



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	Bord Iascaigh Mhara
Address:	Crofton Road, Dún Laoghaire, Co. Dublin.
Date of Application:	15 th May 2019
Date of resubmission of application:	
Date of evaluation:	
Date of site visit (if applicable):	25 th September, 2019
Date of reconvene meeting (if applicable)	29 th June 2020
Date of recommendation to the Programmes and Awards Executive Committee:	5 th December 2019 10 th September 2020

1.2 Profile of provider

Bord Iascaigh Mhara (BIM) is a semi-state agency, established under the 1952 Sea Fisheries Act. The Department of Agriculture, Marine and Food delegates functions to BIM that relate to supporting and regulating the seafood industry.

Within BIM, the BIM Training Unit (hereafter BIM TU) is responsible for the delivery of a structured career path in the seafood sector, through the provision of lifelong accredited learning for the seafood sector. The mission of the BIM Training Unit is to *“provide quality programmes that will help to develop a profitable and sustainable knowledge-based Irish seafood industry, capable of competing in the global marketplace”*. BIM has a forty year track record of developing and delivering training programmes, and initially agreed its quality assurance with FETAC in 2006. The programmes offered are aimed at individuals working in, or aspiring to work in, the seafood industry. Training is offered to the sea-fishing, aquaculture, retail and seafood processing sectors. Programmes currently validated by QQI lead to awards at Levels 5 and 6 on the National Framework of Qualifications. Additional programmes are accredited by the Marine Survey Office, or are delivered as self-accredited in-house training.



Training is delivered at multiple sites around Ireland, including locations in Donegal, Cork and Dublin, and in addition BIM maintains mobile coastal training units and vessels. The administrative hub and quality oversight function of the BIM TU is based in BIM headquarters in Dun Laoghaire.

Part 2 Panel Membership

Name	Role of panel member	Organisation
Billy Bennett	Chair	Letterkenny Institute of Technology
Cathy Peck	Secretary	Independent Education Consultant
Aoife Comiskey Clifford	Panel Member	Kerry Education & Training Board
John Mulcahy	Panel Member	Independent QA Consultant
David Lyons	Panel Member	Food Safety Authority of Ireland

Part 3 Findings of the Panel

3.1 Summary Findings

At the outset of this report, the panel would like to acknowledge the track record of provision and good standing of BIM in the sector.

The panel would like to commend the BIM TU team on their highly constructive engagement with the panel during the site visit, and throughout the re-engagement process to date. BIM TU staff took a candid and collegiate approach to their discussions with the panel, reflective of their commitment to continual improvement and the enhancement of quality.

BIM TU are to be further commended for areas of evident strength in their submission for re-engagement. This notably includes a high level of commitment in the organisation to developing inclusive practices, with particular regard to the promotion of accessibility and supports for learners with disabilities and specific learning differences.

These commendations notwithstanding, the panel was not able to recommend approval of BIM's draft QA until changes at the conclusion of the initial site visit. The panel held a number of specific concerns in areas that included (but were not limited to) *Governance and Management of Quality* and a *Documented Approach to Quality Assurance*. The panel was of the view that BIM TU was capable of reviewing and implementing its organisation-wide QA processes, and willing to commit the resources necessary to increase capacity in this area. The panel noted that full capacity in the area of QA would enable the *Mandatory Changes* listed in Section 6.1 of this report to be made within the allocated period of six months, and would ensure that BIM TU's QA was appropriately aligned to QQI's Core Statutory Quality Assurance Guidelines moving forward.

The panel reconvened in June 2020 to undertake a desk review of evidence resubmitted by the provider. It was the view of the panel that BIM TU had made significant progress and had achieved the required enhancements to its QA. This was



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notably achieved by BIM TU during a period of significant disruption to the sector caused by the Covid-19 pandemic. The panel were therefore pleased to be able to recommend that QQI approve BIM TU's draft QA procedures.



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

	Tick <u>one</u> as appropriate
Approve BIM TU's draft QA procedures	X
Refuse approval of BIM TU's draft QA procedures with mandatory changes set out in Section 6.1 <small>(If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)</small>	
Refuse to approve BIM TU'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	BIM is a semi-state agency which is delegated functions by the Department of Agriculture, Marine and Food. This includes training activities within the sector.
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	BIM is well-established in Ireland, and has a significant multi-site presence here as a training provider.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	At the time of the initial site visit, second provider relationships with Carlow Institute of Technology and GRETB were specified in BIM TU's initial application documents. During the site visit, discussions identified that this area of BIM TU's documentation needed to be reviewed and clarified. Subsequent to a review of the changes made by BIM TU in the interim period, the panel was satisfied that this criterion had been met.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	As per Criterion 4.1.3(a), at the time of the initial site visit, the panel felt this area required further clarification before the panel could make a clear determination. Subsequent to a review of the changes made by BIM TU in the interim period, the panel was satisfied that this criterion had been met.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	The provider has submitted documentation reflective of compliance with relevant regulation and legislation, and the provider's representative has signed a statutory declaration



			confirming this documentation to be true and complete.
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	BIM has a 40 year track record of provision in Ireland and had its QA approved by FETAC in 2006.

Findings

The panel is of the view that BIM TU, within the broader BIM organisation, is a well-established provider in good standing, and is able to demonstrate it meets its legal and compliance obligations. Following changes implemented during the interim period, the panel is satisfied that collaborations and partnerships are appropriately specified.

**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	Appropriate information was provided within the provider's application documentation. This includes BIM's Annual Report 2017 and a letter from the Department of Agriculture, Fisheries, Food & the Marine (DAFM) confirming funding
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	BIM's course expenditure is funded from core current exchequer funds via Department of Agriculture, Fisheries, Food & the Marine.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	At the time of the initial site visit, BIM TU's application required clarification in relation to academic decision-making and governance structures. When the panel reconvened in June 2020 to review the changes implemented by the provider, the panel were satisfied that appropriate clarifications had been made in this area.
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	BIM TU has a track record of certification. Within the BIM TU structure a full-time role is designated for a Quality Officer, and external consultancy is also engaged to support QA development as required.

Findings

The panel is of the view that BIM TU is a provider with a sustainable case for provision, with a sufficient resource base and structures in place to facilitate provision of information to QQI. Following changes implemented during the interim period, the panel is satisfied that fit-for-purpose decision-making structures are in place, and has offered some items of additional specific advice to the provider in relation to these.



4.3 Programme development and provision requirements:

	<i>Criteria</i>	<i>Yes/No/ Partially</i>	<i>Comments</i>
4.3.1(a)	Criterion: <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	Yes	BIM has a 40 year track record in provision of training in the sector, and had its QA agreed with FETAC in 2006.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	The majority of BIM TU training staff are employed directly, rather than contracted. BIM TU has appropriate processes in place surrounding recruitment of staff with training and education qualifications.
4.3.3(a)	Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	The panel is satisfied that BIM TU's track record of certification, and its approach to the re-engagement process reflects its capacity to cooperate with and assist QQI and provide QQI with information as specified in Section 45(3) of the 2012 Qualifications and Quality Assurance (Education and Training) Act.
4.3.4(a)	Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i>	Yes	BIM TU operates across multiple locations in Ireland, utilising specialised training facilities and vessels as well as authentic work environments.
4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	At the time of the initial site visit, the panel noted that further development was needed on documented access, transfer and progression policies, including RPAL and RPEL. When the panel reconvened to review BIM TU's implementation of mandatory changes pertaining to this, they were satisfied that sufficient progress had been made. An additional item of specific advice is offered to BIM TU in relation to RPEL procedures.
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	At the time of the initial site visit, the panel noted that further development was needed in relation to a formal and documented process of recheck and review that was distinct from the appeals process. When the panel reconvened to review the evidence



			submitted by BIM TU, they were satisfied that this issue had been addressed.
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	N/A	This criterion is not applicable in relation to this provider.

Findings

The panel is of the view that BIM TU has a fit-for-purpose complement of education and training staff, and access to appropriate premises and facilities to support its programme provision. Following changes implemented during the interim period, the panel is also satisfied that the access, transfer and progression arrangements in place met QQI's criteria for approval, and that the structures underpinning fair and consistent assessment of learners were in place.



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

At the time of the initial site visit, the panel was satisfied that BIM TU was committed to achieving a QA standard that was demonstrably aligned to QQI's guidelines. The provider had a track record of provision and access to sufficient resources (i.e. staff, facilities, funding).

When the panel reconvened in June 2020 to review the evidence submitted by BIM TU that it had addressed the panel's specific concerns, the panel felt that the necessary revisions, clarifications and development identified in Section 6.1 (*Mandatory Changes*) and Section 6.2 (items of *Specific Advice*) of this report had been undertaken within the allocated 6 month period.



Part 5 Evaluation of draft QA Procedures submitted by BIM.

The following is the panel's findings following evaluation of BIM TU'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:

QQI's 2016 Core Statutory Quality Assurance Guidelines require QA systems to be in place that ensure corporate decision-makers within the provider do not exercise undue influence over academic decision-making. The guidelines also require a structure to enforce a separation of responsibilities between those who produce and develop material and those who approve it.

During the panel's site visit, BIM TU representatives discussed the ongoing development of the provider's structure for academic decision-making and governance with the panel. This included decisions under consideration in relation to the panels and subcommittees proposed to report to the Training & Development Subcommittee (T&DSC). At the time of the site visit, these included a Programme Approval Panel, a Results Approval Panel, Programme Boards and a Self-Evaluation panel. These were represented graphically on a document titled 'Governance of BIM Training Unit' provided to the panel on the day and also included in the provider's formal presentation. However, it was acknowledged by BIM TU that the scope and Terms of Reference of these units required further refinement.

The panel acknowledged the progress BIM TU had made in this area, and supported its continued effort to develop a structure that is appropriate to the contextual needs of the organisation, yet meets the obligations of this dimension of QA. However, the panel was not initially able to recommend approval in relation to this dimension of BIM TU's QA. Two *Mandatory Changes* in Section 6.1 of this document (6.1.1 & 6.1.2) reflected this. These required BIM TU to provide greater clarity on academic decision-making and governance structures, as well as the separation of responsibilities between those who develop, recommend and approve key decisions. Additionally, comprehensive Terms of Reference for the T&DSC and various panels, including membership and reporting, needed to be articulated in the QA Manual. The panel also issued an item of *Specific Advice* relating to redesign of the graphic representation of these structures in the QA Manual, which recommended these more accurately reflect the organisation's QA system.

When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were of the view that the work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had, for example, revised the name and membership of the T&DSC to the Training and Development Committee (TAD), clarified the Terms of Reference for this and other units of governance, and identified a separation of responsibilities between those responsible for programme development and programme approval. The panel also identified further items of *Specific Advice* for BIM TU relevant to this dimension of QA (see Section 6.3).



2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

In relation to this dimension of QA, QQI's 2016 Core Statutory Quality Assurance Guidelines require QA systems to be fully documented, designed as a comprehensive system and consistent with the requirements of relevant legislation. Documented policy and procedures must include a role for learners and other stakeholders, and be translated into practice through processes that allow for participation by all staff within the provider.

During the site visit, the panel sought to better understand the relationship between BIM TU's documented QA procedures and how the QA was lived within the organisation. This discussion made apparent that in some areas of activity, for example learner support, there were a range of good practices in place that are not fully documented in the QA Manual. In other key areas, for example, in relation to assessment rechecks, reviews and appeals, there were omissions within the current documented QA. As this dimension of QA underpins QQI's guidelines in other areas, the panel was of the view that further work was needed to refine BIM TU's documentation. Further, the panel noted that increased capacity in this area would be essential to the provider's work in this regard.

Three *mandatory changes* (6.1.5, 6.1.7 & 6.1.8) emerging from this dimension of QA were therefore identified by the panel. These changes required clearer differentiation between policy and procedure within the QAM, and clarification of the oversight role of the QA officer and the devolved QA roles and responsibilities of all key personnel. They also reflected the imperative of increasing capacity within the organisation through the appointment of an appropriate individual to the role of QA officer. The panel additionally issued an item of *Specific Advice* relating to diagrammatic representation of key procedures in the QA Manual that was directly relevant to the provider's documented approach to QA.

When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were of the view that the significant work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had, for example, much more clearly differentiated between policies within its Quality Assurance Manual and procedures within its Standard Operating Procedures Manual. The panel also identified a further item of specific advice relevant to this dimension of QA (see Section 6.3).



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

This dimension of QA requires development of new programmes to be systematic, and for new programmes to be evaluated systematically by appropriate internal decision-making structures. QQI's QA guidelines further require the consistent application of pre-defined and published regulations in relation to learner admission, progression and recognition. Programme monitoring and review is also a significant aspect of this dimension of QA.

During the site visit, the panel sought to illuminate practice at BIM TU in relation to how new programmes were developed and approved. As the development of academic decision-making structures at BIM TU (see Section 5.1) is ongoing, there was some ambiguity surrounding the intended role of the planned Programme Approval Panel in this process. The panel is of the view that when this is addressed, processes in this area will be more transparent.

The panel also sought to understand more clearly what practices were in place in relation to the Recognition of Prior Accredited Learning (RPAL) and Recognition of Prior Experiential Learning (RPEL), as these were not sufficiently detailed in the QA Manual. Discussion clarified that Programme Leaders act as RPL mentors at BIM TU. However, the panel is of the view that further documentation of policy and procedure to ensure consistent and fair application of these requirements is needed.

The panel discussed transfer and progression routes with the provider. BIM TU representatives acknowledged the contextual implications of some of their programme offerings. Some short course, SPA awards offered by BIM TU are designed to develop specific and discrete skills for use in industry, and to assist learners in finding work or making progression within their workplace. This was acknowledged to make integration of progression routes across all BIM TU programmes a challenge, but viewed as easier within longer programmes offering more logical progression opportunities. The need for new programme design at BIM TU to incorporate transfer and progression opportunities at the design stage was noted. The panel's overall feedback to BIM TU in regard to this aspect of its QA is reflected as a *Mandatory Change* (6.1.6) in this report. This requires the development of a formal Access, Transfer and Progression (ATP) policy, with documented and separate processes for RPAL and RPEL. The panel also noted during discussions that QQI policies and procedures were not explicitly referenced in the provider's QA Manual in relation to the key area of ATP, and advises that this could be usefully addressed in the process of revision.

Within BIM TU's structure, Programme Boards are to be established for larger programmes. In discussion with the panel, these were identified as the bodies with responsibility for oversight of the learning experience. The provider identified that learner input will be sought to programme boards, with class representatives to be nominated for each programme on the basis of election, selection or other processes. Programme boards will review metrics including learner and trainer evaluations of programmes.

When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were of the view that the work undertaken by the provider had addressed their initial concerns. In the interim period, the provider had developed an Access, Transfer and Progression policy and included this within the QA Manual. The panel also identified a further item of specific advice pertaining to RPL that is relevant to this dimension of QA (see Section 6.3).



4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

The panel is satisfied overall that QQI's QA guidelines within this dimension of QA have been met by BIM TU. QQI's 2016 Core Statutory Quality Assurance Guidelines require QA systems to be in place for the provider to assure itself as to the competence of its staff. These should encompass fair and transparent recruitment, further professional development and the maintenance and enhancement of pedagogic standards for teaching staff.

During the panel's discussions with the provider, BIM TU overviewed how BIM's overall organisational development strategy guided analysis of business needs. This process identified skills gaps and the need for either new positions or new individuals in roles across the organisations. Where skills could not be located within the organisation or via direct recruitment, consultants and technical assistants could be engaged. Staff at BIM have twice yearly performance reviews, during which individual CPD needs may be discussed or agreed. Performance reviews of pedagogic staff are conducted by college principals. Within new programmes, programme observations are also conducted by programme leaders. Discussion indicated this was periodic, and would be undertaken early in the implementation of a new programme as well as potentially occurring at random or in response to complaints or feedback.

Tutoring staff at BIM are required to have pedagogic or training qualifications, for example, 'train the trainer' certification. However, generic CPD and ongoing training around pedagogy at BIM TU has been identified by the provider as a gap, and this is an element of the provider's quality improvement plan. Plans for this will be informed by Programme Boards and discussed at the T&DSC. Currently, twice yearly instructor meetings provide an opportunity for knowledge exchange and sharing between tutors. The panel noted during discussion that this relatively informal process could benefit from being captured and shared in a more structured manner.

**5 TEACHING AND LEARNING****Panel Findings:**

This dimension of QA requires the quality of the learning experience to be monitored on an on-going basis, and that there are processes in place to ensure that the content of programmes reflects advances in the relevant disciplines as well as best practice in pedagogy. QQI's 2016 Core Statutory Quality Assurance Guidelines identify that providers should have procedures in place for providing adequate guidance and support, as well as dealing with learner complaints and appeals. This aspect of QA also requires providers to take account of appropriate learning environments for specific programme learning outcomes.

During the site visit, the panel discussed how teaching staff at BIM TU are guided in relation to institutional teaching philosophies or approaches. Programme leaders provided that guidance, with new trainers inducted by programme leaders or, if required, by the Quality Officer. In advance of the site visit, BIM TU submitted a document to the panel indicating a review of teaching, learning and assessment strategies was underway across all programmes, based on the experience of designing strategies for the recently validated diving and fishmonger skills programmes. This document indicated that the incorporation of the principles of Universal Design for Learning (UDL), industry field trips and self-directed learning would be elements of that strategy. The panel was of the view that this aspect of BIM TU's programme provision would be enhanced by the articulation of a clear, overarching Teaching, Learning and Assessment (TLA) strategy for the provider, to which programme specific strategies could align. This was reflected as an item of *Specific Advice* in this report (6.2.3).

A further item of specific advice relevant to this dimension of QA (6.2.8) pertained to the complaints procedure within the QA Manual. The panel advised that this should be clarified to outline that it pertained to complaints about students in addition to complaints from them.

When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were pleased to note progress made in relation to both items of *Specific Advice*.



6 ASSESSMENT OF LEARNERS

Panel Findings:

QQI's 2016 Core Statutory Quality Assurance Guidelines require a provider's assessment framework to establish the provider's philosophy on, and approach to, the assessment of learners. Policies and procedures must also address how assessment supports effective teaching and learning, and ensure that feedback on assessment outcomes is provided to students in an appropriate and timely manner. The security and integrity of assessment processes must be incorporated into procedures and systems. Processes for complaints and appeals must be straightforward, efficient, timely and transparent.

As discussed in Section 5.5 of this report, the panel was of the view that development of an overarching TLA strategy would strengthen and inform pedagogic practices and programme design at BIM TU. This needed to include an outline of the provider's approach to assessment, related directly to its disciplinary contexts and learner cohorts. A document submitted to the panel in advance of the site visit identified that a provider-wide approach to the provision of formative feedback to learners would be a feature of the strategy in development. Discussions during the site visit identified that formative feedback was a feature of current practice, often in the form of immediate verbal feedback to learners during skills demonstrations. The panel supported BIM TU's intention to formalize their approach in this area, noting that formative assessment supports both assessment for learning and assessment of learning, and is central to a learner-centred approach.

Within the provider's current QA Manual, there is evidence that BIM TU has given appropriate attention to policy and procedure ensuring assessment security and integrity. However, the panel notes that current policies and procedures do not outline a formal process for rechecks and reviews distinct from the appeals procedure. Addressing this omission is a *Mandatory Change* (6.1.4) in this report. When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were of the view that the work undertaken by BIM TU had addressed this concern, and that distinct procedures were in place.

**7 SUPPORT FOR LEARNERS****Panel Findings:**

Following QQI's 2016 Core Statutory Quality Assurance Guidelines, providers are required to provide supports for learners that are fit for purpose and accessible. Learners must be informed about the range of services available to them and surveyed annually for their impressions of learning resources and supports. Services such as library, information, and computing, as well as academic and non-academic supports must be regularly reviewed for their adequacy and effectiveness. Mechanisms for learner representation must be in place for learners to make representations to the provider about general matters of concern.

During the site visit the panel discussed the range and focus of the provider's supports for learners with BIM TU representatives. At the time of the site visit, learners at BIM TU had access to facilities that were serviced by wifi. They could also access and use computer suites and study spaces at night. There were library resources. Some programmes utilised physical on site resources, while in others course notes were available for access in advance. BIM TU was commended for its proactive approach to accessibility, demonstrated in its commitment to align to the principles of UDL. Implementation of the principles of UDL enhance the learning experience for a diverse cohort and complement the provider's policy and procedure pertaining to reasonable accommodations.

During the site visit the panel sought to understand how learners could seek and receive academic or non-academic support, and how they would be made aware of the supports available to them. Provider representatives indicated that for all academic queries trainers were the first point of contact. For non-academic issues, administrators and principals were available. All learners experience an induction to BIM TU at the outset of their programme. Provider staff noted that induction includes discussion of issues such as bullying and harassment as well as course overviews and assessment information. Induction was delivered via a uniform presentation shared across all locations. Complementary information was provided in a learner handbook. Some information and resources were also left in student common rooms to enable easier access.

During these discussions, BIM TU representatives discussed plans to roll out further training in relation to plagiarism and academic integrity, and the need to integrate learning how to learn training to induction for their learners. The panel observed that in discussion with BIM TU representatives during the site visit, a comprehensive range of supports were described by staff. Not all of these were included or outlined in detail within the current QA Manual, and the panel therefore included an item of *Specific Advice* (6.2.4) in this report in relation to this.

The panel also explored how the learner voice was captured at BIM TU. A number of feedback and monitoring mechanisms were in place, and were outlined to the panel. However, BIM TU representatives acknowledged that there may have been a gap in the outlined structures for governance and management of academic decision-making in relation to learner representation. The need to address this was reflected in this report as a *Mandatory Change* (6.1.3).

When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were of the view that the work undertaken by BIM TU had largely addressed their concerns in this area. The panel also identified a further item of specific advice relevant to this dimension of QA (see Section 6.3).



8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

Within this dimension of QA, providers are required to ensure that reliable information and data are available for informed decision-making, and that controls and structures are in place to generate data and reports which are communicated to staff and management for self-monitoring and planning purposes. Learner information systems should be capable of maintaining secure learner records for current use and historical review.

During the site visit, BIM TU representatives discussed the organisation's planned transition from data stored in hard copy to an electronic learner management system. At the time of the panel discussions, options for this were being actively explored, and some student data remained dispersed in physical locations. BIM was the data controller for BIM TU, and BIM had retained external expertise to ensure the organisation's data compliance.

Following these discussions, the panel included two items of *Specific Advice* in relation to this dimension of QA. These related to the transition to an enhanced centralised and electronic student record system (6.2.6) and the inclusion of specific reference to data protection legislation and the role of the data controller in the BIM TU QA Manual. When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were pleased to note progress made in relation to both items of *Specific Advice*.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

QQI's 2016 Core Statutory Quality Assurance Guidelines require that providers have policies and procedures to ensure that the information published is clear, accurate, objective, up to date and easily accessible. This encompasses the publishing of QA procedures and ensuring that relevant programme and award information is made available to prospective and current learners.

During the site visit the panel sought to understand what information BIM TU currently published, and planned to publish, and who within the organisation had oversight of provision of information to learners. BIM TU representatives indicated that pursuant to approval by QQI, key policies with relevance to stakeholders in the new QA Manual would be available externally via the website. BIM TU also indicated that while ultimate responsibility for information provision sat with the QA Officer, functional responsibility for this was dispersed throughout the organisation. Discussion indicated that this could usefully be reflected in the relevant section of the QA Manual.

**10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING (incl. Apprenticeships)****Panel Findings:**

Within this dimension of QA, QQI's 2016 Core Statutory Quality Assurance Guidelines require that partnerships and collaborations be organised through reputable bodies and subject to appropriate internal and external QA procedures. Where external partnerships or second provider arrangements are in place, QA procedures must be in place to cover these arrangements, and must include due diligence on the reputation, legal status, standing and financial sustainability of any such parties.

Discussion with the panel on the day of the site visit indicated that BIM TU did not engage in collaborative provision relationships as a first provider, and if acting as a second provider operated under the QA procedures of the first provider. While criteria for entering into arrangements with other providers were outlined in discussion, this information was not indicated in the current QA documentation. Further development was therefore required to align information in BIM TU's QA Manual with QQI's requirements. The panel was of the view that greater formality and clearer definitions were required in this area. This was reflected in this report as a *Mandatory Change* (6.2.9). When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, this had been appropriately clarified by BIM TU in the documentation submitted.

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

QQI requires self-evaluation and self-monitoring to encompass measures that include learner satisfaction and completion/certification rates. Quality systems should monitor the provider's progress against objectives and be carried out at specified intervals. Findings from self-monitoring and self-evaluation reports should be issued to produce quality improvement plans.

During the site visit, the panel sought to understand which of the proposed panels within the governance and management structure would feed the most information to the T&DSC for review. Discussions indicated that while self-evaluation, monitoring and review were a priority for BIM TU, the exact processes surrounding this would be impacted by the decisions under consideration in relation to its structures for academic decision-making (see Section 5.1). A systematic schedule of QA reports had not yet been developed, as this would align to the Terms of Reference and designated roles within that evolving structure.

Following these discussions, the panel included an item of *Specific Advice* in relation to this dimension of QA. This related to developing a schedule of reports (6.2.5). When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements in this area, the panel were pleased to note progress made in relation to this item of *Specific Advice*.

Evaluation of draft QA Procedures - Overall panel findings

The panel again notes and commends BIM TU for its open engagement, and the constructive and positive tone of discussions during the site visit.

The panel initially noted that the provider had gaps to address in relation to the documentation of its academic governance and decision-making processes, and the documentation of its QA more broadly. These were reflected in this report as *Mandatory Changes*. The panel additionally noted items of *Specific Advice*. Although not mandatory, it was the panel's view that these recommendations would support and strengthen internal processes at BIM TU in its ongoing provision in the sector.

While the panel was not in a position to recommend approval of BIM TU's QA policies and procedures at that time, it was confident that with an increase in capacity surrounding QA the provider would be able to effectively address the existing gaps within a six month period.

When the panel reconvened in June 2020 to undertake a desk review of BIM TU's enhancements, the panel were pleased to offer a further commendation to the provider on the progress made in refining and clarifying its documented QA. The panel felt that this area of BIM TU's submission had significantly improved in the interim period.



Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following mandatory changes and specific advice were identified at the conclusion of the site visit on 25th September, 2019 by the Panel. The Panel reconvened in June 2020 to evaluate evidence submitted by BIM TU in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that BIM TU has addressed the issues set out in Section 6.1 below, and made progress on the items in Section 6.2.

6.1 Mandatory Changes

- 6.1.1 Clarify academic decision-making and governance structures within the QAM, including the relationship between the T&DSC and BIM Board and the training unit. This should clearly show a separation of responsibilities between those who develop, recommend and approve key decisions.
- 6.1.2 Articulate in the QA manual the membership and terms of reference of the T&DSC and each of the panels, and the reporting from these panels to the T&DSC.
- 6.1.3 Include the learner voice, for example through representation, in key academic governance and decision-making entities including the T&DSC and in self-evaluation, monitoring and review processes.
- 6.1.4 Develop and document a formal process of recheck and review as a stage that is separate from the appeals process.
- 6.1.5 Clearly differentiate between policies and procedure in the QAM.
- 6.1.6 Develop a formal ATP policy for BIM Training Unit. RPL procedures should have documented and separate processes for recognition of prior certified and prior experiential learning.
- 6.1.7 In addition to the oversight role of the QA officer as outlined in the QAM, clarify in the QAM the devolved QA roles and responsibilities of all key personnel including college principals and programme leaders.
- 6.1.8 Appoint an appropriate individual to the role of QA officer, to take responsibility for oversight, coordination and implementation of QA systems.
- 6.1.9 Clarify in the QA manual that BIM will only operate under the approved collaborative, joint and transnational procedures of other providers. The criteria for entering into collaborative provision, and the approval processes, should be detailed in the QA manual. Formal collaborative agreements must be in place for all collaborative programme provision.

6.2 Specific Advice

- 6.2.1 Redesign the graphic representation of the structures of academic governance and decision-making to accurately reflect the QA system.
- 6.2.2 Present key procedures in diagrammatic form in the QA manual, for example new programme development, plagiarism/academic misconduct, reasonable accommodation, assessment guidelines, trainer evaluation and monitoring.
- 6.2.3 Develop an overarching TLA strategy for BIM TU.
- 6.2.4 Document in more detail the full range of academic and non-academic resources and supports which are available to learners.
- 6.2.5 Develop and document a schedule of reports that are considered periodically by the T&DSC and its constituent panels, and a schedule of reports for publication.



- 6.2.6 Put in place a centralised electronic student record system.
- 6.2.7 Include specific reference to Data Protection legislation and the role of the data controller in the QA manual.
- 6.2.8 Clarify in the QA manual that the complaints procedures apply to all complaints from or about students.

6.3 Further Specific Advice

The following items of further *Specific Advice* were offered to BIM TU by the panel at the conclusion of its meeting in June 2020.

- 6.3.1 BIM TU is advised that the QA documentation needs to clarify the relationship between the TAD and other committees or units within BIM TU, e.g. the PAP and RAP. This could usefully differentiate between ‘dotted line’ communication channels and reporting lines, and identify whether reports are submitted for noting or for approval.
- 6.3.2 BIM TU is advised that the composition of the TAD needs to be adjusted to include representatives of academic staff from within the organisation, given that the TAD takes responsibility for elements of academic decision-making and quality assurance.
- 6.3.3 BIM TU is advised that there is a gap within its academic committee structure in relation to the oversight of teaching, learning and assessment, and the oversight of quality and the quality documentation. Establishing a further academic committee with this remit is strongly recommended.
- 6.3.4 BIM TU is advised that it is appropriate to include currently enrolled learners at the Programme Board and TAD. In the absence of a currently enrolled learner from the programme under discussion at a Programme Board, inviting a currently enrolled learner from another programme to offer a learner voice is also appropriate. In the absence of availability of a currently enrolled learner, the inclusion of a recent graduate (i.e. under 24 months) is appropriate.
- 6.3.5 BIM TU is advised that an explicit procedure for RPEL should be included within the SOP, even if rarely used within BIM TU, and whether it is for credit or for access. Further, this procedure does not need to be reproduced at programme level if an institutional policy exists, streamlining the QA processes. RPAL and RPEL procedures should identify for learners where the contact point is within the provider.
- 6.3.6 BIM TU is advised that despite substantial progress in the quality of its documentation (which is commended by the panel) the suite of documents requires further proofing to ensure consistency of information across charts, appendices, policies and procedures.
- 6.3.7 The panel encourages BIM TU to continue development of diagrammatic representations of key procedures.
- 6.3.8 The panel encourages BIM to progress its implementation of a centralised electronic student record system as a priority.

Part 7 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
5 – 6	Major, Minor, SPA	Engineering, Marine & Aquaculture, Diving, Seafood Processing and Retail



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Part 8 Approval by Chair of the Panel

This report of the panel is approved and submitted to QQI for its decision on the approval of the draft Quality Assurance Procedures of *Bord Iascaigh Mhara*

Name: _____

Date: 13 July, 2020



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

Document	Related to
Bord Iascaigh Mhara Statement of Strategy	General QA Re-engagement
Governance of BIM Training Unit (Diagram)	General QA Re-engagement
New Programme Development (Diagram)	General QA Re-engagement
Dealing with Incidents of Suspected Plagiarism (Diagram)	General QA Re-engagement
Reasonable Accommodation Procedure (Diagram)	General QA Re-engagement
Trainer Evaluation & Monitoring (Diagram)	General QA Re-engagement
BIM Skills Unit – Organisational Chart	General QA Re-engagement
Presentation by BIM TU to Panel for QQI Re-engagement Panel Meeting	General QA Re-engagement

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

Name	Role/Position
Ian Mannix	Manager, Training Unit and Head of Centre
Cathleen Hartnett	QA Advisor
Shane Begley	Principal, National Fisheries College, Castletownbere
Brian Vaughan	Principal, National Fisheries College, Greencastle
Maria McCarron	College Administrator, National Fisheries College, Greencastle
Eileen Soraghan	Trainer and Programme Leader
Margaret Campbell	Director of Corporate Services, BIM

Appendix: Provider response to the Reengagement Panel Report

Ms. Marie Cotter
Quality and Qualifications Ireland (QQI)
26/27 Denzille Lane
Dublin 2.
D02 P266

30th July 2020

RE: Reengagement Panel Report

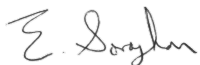
Dear Marie,

BIM is very pleased that the Reengagement Panel have indicated that the required enhancements of our Quality Assurance System have been achieved and that they are recommending approval of our draft QA procedures.

BIM has reviewed the additional, specific advice given in section 6.3 of the Panel Reengagement Report and we have attached an action plan outlining how we intend to address these recommendations. We have also attached the completed factual accuracy feedback form with just one requested change.

We would like to take this opportunity to express our sincere thanks to the Reengagement Panel for their time, expertise and advice. We would also like to thank QQI for their support and professionalism through this reengagement process.

Yours sincerely,



Eileen Soraghan

Quality Officer