Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1   Details of provider

1.1   Applicant Provider

Registered Business/Trading Name:	Irish Times Training
Address:	The Irish Times Building, 24-28 Tara Street, Dublin 2
Date of application:	29 May 2020
Date of resubmission of application:	24 September 2020
Date of site visit (if applicable):	30 July 2020
Date of reconvene meeting (if applicable)	9 October 2020
Date of recommendation to the Programmes and Awards Executive Committee:	3 December 2020

1.2   Profile of provider

Irish Times Training (ITT) was founded in 1977 and has been in the professional development and education sector for over forty years. ITT is a subsidiary of The Irish Times Group and first registered as a provider of FETAC (subsequently Quality and Qualifications Ireland (QQI)) in 2008. ITT currently has eight programmes validated through QQI:

- Health Service Skills (Level 5);
- Digital Marketing (Level 5);
- Principles and Practice of Selling (Level 5);
- Training, Delivery and Evaluation (Level 6);
- Community Health Services (Level 5);
- Information, Advice and Advocacy Practice (Level 6);
- Care Skills (Level 5); and
- Personal and Professional Development (Level 6).

Moreover, ITT offers a range of accredited and certified education and training solutions both independently through their range of QQI programmes and through a number of other partners including Ulster University and two Education and Training Boards (ETB) (i.e. Laois and Offaly ETB and Dublin and Dún Laoghaire ETB). These accredited and certified programmes are delivered directly to the consumer through a range of 'open programmes' as well as through a number of private and public sector clients and through special government initiatives including Springboard+ and Skillnet. In 2019, ITT certified approximately 823 learners through their QQI, ETB and Ulster University programmes, of which 358 were certified through QQI as a first provider and a further 230 as a second provider.

Overall, ITT engages with a broad range of people and organisations to deliver business and management training opportunities to junior, middle and senior executives from across government, large corporations and SMEs. The core business focus of ITT is to deliver a wide range of business and personal development short non-accredited training programmes to corporate clients. ITT also works with training and development departments to help these departments meet their organisational objectives and develop customised training in line with their individual objectives.

Part 2   Panel Membership

Name	Role of panel member	Organisation
Jack O'Herlihy	Chair	Former Head of Development, Letterkenny Institute of Technology
Helen Keogan	QA & Subject Matter Specialist	Interim Head of Quality Assurance and Improvement, National Learning Network
Naomi Pasley	QA & Subject Matter Specialist	Lecturer, Hibernia College
Dr Eric Derr	Report Writer	Quality Assurance Officer / Lecturer, Carlow College, St. Patrick's

Part 3   Findings of the Panel

3.1   Summary Findings

During the virtual site visit, the Panel had the opportunity to meet with staff members of ITT to further assess its capacity and quality assurance procedures as part of the reengagement process. The Panel commend the ITT staff on their engagement with this process and the significant self-reflection that the staff have undertaken to improve ITT's quality assurance framework. Throughout the virtual site visit, the Panel found that the ITT staff were engaged in several strong quality assurance practices that should be celebrated and articulated in the written documentation. It was further evident to the Panel that ITT places a high importance on being a learner-centred institution and ITT staff members are keenly aware of who ITT's learners are, and the academic needs of this cohort.

Nonetheless, at the conclusion of the virtual site visit, the Panel had concerns around the management of quality assurance and the articulation of ITT's quality assurance framework within its *Quality Assurance Manual*. These are outlined in Section 7.1 of this report and identified as *proposed mandatory changes*. Given that these issues were discreet, and in the Panel's view could be addressed quickly by the provider, the Panel availed of the option to defer its overall decision for a period of six weeks, and allowed ITT this time to submit evidence to the panel that the changes identified have been satisfactorily addressed.

The Panel reconvened on 9 October 2020 to undertake a desk review of the evidence subsequently submitted by ITT. It is the Panel's view that ITT has satisfactorily addressed the proposed mandatory changes and has responded appropriately to the Panel's initial specific advice. The Panel consequently recommends that QQI approve ITT's QA procedures.

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

	Tick <u>one</u> as appropriate
Approve Irish Times Training draft QA procedures	✔
Refuse approval of [the provider's – insert name] draft QA procedures **pending mandatory changes** set out in Section 6.1 (If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)	
Refuse to approve [the provider's – insert name] draft QA procedures	

Part 4   Evaluation of provider capacity

4.1   Legal and compliance requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.1.1(a)	**Criterion:** *Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?*	*Yes*	ITT provided a Certificate of Incorporation for the Irish Times Group (1924).
4.1.2(a)	**Criterion:** *Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*	*Yes*	ITT is a legal entity in the EU and is based in Dublin.
4.1.3(a)	**Criterion:** *Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*	Yes	ITT is a wholly owned subsidiary of The Irish Times Group. ITT provided copies of all existing MOUs and contracts (i.e. DDLETB, LOETB, HSE and Frontline Training).
4.1.4(a)	**Criterion:** *Are any third-party relationships and partnerships compatible with the scope of access sought?*	*Yes*	ITT provided full details of all third-party relationships and partnerships compatible with the scope of access sought.
4.1.5(a)	**Criterion:** *Are the applicable regulations and legislation complied with in all jurisdictions where it operates?*	Yes	ITT evidenced a commitment to compliance with legislative requirements in Ireland, including in respect of health and safety legislation, equality legislation and employment legislation. As part of the Irish Times Group, ITT use certain shared services including IT, HR and Finance. Any legal obligations arising from participation in a collaborative arrangement are detailed in the relevant MOUs and contracts.
4.1.6(a)	**Criterion:** *Is the applicant in good standing in the qualifications systems and education and training systems*	Yes	ITT has confirmed that it is in good standing in the qualifications and education and training system in Ireland.

in any countries where it operates (or where its parents or subsidiaries operate) or enrols learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.		

Findings

The Panel finds that ITT has satisfied all aspects of Criteria 4.1, which was supported by satisfactory documentary evidence.

4.2 Resource, governance and structural requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.2.1(a)	**Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*	**Yes**	ITT provided documentary evidence that it is in good financial standing. However, at the time of the initial site visit the Panel found that ITT required a dedicated quality assurance function within the provider to further enhance its quality assurance framework. The Panel reconvened 9 October 2020 and note that ITT has a dedicated quality assurance function *in situ*.
4.2.2(a)	**Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*	**Yes**	ITT has a proven track-record of delivering academic programmes as a first and second provider. The Panel is satisfied that ITT have a reasonable business case for sustainable provision.
4.2.3(a)	**Criterion:** *Are fit-for-purpose governance, management and decision-making structures in place?*	**Yes**	At the time of the initial site visit the Panel noted that the governance, management and decision-making structures were in place but that they should be reviewed / revised to reflect practice. The Panel reconvened 9 October 2020 and note that the governance, management and decision-making structures were revised in the *Quality Assurance Manual* to reflect practice.
4.2.4(a)	**Criterion:** *Are there arrangements in place for providing required information to QQI?*	**Yes**	The Panel finds that there are arrangements in place for providing required information to QQI.

Findings

The Panel is satisfied that ITT fully complies with criterion 4.2.2(a) and 4.2.4(a). At the time of the initial virtual site visit, the Panel found that criterion 4.2.1(a) was not fully met as there were questions regarding where the management of quality assurance rested within the provider. The Panel requested that ITT provide them with the intended role / responsibilities of this function and to include an update on the recruitment timeframe for this role. At the time of the initial virtual site visit, the Panel found that criterion 4.2.3(a) was not fully met as the governance, management and decision-making structures documents in the *Quality Assurance Manual* were not wholly reflective of institutional practice and should be amended accordingly.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel notes that ITT has a dedicated quality assurance function *in situ*, that this role has been articulated throughout the *Quality Assurance Manual* and criterion 4.2.1(a) is now fully satisfied. The Panel further notes that ITT made significant changes to its governance, management and decision-making structures to reflect practice within the provider; criterion 4.2.3(a) is now fully satisfied.

4.3 Programme development and provision requirements:

	Criteria	*Yes/No/ Partially*	*Comments*
4.3.1(a)	**Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*	**Yes**	ITT has delivered education and training programmes as a first and second provider at Levels 5 & 6.
4.3.2(a)	**Criterion:** *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*	**Yes**	ITT has a stable complement of education and training staff to deliver its programmes.
4.3.3(a)	**Criterion:** *Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?*	**Yes**	The Panel is satisfied that ITT has the capacity to comply with the standard conditions for validation.
4.3.4(a)	**Criterion:** *Does the applicant have the fit-for-purpose premises, facilities and resources to meet the*	**Yes**	The Panel finds that the applicant has a fit-for-purpose premise, facility and resource-base to

	requirements of the provision proposed in place?		meet the requirements of its current provision.
4.3.5(a)	**Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*	**Yes**	ITT meets QQI's criteria regarding access, transfer and progression; these are detailed in Sections 5 of the *Quality Assurance Manual*.
4.3.6(a)	**Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*	**Yes**	ITT evidenced that it has the capacity to meet this criterion, but the Panel find that it should formalise the structures by which programme delivery and assessment are continually evaluated and reflect these in the quality assurance documentation.
4.3.7(a)	**Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*	**Yes**	ITT does not currently offer programmes of more than three months duration as a first provider; as such this is not applicable.

Findings

The Panel finds that ITT has satisfied all aspects of Criteria 4.3.

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

At the time of the initial virtual site visit, the Panel found that ITT had the capacity to provide sustainable education and training, pending proposed mandatory changes outlined in Section 7.1. The Panel further noted that the priority for ITT was the articulation of practice within its *Quality Assurance Manual*.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel is satisfied that the proposed mandatory changes outlined in Section 7.1 have been addressed by ITT.

Part 5   Evaluation of draft QA Procedures submitted by Irish Times Training

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

1   GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

ITT is a wholly owned subsidiary of The Irish Times Group. The Irish Times Trust (CLG) owns The Irish Times (DAC), which has a Board that is responsible for the strategy, financial management and overarching governance of the Group. The Board delegates the strategic management of ITT to the Irish Times Training Executive Group, chaired by the Managing Director of the Irish Times Group; this body has oversight over the design, development and delivery of the strategy, financial management and governance of ITT. The Executive Group has delegated the day-to-day management of ITT to the Management Team, chaired by the Managing Director. The Academic Review Panel (ARP), with an external chair, is comprised of seven representatives comprising subject matter experts, qualification experts, learner representatives, industry representatives and members of the ITT Executive Group. The ARP is responsible for regular, on-going systematic monitoring of programme provision and quality of programmes. There are two sub-committees of the ARP: the Results Approval Panel and the Programme Design and Development Team.

During the virtual site visit, the Panel discussed the presentation of the governance structure and the description of the components therein with ITT. In particular, the Panel noted that there were several inconsistencies throughout the *Quality Assurance Manual* related to terminology (e.g. Head of Centre / Managing Director; Operational Team / Management Team). The Panel sought clarity on which function had line management responsibility over the subject matter experts / trainers (hereafter referred to as 'tutors'). ITT indicated that the Programme Manager is responsible for programme oversight and much of the day-to-day interaction with the tutors; this day-to-day interaction with the tutors is supported by the Operations Manager. The Panel found that the *Quality Assurance Manual* needed to be revised to reflect practice as the organisational structure chart and the description of departmental functions did not reflect the practice articulated by ITT.

Moreover, the Panel sought clarity on where the responsibility for quality assurance rested within the provider as it was not well-articulated in the *Quality Assurance Manual*. In its presentation to the Panel, ITT indicated that quality assurance was an institutional priority and that during the reengagement process it emerged as a vulnerability that required attention. As such, ITT stated to the Panel that responsibility for quality assurance currently rested with the Operations Manager, but that as this role had evolved, it was becoming increasingly apparent that additional resourcing in the area of quality assurance is required. ITT indicated that it intends to appoint an internal Quality Assurance Officer to manage quality assurance within the provider before the end of Q3. The Panel welcomed this and, as a proposed mandatory change, requested that ITT provide the Panel with the intended role / responsibilities of this function to include an update on the recruitment timeframe for this role.

The Panel commended ITT on a number of good practices and the team members that were involved in maintaining the quality of programmes. However, the Panel noted that these practices were not always clearly articulated in the *Quality Assurance Manual*. For instance, the Lead Trainer only appears in its role regarding assessment but has an enhanced role in the management of the programme; likewise, the Peer

Reviewers for Content are not documented. The Panel requested that ITT adequately document its practice within the *Quality Assurance Manual*.

QQI's Core Statutory Quality Assurance Guidelines (2016) mandate that the provider's quality assurance framework is one where all of its "staff and learners are involved in quality assurance, and in which quality is accepted as a responsibility for all to improve upon." The Panel commended ITT on its learner-centred approach to quality enhancement, which was well-articulated during the virtual site visit. However, the Panel queried the involvement of tutors in the development of the revised *Quality Assurance Manual* and within ITT's ongoing commitment to quality enhancement. ITT stated that it held informal meetings with tutors to obtain their feedback / ideas and that the revised quality assurance framework has built-in mechanisms for obtaining ongoing feedback / ideas from tutors. The Panel recommended that, as many of the tutors are on contracts, it needed to be articulated more clearly in the documentation.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel commend ITT on the changes it made to its *Quality Assurance Manual* related to governance and management of quality. In particular, the Panel commends ITT on having a dedicated quality assurance function appointed and articulating this function throughout the *Quality Assurance Manual*. As an additional specific advice, the Panel recommends that ITT continues embedding the function of Quality Assurance Officer into its quality assurance framework.

The Panel further noted that the Operations Manager is referenced in the revised organisational chart and is mentioned as being a member of the Management Team. However, the roles and responsibilities for this function are not articulated in the *Quality Assurance Manual*. As an additional specific advice, the Panel recommends that the roles and responsibilities for this function are articulated in the *Quality Assurance Manual*.

2   DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

QQI's Core Statutory Quality Assurance Guidelines (2016) mandate that the quality assurance framework is "designed as a comprehensive system". The Panel noted that ITT deliver programmes as both a first provider and second provider and queried what challenges this posed. ITT indicated that when it received the contracts for the ETBs there were challenges managing the varying quality assurance systems as the information / documents required by the ETBs was initially overwhelming. However, over-time ITT found that the level of detail required as a second provider had significantly aided ITT in running programmes as a first provider; in turn, this had aided ITT in developing its quality assurance framework.

The Panel further noted that ITT delivers programmes validated by both QQI and Ulster University and queried what challenges this posed. ITT indicated that its collaboration with Ulster University is unique and that ITT's responsibility within this collaboration is largely marketing / learner recruitment and Ulster University has responsibility for the quality assurance of programmes that are delivered by its staff using ITT facilities. ITT further noted that it was involved in a programme revalidation several years ago and the validating agency of Ulster University degrees (Quality Assurance Agency for Higher Education (QAA)) noted that, although it was not a typical arrangement for delivering programmes, the arrangement appeared to be working.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel commend ITT on the revisions it made to *Quality Assurance Manual* and recommend that ITT continues to fully embed the function of Quality Assurance Officer into its quality assurance framework.

3   PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

During the virtual site visit, ITT indicated that it was in the process of finalising a new programme for validation. The Panel asked ITT to take them through the development and approval process for this programme to get a sense of how its quality assurance system operated in practice. ITT took the Panel through the approval process, which included the establishment of a Design Team, the completion of a Programme Initiation Form, feasibility study to determine if there was a business case for the programme, and submission to the ARP for approval in principle. Once the programme had received approval in principle, the Design Team then prepares the validation documentation; once complete, it will be sent back to the ARP for final approval before being sent to QQI for validation.

The Panel sought clarity on the development and monitoring of programme content, namely, where responsibility resided regarding the accuracy of programme content. ITT stated that programme development is a joint effort between the Programme Manager and tutor. The tutor designs the content and the Programme Manager comes in at the stage of validation and reviews all of the documentation to ensure that everything is appropriate for the proposed programme; the Programme Manager 'sets out the programme briefs' but the tutors design the programme based on the learning outcomes and, once the programme is being delivered, the Programme Manager ensures the tutor is on track with delivering the programme such that the stated learning outcomes can be achieved by learners. The Panel was satisfied with this description of practice, but again requested that it was adequately documented in the *Quality Assurance Manual*.

Exploring the monitoring of programmes further, the Panel sought clarity from ITT regarding the types of feedback used to monitor programmes and how that feedback was acted upon by the relevant personnel. ITT described that learners can feedback through a variety of methods, with the most used method being the Learner Feedback Form (this form can be issued both in hard copy or digital format). ITT further described that tutors complete a feedback form which is sent to the Programme Manager for processing and analysis. The Panel was satisfied with the summation provided by ITT but asked how the feedback was actioned, specifically as it related to the quality of teaching. ITT indicated that one of the questions on its feedback questionnaire was about the teaching experience and in terms of the quality assurance process the Programme Manager is active in the monitoring of the teaching experience through the practice of conducting unannounced visits to classes and ensuring that tutors have the required expertise to deliver the programme content; it was further noted by ITT that it actively promotes differentiated learning techniques. The Panel were satisfied with this description of practice but found the description of practice was not documented in the *Quality Assurance Manual*.

The Panel asked ITT to describe its institutional framework around access, transfer and progression. ITT indicated that its access requirements are clearly articulated on its website and that ITT is committed to signposting to its learners a clear progression route so that learners do not find themselves in a 'cul de

sac'. ITT noted that learner feedback figures strongly in the development of programmes and that ITT actively use its alumni database in this regard.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel notes that ITT has now included in its *Quality Assurance Manual* a section dedicated to the minimum entry requirements for English language proficiency. However, the Panel notes that this section does not indicate the minimum standards required. As an additional specific advice, the Panel recommends that ITT include the minimum English proficiency standards required for programme admission at ITT.

4   STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

QQI's Core Statutory Quality Assurance Guidelines (2016) state that there should be a "systematic approach to the fair and transparent recruitment and further professional development of people engaged in programme and service delivery." Owing to the strong reliance on tutors to deliver the programmes, the Panel asked ITT to clarify its processes around staff recruitment, management and development. ITT detailed this process and stated that it was fortunate to be a member of a much larger institution as once it has identified a gap the HR Department of The Irish Times Group oversees the recruitment process.

Moreover, since most of ITT's tutors are on a short-term contract, the Panel queried what CPD opportunities are provided to tutors. ITT indicated that it provides informal and formal CPD opportunities. For instance, ITT has, at minimum, six breakfast briefings and lunch and learns throughout the year where tutors and clients are invited to network and engage with CPD content. ITT also stated that tutors are encouraged to engage with virtual upskilling events, especially as they relate to blended learning, and its in-house blog series which is published on the ITT website. A tutor, who participated in the virtual site visit, indicated that as part of the tutor's annual review they were encouraged to identify any 'gaps' and that ITT often provides CPD opportunities; this particular tutor reported that they were provided the opportunity to upskill in the area of digital marketing and ITT provided this tutor with CPD opportunities.

The Panel is satisfied with the quality assurance practices around staff recruitment, management and development.

5   TEACHING AND LEARNING

Panel Findings:

Prior to the virtual site visit, the Panel was given access to the Learner Management System (LMS) used at ITT. The Panel sought a number of clarifications related to the development of blended learning content and the oversight / sign-off of information in the LMS. ITT noted that Frontline Training provide the platform for its healthcare blended learning programmes. The Panel queried where the sign-off of content rested, with Frontline or with ITT. ITT confirmed to the Panel that it had full access to this platform and its

staff are fully trained on the system. The Panel found the quality assurance processes related to the LMS were satisfactory but advised that the practice be fully documented in the *Quality Assurance Manual*.

Related to teaching and learning, the Panel commended ITT on the variety of teaching and learning activities articulated during the virtual site visit, however, found that these practices could be more fully developed in ITT's documentation. For discussion around blended learning, see Section 5.12.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. Although it was not a stated specific advice in Section 7.2 of this report, following the initial virtual site visit, the Panel recommended that the processes related to the LMS be fully documented in the *Quality Assurance Manual*. Moreover, the Panel note that ITT had developed a new document titled 'Approaches to Teaching and Learning'. The Panel is of the view that the provider's approach to teaching and learning is vastly improved and commend the provider on its progress in this area. As a specific advice, the Panel recommends that its approach to teaching and learning be expanded to include assessment.

The Panel further notes that there is a section in the *Quality Assurance Manual* dedicated to the 'Managing and Monitoring of Work Placements' and a document titled 'Work Placement Guidelines for Host' is referenced. As work placements are an intrinsic part of this provider's programmes, the Panel is of the view that this document be added as an appendix to the *Quality Assurance Manual*.

6	ASSESSMENT OF LEARNERS

Panel Findings:

During the virtual site visit, the Panel noted that there were some inconsistencies in the *Quality Assurance Manual* related to academic integrity. As such, the Panel asked ITT to articulate its approach and management of academic integrity as it relates to assessment. ITT indicated that before joining the programme, learners receive the handbook for their programme which contains a section devoted to academic integrity; academic integrity is also a topic of discussion at their programme induction where learners are given examples of how academic integrity can be breached. ITT's philosophy around this is to develop an open dialogue on this topic and create the space whereby learners are encouraged to ask questions prior to submitting their assessments. The Panel further noted that the learner handbooks details consequences for plagiarism whereas the *Quality Assurance Manual* does not, the Panel queried whether the consequences were consistent across programmes. ITT confirmed that the consequences were consistent across programmes and outlined the process for dealing with plagiarism. The Panel advised that the *Quality Assurance Manual* should be revised to adequately capture ITT's practice.

QQI's Core Statutory Quality Assurance Guidelines (2016) state that "the assessment framework incorporates procedures and systems for the security and integrity of the assessment process." The Panel sought clarification from ITT regarding internal verification within its assessment processes. ITT reported that its strategy around grade authentication is usually 20%. ITT further outlined its internal authentication process and how this interacts with the external authentication process. The Panel queried whether peer-reviewed marking was part of ITT's verification process. ITT confirmed that it brings in a tutor that has not been part of the programme and this tutor will sample modules to ensure that marks align with QQI guidelines related to marks and standards. The Panel commended ITT on its internal

verification process but noted that the practice was not adequately detailed in its *Quality Assurance Manual*.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel note that ITT now has a dedicated section of its *Quality Assurance Manual* dedicated to 'Dealing with Academic Misconduct'. Although this section is significantly more clear and there are now documented penalties for plagiarism, the Panel is of the view that this section should be monitored and reviewed to ensure that it is fit-for-purpose. The Panel also welcomes the documented processes around internal / external authentication.

7 SUPPORT FOR LEARNERS

Panel Findings:

QQI's Core Statutory Quality Assurance Guidelines (2016) state that "the needs of a diverse learner population (mature, part-time, employed, international, as well as learners with disabilities) is taken into account when planning and providing learning resources and supports." As such, the Panel asked ITT to clarify what learner supports it provides to its learners. ITT reported that reasonable accommodation is assessed at application and it has procedures in place for learners to make a disclosure after registration. The Panel asked ITT what learning philosophy for learners underpins the universal design of its programme. ITT noted that the learner handbook clearly articulates ITT's leaner-centred approach and that every programme has a support person attached to it, who are introduced from the programme's outset. ITT further noted that it had linked learner supports and resources into the *Quality Assurance Manual* and ITT is always trying to integrate process but also want the quality assurance framework to be 'live and forward-moving'.

The Panel asked ITT what percentage of its learners' avail of learner supports and what provisions does ITT have in place outside of the normal working day. ITT detailed the learner supports available and reported that the dedicated learner support liaison is the primary point-of-contact for learners; as its provision has moved online owing to the COVID-19 Pandemic, most of learner support queries have been related to technology. The Panel asked ITT to elaborate further on the adaptability of its quality assurance framework as a result of COVID-19. ITT reported that it was amazed at how quickly it was able to adapt and that there was a continuation of support services for learners, which was of primary importance. ITT further stressed that it tried to maintain the same level of contact with the learners as it would if the module was delivered face-to-face.

At the initial virtual site visit, the Panel also noted that the *Quality Assurance Manual* (page 33) indicates that proficiency in the English language is done at the stage of interview and queried what mechanisms ITT use to measure reading and written proficiency. The Panel further asked what writing supports ITT had in place for learners where English is not their first language and, by extension, the entire learner cohort. ITT confirmed that for its programmes where ITT is the first provider, ITT does not have clear standards to benchmark but for its programmes as a second provider for the ETBs there are required tests as part of the application process. The Panel advised ITT to develop clear minimum entry requirements for English language proficiency that are transparently demonstrated through achievement in a recognised test (e.g. IELTS).

At the initial virtual site visit, the Panel found that the supports for learners were satisfactory but that the processes, as expressed by ITT, were not well-articulated in the *Quality Assurance Manual*. ITT acknowledged this and indicated that a dedicated Quality Assurance Officer will hopefully rectify this lacuna and be a big assistance to the entire organisation.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel finds that ITT addressed their concerns related to its supports for learners but note that as an additional specific advice ITT should include the minimum English proficiency standards required for programme admission at ITT.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

ITT indicated in its presentation to the Panel that the Executive Team and ARP are responsible for the identification and monitoring of institutional risks. One area of risk identified related to information and data management. ITT reported that the Irish Times Group are moving towards cloud and that ITT's data storage is maintained on a centralised secure server and is managed by its IT Team. When ITT was forced to close temporarily owing to the COVID-19 Pandemic, as the data had not been migrated to the cloud, some data was inaccessible. As a result, ITT is moving its data storage to the cloud, which will be completed by November 2020.

IT further reported to the Panel that it is currently consolidating internal systems and it is launching a new website and operations systems in early October 2020. The Panel noted these changes and find that ITT adequately document these new systems in the *Quality Assurance Manual*.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel recommends that ITT monitor and continue to improve its quality assurance framework in the area of information and data management as new systems are introduced.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The Panel commended ITT on the level of information provided to learners and staff, in particular, the level of information flowing between quality assurance related documents. To get a better sense of its documented approach to quality assurance, the Panel queried what mechanisms were in place to ensure that there was alignment between the different information sources. ITT indicated that handbooks and the website were the primary information sources for learners; the *Quality Assurance Manual* is an additional resource and is available to learners, but it is not seen as the primary information source for learners. ITT further indicated that handbooks are available, and can be downloaded, through the LMS and the website. ITT stated it was currently in the process of having a new system developed that will have everything consolidated in a learner portal and trainer portal.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel recommends that ITT monitor and continue to improve its quality assurance framework in the area of public information and communication as new systems are introduced.

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

Panel Findings:

QQI's Core Statutory Quality Assurance Guidelines (2016) state that "other awards, accreditations, collaboration, arrangements and partnerships, both in Ireland and abroad, offered through or by the provider are organised with reputable bodies and are subject to appropriate internal and external quality assurance procedures." The Panel engaged with ITT on this in the context of developing a comprehensive quality assurance framework. As such, the Panel noted that ITT deliver programmes as both a first provider / second provider and engage with two validating bodies, QQI and Ulster University. Through this discussion, and the evidence provided to the Panel by ITT, the Panel is satisfied that ITT's quality assurance framework aligns with this core statutory guideline.

The Panel commends ITT on the externality of its ARP which currently has three external members.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel further notes that there is a section in the *Quality Assurance Manual* dedicated to the 'Managing and Monitoring of Work Placements' and a document titled 'Work Placement Guidelines for Host' is referenced. As work placements are an intrinsic part of this provider's programmes, the Panel is of the view that this document be added as an appendix to the *Quality Assurance Manual*.

11	SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

At the initial virtual site visit, the Panel found that ITT had a satisfactory basis to self-evaluate, review and monitor quality throughout the organisation, but advised the provider that the structures by which programme delivery and assessment are continually evaluated should be formalised and reflected in the *Quality Assurance Manual*. Throughout the virtual site visit, the Panel found that the articulation of processes were not always articulated in the documentary evidence. The Panel note that ITT's quality assurance framework has undergone significant developments since commencing the reengagement process. However, the Panel was of the view that the *management* of quality assurance was too spread out within the provider and that the appointment of a dedicated Quality Assurance Officer should be an institutional priority.

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. With the appointment of a Quality Assurance Officer, the Panel finds that ITT had addressed their concerns related to self-evaluation, monitoring and review.

12	TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING

Panel Findings:

The Panel reviewed the blended learning procedures submitted by ITT to ensure that the procedures align to the *Topic Specific Statutory Quality Assurance Guidelines for Providers of Blended Learning Programme* (2018). These guidelines require that "learning resources, materials and delivery mechanisms are appropriate, fit-for-purpose, monitored and reviewed" (Section 4.2.1). Prior to the virtual site visit, the Panel was given access to the LMS used at ITT for its healthcare programmes, which is provided by Frontline Training. The Panel was particularly interested in the ownership of content and the mechanisms in place for the monitoring and review of programme content (see Section 5.5 of this report).

The Panel further engaged with ITT on its arrangements for the quality assurance of learning resources, the learning environment and other learning resources (Section 4.3.3). As it related to the programmes collaborating with Frontline Training, the Panel sought clarity on how the programmes were developed and the quality assurance framework around content. ITT indicated that the Programme Manager takes a lead role to ensure that content is quality assured and that learners have access to the LMS and can go back to review content even after the learning has taken place. Furthermore, ITT staff members identify content (e.g. TED Talks, Harvard Business Review) and Frontline Training is there to facilitate in the sharing of the content. ITT intimated to the Panel that, although blended learning is important to its overall strategic objective to be innovative, the main part of its academic provision is based on face-to-face programmes; ITT wants blended learning to enhance, not replace, this.

Evaluation of draft QA Procedures - Overall panel findings

The Panel commend the staff at ITT on their engagement with this process. In particular, the Panel noted at the conclusion of the virtual site visit that ITT articulated a number of good quality assurance practices within its quality assurance framework. However, the Panel further noted that many of these practices, although articulated well during the virtual site visit, were not adequately documented in the *Quality Assurance Manual*. Moreover, the Panel found that the management of quality assurance within ITT was not well defined. As a result, the Panel identified a number of lacunae in the documentation of ITT's quality assurance framework, and in the documentation of processes.

At the conclusion of the site visit, the Panel had concerns around the management of quality assurance and the articulation of ITT's quality assurance framework within its *Quality Assurance Manual*. These are outlined in section 7.1 of this report and identified as *proposed mandatory changes*. Given that these issues were discreet, and in the Panel's view could be addressed quickly by the provider, the Panel availed of the option to defer its overall decision for a period of six weeks, and allowed ITT this time to submit evidence to the panel that the changes identified have been satisfactorily addressed.

The Panel confirms that ITT effectively addressed and provided evidence addressing the proposed mandatory changes outlined in Section 7.1 within the allocated 6 week period. As a consequence, the Panel recommends that QQI approve ITT's QA procedures.

Part 6   Conditions of QA Approval

6.1   Conditions of QA Approval

1.   N /A

Part 7   Mandatory Changes to QA Procedures and Specific Advice

The following proposed mandatory changes were identified at the conclusion of the virtual site visit on 30 July 2020 by the Panel. The Panel availed of the option to defer its decision to allow Irish Times Training an opportunity to address these issues within a six-week period.

The panel reconvened on 9 October to evaluate evidence submitted by ITT in support of the proposed changes. Following an evaluation of the evidence submitted, the panel **is satisfied** that ITT has adequately addressed the issues set out in Section 7.1 below.

7.1   Mandatory Changes

1.   Adequately document practice within the *Quality Assurance Manual*.

2.   Review and revise the roles and responsibilities of functions within the governance and management of Irish Times Training, and these should reflect practice.

3.   Formalise the structures by which programme delivery and assessment are continually evaluated and reflect these in the quality assurance documentation.

4.   Irish Times Training indicated that they are in the process of sourcing a Quality Assurance role; please provide the panel with the intended role / responsibilities of this function to include an update on the recruitment timeframe for this role.

7.2   Specific Advice

1.   Irish Times Training is advised to develop clear minimum entry requirements for English language proficiency that are transparently demonstrated through achievement in a recognised test (e.g. IELTS).

The Panel reconvened on 9 October 2020 and conducted a desk review of the revised *Quality Assurance Manual* of ITT. The Panel notes that ITT has now included in its *Quality Assurance Manual* a section dedicated to the minimum entry requirements for English language proficiency. However, the Panel notes that this section does not indicate the minimum standards required. As an additional specific advice, the Panel recommends that ITT include the minimum English proficiency standards required for programme admission at ITT.

Moreover, after conducting its desk review of the revised Quality Assurance Manual submitted by ITT, the Panel submits additional specific advice:

2.   ITT is advised to continue embedding the function of Quality Assurance Officer into its quality assurance framework.

3. ITT is advised that the roles and responsibilities for the Operations Manager be articulated in the *Quality Assurance Manual*.

4. ITT is advised to add as an appendix to its *Quality Assurance Manual* the document titled 'Work Placement Guidelines for Host'.

Part 8   Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 5 to Level 6	Major, Minor and SPA	Business, Marketing, Healthcare and Training and Development

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 Irish Times Training.

Date: 13th October 2020

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

Document	Related to
Irish Times Training Re-Engagement Application Form	
Statutory Declaration	Section 1 – Legal and Compliance Section
LOETB Contract	
DDLETB Contract	
HSE Contract	
ETB Sample Programme Contract	
Certification for Incorporation	
Tax Clearance Certificate	
Public Liability Insurance 2020	
Irish Times Training Income and Expenditure 2017	Section 3 – Financial Viability and Resources
Irish Times Training Income and Expenditure 2018	
Irish Times Training Income and Expenditure 2019	
Irish Times DAC Financial Statement 2016	
Irish Times DAC Financial Statement 2017	
Irish Times DAC Financial Statement 2018	
Governance Structure and Organisation Chart	Core Guideline 1: Governance and Management of Quality
Terms of References for: • Academic Review Panel • Executive Group • Results Approval Panel • Programme Design and Development Team	
Roles and Descriptions of Key Roles: • Managing Director • Operations Manager	

• Programme Manager / Programme Assistant • Quality Advisor • Trainer	
Irish Times Quality Assurance Manual Learner Handbook Staff Handbook Irish Times Training Quality Assurance Process Flow Chart Schedule of Reports Presented to Governance Units Relevant Policies	Core Guidelines 2: Documented Approach to Quality Assurance
Memorandum of Understanding – Frontline Training and Irish Times Training	Core Guidelines 10: Other Parties Involved in Education and Training
PowerPoint Presentation	All Sections

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

Name	Role/Position
Imelda Ray	Managing Director
Una O'Hare	Director
John Dunleavy	Operations Manager
Alison McKeon	Programme Manager
Yvonne Farrell	Subject Matter Expert and Trainer

Appendix: Provider response to the Reengagement Panel Report

Dr. Deirdre Stritch
Manager of Approval and Monitoring - QQI Awards
Quality and Qualifications Ireland (QQI)
26/27 Denzille Lane
Dublin 2
D02 P266

23 October 2020

Dear Deirdre

Re: Formal response to QQI regarding the Irish Times Training Reengagement Panel Report

We would like to formally acknowledge receipt, and acceptance, of the QQI Panel Report and we welcome the panel's recommendation that QQI approve our draft QA procedures at the PAEC meeting on 3 December

Thank you also for inviting us to identify any factual inaccuracies in the report. We have reviewed the report in detail and are happy to report that we cannot identify any inaccuracies and are happy that the report be published as is.

We wish to thank the panel. We were given a very fair hearing and the feedback, insights and advice provided by the panel was very constructive and useful. We would also like to record our thanks to all the QQI staff members that we worked with on the re-engagement journey; they were helpful, courteous and responsive.

As an organisation, Irish Times Training benefited enormously from the process and we have no doubt that it contributed to the development of a more robust, practicable and accessible QA which will , in turn, benefit our learners through the enhancement of our training provision.

Irish Times Training looks forward to continuing its relationship with QQI as a recognised provider and to actively engaging with other providers, collaborators, communities of practice and sectoral bodies in the future.

Please contact me if there are any points you need to clarify or discuss further.

Imelda Rey
Managing Director