

**QQI**Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of Provider

1.1 Applicant Provider	
Registered Business/Trading Name:	DX2 Training Solutions Limited
Address:	Unit 21 Seatown Business Campus, Swords, Co. Dublin K67 DC04
Date of application:	30 September 2020
Date of resubmission of application:	20 October 2021
Date of (virtual) site visit:	8 January 2021
Date of reconvene meeting:	24 November 2021
Date of recommendation to the Programmes and Awards Executive Committee:	8 April 2021 10 February 2022



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1.2 Profile of Provider

Established in April 2010 as a Limited Company, DX2 Training Solutions Limited (DX2) primarily offers training and education programmes, as well as CPD opportunities, to those working in, or connected to, the healthcare sector. DX2 sought conversion to a Private Company Limited by Shares in 2016, which was officially certified in December of that year.

Among its catalogue of programmes, DX2 offers three Special Purpose Awards (SPA) at NFQ Level 6. These are:

1. Manual Handling Instruction
2. People Handling Instruction
3. Training and Development

Programmes are open to learners who have previously attained a minimum of a Leaving Certificate or Level 5 Certificate. Where neither Certificate is held by a prospective learner, DX2 recognises prior learning in the form of equivalent life experience as a potential access route.

DX2 has stated its desire to expand its current catalogue of programmes within its scope of provision.



Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr Annie Doona	Chair / QA Expert	Independent Consultant and Former President, Dun Laoghaire Institute of Art, Design and Technology
Matthew Hurley	Report Writer	QA Officer, Bridge Mills Galway Language Centre
Naomi Pasley	Panel Member	Lecturer in Nursing, Hibernia College
Dr Catherine Peck	Panel Member	Independent Education Consultant
Dr Terry Twomey	Panel Member	Director of Technological University Development, Limerick Institute of Technology

Part 3 Findings of the Panel

3.1 Summary Findings

The panel would like to acknowledge DX2's place as a well-established provider with significant expertise in the important domain of Pre-Hospital Emergency Care training and education. DX2 representatives outlined a significant process of development in preparation for reengagement to the panel during the virtual site visit, and the panel wishes to extend its gratitude to DX2 for the open and constructive nature of their approach. The panel was of the view that DX2 is an enhancement-focused organisation, in which reflection and constructive critique is valued.

QQI's Core Statutory Quality Assurance Guidelines (2016) require organisations to ensure that academic decision-making is independent of commercial interests, and furthermore enforce a "separation of responsibilities between those who produce/develop material and those who approve it." At the time of the site visit, the panel was of the view that DX2 had not sufficiently evidenced these separations.

Additionally, the panel identified a number of areas within the provider's existing documentation which required further attention, including information on the membership and roles of the Academic Oversight Committee and the Results Approval Panel, as well as the Terms of Reference and membership for the Board of Directors.

At the conclusion of the virtual site visit, the panel was not in a position to recommend immediate approval of DX2's draft QA procedures. The panel was of the view, however, that the areas of concern could be addressed by the provider within a period of six months. It therefore recommended that QQI refuse to approve DX2 Training Solutions Ltd.'s draft QA procedures pending mandatory changes.



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Following this six-month period, DX2 resubmitted documentation which aimed to address the concerns identified by the panel. The panel reconvened on 24 November 2021 in order to discuss these revisions and agreed that DX2 made a genuine and considered effort which appropriately addressed the mandatory changes.

The panel is therefore pleased to recommend that QQI approve the draft QA procedures of DX2 Training Solutions Limited.

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

	Tick <u>one</u> as appropriate
Approve DX2 Training Solutions Limited's draft QA procedures	✓
Refuse approval of DX2 Training Solutions Limited's draft QA procedures pending mandatory changes set out in Section 7.1 (If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)	
Refuse to approve DX2 Training Solutions Limited's draft QA procedures	



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

	Criteria	Yes/No/ Partially	Comments
4.1.1(a)	Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	<p>The provider operated as a limited company between April 2010 and December 2016, at which point it converted to a private company limited by shares. The provider has supplied Certificates of Incorporation for both registrations to support this.</p> <p>The provider began operations in April 2010 and obtained FETAC approval of its Quality Assurance Systems in October 2011.</p>
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	<p>The provider's documentation certifies that it is a registered Irish company by the Companies Registration Office, and is, therefore, a legal entity of the European Union.</p>
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	<p>The provider has not declared or provided documentation of any existing third-party relationship or 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 4.1.3(a), the provider has not declared or provided documentation of any existing third-party relationship or collaborative provision.</p>
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	<p>The provider's documentation indicates that is in compliance with all legal obligations in relevant territories (i.e., Ireland)</p>



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	The provider has had a continued relationship with QQI (and previously FETAC) since 2011, and has provided sufficient evidence of its compliance with all associated obligations. Furthermore, the provider is recognised by a number of other accreditation bodies, including the Pre-Hospital Emergency Care Council and the National Association of Emergency Medical Technicians. As an accredited organisation, DX2 is required to satisfy the individual requirements of each body.
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Findings

Following a comprehensive evaluation of the provider's capacity, the panel is satisfied that DX2 Training Solutions Ltd. meets the *Legal and Compliance* requirements 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 financial statements for the years 2018 and 2019, Certificates of Public and Products Liability Insurance and Professional Indemnity Insurance, and an Accountant's declaration of the provider's conformance with Irish company law and tax obligations.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	DX2 has a track record of delivering short programmes within its scope of provision Upon proposal of a new programme, DX2 develops a business case to assess viability, which considers sectoral needs, market analysis and return on investment.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision-making structures in place?</i>	Yes	While significant strides had been made to distance commercial and academic decision-making within the organisation, including the creation of an Academic Oversight Committee of which the Managing Director was not a member, the panel was of the view that further development in this area was necessary in order to satisfy QQI's core requirement that "corporate decision-makers within the provider...do not exercise exclusive authority or undue influence over academic decision-making." (QQI Core Statutory Quality Assurance Guidelines, 2016)



			Following a review of the revised documentation, it was clear that DX2 had carefully considered the panel's original concern and adjusted the membership of its Academic Oversight Committee to ensure the separation of academic and corporate governance was clearly evidenced.
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	DX2 has had an ongoing, documented relationship with QQI (and previously FETAC) since 2011. The Director of Training and Quality Assurance is the primary point of contact between the provider and QQI.

Findings

The panel was originally of the view that DX2 Training Solutions did not fully satisfy the *Resource, Governance and Structural* requirements outlined in Section 4.2.

The primary issue identified pertained to Subsection 4.2.3(a). While recognising the steps which had already been taken in addressing weaknesses within the organisation's QA, the panel believed that a clear separation of corporate and academic decision-making had yet to be fully demonstrated and documented. To this end, the panel identified a number of mandatory changes, detailed in Section 7, which aimed to align DX2's QA more closely with QQI's core QA guidelines.

The panel reconvened in November 2021 to determine whether DX2 had sufficiently addressed this key concern. DX2 made a number of revisions to the membership of its Academic Oversight Committee, such as expanding the level of externality and removing the Director of Training and Quality Assurance. With the revisions made, the panel is satisfied that DX2 took seriously the panel's original concern and made appropriate amendments to address this.

**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	<p>The provider has three programmes which lead to QQI awards. Two of these (Manual Handling Instruction and People Handling Instruction) were validated in 2012, and one (Training and Development) was validated in 2015.</p> <p>In addition, the provider offers several programmes which do not lead to QQI awards, but which are recognised by other established bodies, including NAEMT and the Pre-Hospital Emergency Care Council.</p>
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>The provider has a sizable faculty consisting of 20+ members, the preponderance of which are teaching staff. All staff are fully qualified and hold relevant experience in their area of expertise. Many staff members are also actively working within their field.</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	<p>The panel is of the view that the provider has sufficiently evidenced its capacity to comply with standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act).</p>
4.3.4(a)	Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the</i>	Yes	<p>The site visit typically undertaken by the panel was, in this instance, conducted virtually, as</p>



	<i>requirements of the provision proposed in place?</i>		a result of the COVID-19 pandemic. However, during the course of the virtual site visit, the panel was afforded a live tour of the premises, including the provider's on-site simulation ambulance, equipment and facilities. Following this, the panel was satisfied that the provider has the necessary resources and facilities for the provision of its programmes.
4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	The provider's <i>Access, Transfer and Progression (ATP)</i> arrangements are detailed in Section 3.10 of the draft QA manual.
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	While the provider demonstrated an adequate understanding of assessment practices at its level of operation, the panel identified a number of areas where further development was nonetheless necessary, specifically in relation to academic integrity. These concerns were subsequently addressed in the provider's revised documentation and the panel is therefore satisfied that DX2 has addressed the requirements set out under this Criterion.
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	Yes	DX2 does not currently offer any programmes of a duration that is more than three months. Nonetheless, arrangements have been developed and implemented as a safeguard for



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			the protection of enrolled learners on shorter programmes, whereby learners may be offered a transfer to the same programme on an alternative date, or a full refund, depending on the circumstances present.
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Findings

Following a comprehensive evaluation of the provider's capacity, the panel is satisfied that DX2 Training Solutions meets the majority of the *Programme Development and Provision* requirements outlined in Section 4.3.

The panel had originally identified inadequacies in the policies which underpin academic integrity, but these were subsequently addressed in DX2's revised documentation.

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

The panel is satisfied that DX2 has the capacity to provide sustainable education and training, and has a track record in doing so. The organisation has taken significant steps to revise and redevelop its quality assurance framework to more closely align it with QQI's guidelines, without sacrificing the requirements it must fulfil with other accreditation bodies.

Nonetheless, the panel had identified a number of areas where further work was required to bring the provider's QA procedures into line with the requirements of QQI's QA Guidelines. These are set out as mandatory changes in Section 7.2 of this report.

Following a six-month period in which DX2 made significant revisions to its QA procedures in an effort to address the concerns identified at the site visit, the panel is satisfied that its concerns have been adequately addressed.



Part 5 Evaluation of draft QA Procedures submitted by DX2 Training Solutions Limited

The following is the panel's findings following evaluation of DX2 Training Solutions Limited's quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016). Sections 1-11 of the report follows the structure and referencing of the Core QA Guidelines.

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

The panel would first like to acknowledge the efforts to facilitate representation of faculty members and learners within the organisation's governance structures. Representation plays a significant role in embedding a quality culture within any organisation. Equally, the panel welcomes DX2's commitment to self-reflective practices and measuring the effectiveness of its quality culture, with the aim of cultivating a positive internal environment and a practice of open communication.

The panel spoke with DX2 at length during the site visit about the selection process with regard to faculty representation on the Academic Oversight Committee ("AOC"). This committee was established to ensure the mandated separation of commercial and academic decision-making. Appointment to the AOC may arise out of an expression of interest or nomination, with the candidate deemed most suited to the role being chosen. The process was described by DX2 representatives as a collaborative one.

The panel acknowledges that the requirements of reengagement for QA in relation to the aforementioned separation of commercial and academic decision-making are challenging for small private providers. The draft QA procedures presented by DX2 reflected cognisance of these requirements within the organisation, such as in the appointment of an external Chair for the provider's Academic Oversight Committee, of which the Managing Director was not a member. However, the panel was of the view that further adjustments to the QA procedures were necessary in order to more concretely evidence that the organisation's structures and processes consistently and appropriately demonstrated this active distancing of corporate influence.

This was addressed by DX2 with three primary revisions:

(i) In relation to Mandatory Change 7.1.1(a), the membership of the AOC has been amended to increase the level of externality. The revised membership now includes both Further Education and Higher Education representatives as well as a Medical Advisor, in addition to the Learner Representative who had already been on the Committee. The Chair of the AOC remains external to the company, and the Director of Training and Quality Assurance has been removed as a member.

(ii) In relation to Mandatory Change 7.1.1(b), the membership and roles of the Results Approval Panel ("RAP") have been more clearly documented in the revised QA Manual, and the Director of Training and Quality Assurance, as well as the Managing Director — both of whom had previously been identified as members — have been removed.

(iii) In relation to Mandatory Change 7.1.1(c), the documentation relating to External Authenticators and other external experts was expanded significantly to more clearly identify the selection process, remit and responsibilities of such individuals.



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The panel is satisfied that these important amendments and updates adequately address Mandatory Change 7.1.1 and its subsections.

In addition to the information above, the panel also sought clear Terms of Reference and membership for the Board of Directors, as this had been notably absent in the original submission. The revised QA Manual now includes the requested information, and the panel is satisfied that the associated Mandatory Change (7.1.2) has been adequately addressed.

Finally, QQI's guidelines under this branch of QA require a provider to have processes in place to ensure that those responsible for developing materials are distinct from those who approve them. At the time of the original site visit, there was some overlap in the membership of the Academic Oversight Committee and the Programme Development Subcommittee. The panel acknowledged that the clear intent of DX2 was to facilitate separation and independence within the processes. However, the process to enforce and manage this needed to be visible within the documentation. This is further explored under Criterion 3 (Programmes of Education and Training).

Upon reviewing the revised QA Manual, the panel noted the greater emphasis placed on separation and that this was demonstrated in the revised membership of the Programme Development Committee ("PDC"). In particular, the Director of Training and Quality Assurance, who had previously been on the PDC and AOC, has been removed from both. This will allow for other appropriately-qualified faculty members to join and ensure that separation is maintained between the PDC and AOC to avoid any potential conflicts of interest.

In respect of the concerns above, the panel had identified a number of mandatory changes for the provider, detailed in Section 7 of this report. The panel is satisfied that the changes made by DX2 in the intervening six-month period have satisfactorily addressed the panel's concerns under this Criterion.



2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

As noted by the provider, DX2's motivation for pursuing reengagement was born out of a commitment to embedding a quality culture within the organisation and a desire to ensure robust processes are in place to uphold standards. The QA system was substantially reviewed in preparation for reengagement. DX2 operates a unified QA system designed to satisfy the requirements of multiple stakeholders and accreditation bodies including the Pre-Hospital Emergency Care Council. The draft QA procedures presented for evaluation therefore reflect a unified QA system.

The panel recognises that DX2 is engaged in a process of continual enhancement and that the draft QA procedures presented represent significant progress on its QA journey. However, the panel was of the view that further development was needed to ensure that the QA procedures comprehensively documented the organisation's practices and provided sufficient guidance for all foreseeable events. During the virtual site visit the panel was informed verbally of a number of good practices and procedures which were not fully outlined in the quality documentation. Examples of processes which needed to be further documented included, but were not limited to:

- DX2's approach(es) to the maintenance of academic integrity;
- Procedures to guide teaching staff responding to issues of potential academic misconduct;
- Appeals procedures in relation to academic impropriety

In reviewing the revised documentation, the panel noted the extensive work which had been undertaken to ensure the aforementioned areas (as well as other areas such as learner supports) were not only documented, but that they were comprehensive and robust. These are further explored under Criterion 6 (Assessment of Learners).

The panel was also of the view that although the draft QA procedures submitted by DX2 aligned to the sequence of QQI's Core Guidelines, the format of the QA documentation used by DX2 was not conducive to easy review and evaluation against these. This required the provider to articulate the principles that guide action under different dimensions of QA (typically policy statements) and to demonstrate how those principles are realized in systematic processes (typically step-by-step procedures that outline who does what and in what order). This was reflected within the dialogue between the panel and DX2 representatives during the virtual site visit. The panel spent substantial time exploring how various processes would unfold in practice, with whose involvement, as this was not always transparent within the documentation. The panel identified a mandatory change in relation to this element of the provider's QA procedures, as set out in Section 7 of the report.

DX2 conducted a complete overhaul of the original layout of its QA Manual, opting instead for one based on a HEI model. Several policies and procedures, particularly those identified by the panel as being in need of further development or revisions, were enhanced and expanded upon. The panel recognises the significant work involved in this and notes that the QA Manual is now much more accessible due to there being a more identifiable link between policies and their associated procedures. The panel is therefore satisfied that the mandatory change has been adequately addressed.



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

At the outset of this section, the panel would like to acknowledge DX2's track record in the delivery of emergency care and education programmes. Among its extensive catalogue of programmes, DX2 offers three Level 6 Special Purpose Awards (SPAs), as well as continuing professional development opportunities for emergency first responders. DX2 has stated its desire to expand its current suite of programmes within its scope of provision.

In relation to *Programmes of Education and Training*, QQI's primary criteria is threefold:

1. Programme Development and Approval

Within this first criterion, QQI's Core Statutory Quality Assurance Guidelines (2016) require the development of programmes to be conducted systematically and should involve consultation with all relevant stakeholders.

As previously stated in Section 5.1, the panel identified some overlap between the Academic Oversight Committee and the Programme Development Subcommittee, which caused some concern among the panel due to the presence of conflicting interest. For this reason, the panel felt DX2's current system of programme development did not adequately demonstrate a clear separation between those who propose programmes, those who develop programmes, and those who approve programmes. This separation creates assurances that no one stakeholder, board or committee can exercise undue influence over the development or approval of programmes. A mandatory change was noted in respect of this concern and is formalised in Section 7 of this report.

At the panel's reconvene meeting, it was agreed that separation of interests within the programme development process was now much more observable, particularly due to revisions made regarding the input of certain faculty members, and the panel was pleased to see that the chart on p. 33 had been appropriately updated to reflect the revisions made. The panel has confidence that these revisions will endorse the effectiveness of DX2's quality culture.

The panel is therefore satisfied that the mandatory change has been adequately addressed.

2. Learner Admission, Progression and Recognition

Within this second criterion, QQI's Core Statutory Quality Assurance Guidelines (2016) require providers to establish and implement Access Policies, Admission Processes and Criteria in accordance with national policy on Access, transfer and Progression (ATP).

Access to DX2's programmes is by one of two primary channels: fulfilment of the relevant entry criteria for the programme in question, or via recognition of prior learning (RPL). Section 3.10 of the provider's draft QA outlines the organisation's ATP and RPL processes, and the provider also supplied the relevant RPL application forms for review.

In assessing an application for RPL, DX2 takes into consideration:

- courses provided by professional bodies, enterprises, private educational providers;



- relevant work or practical experience;
- relevant life experience

While DX2 does not currently have the scope to facilitate internal transfer within its programmes, arrangements are in place to facilitate advanced entry onto its programmes based on learning outcomes achieved by learners transferring from other providers. In the latter instance, applicants are considered under RPL.

In relation to progression, DX2's draft QA procedures note that upon successful completion of a programme leading to an award, "learners may be eligible to apply to undertake the next programme on the designated progression pathway on the National Framework of Qualifications."

3. Programme Monitoring and Review

Within this third criterion, QQI's Core Statutory Quality Assurance Guidelines (2016) require providers to monitor programmes and programme delivery "in a way which allows for the identification of needs and the modification and adjustment of the programme and the delivery method as appropriate."

The panel was generally satisfied with DX2's documented approach to programme monitoring, which is conducted via multiple channels, including tutor and learner feedback, live monitoring by the Director of Training and Quality Assurance (the provider noted in their documentation that 15% of all programmes are subject to monitoring), as well as a cyclical review every five years. The specific methods used to carry out these reviews are detailed in Section 3.8 of the draft QA Manual.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

DX2 employs over twenty staff members across its administration, operations and teaching departments. While most of the provider's trainers are part-time due to also actively working within their field, all employees are nevertheless under contract. DX2 does not sub-contract its trainers from any other organisation, which enables the provider to maintain a high level of oversight of implementation of the QA procedures and standards of training provision.

Despite the considerable staff body within the organisation, the panel expressed concern at the limited number of staff available to participate in the virtual site visit, with the sole representatives for the provider being the Managing Director and the Director of Training and Quality Assurance. The panel was not able to speak to any faculty staff outside of management who are actively involved in current programme delivery. Normally, the panel would verify with the teaching staff that the practices (e.g. in staff development) that were described by management were taking place. The panel was informed that due to COVID-19 most faculty staff were actively engaged in front line work which made attendance at the panel difficult. DX2 acknowledged and appreciated the panel's concern on this matter. Given the nature and length of the programmes, and taking into consideration the documentation provided, the panel was of the opinion that it was able to make a judgement on this area.

The panel noted the staff profiles provided and acknowledges the provider's challenge in recruiting a gender-balanced faculty when the majority of applications received are from male candidates.



Notwithstanding this, the panel is of the opinion that there is significant room for improvement in the gender profile of its faculty, particularly considering the diverse profile of its students, and welcomes further development in this area.

The panel commends DX2's clear commitment to the recruitment of fully qualified and experienced staff members, and the provision of meaningful professional development opportunities.

- Recruitment of new staff is carried out on an 'as and when' basis. Positions are advertised predominantly online via the provider's website and social platforms. The screening and selection process is currently conducted by administrative staff, which the panel identified could be revised and/or expanded to include senior faculty (i.e., trainers) with experience in the relevant area(s).
- DX2 provides all new staff with a comprehensive two-day induction which includes a focus on the ethos of the organisation, the organisation's approach to teaching and learning, feedback and support, and training on the Virtual Learning Environment (VLE).
- A "buddy" teaching system is in frequent operation within the organisation, whereby trainers are paired together (alternating in the role of the 'redundant' trainer) as a safeguard in the event a rostered trainer is unable to teach on a given day.
- DX2's staff development policy facilitates staff upskilling through participation in programmes delivered by the provider. Staff may also be funded to complete programmes delivered by other providers that are relevant to their roles, and DX2 is a member of the Fingal Chamber of Commerce, which offers further options for staff development.

Following a review of the updated documentation, the panel would also like to acknowledge the work undertaken to enhance information for and related to staff throughout the revised QA Manual.



5 TEACHING AND LEARNING

Panel Findings:

The panel is cognisant of DX2's obligations to satisfy discipline-specific requirements of other external accreditation bodies, such as the Pre-Hospital Emergency Care Council's *Clinical Practice Guidelines*. These requirements ensure that DX2 is considerate of effective practices and pedagogical approaches in the wider community, as required by QQI's own core guidelines. Furthermore, systematic practices of monitoring and review in relation to this area of QA are documented in the provider's draft QA manual.

DX2 takes a learner-centred approach to teaching. Multiple modes of programme and content delivery are in operation as a means of adapting to different learning styles. These include live learning, mentoring, one-to-one tutoring, and practical skills training. However, the extent to which the effectiveness of this approach could be evaluated in the context of DX2 was limited by the lack of available teaching staff or learners during the site visit. This issue was noted by the panel and acknowledged by the provider.

Despite the virtual nature of the site visit, the provider offered the panel a live tour of the organisation's premises and facilities from their base in Swords, Co. Dublin. The panel would like to highlight this for particular commendation, as it allowed for a more palpable window of insight into key areas of evaluation. DX2 has its own extensive, on-site stockroom with the equipment necessary to run its programmes without reliance on other third parties. This includes, but is not limited to, a simulation ambulance, mannequins, defibrillators, medical devices and other medical supplies. Systematic hygiene and maintenance practices are well-embedded within the organisation to ensure that all equipment is fit-for-purpose, routinely inspected and sterilised after each training session. Representatives for the provider noted during the site visit that equipment can and has been made available for learners to sign out as and when needed.

6 ASSESSMENT OF LEARNERS

Panel Findings:

A provider's assessment framework should, as per QQI's core guidelines, incorporate "procedures and systems for the security and integrity of the assessment process." The panel discussed DX2's assessment practices at great length with company representatives during the site visit, and the panel was satisfied that DX2 has an adequate understanding of these at their level of operation.

However, the panel identified a significant gap in the underpinning principles which guide DX2's approach to academic integrity, and have noted a mandatory change in respect of this. Furthermore, the panel was of the view that DX2's existing processes for investigating matters of academic impropriety were inadequate and in need of development. Similarly, while an appeals process was documented within the draft QA procedures, the panel felt that this process was insufficiently developed.

In relation to these matters, the panel noted that DX2 needed to develop its processes for academic misconduct and managing appeals, ensuring they are adequately documented and that those involved in hearing an appeal on a decision were not involved in the original decision.

Following submission of the revised documentation, the panel closely examined DX2's procedures around academic integrity and misconduct, as well as learner appeals.



In relation to academic integrity, the panel would like to recognise the significant work undertaken to ensure areas such as plagiarism, academic dishonesty, academic misrepresentation, academic interference, reporting of alleged breaches, and investigation of academic impropriety were clearly and comprehensively documented. It is also to be noted that these enhancements include information for both learners and staff in relation to academic integrity and reporting related concerns.

In relation to learner appeals, the panel noted the enhanced procedure in the QA Manual which places particular importance on ensuring that those hearing an appeal relating to a DX2 academic decision are external to the company, thus avoiding any potential conflict of interest. While the panel is generally satisfied that the enhanced appeals procedure adequately addresses the original concern, the panel would like to draw attention to the final stage of the appeals procedure, which escalates the process to the awarding body if applicable.

The panel is cognisant that DX2 engages with more than one certification body. However, it must be noted that as an awarding and regulatory body, QQI does not involve itself in the appeals procedures of providers. As such, it is important that providers have appeals processes in place with appropriate stages of escalation which do not rely on the intervention of QQI. For this reason, the panel recommends the appeals procedure be updated to reflect this. An item of specific advice has been identified in respect of this.

7 SUPPORT FOR LEARNERS

Panel Findings:

At the outset of this section, the panel would like to commend DX2 on its considerable efforts to provide all learners with an adequate and responsive range of supports and learning resources. The panel discussed this branch of QA at length with the provider, in an effort to understand the extent to which learning resources and learner supports are integrated within the organisation.

Learning Resources

QQI's guidelines require learning resources to be in constant development, updated and expanded to reflect learner needs and best practices. While not intended to be an exhaustive list of resources, all learners enrolled on DX2 programmes have access to:

- fit-for-purpose and routinely monitored facilities within the organisation's building;
- the organisation's VLE platform and the library of resources contained therein;
- educational resources (i.e. textbooks)
- programme training equipment, which can be signed out by learners;
- robust technical services, as detailed more extensively in Section 5.8;
- information provision relevant to their programme of study, and associated administrative support

Learner Supports

During the site visit, the provider guided panel members through the step-by-step process whereby a learner may seek additional support or other reasonable accommodations. Learners are given the



opportunity to identify additional supports at the point of application, after which an interview is held between DX2 and the student to assess the best method of accommodation. Arrangements are managed on a case-by-case basis. Examples of needs which may require additional support include dyslexia, hearing impairment or visual impairment, and DX2 has made welcome efforts to have more comprehensive supports available to learners, such as their recent investment in an application that translates audio to sign language.

However, the panel was of the view that existing support services were not adequately promoted by DX2, as per QQI's guidelines which also require providers to ensure learners are informed about the full range of services available to them. The panel identified the need for a mandatory change in respect of this, which is formalised in Section 7 of this report.

This was subsequently addressed by DX2 — following a six-month intervening period — with the inclusion of more extensive information around supports in the QA Manual, as well as a dedicated page to Learner Supports on the website. The panel acknowledges this attempt to make key learner-facing information more publicly accessible. However, the panel was of the view that the placement of this Learner Supports link on the website was quite difficult to find and has identified an item of specific advice recommending it be moved to the “Resources” section on the navigation menu.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

DX2 representatives identified *Information and Data Management* as an area of continual development, and the panel acknowledges the significant steps already taken by DX2 to expand its methods of data collection in order to inform decision-making, and for the implementation of record management practices in accordance with the General Data Protection Regulations 2018, Data Protection Act 1988, Data Protection (Amendment Act) 2003 & the Freedom of Information Act 1997.

During the course of the site visit, DX2 stated its intent to move into a benchmarking arrangement in the near future, driven in large part by the increased interest in PHECC programmes. While no arrangement existed at the time of evaluation, the panel views this as a positive step forward for the organisation in its medium-term plan.

DX2 manages a robust in-house IT system, although an external service is also used for system maintenance. DX2 utilises the VLE platform *Moodle* predominantly for the dissemination of relevant course content and resources to learners. Access to DX2's VLE system is via its website. The panel commends DX2's implementation of fail-safe practices to prevent loss of service, including:

- A secondary, redundant VLE system, housed on a separate server;
- Routine backups of the VLE server, which occur twice daily;
- A secondary, redundant Wi-Fi network, which is available in the event of a problem with the main Wi-Fi network



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The DX2 Office is the first point of contact for IT troubleshooting, and from there, learners are directed to members of staff trained to support. The panel suggests it may be advisable for a member of administrative staff to be trained on how to handle *Moodle* queries.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

QQI's guidelines require providers not only to ensure that the information they publish is "clear, accurate, objective, up to date and easily accessible" but also, more specifically, that "all relevant programme and award information is made available to prospective and current learners." (QQI Core Statutory Quality Assurance Guidelines, 2016).

DX2's primary avenue for the dissemination of information is via its website, and the panel was satisfied that DX2's practices in this area are honest, transparent and facilitate comparison with other providers offering programmes in similar disciplinary areas.

However, the provider needed to ensure that information on the comprehensive range of supports available to learners, as previously highlighted in Section 5.7, was publicly available to prospective learners and other stakeholders. This requirement of the panel was formalised in the mandatory changes in Section 7.

During the reconvene meeting, the panel referred to DX2's website to check exactly how visible these learner supports were. Although a section on Learner Supports was indeed identified, the link was positioned at the bottom of a list on the bottom corner of the website, which made it somewhat difficult to find.

While the panel is nonetheless satisfied that the mandatory change has been addressed, a further item of specific advice has been identified; namely that the panel recommends that the Learner Supports section on the website be moved to the "Resources" section of the Navigation Menu so that it is more visible and accessible.

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

Panel Findings:

As outlined in Section 4.1.4(a), DX2 is not involved in any existing third-party relationships or collaborative provision. While DX2 is seeking to enter a formal benchmarking arrangement with another provider, no such arrangement existed at the time of the panel's review.

The panel is otherwise satisfied that matters relating to this area of QQI's core guidelines have been sufficiently addressed.

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

QQI guidelines state that the purpose of self-evaluation is to “review, evaluate and report on the education, training, research and related services provided by the provider and the quality assurance system and procedures which underpin these.” (QQI Core Statutory Quality Assurance Guidelines, 2016).

Following discussions with the provider during the site visit, the panel acknowledges and supports DX2’s commitment to systematic monitoring and self-evaluation practices, which are consistently evident throughout its QA procedures and reflective of their philosophy to facilitate the evolution of the organisation to meet the requirements of learners now and in the future.

Evaluation of draft QA Procedures - Overall panel findings

The panel recognises the significant steps taken by DX2 to identify areas of weakness within the organisation’s QA system and enhance its policies and procedures accordingly. Furthermore, the panel made a number of commendations to the provider, namely on its open and constructive approach to the reengagement process, its demonstrated dedication to self-reflective practices, as well as its commitment to the continuing professional development of its staff.

During the course of the panel’s evaluation, a number of key areas were identified as being in need of further development. Following a period of six months in which DX2 was requested to address these key concerns, the panel reconvened in November 2021 to review the revised documentation and the changes made. The panel concluded that the work undertaken in the intervening period was clear and evidenced, and that DX2’s QA procedures were in a much healthier position as a result.

In respect of this, the panel is pleased to make the recommendation that QQI approve the draft QA procedures of DX2 Training Solutions Limited.



Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

N/A

Part 7 Mandatory Changes to QA Procedures and Specific Advice

Following the (virtual) site visit on Friday, January 8th, 2020, a number of mandatory changes and items of specific advice were identified by the panel.

7.1 Mandatory Changes

The following mandatory changes were identified at the conclusion of the virtual site visit which took place on 8 January 2021:

1. DX2 Training Solutions (“The Provider”) must review and develop its governance structures, ensuring the separation of academic and corporate governance is clearly evidenced and demonstrated, particularly in relation to:
 - a. Academic Oversight Committee membership and roles;
 - b. Results Approval Panel membership and roles;
 - c. The remit and responsibilities of external authenticators and other external roles
2. The Provider must include Terms of Reference and membership for the Board of Directors as part of its Quality Assurance documentation.
3. The Provider must undertake a comprehensive review of its QA documentation to ensure the relationship between policy (principle) and process (practice) is clearly documented and transparent.
4. The Provider must further develop its processes for programme development to ensure a clear separation between those who propose programmes, those who develop programmes, and those who approve programmes.
5. The Provider must further develop its policies and processes around academic integrity and the investigative and appeals processes therein, ensuring that the principles underpinning these policies are adequately highlighted and evidenced in practice.
6. The Provider must ensure that those who hear an appeal are not involved in the awarding of the grade or the decision being appealed. Furthermore, the majority of those hearing an



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appeal of a DX2 academic decision should be external to DX2.

7. The Provider must review its QA documentation to ensure that all key policies and processes are included within it, particularly in relation to:
 - a. Learner supports;
 - b. Information for staff on all key procedures, including Academic Integrity
8. The Provider must ensure that information on the comprehensive range of supports available to learners is publicly available to prospective learners and other stakeholders.

Following a period of six months in which DX2 was requested to make the above changes, the panel is satisfied that these changes have been appropriately and satisfactorily addressed.

7.2 Specific Advice

The following two items of specific advice were identified at the conclusion of the virtual site visit which took place on 8 January 2021:

1. The panel acknowledges the diverse profile of the learners within DX2 programmes. The panel notes, however, that the faculty profile does not currently reflect this diversity. The panel welcomes recent attempts to reflect this diversity in their faculty, and encourages further development in this area.
2. The panel acknowledges DX2's strategic intent to develop blended learning procedures. This development would require a comprehensive blended learning strategy for supports, pedagogy, programme development and assessment, specific to the blended learning environment.

The following three items of specific advice were identified at the conclusion of the reconvene meeting which took place on 24 November 2021:

1. The panel recommends that the last line of the Learner Appeals procedure be updated to reflect the fact that QQI, in its capacity as an awarding body, does not involve itself in appeals processes.
2. The panel recommends that the link to Learner Supports on the website be moved to the "Resources" section of the Navigation Menu so that it is more visible and accessible.



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3. The panel recommends that the same information on Learner Supports be consistently available across all QQI programmes on the website.

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 6	Minor Award, Special Purpose Award (SPA)	Education



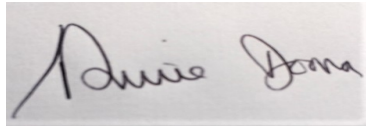
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Part 9 Approval by Chair of the Panel

This report of the panel is approved and submitted to QQI for its decision on the approval of the draft Quality Assurance Procedures of DX2 Training Solutions Limited.

Name:



Date: 22nd December 2021

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

Document	Related to
Statutory Declaration	Legal and Compliance Requirements (Section 4.1)
Certificates on Incorporation	Legal and Compliance Requirements (Section 4.1)
Accountant's Letter	Resource, Governance and Structural Requirements (Section 4.2)
Financial Statements (2017-2019, inclusive)	Resource, Governance and Structural Requirements (Section 4.2)
Insurance Certificates	Resource, Governance and Structural Requirements (Section 4.2)
Tax Clearance Certificates	Resource, Governance and Structural Requirements (Section 4.2)
Organisational Chart	Governance and Management of Quality (Section 5.1)
Staff Handbook	Staff Recruitment, Management and Development (Section 5.4)
Learner Handbook	Support for Learners (Section 5.7)
Child Protection Policy	Information and Data Management (Section 5.8)
Reengagement Application Form and Gap Analysis	All sections
Draft QA Manual	All sections

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

Name	Role/Position
Daniel Davern	Managing Director
Michelle Davern	Director of Training and Quality Assurance

Appendix: Provider response to the Reengagement Panel Report



Ms Marie Cotter
Quality and Qualifications Ireland
27 Denzille Lane
Dublin
D02 P266

12/01/2022

Dear Marie,

DX2 Training Solutions welcomes the report issued by the independent panel assembled to consider DX2 Training Solutions reengagement with Quality and Qualifications Ireland, which took place on the 8th January 2021 and subsequent reconvening of the panel.

DX2 Training Solutions would like to extend our sincerest gratitude to the panel for the professional and supportive manner in which they undertook their review. All members of our team appreciate the commendations offered particularly their recognition that our institution is 'enhancement focused'. We also greatly appreciate the specific advice made by the panel both of which have now been actioned.

DX2 Training Solutions would also like to thank QQI for their support throughout this process, we particularly found the briefings beneficial.

DX2 Training Solutions have approached the reengagement process as an opportunity to improve our internal processes and provide a robust quality assurance system which underpins our daily activities as a provider of quality assured training, as an employer and as a stakeholder within the Further Education and Training community in Ireland and internationally.

Your safety is our business

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DX2 Training Solutions Limited

Company Number. 483510

Directors. Daniel Davern Jnr., Michelle Davern.



Although we found the process challenging, we also found it very worthwhile and will take on board the advice and recommendations made to us to improve our Quality Assurance practices.

Kind Regards,

A handwritten signature in black ink that reads 'Michelle Davern'.

Michelle Davern
Director of Training & Quality Assurance

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