonable accommodations due to specific learning differences or disabilities. WMC's representatives stepped the panel through the learner journey for requesting consideration of reasonable accommodation.

A Learner Handbook was also provided to the panel for its meeting on 12 April 2021. This publication was very rules and regulation focused, and contained no details on the various processes and supports in place relevant to the learner. The panel acknowledged that this may be linked to the nature of proposed (short) programmes and target learners, but recommended that a review of the learner handbook be undertaken by WMC staff prior to enrolling learners.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 in relation to the learner handbook content, tone and level-appropriate language.

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8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

QQI's 2016 Core Statutory Quality Assurance Guidelines require that policies and procedures are in place to ensure information published is clear, accurate, objective, up to date and easily accessible.

WMC has developed an in-house record management system to maintain learner information.

At the time of the initial site visit, the panel found that WMC's Record Management Policy and Schedule may benefit from further enhancement, as it did not reflect certification data, assessment records (internal verifier and external authenticator reports and results approval panel minutes), assessment material, programme documents, meeting minutes, information of record, etc.

This should be aligned with the required review of all the QA documents by FET QA expert to ensure their consistency and compliance with FE requirements, processes and terminologies. This issue has been noted as an item of proposed *Mandatory Change* in Section 7.1 of this report.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

The QA Manual describes WMC's revised Record Management Policy and Schedule. The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 in relation to this criterion.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

WMC indicated it will publish its draft QA Manual on its website upon completion of the application process.

Information pertaining to QQI programmes on the website will offer details on relevant NFQ level, award type and course content.

The panel noted the learner support information, such as that pertaining to appeals, complaints, and reasonable accommodation needed to be accessible to learners and the Learner Handbook amended to ensure it is language appropriate for learners. This should be aligned with the required review of all the QA documents by FET QA expert to ensure their consistency and compliance with FE requirements, processes and terminologies. This issue has been noted as an item of proposed *Mandatory Change* in Section 7.1 of this report.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

The panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 in relation to the QA Manual content and level-appropriate language, to ensure consistency, and compliance with FE requirements and processes, and terminology.

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10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING

Panel Findings:

The provider did not indicate its involvement in any form of collaborative provision, and the panel is otherwise satisfied that QQI's guidelines under this dimension of QA have been addressed.

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

QQI's 2016 Core statutory Quality Assurance Guidelines require a provider to review, evaluation and report on education and training services it provides and the QA systems and procedures that underpin these.

WMC has engaged a number of consultants to support its self-evaluation and development within its development of its policies, practices and documentation in preparation for its application for initial access to validation.

The provider noted that it had completed a critical review of its practices prior to submission of its application, and the panel were satisfied that this critical self-analysis was thorough and appropriately reflective to identify gaps and weaknesses and propose enhancements.

At the site visit, WMC identified a range of practices for the collection and monitoring of its programmes. Learner and tutor feedback forms and annual programme report templates were provided for the panel's consideration. The panel were satisfied that these policies effectively demonstrate how this information is utilised to enhance the quality system.

Throughout this quality assurance evaluation process, WMC has shown a commitment to quality assurance, an openness to receiving feedback, and a drive towards quality enhancement.



Evaluation of draft QA Procedures - Overall panel findings

As noted at the outset of this report, the panel would like to acknowledge the substantive documentation prepared by WMC in support of its application. The panel recognises the significant work that was undertaken by the provider and the progress made in moving toward alignment with QQI's Core and Sector Specific Statutory Quality Assurance Guidelines (2016)

In considering its overall findings the panel commended Western Management Centre on the QA Manual, and the policy and procedure framework (and its template format) - this facilitated a very useful template structure. The clean and effective presentation and clear language was also evident in the sample forms provided (templates).

There was an obvious understanding across the team on the need for separation and independence of academic and commercial decision making, and this was actively supported within the governance structure.

The openness of the team, their willingness to accept constructive feedback, and their consistency of message was particularly remarked on by the panel. This supported an open engagement on the day of the panel site visit, in which the panel evidenced an articulation of strengths, and an openness to sharing weaknesses, by a proud FE provider with a passionate and committed leader. This positive engagement was embodied right across the team.

The organisation had shown the strength and capacity to navigate ongoing challenges, including the timing of the QA review processes, new ownership, and senior management changes. Organisational continuity, engagement of a consultant/external expertise engagement to support its QQI QA approval journey and the implications of the pandemic have all been navigated very effectively by the team.

Western Management Centre, with support from its parent ICE Group, has indicated an openness to technology, and its use – this will support to the future activity and growth and will further enhance the staff and learner experience.

The team articulated a clear vision and a considered approach, grounded in reality (including its strategies for major award consideration and blended learning).

Nonetheless, at the conclusion of the site visit, which was held on 12 April 2021, the panel had concerns around:

- the compliance, consistency and user-friendliness of the Learner and Tutor Handbooks with the wider QA documentation (and the QA Manual in particular).
- the compliance of the QA documents and identified processes with FE requirements and processes.
- the appropriateness and scale of the academic governance structure for the organisation's size (including and communication and reporting lines).
- the extent of externality in and across the committee and decision-making structures.
- the defined role of QA gate-keeper as required to support the FET framework, and the distribution/delegation of decision-making through the organisation (to facilitate escalation in relation to academic decisions).

These are outlined in section 7.1 of this report and identified as proposed mandatory changes.



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Given that these issues were discreet, and in the Panel's view could be addressed quickly by the provider, the Panel availed of the option to defer its overall decision for a period of six weeks, and allowed Western Management Centre this time to submit evidence to the panel that the changes identified have been satisfactorily addressed.

The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021.

Following their review of the provided documentation, and the engagement with the WMC personnel at the reconvened meeting, on 22 June 2021, the panel are satisfied that WMC has addressed the proposed Mandatory Changes identified in section 7.1 and, consequently, are happy to recommend WMC's QA procedures to QQI for approval.

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Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

There are no conditions proposed.

Part 7 Mandatory Changes to QA Procedures and Specific Advice

The following proposed mandatory changes were identified at the conclusion of the site visit on 12 April 2021 by the panel. The panel availed of the option to defer its decision to allow Western Management Centre an opportunity to address these issues within a six-week period. The Panel reconvened on 04 June 2021 to undertake a desk review of the revised QA Manual and other documentation (including a Tutor Handbook and Learner Handbook) submitted by WMC. The panel subsequently met (virtually) with key personnel from WMC on 22 June 2021. Following these reconvened events, the panel are satisfied that WMC have addressed the Mandatory Changes identified in section 7.1.

7.1 Mandatory Changes

At the conclusion of the virtual site visit, which was held on 12 April 2021, the panel identified the following proposed Mandatory Changes. Western Management Centre should:

1. Reconsider and review both the Learner and Tutor Handbooks to ensure their compliance and consistency with wider documentation – i.e. QA Manual as a single source of truth – and to make them more user friendly.
– To meet the deferred decision turn-about, the panel requires that an Audit check is conducted in the short-term, with a plan for further development also generated as a response.
2. Review (proof) of all QA documents by FET QA expert to be conducted to ensure consistency, and compliance with FE requirements and processes. (Audit check)
3. Review academic governance structure to ensure that it is appropriate and proportionate to the organisation's size, while reflecting the lines of communication, and generating a schema to support clarity (ToRs to be included in the QA manual – single source).
4. When reviewing the academic governance structure, check if externality is 'really' required to ensure independence in and across the committee and decision-making structures.
5. Review executive/senior management roles, to ensure that role of QA gate-keeper is defined as required to support the FET framework. Once defined, distribute/delegate decision-making through the organisation, to facilitate subsequent escalation in relation to academic decisions.

The Panel, following its reconvened events on 04 June 2021 and on 22 June 2021 (for a desk review, and meeting with WMC personnel, respectively) are satisfied that WMC have addressed the proposed Mandatory Changes.

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7.2 Specific Advice

1. While independence and externality have been further developed in the documentation, there is still some overlap regarding the Registrar's role in both the results approval panel (RAP) process and the appeals board – this needs to be addressed. The panel recommends that the implementation of this item of specific advice be reviewed by the first QQI validation panel when exploring the planned academic processes for the proposed programme.

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 5 to Level 6	Minor & SPA	Healthcare, Business, Management and Administration
Delivered via face-to-face modes only		

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Part 9 Approval by Chair of the Panel

This report of the Quality and Capacity Panel is approved and submitted to QQI for its decision on the recommendation to approve the draft Quality Assurance Procedures of Western Management Centre and approve its progression to Stage 2 of the initial programme validation process.

Name:

Dr Áine Ní Shé, Chair of the Panel

Date:

01 July 2021

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

Document	Related to
LegalEntity_	Governance: Evidence of the type of legal entity is submitted (1.2)
OrgChartWMC_2.3 & OrgChartShared_2.3	Governance: Organisation Chart (2.3)
AuditorsRefLetter & QQI Course Numbres 2020-2025	Governance: Documentation relevant to financial viability and resources (3.1)
PublicLiability_3.2	Public Liability Insurance Details (3.2)
TaxClearanceCert_3.3	Current eTax Clearance Confirmation (3.3)
StatutoryDeclaration_5 PDF	The statutory declaration has been signed by the Owner, Director or Principal Executive Officer of the Applicant and witnessed by an authorised person (5)
WMC QA Handbook	Draft QA procedures
WMC File of Evidence	Various documents supporting the implementation of the QA system (all)
RecordsRetentionScheduleV1.0 (supplementary document provided in response to panel query)	Record management (criterion 8)
SampleForms-Final (supplementary document provided in response to panel query)	Forms supporting the implementation of the QA system (criteria 5, 6 and 7)
	Sample standard agenda – Academic Council (Criterion 1)
Additional Documentation Provided for reconvened panel (04/22 June 2021)	panel Information - overview of QA reviewed changes to WMC documentation, plus the following: <ul style="list-style-type: none">- WMC QA Handbook V2.0- WMC Tutor Handbook V2.0- WMC Learner Handbook V2.0- WMC response - stage 1 IAV

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Name	Role/Position
Margaret Cox*	Managing Director
Alice Brennan	Chair of Academic Council
Evanna Keaveny*	Registrar
Lourda O'Dea*	Programme Manager
Joan Donnellan	Oversight of IV
Kevin McDonnell	Tutor
Rita Kearney	Tutor
Christina Breathnach	Administrator

* Additionally met with the reconvened panel (on 22 June 2021)

Appendix: Provider response to the Initial Access to Validation Panel Report

**Western Management Centre
Galway Business Park
Dangan
Galway
H91 P78R**

091 528 777



Quality and Qualifications Ireland (QQI)
26/27 Denzille Lane
Dublin 2

30 July 2021

To whom it may concern

Many thanks for the Report of the Quality and Capacity Evaluation Panel (Stage 1 Assessment of Capacity and Approval of QA Procedures) dated August 2021, based on Western Management Centre's (WMC) application for Provider Access to Initial Validation of Programmes leading to QQI Awards.

WMC welcomes the panel's findings in this report and greatly appreciates the time, effort, experience and feedback the panel members have provided as part of this application process. We found the report to be very comprehensive and we are in agreement that it fully captures the discussions and recommendations that were part of our engagement with the Panel.

Our panel meeting session of April 2021 and the findings shared on the day and in during subsequent panel engagements have been highly constructive and supportive to the process of developing our quality-assured procedures that meet all stakeholder needs and deliver on the Centre's mission and objectives.

As noted in the report, we will update our quality assurance processes in the areas highlighted.

Yours sincerely

A handwritten signature in black ink that reads "Margaret Cox". The signature is written in a cursive style with a large, stylized 'M' and 'C'.

**Margaret Cox
Director**