



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Template Version 2.0 - 31.05.2017

Independent Evaluation Report on an Application for Validation of a Programme of Education and Training

Part 1

Provider name	National College of Ireland
Date of site visit	9 th and 10 th May 2018
Date of report	05/09/2018

Overall recommendations

Principal programme	Title	Certificate in Community Welfare Service Provision
	Award	Certificate in Community Welfare Service Provision
	Credit	15 Credits – Level 7
	Recommendation <i>Satisfactory OR Satisfactory subject to proposed conditions¹ OR Not Satisfactory</i>	Satisfactory subject to proposed conditions

¹ Normally an application that fails to meet the criteria in any of its aspects will be considered as not satisfactory. Nevertheless, so as to ensure that the validation process will not be implemented unreasonably, if an independent evaluation finds that a programme virtually meets the validation criteria but needs some minor modifications, the independent evaluation could conclude “Satisfactory subject to recommended special conditions” where the special conditions prescribe the defects that require to be corrected.

Further, in exceptional cases the ‘special conditions’ may be used to identify parts of the application that are considered satisfactory on a stand-alone basis. For example, an application might propose a programme to be provided at two locations but the independent evaluation report may find the application satisfactory on condition that it be provided only at one specified location and not at the other. These conditions will not however be used to recommend that QQI can be satisfied with a programme conditional on a different QQI award (e.g. at a lower NFQ level or having a different CAS award title) being sought than the one identified in the application.

Evaluators

Evaluators		
Name	Role	Affiliation
Hugh McBride	Chair	Galway Mayo Institute of Technology
Jennifer Kavanagh	Secretary	Waterford Institute of Technology
Nuala Whelan	Subject-Matter Expert	Assistant Manager, Ballymun Job Centre / Maynooth University
Fiona Dukelow	Subject-Matter Expert	University College Cork
Joanna Siewierska	Student Representative	University College Dublin
Colm McDermott	Industry Representative	Formerly of Department of Employment and Social Protection

Principal Programme

Names of centres where the programmes are to be provided	Maximum number of learners (per centre)	Minimum number of learners
National College of Ireland – IFSC, Mayor Street, Dublin, Newbridge, Intreo Centre, Moorefield Road, Newbridge, Co. Kildare, Intreo Employment & Support Services, Dept of Social Protection, Cork Road, Waterford, Galway Intreo Centre, Sean Duggan Centre, Fairgreen Road, Galway, Clondalkin Intreo, 9th Lock Road, Clondalkin, Dublin 22 and SDU Training Room / Pensions Office, College Road, Sligo.	100	25

Enrolment interval (normally 5 years)	Date of first intake	October 2018
	Date of last intake	February 2023
Maximum number of annual intakes	4	
Maximum total number of learners per intake	100	
Programme duration (months from start to completion)	6 months	
Target learner groups	Department of Employment Affairs and Social Protection employees	
Approved countries for provision	Republic of Ireland	
Delivery mode: Full-time/Part-time	Part-time, day release	
The teaching and learning modalities	Class room based learning will be the primary method of teaching / learning. Activities in each session will range from: lectures, discussions, quizzes, exercises, review of articles, guest speakers, review of policies, case studies and practical exercises.	

<p>Brief synopsis of the programme (e.g. who it is for, what is it for, what is involved for learners, what it leads to.)</p>	<p>The programme is specifically designed for new employees or employees currently working as Designated Persons in the Department of Employment Affairs and Social Protection (DEASP).</p> <p>The programme has been designed in alignment with the Occupational Profile for the Designated Person. This role holder has previously been supported through the ‘One DEASP Learning’ material. The current design draws upon these resources to provide a specifically designed curriculum arising from current and profile role requirements.</p> <p>The aim of the programme is to provide Designated Persons with the scope to either build up or upon their professional knowledge through an accredited programme that enhances their learning and development.</p> <p>The objectives of the programme is to provide Designated Persons with the competence and confidence to fully meet the requirements of their role along with the key skills required to effectively deliver on DEASP services.</p>
<p>Summary of specifications for teaching staff</p>	<p>Each NCI lecturer will ideally possess a primary or Master’s degree in the relevant discipline ideally Social Sciences/Public Administration and/or relevant Industry experience. Specialist DEASP tutors will be used as required in specific professional / technical aspects of each module. Each DEASP tutor will have completed an IITD Training & Development Programme, NCI Associate Faculty induction training and have a minimum of three years’ work experience in DEASP. Specialists used in each module will have extensive relevant experience in the area and will have at least three years relevant experience at appropriate level. Programme co-ordinating roles will be provided by the central co-ordinator assigned to the position at NCI. DEASP will also have dedicated resources within the SDU unit to provide support for staff members within the programme.</p>
<p>Summary of specifications for the ratio of learners to teaching-staff</p>	<p>1:25 One lecturer will be designated as ‘Lead Lecturer’ for the module and s/he will be responsible for ensuring effective delivery of each module concerned.</p> <p>1:15 A support lecturer may be used, from time to time, to facilitate discussion and optimise contact with students prior to assessment.</p>

Part 2 Evaluation against the validation criteria

Criterion 1

<p>The provider is eligible to apply for validation of the programme</p> <ul style="list-style-type: none"> a) The provider meets the prerequisites (section 44(7) of the 2012 Act) to apply for validation of the programme. b) The application for validation is signed by the provider’s chief executive (or equivalent) who confirms that the information provided is truthful and that all the applicable criteria have been addressed. c) The provider has declared that their programme complies with applicable statutory, regulatory and professional body requirements.² 	
<p>Satisfactory (yes, no, partially)</p>	<p>Comment</p>
<p>YES</p>	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion regarding eligibility.</p>

Criterion 2

<p>The programme objectives and outcomes are clear and consistent with the QQI awards sought</p> <ul style="list-style-type: none"> a) The programme aims and objectives are expressed plainly. b) A QQI award is specified for those who complete the programme. <ul style="list-style-type: none"> (i) Where applicable, a QQI award is specified for each embedded programme. c) There is a satisfactory rationale for the choice of QQI award(s). d) The award title(s) is consistent with unit 3.1 of QQI’s <i>Policy and Criteria for Making Awards</i>. e) The award title(s) is otherwise legitimate for example it must comply with applicable statutory, regulatory and professional body requirements. f) The programme title and any embedded programme titles are <ul style="list-style-type: none"> (i) Consistent with the title of the QQI award sought. (ii) Clear, accurate, succinct and fit for the purpose of informing prospective learners and other stakeholders. g) For each programme and embedded programme <ul style="list-style-type: none"> (i) The minimum intended programme learning outcomes and any other educational or training objectives of the programme are explicitly specified.³ (ii) The minimum intended programme learning outcomes to qualify for the QQI award sought are consistent with the relevant QQI awards standards. h) Where applicable, the minimum intended module learning outcomes are explicitly specified for each of the programme’s modules. i) Any QQI minor awards sought for those who complete the modules are specified, where applicable. 	
--	--

² This criterion is to ensure the programme can actually be provided and will not be halted on account of breach of the law. The declaration is sought to ensure this is not overlooked but QQI is not responsible for verifying this declaration of enforcing such requirements.

³ Other programme objectives, for example, may be to meet the educational or training requirements of a statutory, regulatory or professional body.

For each minor award specified, the minimum intended module learning outcomes to qualify for the award are consistent with relevant QQI minor awards standards. ⁴	
Satisfactory (yes, no, partially)	Comment
YES	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion.</p> <p>The programme aims and objectives are expressed clearly in Section 2.1 of the programme document.</p> <p>The award title is Certificate in Community Welfare Service Provision and it is a Special Purpose Award at Level 7.</p> <p>There is a satisfactory rationale for the choice of award linked to the QQI award standards. This was articulated clearly by the programme team during the panel visit and is set out in Section 2.2 of the programme document. The panel is satisfied that the award title is consistent with the nature and content of the programme, with the occupational profile and job specification of the intended learners, and states what the programme seeks to achieve. It is clear, accurate, succinct and fit for the purpose of informing intended learners and stakeholders. The panel is also satisfied that the award level chosen for the qualification is appropriate to the aims and rationale of the programme, the requirements of the DEASP, and the profile of the intended student cohort from within the DEASP.</p> <p>The minimum intended programme learning outcomes (MIPLOs) are specifically stated in Section 2.4 of the programme document, are consistent with the QQI Business Awards Standards and with the Level 7 award sought, and are suitable for the professional role of the learner. The reason for the use of the Business Award Standards at Level 7 and the consistency of the programme in this regard is set out clearly with examples in Section 2.3 of the document. The MIPLOs are comprehensively mapped to the Business Award Standard in Section 2.6, <i>Table 2: Evidencing the attainment of MIPLOs against the QQI Award Standards</i>. The panel is of the opinion that this Standard is appropriate, particularly in view of the core skills and knowledge that the learners will engage with on the programme. The MIPLOS are well communicated to intended learners and are consistent with the Standard.</p> <p>The minimum intended module learning outcomes (MIMLOs) are explicitly stated in Section 2.4.1 and again in the module descriptor in Section 6. They are mapped to the MIPLOs in the evidence thread in Section 2.6, Table 2.</p>

⁴ Not all modules will warrant minor awards. Minor awards feature strongly in the QQI common awards system however further education and training awards may be made outside this system.

Criterion 3

The programme concept, implementation strategy, and its interpretation of QQI awards standards are well informed and soundly based (considering social, cultural, educational, professional and employment objectives)

- a) The development of the programme and the intended programme learning outcomes has sought out and taken into account the views of stakeholders such as learners, graduates, teachers, lecturers, education and training institutions, employers, statutory bodies, regulatory bodies, the international scientific and academic communities, professional bodies and equivalent associations, trades unions, and social and community representatives.⁵
- b) The interpretation of awards standards has been adequately informed and researched; considering the programme aims and objectives and minimum intended programme (and, where applicable, modular) learning outcomes.
 - (i) There is a satisfactory rationale for providing the programme.
 - (ii) The proposed programme compares favourably with existing related (comparable) programmes in Ireland and beyond. Comparators should be as close as it is possible to find.
 - (iii) There is support for the introduction of the programme (such as from employers, or professional, regulatory or statutory bodies).
 - (iv) There is evidence⁶ of learner demand for the programme.
 - (v) There is evidence of employment opportunities for graduates where relevant⁷.
 - (vi) The programme meets genuine education and training needs.⁸
- c) There are mechanisms to keep the programme updated in consultation with internal and external stakeholders.
- d) Employers and practitioners in the cases of vocational and professional awards have been systematically involved in the programme design where the programme is vocationally or professionally oriented.
- e) The programme satisfies any validation-related criteria attaching to the applicable awards standards and QQI awards specifications.

Satisfactory (yes, no, partially)	Comment
YES	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion.</p> <p>The key stakeholders of the programme are the management and staff at the DEASP and at NCI. The programme was developed and designed as a collaborative partnership between the DEASP and NCI to provide an accredited award that will meet the specific requirement and occupational needs of DEASP staff. The design was based on an extensive and comprehensive consultation process with all relevant staff in both institutions as evidenced and demonstrated in Section 3.8 of the programme document and in Appendices 1-3. The design also drew on prior experience in developing and delivering a Level 8 Certificate in Employability Studies and on the DEASP's One DSP Learning programme. The Panel was particularly impressed by the strong sense of shared ownership and pride in the programme among the</p>

⁵ Awards standards however detailed rely on various communities for their interpretation. This consultation is necessary if the programme is to enable learners to achieve the standard in its fullest sense.

⁶ This might be predictive or indirect.

⁷ It is essential to involve employers in the programme development and review process when the programme is vocationally or professionally oriented.

⁸ There is clear evidence that the programme meets the **target learners'** education and training needs and that there is a clear demand for the programme.

development team; and the coherence of their understanding of the programme concept, of the implementation strategy and of the challenges in delivery.

While the programme documentation clearly outlines the extensive nature of the consultation and engagement between the collaborative partners, their staff and the prospective student cohort, the panel was also provided during the discussions with information about additional engagement and consultation with various civil society and DEASP client groups that also informed the programme development and design.

One of the recommendations of the panel is that details of this additional stakeholder consultation be outlined in the programme documentation to capture the full richness and comprehensive nature of the consultation process.

The interpretation of the award standard has been adequately informed and communicated to the panel. The awards standards were interpreted in the context of the DEASP providing its employees with a firm grounding and knowledge of the purpose and practice of this government function, as outlined in Section 3 of the programme document and as clearly articulated during the panel discussions. This is reflected in both the MIPOLs and the MIMLOs, where outcomes have been written with the target learners in mind and reinforced by the practical based delivery of the modules.

The panel is satisfied that there is a convincing evidence-based rationale for the provision of the programme which was clearly communicated by the development team. This is explained particularly in Section 3.2 of the programme document.

The programme is bespoke, designed specifically to meet the requirements of the DEASP. Section 3.15 of the programme document outlines comparators, firstly in terms of programmes that have been designed to suit specific governmental departments, for example, the Office of the Revenue Commissioners has been at the forefront of providing bespoke education programmes for their employees via their partnership with University of Limerick. Secondly, the programme offerings of the Institute of Public Administration (IPA) are relevant comparators in so far as they are programmes designed specifically for public servants. However, these programmes are open enrolment and not specifically targeted at the DEASP learner. Section 3.15.2 draws comparisons with UK programmes. Section 2.7 draws comparison with work based training programmes offered by NCI. In particular the Certificate in Employability Services and the Certificate in Credit Union Risk & Compliance are identified, demonstrating NCI's experience with the overall pedagogical approach.

The introduction of the programme is strongly supported by the DEASP. It will form a core element of staff induction, continuing professional education, vocational training and planned staff development. The prospective students for the programme are all employees of the DEASP currently working in, or newly appointed to, the role of Designated Persons. In this regard, it satisfies the genuine education and training needs of the DEASP. Learner demand will be underpinned by the commitment of the DEASP to promoting the programme among its staff and to the provision of significant learner support. This is clearly outlined in Sections 3.9, 3.10 and 3.11 of the programme document and was convincingly articulated during the panel discussions.

Section 3.14 of the programme document outlines the mechanisms to ensure that the programme remains relevant and up to date. In particular, this is illustrated in Diagram

	1, Section 3.14.1. Essentially, this will be done through the programme committee, standardisation meetings, the steering group, feedback from learners, feedback from external examiners, and feedback from the DEASP.
--	---

Criterion 4

The programme's access, transfer and progression arrangements are satisfactory

- a) The information about the programme as well as its procedures for access, transfer and progression are consistent with the procedures described in QQI's policy and criteria for access, transfer and progression in relation to learners for providers of further and higher education and training. Each of its programme-specific criteria is individually and explicitly satisfied⁹.
- b) Programme information for learners is provided in plain language. This details what the programme expects of learners and what learners can expect of the programme and that there are procedures to ensure its availability in a range of accessible formats.
- c) If the programme leads to a higher education and training award and its duration is designed for native English speakers, then the level of proficiency in English language must be greater or equal to B2+ in the Common European Framework of Reference for Languages (CEFR¹⁰) in order to enable learners to reach the required standard for the QQI award.
- d) The programme specifies the learning (knowledge, skill and competence) that **target learners** are expected to have achieved before they are enrolled in the programme and any other assumptions about enrolled learners (programme participants).
- e) The programme includes suitable procedures and criteria for the **recognition of prior learning** for the purposes of access and, where appropriate, for advanced entry to the programme and for exemptions.
- f) The programme title (the title used to refer to the programme):-
 - (i) Reflects the core *intended programme learning outcomes*, and is consistent with the standards and purposes of the QQI awards to which it leads, the award title(s) and their class(es).
 - (ii) Is learner focused and meaningful to the learners;
 - (iii) Has long-lasting significance.
- g) The programme title is otherwise legitimate; for example, it must comply with applicable statutory, regulatory and professional body requirements.

Satisfactory (yes, no, partially)	Comment
Partially	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme partially meets this criterion. The minor deficiencies are detailed below.</p> <p>The requirements for entry, transfer and progression are set out in Sections 4.2, 4.3 and 4.4 of the programme document. Applicants must be employed by the DEASP and</p>

⁹ Each of the detailed criteria set out in the Policy and criteria for access, transfer and progression in relation to learners for providers of further and higher education and training must be addressed in the provider's evaluation report. The detailed criteria are (QQI, restated 2015) arranged under the headings

- Progression and transfer routes
- Entry arrangements
- Information provision

¹⁰ http://www.coe.int/t/dg4/linguistic/Source/Framework_EN.pdf (accessed 26/09/2015)

	<p>will normally have a minimum of a Higher Certificate or equivalent at Level 6 on the National Framework of Qualifications.</p> <p>The panel noted that the documentation referred to “advanced standing recognition” which would be terminology used in NCI for professional programmes where candidates are deemed suitable to entry on a particular course due to the position which they hold in their industry.</p> <p>The issue of RPL for learners who may wish to take the course was raised by the panel. The panel was informed that both NCI and DEASP would support any such candidates who did not meet the normal qualification entry criterion in accessing the programme on the basis of RPL. This is especially relevant in light of the programme becoming part of the mandatory training for new staff in the DEASP and strongly encouraged for existing staff in the particular occupational role.</p> <p>The issue of the process of student application, nomination and selection for entry onto particular delivery intakes was also discussed with the panel, as set out in Sections 4.2.1 and 4.2.8 in particular.</p> <p>The panel recommends as a special condition of validation that the programme documentation be amended to clarify entry requirements to reflect RPL issues, advanced entry and the entry process.</p> <p>The panel also noted a misstatement of entry requirements in the module summary details as set out in the opening to Sections 6.1. This should be amended (refer special condition of validation under criterion 5 below).</p> <p>Following discussion with the programme team, the panel were of the opinion that there was a lack of clarity in the documentation (see for example Sections 5.2.1, 5.10, 6.1.5 and 6.1.6) about a suggested e-learning prerequisite for effective learner entry onto and participation in the programme. Accordingly, it is a special condition of validation that any suggestion of an e-learning prerequisite for entry onto the programme be removed and that this aspect is clarified.</p> <p>The programme information for learners is clear and in plain language. The programme titles reflect the core intended learning outcomes and they are meaningful to learners. The programme length is suitable to cover the learning outcomes and material.</p>
--	---

Criterion 5

The programme’s written curriculum is well structured and fit-for-purpose

- a) The programme is suitably structured and coherently oriented towards the achievement by learners of its intended programme learning outcomes. The programme (including any stages and modules) is integrated in all its dimensions.
- b) In so far as it is feasible the programme provides choice to enrolled learners so that they may align their learning opportunities towards their individual educational and training needs.
- c) Each module and stage is suitably structured and coherently oriented towards the achievement by learners of the intended *programme* learning outcomes.

<p>d) The objectives and purposes of each of the programme's elements are clear to learners and to the provider's staff.</p> <p>e) The programme is structured and scheduled realistically based on sound educational and training principles¹¹.</p> <p>f) The curriculum is comprehensively and systematically documented.</p> <p>g) The credit allocated to the programme is consistent with the difference between the entry standard and minimum intended programme learning outcomes.</p> <p>h) The credit allocated to each module is consistent with the difference between the module entry standard and minimum intended module learning outcomes.</p> <p>i) Elements such as practice placement and work based phases are provided with the same rigour and attentiveness as other elements.</p> <p>j) The programme duration (expressed in terms of time from initial enrolment to completion) and its fulltime equivalent contact time (expressed in hours) are consistent with the difference between the minimum entry standard and award standard and with the credit allocation.¹²</p>	
Satisfactory (yes, no, partially)	Comment
Partially	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme partially meets this criterion. The minor deficiencies are detailed below.</p> <p>The curriculum structure is clearly outlined in Section 5 of the programme document. It comprises one mandatory 15 credit modules, coherently oriented towards the achievement of the intended programme learning outcomes (see also Section 2.6 for further detail in this regard). The rationale for the programme structure is set out in Sections 5.2 and 5.3.</p> <p>The programme meets the needs of the intended learners and the learning outcomes are achievable to the required standard. The programme documentation is clear in setting out what is intended for the students to develop and enhance their professional competences and knowledge, and their ability to fulfil their occupational role in the DEASP.</p> <p>The curriculum is comprehensively and systematically documented in the module descriptor in Section 6. This information will be publicly available through the college's web-based information system. The module descriptor will allow for the learners to align with their educational needs.</p> <p>The credit allocated to the module is appropriate and the intended learning outcomes are realistic and achievable. The credit allocation of this programme is consistent with expected level of effort required to achieve the award. The programme has 15 ECTS, which is allocated at a 1 credit per 25 effort-hours ratio as outlined in Section 4.6. Details of the learner work load and the delivery schedule is set out in Section 5.4.1. The effort-hours allocation is suitable to the level of the award, realistic and based on sound educational principles.</p>

¹¹ This applies recursively to each and every element of the programme from enrolment through to completion.

In the case of a modular programme, the pool of modules and learning pathway constraints (such as any prerequisite and co-requisite modules) is explicit and appropriate to the intended programme learning outcomes.

¹² If the duration is variable, for example, when advanced entry is available, this should be explained and justified

Section 2.9 of the programme document sets out a Transferable Skills Matrix indicating the range of skills that a graduate of this programme will attain. The panel is of the view that this is overly generic and lacking in specific reference and detail relating to the particulars of the programme and the particular occupational profile (as outlined in section 3.7). Accordingly, **the panel recommends as a special condition of validation that the programme document clarify and expand on the Transferable Skills Matrix tailoring and linking it as appropriate to the occupational profile of learners.**

Summary details of the module are set out in the opening to Section 6.1, and the programme schedule is set out in Section 5.13 of the document. **The panel recommends as a special condition of validation that these schedules be reviewed and minor editing issues relating to names, entry, contact hours and assessment % be corrected.**

The panel compliments the programme team for the overall standard of the presentation of the programme documentation. **As a general recommendation, the document would be further enhanced by tidying up the typographical issues raised during the panel discussion.**

The general recommendation made by the panel that all 7 programmes in the integrated suite of programmes presented for validation include a greater focus on service user perspectives and reading material drawing on service user perspectives and experiences is especially relevant to this programme. The relevance and appropriateness of incorporating a focus on a number of topics in this regard was discussed, including: working with service users in distress and in extreme need; the evolving nature of needs that Community Welfare Officers encounter; and the challenges posed by diverse nature of service users, including for example clients whose first language is not English.

The panel are also of the opinion that ethical issues arising from the potential challenges posed in service user interaction are particularly relevant in this occupational role. **The panel recommends as a special condition of validation that ethics to be more clearly articulated as an element of the curriculum.**

Criterion 6

There are sufficient qualified and capable programme staff available to implement the programme as planned

- a) The specification of the programme's staffing requirements (staff required as part of the programme and intrinsic to it) is precise, and rigorous and consistent with the programme and its defined purpose. The specifications include professional and educational qualifications, licences-to practise where applicable, experience and the staff/learner ratio requirements. See also criterion 12 c).

<p>b) The programme has an identified complement of staff¹³ (or potential staff) who are available, qualified and capable to provide the specified programme in the context of their existing commitments.</p> <p>c) The programme's complement of staff (or potential staff) (those who support learning including any employer-based personnel) are demonstrated to be competent to enable learners to achieve the intended programme learning outcomes and to assess learners' achievements as required.</p> <p>d) There are arrangements for the performance of the programme's staff to be managed to ensure continuing capability to fulfil their roles and there are staff development¹⁴ opportunities¹⁵.</p> <p>e) There are arrangements for programme staff performance to be reviewed and there are mechanisms for encouraging development and for addressing underperformance.</p> <p>f) Where the programme is to be provided by staff not already in post there are arrangements to ensure that the programme will not enrol learners unless a complement of staff meeting the specifications is in post.</p>	
Satisfactory (yes, no, partially)	Comment
YES	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion.</p> <p>The staffing requirement and arrangements are outlined in Section 7 of the programme document. The CVs of core programme staff are provided in Appendix 9.</p> <p>In accordance with the tender agreement between DEASP and NCI, NCI provide the necessary guarantees that all staff members contracted to contribute to the programme have the required technical and professional expertise, competence, ability and experience.</p> <p>Programme delivery will be by NCI staff including NCI associate faculty drawn from the staff of the DEASP. NCI will request the same degree of information on the professional and educational qualifications and experience of contributing DEASP staff members in evaluating their competence and suitability as associate faculty members. Training for the purposes of course delivery has been provided internally through the DEASP's Staff Development Unit and the NCI staff induction programme. NCI staff will also undergo an induction to the DEASP.</p> <p>NCI's Centre for Learning and Development offers professional development opportunities for Faculty and staff throughout the year in terms of lunchtime lectures and webinars in many topic areas including reflective practice, assessment and teaching practices. Procedures for performance management and review will be covered by Standard NCI Performance systems. Learner feedback on each lecturer's modules is provided via end of module evaluation following delivery. This evaluation</p>

¹³ Staff here means natural persons required as part of the programme and accountable (directly or indirectly) to the programme's provider, it may for example, include contracted trainers and workplace supervisors.

¹⁴ Development here is for the purpose of ensuring staff remain up-to-date on the discipline itself, on teaching methods or on other relevant skills or knowledge, to the extent that this is necessary to ensure an adequate standard of teaching.

¹⁵ Professional or vocational education and training requires that teaching staff's professional/vocation knowledge is up to date. Being qualified in a discipline does not necessarily mean that a person is currently competent in that discipline. Therefore, performance management and development of professional and vocational staff needs to focus on professional/vocational competence as well as pedagogical competence. Professional development may include placement in industry, for example. In regulated professions it would be expected that there are a suitable number of registered practitioners involved.

	<p>is facilitated through the Quality Assurance and Statistical Services Office in the College, the results being provided to the member of faculty via the Dean of School of Business.</p> <p>The panel is satisfied by the programme documentation and by the discussion with the programme team that staffing requirements of the programme have been well considered and documented, and that the staffing resource necessary to deliver the programme successfully is in place.</p>
--	--

Criterion 7

<p>There are sufficient physical resources to implement the programme as planned</p> <p>a) The specification of the programme’s physical resource requirements (physical resources required as part of the programme and intrinsic to it) is precise, and rigorous and consistent with the programme, its defined purpose and its resource/learner-ratio requirements. See also criterion 12 d).</p> <p>b) The programme has an identified complement of supported physical resources (or potential supported physical resources) that are available in the context of existing commitments on these e.g. availability of:</p> <ul style="list-style-type: none"> (i) suitable premises and accommodation for the learning and human needs (comfort, safety, health, wellbeing) of learners (this applies to all of the programme’s learning environments including the workplace learning environment) (ii) suitable information technology and resources (including educational technology and any virtual learning environments provided) (iii) printed and electronic material (including software) for teaching, learning and assessment (iv) suitable specialist equipment (e.g. kitchen, laboratory, workshop, studio) – if applicable (v) technical support (vi) administrative support (vii) company placements/internships – if applicable <p>c) If versions of the programme are provided in parallel at more than one location each independently meets the location-sensitive validation criteria for each location (for example staffing, resources and the learning environment).</p> <p>d) There is a five-year plan for the programme. It should address</p> <ul style="list-style-type: none"> (i) Planned intake (first five years) and (ii) The total costs and income over the five years based on the planned intake. <p>e) The programme includes controls to ensure entitlement to use the property (including intellectual property, premises, materials and equipment) required.</p>	
Satisfactory (yes, no, partially)	Comment
YES	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion.</p> <p>This programme will be delivered both in the NCI campus and a number of various regional centres as outlined above.</p> <p>The physical resources required for the delivery of the programme are clearly documented in Section 8 of the programme document with further details in</p>

Appendix 8. The programme team envisage that the majority of programme deliveries will take place in Dublin at the NCI Campus, as this best facilitates most of its employees. However, the programme will be delivered in off-campus DEASP centres where numbers demand.

Section 8.2.2 of the programme document outlines the standards and facilities that must be provided in cases of off-campus delivery at external regional sites. NCI have a quality assurance programme internally regarding external delivery sites and these sites will have to be compliant with these regulations in advance of delivery. When delivering in off-campus centres, NCI will ensure that the premises meet their quality assurance standards. Students in such cases will have access to the same services as those studying on-campus. For example, premises must have access to electronic presentation facilities, internet access and refreshment facilities for students. These venues are frequently used to deliver full day and block training sessions and are equipped to provide for all learners needs. The comfort and safety of students is of paramount importance, and maximum numbers of students in a class must be reflected by the room capacity being provided. When using premises for the first time, a member of NCI staff will visit in advance in order to ensure suitability. All student materials and lesson plans remain the same regardless of the venue.

Potential locations for delivery that have already been identified and deemed suitable in terms of meeting the quality standards required are specified in Part 1 of this document.

Regardless of location, learners will have access to the library (including electronic material and software), Moodle and all other learning supports and materials normally provided to learners by the College. Moodle typically carries, as a minimum, details of how the module timetable and curriculum will be delivered, lecture notes, textbooks, eLearning activities and/or other appropriate learning materials, lecturer contact details, a discussion forum, and links to other relevant College based pages and outside sources. Assessments are submitted through Moodle and Turnitin (anti-plagiarism software), and results and individual feedback are available through these systems.

Section 8.2.6 specifies that administrative support to the programme will be provided by a dedicated Programme Co-ordinator. This role is complemented by centralised administration which manages admissions, terminal assessment, timetabling and general programme queries. The DEASP have also committed to a designated resource for learners within the Staff Development Unit

Regarding the envisaged throughput of students, the panel is satisfied that there are adequate resources to maintain a suitable lecturer/student ratio to ensure quality.

NCI policy requires that controls to ensure entitlement to use property (including intellectual property, premises, materials, and equipment) are in place and that all staff are aware of their obligations in respect of it (refer Section 8.6).

Criterion 8

The learning environment is consistent with the needs of the programme's learners

- a) The programme's physical, social, cultural and intellectual environment (recognising that the environment may, for example, be partly virtual or involve the workplace) including resources and support systems are consistent with the intended programme learning outcomes.
- b) Learners can interact with, and are supported by, others in the programme's learning environments including peer learners, teachers, and where applicable supervisors, practitioners and mentors.
- c) The programme includes arrangements to ensure that the parts of the programme that occur in the workplace are subject to the same rigours as any other part of the programme while having regard to the different nature of the workplace.

Satisfactory (yes, no, partially)	Comment
YES	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion.</p> <p>As the students on this programme will be fully registered students of NCI, they will have full access to the student learning supports, and to all the physical, organisational, social and cultural facilities, that are available to all NCI students. This will be the case irrespective of which location their course is delivered in. Details are set out in Appendix 8. Delivery of constituent parts of the programme will also be supported online through virtual learning platforms. There will be a comprehensive induction for all students. Additionally, there will be a designated support officer for students within the DEASP.</p> <p>Facilitation of learner interaction with their peers and teachers is provided for in the NCI's Learning, Teaching, and Assessment strategy. Copies of this are available in both printed and electronic versions to both staff and learners (see Section 5.6 and 5.8 of the programme documentation).</p> <p>The panel welcomes NCI's encouragement of the class representative structure, including for students in remote centres, and their commitment to ensuring that there are structures in place to allow the voice of the students to be involved continuously in enhancing the programmes and the student experience in general. In this context, the panel recommends as part of the programme that NCI integrate and give class representatives access to the NStEP training programme.</p> <p>The panel also recommends that the nature and role of the Student Contact Person in DEASP be clarified and that this information be included in the student handbook.</p>

Criterion 9

There are sound teaching and learning strategies

<p>a) The teaching strategies support achievement of the intended programme/module learning outcomes.</p> <p>b) The programme provides authentic learning opportunities to enable learners to achieve the intended programme learning outcomes.</p> <p>c) The programme enables enrolled learners to attain (if reasonably diligent) the minimum intended programme learning outcomes reliably and efficiently (in terms of overall learner effort and a reasonably balanced workload).</p> <p>d) Learning is monitored/supervised.</p> <p>e) Individualised guidance, support¹⁶ and timely formative feedback is regularly provided to enrolled learners as they progress within the programme.</p>	
Satisfactory (yes, no, partially)	Comment
Partially	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme partially meets this criterion. The minor deficiencies are detailed below.</p> <p>The teaching and learning strategies are set out in Sections 5.4-5.7 of the programme document and were discussed in full with the panel. The programme combines a broad mix of learning opportunities for participants, focussed on intended learning outcomes and their integration with the individual's role within the DEASP. The design of the programme and its delivery plan seeks to facilitate the optimum learning experience for participants allowing them build upon day-to-day work experiences to which they are exposed.</p> <p>A feature of the delivery of the programme will be the creation of an environment and context within which participants will be able to engage with colleagues from across the DEASP and to incorporate their work-life experiences and standards of 'good practice' as an integral part of the discussions and conversations within the classroom. Active participation by learners and team working are integral parts of the approach to teaching and learning.</p> <p>The use of lecturers drawn from NCI subject matter experts, staff of the DEASP and guest speakers, in a collaborative delivery process, will ensure that students are provided with authentic learning opportunities that are current and relevant to the subject matter being taught. The learning will be contextualised and related to the values and strategies of the DEASP with a great emphasis being placed on application of knowledge in the workplace. This is further demonstrated by the use of real-life case situations drawn from a bank of such materials already developed and available within the DEASP.</p> <p>Arrangements for the monitoring of learners are set out in Section 5.9 of the programme document and in Appendix 7 – Learner Handbook. Learners are required to sign an attendance sheet for each class. Those studying in NCI will also badge swipe into class so attendance can also be electronically monitored. Attendance will be closely monitored on the basis that the module is delivered on a day release basis and the DEASP staff member has been released from their duties for the day in order to</p>

¹⁶ Support and feedback concerns anything material to learning in the context of the programme. For the avoidance of doubt it includes among other things any course-related language, literacy and numeracy support.

	<p>participate. Any unauthorised absence will be flagged to the relevant contact in the SDU of the DEASP.</p> <p>The panel is satisfied that arrangements for monitoring/supervision of learners are satisfactory. However, it is of the opinion that further explanation is needed in relation to the minimum attendance requirement for learners. Accordingly, the panel recommends as a special condition of validation that the programme document clarify the attendance policy for students.</p>
--	---

Criterion 10

<p>There are sound assessment strategies</p> <p>a) All assessment is undertaken consistently with <i>Assessment Guidelines, Conventions and Protocols for Programmes Leading to QQI Awards</i>¹⁷</p> <p>b) The programme’s assessment procedures interface effectively with the provider’s QQI approved quality assurance procedures.</p> <p>c) The programme includes specific procedures that are fair and consistent for the assessment of enrolled learners to ensure the minimum intended programme/module learning outcomes are acquired by all who successfully complete the programme.¹⁸</p> <p>d) The programme includes formative assessment to support learning.</p> <p>e) There is a satisfactory written programme assessment strategy for the programme as a whole and there are satisfactory module assessment strategies for any of its constituent modules.¹⁹</p> <p>f) Sample assessment instruments, tasks, marking schemes and related evidence have been provided for each award-stage assessment and indicate that the assessment is likely to be valid and reliable.</p> <p>g) There are sound procedures for the moderation of summative assessment results.</p> <p>h) The provider only puts forward an enrolled learner for certification for a particular award for which a programme has been validated if they have been specifically assessed against the standard for that award.²⁰</p>	
Satisfactory (yes, no, partially)	Comment
Partially	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme partially meets this criterion. The minor deficiencies are detailed below.</p> <p>Details of the programme/module assessment strategy are outlined in Section 5.6, 6.1.12 and 6.1.13 of the programme documentation, including sample assessment materials and assessment scheduling. These were discussed in full with the panel. The panel are satisfied that there are adequate formative and summative assessment strategies which enable the learners to meet the intended learning outcomes.</p>

¹⁷ See the section on transitional arrangements.

¹⁸ This assumes the minimum intended programme/module learning outcomes are consistent with the applicable awards standards.

¹⁹ The programme assessment strategy is addressed in the Assessment Guidelines, Conventions and Protocols for Programmes Leading to QQI Awards. See the section on transitional arrangements.

²⁰ If the award is a QQI CAS compound award it is not necessarily sufficient that the learner has achieved all the components specified in the certification requirements unless at least one of those components is a capstone component (i.e. designed to test the compound learning outcomes).

	<p>Provision is made for formative feedback to be incorporated into the students learning. The formative assessment elements will also form part of learner monitoring and aid in the achievement of the MIPLOS. There is a balanced approach to assessment considering the timelines for subject and assessment delivery. There are clear communication channels and programme management procedures to ensure internal moderation and standardisation between the various centres and iterations of the programme delivery and assessments.</p> <p>All summative assessments are subject to internal peer review and review by external examiners, and all are subject to random sampling (second marked) internally, and are submitted to an external examiner in accordance with NCI policy. There is internal moderation of results to ensure that common standards are being achieved across the various delivery groups and centres, with reference to external examination procedures and in line with NCI's internal quality assurance procedures. To ensure consistency in assignments, standardisation meetings will be held in advance of examination boards on an annual basis to review marks and extern comments</p> <p>The panel is of the opinion that the assessment strategies are sound and that the proposed assessment will be authentic, valid and reliable. The panel is also satisfied with the sample course work and assessment provided. However, the panel felt that greater clarity was required in the documentation in relation to a number of issues. Accordingly, the panel recommends the following as special conditions of validation:</p> <ul style="list-style-type: none"> - amend proposed delivery schedules as outlined in the programme documents (for example, Section 5.4.1) to include the time required for assessment presentations; - clarify and expand on the method to be used and resourcing required for the presentations; - (if module assessment involves more than one piece of assessment) outline the requirement for passing the module (i.e. make clear whether the pass mark is 40% overall or whether each piece of assessment needs to reach 40%); - provide greater clarity about repeat assessment provision and methods.
--	---

Criterion 11

Learners enrolled on the programme are well informed, guided and cared for

- a) There are arrangements to ensure that each enrolled learner is fully informed in a timely manner about the programme including the schedule of activities and assessments.
- b) Information is provided about learner supports that are available to learners enrolled on the programme.
- c) Specific information is provided to learners enrolled on the programme about any programme-specific appeals and complaints procedures.
- d) If the programme is modular, it includes arrangements for the provision of effective guidance services for learners on the selection of appropriate learning pathways.
- e) The programme takes into account and accommodates to the differences between enrolled learners, for example, in terms of their prior learning, maturity, and capabilities.

<p>f) There are arrangements to ensure that learners enrolled on the programme are supervised and individualised support and due care is targeted at those who need it.</p> <p>g) The programme provides supports for enrolled learners who have special education and training needs.</p> <p>h) The programme makes reasonable accommodations for learners with disabilities²¹.</p> <p>i) If the programme aims to enrol international students it complies with the <i>Code of Practice for Provision of Programmes to International Students</i>²² and there are appropriate in-service supports in areas such as English language, learning skills, information technology skills and such like, to address the particular needs of international learners and enable such learners to successfully participate in the programme.</p> <p>j) The programme's learners will be well cared for and safe while participating in the programme, (e.g. while at the provider's premises or those of any collaborators involved in provision, the programme's locations of provision including any workplace locations or practice-placement locations).</p>	
Satisfactory (yes, no, partially)	Comment
Partially	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme partially meets this criterion. The minor deficiencies are detailed below.</p> <p>The panel is satisfied on balance that the programme fulfils all the sub-criteria set out above. However, there are a number of issues that the panel would like to see refined before the first intake. In this context, confirmation of the policy in relation to attendance and repeats should be clearly outlined (refer to the special conditions of validation specified under criteria 9 and 10 above).</p> <p>The panel is of the opinion the handbook for each course could be more comprehensive. The handbook should also outline course management, administration and support personnel roles as relevant to student needs. In particular, the role of the DEASP support person for each course, as mentioned during discussions, needs to be detailed in the handbook (refer to recommendation under criterion 8 above).</p> <p>The student handbook needs to contain accessible and clear information on all of the student supports available, and should also contain information about the role of class representatives. It is important that academic, welfare, student union and course specific support and information is condensed into the handbook, with the links and contact details for sourcing additional information. This would be very important for students who are undertaking the course from remote locations as opposed to within NCI itself.</p> <p>Accordingly, the panel recommends as a special condition of validation that Appendices 7 and 8 of the programme documentation be incorporated into the Learner Handbook.</p>

²¹ For more information on making reasonable accommodations see www.AHEAD.ie and QQI's Policies, Actions and Procedures for Access, Transfer and Progression for Learners (QQI, restated 2015).

²² See Code of Practice for Provision of Programmes to International Students (QQI, 2015)

Criterion 12

The programme is well managed

- a) The programme includes intrinsic governance, quality assurance, learner assessment, and access, transfer and progression procedures that functionally interface with the provider's general or institutional procedures.
- b) The programme interfaces effectively with the provider's QQI approved quality assurance procedures. Any proposed incremental changes to the provider's QA procedures required by the programme or programme-specific QA procedures have been developed having regard to QQI's statutory QA guidelines. If the QA procedures allow the provider to approve the centres within the provider that may provide the programme, the procedures and criteria for this should be fit-for-the-purpose of identifying which centres are suited to provide the programme and which are not.
- c) There are explicit and suitable programme-specific criteria for selecting persons who meet the programme's staffing requirements and can be added to the programme's complement of staff.
- d) There are explicit and suitable programme-specific criteria for selecting physical resources that meet the programmes physical resource requirements, and can be added to the programme's complement of supported physical resources.
- e) Quality assurance²³ is intrinsic to the programme's maintenance arrangements and addresses all aspects highlighted by the validation criteria.
- f) The programme-specific quality assurance arrangements are consistent with QQI's statutory QA guidelines and use continually monitored completion rates and other sources of information that may provide insight into the quality and standards achieved.
- g) The programme operation and management arrangements are coherently documented and suitable.
- h) There are sound procedures for interface with QQI certification.


Satisfactory (yes, no, partially)	Comment
YES	<p>The panel has evaluated the programme having regard to the criterion and sub-criteria and recommends that QQI can be satisfied that the programme meets this criterion.</p> <p>The programme includes intrinsic governance, quality assurance, learner assessment, and access, transfer and progression procedures that functionally interface with the provider's general and institutional procedures.</p> <p>No changes are required to the provider's QA procedures and the overall programme adheres to the institution's existing policies. There is a clear management structure comprised of DEASP and NCI representatives. The panel welcomes the commitment of NCI, articulated in the discussions, to include class representatives in the programme management structure at the earliest stage of each programme intake as per their normal practice.</p> <p>There are explicit and suitable programme-specific criteria for selecting persons who meet the programme's staffing requirements and can be added to the programme's complement of staff and this has been detailed in the consideration of criterion 6.</p> <p>The programme-specific quality assurance arrangements are consistent with QQI's statutory QA guidelines and use continually monitored completion rates and other sources of information, such as class representatives, that may provide insight into achieving the quality and standards. This will be further achieved through the</p>

²³ See also QQI's Policy on Monitoring (QQI, 2014)

	<p>Department’s monitoring process of the programme as discussed by the programme management team and included in the programme validation documentation.</p> <p>Due to the structure of the programme, the panel notes that close and regular interaction between the NCI and DEASP is critical to the success of the programme through the programme management structures. In this context, and in light of the envisaged numbers and programme deliveries, the panel recommends that NCI ensure that programme management roles are clearly delineated and defined, as well-structured programme management will be essential to the successful roll out of the programme.</p>
--	---

Overall recommendation to QQI

1.1 Principal programme

	Satisfactory (meaning that it recommends that QQI can be satisfied in the context of unit 2.3) of Core policies and criteria for the validation by QQI of programmes of education and training;
	Satisfactory subject to proposed special conditions (specified with timescale for compliance for each condition; these may include proposed pre-validation conditions i.e. proposed (minor) things to be done to a programme that almost fully meets the validation criteria before QQI makes a determination); ²⁴
	Not satisfactory.

1.1.1 Reasons²⁵ for the overall recommendation

The Panel are satisfied with the programme as presented in light of discussion surrounding validation criteria as discussed above. The Panel commends the NCI and DEASP team on the work that went into the development the programme, and on the openness and constructive nature of their engagement with the validation review process. The issues raised by the Panel were adequately and comprehensively addressed which augers well for the success of the programme.

The proposed special conditions relate to the Panels’ remaining concern that the programme document be amended to clarify, enhance and expand on a number of issues as summarised below.

Summary of recommended special conditions of validation

The panel proposes that as a special condition of validation the following issues are addressed before the initial intake of students to the programme:

1. Clarify entry requirements to reflect RPL issues, advanced entry and the entry process.
2. E-learning prerequisite to be removed.

²⁴ Normally an application that fails to meet the criteria in any of its aspects will be considered as not satisfactory. Nevertheless, so as to ensure that the validation process will not be implemented unreasonably, if an independent evaluation finds that a programme virtually meets the validation criteria but needs some minor modifications, the independent evaluation could conclude “Satisfactory subject to recommended special conditions” where the special conditions prescribe the defects that require to be corrected.

²⁵ Give precise reasons for the conclusions organised under each of the 12 criteria (for the programme and each embedded programme and any modules proposed to lead to QQI awards) citing supporting evidence. If any criteria or sub-criteria are not met by the application this must be stated explicitly giving precise reasons with evidence. A “Not Satisfactory” recommendation may be justified if any one of the applicable criteria or sub-criteria are not demonstrated to be satisfied.

3. Clarify and expand on the Transferable Skills Matrix tailoring and linking it as appropriate to the occupational profile of learners.
4. Correct programme/module schedules for names, entry, contact hours and assessment percentages.
5. Ethics to be more clearly articulated as an element of the curriculum.
6. Clarify the attendance policy for students.
7. Amend the proposed delivery schedules to include the time required for assessment presentations.
8. Clarify and expand on the method to be used and resourcing required for the presentations.
9. Clarify the requirement for passing the module.
10. Clarify the repeat assessment provision and methods.
11. Combine Appendices 7 and 8 for incorporation into the Learner Handbook.

Summary of recommendations to the provider

The panel recommend the following for consideration by the provider:

1. Include narrative on stakeholder consultations in development of programmes which was absent from the documents but which was clearly part of the preparation, as confirmed during panel discussions.
2. Tidy up of the typographical issues in the document.
3. Include a greater focus on service user perspectives and reading material drawing on service user perspectives and experiences across all programmes.
4. Integrate and give class representatives access to the NStEP training programme.
5. Clarify nature and role of Student Contact Person in DEASP, and include this information in the student handbook.
6. Ensure that programme management roles are clearly delineated and defined.

Declarations of Evaluators' Interests

This report has been agreed by the evaluation panel and is signed on their behalf by the chairperson.

Panel chairperson: *H. Mc BRIDE* Date: *05/09/2018*

Signed: *H. Mc Bride*

Disclaimer

The Report of the External Review Panel contains no assurances, warranties or representations express or implied, regarding the aforesaid issues, or any other issues outside the Terms of Reference.

While QQI has endeavoured to ensure that the information contained in the Report is correct, complete and up-to-date, any reliance placed on such information is strictly at the reader's own risk, and in no event will QQI be liable for any loss or damage (including without limitation, indirect or consequential loss or damage) arising from, or in connection with, the use of the information contained in the Report of the External Evaluation Panel.

Part 3: Proposed programme schedules

5.13 PROPOSED PROGRAMME AND STAGE SCHEDULES

Name of Provider:		National College of Ireland												
Programme Title		Certificate in Community Welfare Service Provision												
Award Title		Certificate in Community Welfare Service Provision												
Stage Exit Award Title														
Modes of Delivery (FT/PT):		PT, day release												
Teaching and learning modalities		Lectures, On line, Case Conference, Adobe, Collaborative provision												
Award Class	Award NFQ level	Award EQF Level	Stage (1, 2, 3, 4, ..., or Award Stage):	Stage NFQ Level	Stage EQF Level	Stage (ECTS)	Credit	Date Effective	ISCED Subject code					
SPA	7	6	Award	7	6	15		January 2019	0417					
Module Title (Up to 70 characters including spaces)	Semester no where applicable. (Semester 1 or Semester 2)	Module		Credit Number	Total Student Effort Module (hours)					Allocation Of Marks (from the module assessment strategy)				
		Status	NFQ Level where specified	Credit Units ECTS	Total Hours	Class (or equival) Contact Hours	Directed e-learning	Hours of Independent Learning	Work-based learning effort	C.A. %	Supervised Project %	Practiced demonstration	Practiced practical	Practiced written exam %
Community Welfare Service Provision			7	15	375	54	6	108	207	100%		3		
Special Regulations (Up to 280 characters)														