



Initial Access to Validation Quality and Capacity Panel Report

Assessment of Capacity and Approval of QA Procedures

This report documents the findings of a panel convened to make a recommendation on approval of the quality assurance (hereafter QA) procedures of the City Education and Learning Group Ltd. The panel, appointed by QQI, first met with the provider on 06 July, 2018, and following that meeting recommended that the provider's application be refused pending mandatory changes to be implemented within a six month period. The panel reconvened on 07 May, 2019 to review the provider's resubmitted draft QA manual and meet for a second time with the provider's representatives. This report preserves the findings of the panel's original engagement with the provider on 06 July 2018. It then documents the findings of the panel following the 07 May, 2019 meeting.

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	6 th July 2018 - City Colleges Group 7 th May 2019 - City Education and Group Ltd.
Address:	38-40 Parliament Street, Dublin 2.
Date of Application:	7 th June 2018 rev 24 April 2019
Date of evaluation:	6 th July 2018 and 7 th May 2019
Date of recommendation to the Approval and Review Committee:	20 th September 2019 and 20 th June 2019

1.2 Profile of provider

Profile of the provider following the original re-engagement meeting – 06 July 2018

City Colleges Group (CCG) is made up of four distinct Colleges: City Colleges, the College of Progressive Education (CPE), Ashfield College and Chapterhouse Dublin. The Group delivers a diverse range of second and third-level, academic and professional training and education programmes. City Colleges has traditionally focused on the delivery of professional programmes in law, accountancy and psychology, while the College of Progressive Education specialises in Further Education Training. Ashfield College is exclusively a provider of second level education, and Chapterhouse Dublin is an English language school.



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The Group currently delivers professional courses online to learners in Australia, Canada, France, Italy, Latvia, Romania, Singapore, the United Kingdom, and the United States, and has an office in Greenwich, London. The Group encompasses a 3,500 global student body supported by 151 full time equivalent staff. The City Colleges Group has an established record of successful collaboration with accrediting bodies including City & Guilds, UCD, Froebel College of Education, the Psychological Society of Ireland, Northern Council for Further Education and Association of Chartered Certified Accountants. The CPE has been delivering FETAC /QQI validated programmes since 2003.

The Group has had significant student success and recognition including an Ashfield College student receiving best Leaving Certificate result in 2017; 1st prize winners in the Law Society FE1 exams and six 1st place prize-winners in the 2017 ACCA exam sittings. City Colleges received the Excellence and Training Award at the 2018 Irish Accountancy Awards. CCG has previously operated separate quality assurance and standards arrangements in each of the respective Colleges.

Reflecting the strategic aspiration to deliver degree level programmes in Accounting, Law, Business, Psychology, ECCE, the Group recently undertook a Quality Assurance approval process with The University of Chester and have been approved to deliver a degree programme in Accounting and Finance.

Profile of Provider following the second panel meeting – 07 May, 2019

The panel notes the following changes to the provider profile, which occurred in the period between the panel's first and second site visits. These were set out by the provider's CEO during a presentation on May 7, 2019, and also provided to the panel in writing.

At the time of the initial submission, the provider group was referred to collectively as the City Colleges Group (CCG), which comprised of City Colleges, the College of Progressive Education (CPE), Ashfield College and Chapterhouse Dublin in the panel's report dated 20th September 2018. Following discussions between the provider representatives and Quality and Qualifications Ireland (QQI), it was decided that the legal entity that will engage directly and exclusively with QQI moving forward is the City Education and Learning Group Ltd (CEG). CEG is a holding company, and will act on behalf of its three subsidiaries, City Colleges (incorporating Ashfield College and City Colleges), Progressive Education Limited (trading as The College of Progressive Education) and Malvern House Ireland Limited (trading as Oscars International). Oscars International replaces Chapterhouse Dublin as the group's English Language Education (ELE) provider.

It should be noted that this change does not impact the substance or scope of the provider group's original submission for approval, or resubmission following the six-month period allocated for implementation of mandatory changes. References to the provider group as CEG herein are therefore contiguous with references to CCG in the previous report.



Part 2 Panel Membership

Name	Role of panel member	Organisation
Jack O’Herlihy	Chair	Independent Expert Retired Head of Development in Letterkenny IT
Prof. Aideen Long	Higher Education Representative	Professor in Molecular Medicine and former Dean of Graduate Studies, Trinity College Dublin
Prof. Denis Ryan	Higher Education Representative	College Director, Irish College of Humanities & Applied Sciences
Anne Higgins	Further Education Representative	Centre Director, GRETB
Carol Lacey	Secretary 06 July 2018 Panel Meeting	Education and Quality Assurance Consultant
Dr Catherine Peck	Secretary 07 May 2019 Panel Meeting	Education Consultant

The following change to the composition of the panel is duly noted. Ms Carol Lacey attended the first meeting of the panel on 06 July 2018 in the role of Secretary, and did not attend on 07 May 2019. Dr Catherine Peck was not present for the panel meeting on 06 July 2018, but attended in the role of Secretary on 07 May 2019.



Part 3 Findings of the Panel

3.1 Summary Findings

Findings of the panel following the original re-engagement meeting - 06 July 2018

The Panel's role is to evaluate the capacity of City Colleges Group (CCG) to provide quality education and training to learners in the context of the education and training provision proposed. Core to this consideration, the panel is required to evaluate the draft quality assurance procedures and supporting infrastructure submitted by CCG.

The overall impression of the panel is that while the documentation is well presented, CCG is still in the initial phase of implementation of its strategy to amalgamate and integrate a single unified Quality Assurance Framework throughout the Group while recognising the specific requirements of QQI and the distinct needs and nuances of Further, Higher and Professional Education.

A key characteristic of the QQI requirements is for a quality assurance system to reflect on itself. The Self-Assessment Report and panel meeting provide an opportunity to illustrate the journey an organisation has travelled in implementing its unique Quality Assurance System (QAS) based on QQI requirements, its implementation plans and how prepared it is to meet its future challenges. The panel concluded that CCG had not progressed sufficiently on this journey as the materials were at times overly generic, lacking QQI specifics coupled with evidence of adequate distinction between corporate and academic interests, appropriate reporting and resourcing. A more reflective process needed to be demonstrated in the Self-assessment Report to illustrate what issues the process and the QAS itself had elicited and how CCG would address the emerging issues.

Findings of the panel following the second panel meeting – 07 May, 2019

The focus of the meeting on 07 May 2019 was to evaluate how effectively CEG had responded to the *mandatory changes* (see section 6.1) to its QA that had been identified by the panel following the 06 July 2018 panel meeting. The panel also took this opportunity to discuss CEG's approach to *advised changes* (see section 6.2) that had been concurrently identified. During the meeting, the panel heard from the provider's representatives regarding the impact that implementation of these changes had had on CEG's staff development and organisational culture.

The panel commends CEG for the significant work the provider has undertaken in the six-month period allocated for implementation of *mandatory changes*. The provider has used this opportunity to undertake a substantial internal review and has made significant changes to corporate and academic governance structures. The provider's resubmitted QA documentation included appropriately detailed evidence of these structures, including terms of reference, membership and reporting lines. During the meeting CEG



also presented its internal process for programme development to the panel and used one specific programme currently under development to exemplify the process in action. Further documentation pertaining to programme design and approval was provided to the panel during the site visit to supplement this presentation.

The panel further notes that the provider's staff have displayed a constructive attitude following the disappointment of the previous meeting outcome. An openness to feedback and willingness to engage in self-reflection has been consistently demonstrated in the provider's interactions with the panel and in its evident commitment to internalizing QA. Consequently, following review of CEG's resubmitted documentation, as well as the presentations by and meeting with senior CEG staff, the panel is satisfied that it can now recommend to the Programmes and Awards Executive Committee of QQI that CEG's draft QA procedures be approved.

This recommendation notwithstanding, the panel has identified several specific advices to CEG's QA procedures. These are outlined in section 6.2 of this report.

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

Recommendation of the panel following the original panel meeting - 06 July 2018

The panel's recommendation to QQI is that it refuse to approve this application but with recommendations i.e. the panel is confident of the provider's capacity to address the issues identified and that it should be given the opportunity to make the necessary amendments and reapply within six months of the decision date.

This recommendation reflects the panel's view that while the provider has the intent and capacity to deliver quality programmes, it needs to substantially develop its academic and corporate governance structures and provide greater detail in some quality assurance procedures to more fully QQI Guidelines and expectations.



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Recommendation of the panel following the second panel meeting – 07 May, 2019

	Tick <u>one</u> as appropriate
Approve CEG's draft QA procedures	<input checked="" type="checkbox"/>
Refuse approval of CEG's draft QA procedures pending mandatory changes set out in Section 6.1 <small>(If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)</small>	<input type="checkbox"/>
Refuse to approve CEG's draft QA procedures	<input type="checkbox"/>



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

- 4.1.1(a) **Criterion:** *Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?*
- 4.1.2(a) **Criterion:** *Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*
- 4.1.3(a) **Criterion:** *Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*
- 4.1.4(a) **Criterion:** *Are any 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?*
- 4.1.6(a) **Criterion:** *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.*

Findings

Findings of the panel following the original re-engagement meeting – 06 July 2018

While the panel were satisfied that the legal and compliance criteria were broadly met CCG should address the following:

- it should be clear in the documentation that, where necessary, Protection for Enrolled Learners arrangements need to be put in place in advance of each programme validation application.
- The vision statement needs to be reviewed. As currently written the vision statement does not reflect the business strategy expressed by CCG during the panel discussions, nor is the orientation to commit to validating programmes on an Irish National Framework of Qualifications as stated.
- Information / declarations for influential non-owners need to be supplied.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel is satisfied that the legal and compliance criteria have been met.



4.2 Resource, governance and structural requirements:

- 4.2.1(a) **Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*
- 4.2.2(a) **Criterion:** *Does the applicant 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?*
- 4.2.4(a) **Criterion:** *Are there arrangements in place for providing required information to QQI?*

Findings

Findings of the panel following the original re-engagement meeting – 06 July 2018

The panel considered the lack of clarity in the relationships and distinctions between academic and corporate governance as a structural concern. Notwithstanding the challenges of running a small independent college where multiple roles are fulfilled by a small group of people there needs to be strong governance structures and safeguards in terms of the autonomy of academic decision making to protect academic integrity.

The panel recommend that CCG consider the following advice:

- Document the corporate governance structures, detailing for each board and committee its expected composition, terms of reference, reporting and accountability processes and relationships.
- The Chief Executive Officer carries ultimate responsibility for all CCG operations and management. The role of the CEO in academic affairs raises issues vis a vis interplay between commercial and academic interests. The governance structures should establish and demonstrate academic independence.
- The application states that the Academic Board enjoys autonomy, save when its decisions have significant commercial consequences when consent from the Management Board and Board of Directors are required. The role and responsibilities of the Academic Board needs to be clarified, as does the membership of the Board with reference to the balance between senior managers, academic staff and student representation. In the context of the independence of the Board the selection of the chairperson needs further consideration. Membership and reporting of each forum needs to be resolved to ensure the Academic Board has academic independence and oversight.
- The panel considered that the role of Advisory Board as a corporate governance body requires further development.
- Given the projected student numbers the panel consider it prudent for CCG to evaluate the organisation's capacity and resourcing to fulfil the projected numbers. The documentation presented projected three intakes per year while at the panel meeting this was reduced to 2. It was unclear how these projections had been deliberated and decided upon. They are very significant from both academic and commercial perspectives.
- Most senior staff of CCG appear to have multiple functions. The viability of this in the medium to long term needs to be considered.
- The CCG Quality Framework was scheduled to be rolled out over a two-year period commencing in December 2017. Information on the implementation plan and experience to date at the time of any



revised application would provide the panel with an insight into the organisation's experience, its understanding of QQI specific requirements and evidence of the reflection needed within the process.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel is satisfied that concerns regarding fit-for-purpose governance, management and decision-making structures have been broadly addressed. This is discussed in further detail in section 5.1 of this report.

4.3 Programme development and provision requirements:

- 4.3.1(a) **Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*
- 4.3.2(a) **Criterion:** *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*
- 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)?*
- 4.3.4(a) **Criterion:** *Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?*
- 4.3.5(a) **Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*
- 4.3.6(a) **Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*
- 4.3.7(a) **Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*

Findings

Findings of the panel following the original re-engagement meeting – 06 July 2018

The panel acknowledges considerable experience within the CCG; namely successfully delivering programmes accredited by other bodies and other programmes of short duration.

The panel also acknowledge the experience of CPE in programme development, under what was FETAC's programme development system, leading to awards in childcare at level 5 and level 6 on the NFQ.

CCG does not as yet have direct experience of developing and providing programmes at levels 7, 8 and 9. While several significant staff appointments have been made recently, the recruitment and embedding process is in an early stage. Coupled with the lack of clarity on the planned student intake, the panel was concerned about CCG's full understanding of the capacity implications of design and delivery of new degree level programmes.



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Findings of the panel following the second panel meeting – 07 May, 2019

Following the panel's second meeting with the provider's representatives, the panel is satisfied that CEG has made significant efforts to address its concerns regarding criterion 4.3.3(a), with reference to programmes at levels 7 and above. This is discussed in further detail in section 5.3 of this report.



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

Findings

Findings of the panel following the original re-engagement meeting – 06 July 2018

CCG has a strong record in programme delivery. However, the move from delivering well established, externally developed programmes to the end to end process of research, design, development, delivery and assessment with all associated QA processes underpinning the programme is a significant shift.

The panel recommend that CCG consider the following advice:

- Provide more evidence of institutional capacity to deliver the proposed plans i.e. a range of degree level programmes with multiple intakes per annum.
- Demonstrate more clearly, with referencing, the governance expectations as set out in QQI QA Guidelines.
- Explicitly illustrate in the Self-Assessment Report the reflective and evaluation process within the CCG quality assurance framework.
- The panel suggests one of the proposed new programmes is used as a trial run to stress test the QAS i.e. test out the effectiveness of the procedures relating to programme development and approval / governance by contemporaneous development of an application for programme validation.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel is satisfied that concerns raised in its original report pertaining to this criterion have been broadly met by the provider.

Within the provider's resubmitted QA documentation (specifically, the self-assessment report dated 11 April 2019) and during the second meeting of the panel, the capacity within CEG to engage in a reflective process of self-evaluation was evident.

Sections 5.1 and 5.3 of this report discuss how CEG has addressed concerns regarding the governance, design, development and delivery of programmes.



Part 5 Evaluation of draft QA Procedures submitted by City Colleges Group

The following is the panel's findings following evaluation of City Colleges Group's quality assurance procedures against QQI's Core and relevant Sector and Topic Quality Assurance Guidelines.

This section of the report follows the structure and referencing of the Core guidelines.

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

Findings of the panel following the original re-engagement meeting – 06 July 2018

The system presented contain documented policies and procedures for all relevant areas being quality assured. CPE is already a provider of programmes validated by QQI, but this was the first attempt to establish QA procedures across the whole group having regard to QQI guidelines. Three separate QQI statutory QA Guidelines are of relevance to this provider i.e. Core Guidelines, Guidelines for Independent / Private Providers and Guidelines for Blended Learning.

The panel is not yet satisfied that CCG's governance arrangements for maintaining the quality of programmes of education and training across the Group are sufficiently aligned with relevant QQI Guidelines.

The panel recommends that CCG consider the following advice:

- The over-representation of the SMT across each governance forum needs attention.
- The Academic Board was highlighted as the key guardian of academic integrity. Yet its composition, relationship within the corporate governance structure and bi/triannual scheduling is deemed too weak to fulfil its intention to safeguard academic and quality standards. As the guarantor of academic standards, the role of the Academic Board, its composition, independence and authority need further consideration. It needs to be clear that the Academic Board structures are robust with the authority to hold to accounts its sub-committees and the various academic programmes, departments, examination boards etc.
- The CEO appoints the Chairperson of the Academic Board who is typically the Head of Quality/Director of Academic Development or another nominated senior staff member. Again, the panel was concerned that the Academic Board would be able to exercise academic independence.
- The precise role and composition of the Advisory Board needs further consideration.
- There should be a policy on the composition of boards and committees to ensure a diversity of representation and a balance between management and academic representatives, both full-time and part-time, learners and employers. Similarly, the composition of the various sub-committees and working groups of the Academic Board needs further articulation.
- The panel welcomed the commitment by CCG SMT to manage potential conflicts between academic and commercial interests in decisions making. However, as noted previously, while the governance structures are in place, the composition of each board and committee with a role in quality assuring programmes needs to be reviewed to ensure that appropriate outside expertise is added, clarifying key decision-making processes and where overall authority rests, with appropriate reporting and accountability and timely scheduling.



- The materials state, *'the Academic Board shall also have such other functions as may be determined from time to time and recommended by SMT and/or identified by CEO'*. This calls into question the independence of the Board with functions extended and curtailed by the SMT/CEO and merits reconsideration.
- The flow diagrams could be refined to communicate more succinctly the routes of decision making and governance with specific reference to the degree programmes proposed.
- There are multiple roles identified where the responsibilities and reporting lines should to be more clearly described e.g. Senior Registry Officer and Head of Quality, Director of Quality, Deputy Director of Quality/Director of Academic Professional.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been broadly met by the provider.

The provider has undertaken significant internal restructuring. This has notably included removing the CEO from the Academic Board and establishing a Board of Directors. During discussion, the panel noted that the provider's intent to have the Director of Quality chair the Academic Board was understandable in the short term, but that the provider should make efforts to have a member of the academic staff take up this role in the future (also noted as an advised change in section 6.2 of this report). The overrepresentation of the Senior Management Team on various boards and committees has been addressed, and reporting lines have been clarified. Overall, the panel is satisfied that the revised structure establishes appropriate conditions for academic decision making to take place independently of corporate influence.

Within section 2 of the CEG QA Manual (2019 edition) the Governance and Management Structures of the CEG group and its subsidiaries are clearly outlined. For CEG, further detail of the Senior Management Team, Advisory Board and Academic Board is provided. This detail includes membership, terms of reference and reporting lines, as well as the nature and frequency of meetings, quorum, procedures pertaining to agendas and minutes. Additional information has been provided outlining the subcommittees of the Academic Board.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

Findings of the panel following the original re-engagement meeting – 06 July 2018

While the panel commend CCG on the work undertaken to develop the Quality Framework thus far and the commitment illustrated during the panel meeting, it was concerned that further development is required to adequately reflect the QQI Guidelines.

The panel recommend that CCG consider the following advice:



- The Quality Manual and Regulations overly rely on generalised statements referring to processes and procedures from course design to delivery encompassing requirements of professional bodies, university partners and QQI. In trying to cover too many stakeholders across a group with distinct learner cohorts it is unclear how relevant policies are to be applied. The QQI QA guidelines need to be more specifically visible within the policies and procedures.
- The entire quality cycle covering programme design to graduation should be more clearly visible i.e. how it all fits together. This might best be done graphically with references to documented procedures.
- Standardisation across the Quality Manual and Regulations is required. If the same policies and procedures are to apply to both higher and further education and training, they need to reflect this. Currently the Regulations have a higher education and training orientation.
- The complaints and academic/non-academic appeals process and procedures need to be streamlined with the learner in mind.
- Ensure that all policies and procedures adhere to the stated goal of guidance and easy access for staff. Consider an internal communication plan for implementation once the procedures are approved.
- The documents referred to quality assurance key performance indicators (KPIs) but these were not documented.
- The lack of evidence in the Self-Assessment Report of a self-reflective process regarding the application materials raised concerns about the ability to critically self-evaluate. For example, it is stated in the application that *“evaluation of staff performance and the encouragement of innovation in pedagogy... is being standardised from January 2018”*. As part of the Self-Assessment process it would be very beneficial to the panel if CCG reported on the findings of such evaluations.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG’s resubmitted QA documentation and the panel’s second meeting with the provider’s representatives, the panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been broadly met by the provider.

Efforts have been made to avoid overly general references to processes and procedures, and in many areas of the provider’s resubmitted documentation (particularly in relation to governance structures and programme development processes) significantly more detail is evident. This detail reflects not only better articulation of procedures, but the substantial further development of these undertaken by the provider within the six-month period allocated for implementation of *mandatory changes*.

However, the panel notes that errors in formatting and cross-reference to other sections of the document remain frequent and problematic in the CEG QA Manual (2019 Edition). An indicative example of this can be found on p. 31, where the reader is referred to section 8.24 for further detail on the Board of Examiners. This section can be found under 8.23 on p. 187. In multiple areas, numbering of sections is inconsistent, as can be seen on pp. 31 – 33. Additionally, typographical errors are present. These errors undermine the usefulness of the document as a readily accessible resource for staff and learners at CEG, and should be corrected prior to the document entering the public domain. This is an *advised change* listed in section 6.2 of this document.



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

Findings of the panel following the original re-engagement meeting – 06 July 2018

The panel considered the documentation on programme development, management and assessment and the corporate governance processes underpinning them to require further development.

The panel recommend that CCG consider the following advice:

- Document the composition of the Programme Design Teams, Programme Teams, Senior Management Team and their interplay with the Programme Management Committee and Academic Board.
- Document the academic governance structures / process(es) involved in each stage of the programme design and development process.
- Develop indicators to enable those responsible for the various stages of the programme life cycle to monitor and report on the effectiveness of activities. Explain how the indicators will be used.
- The Quality Manual needs to more specifically reference access, transfer and progression processes.- Taking one of the proposed courses, summarily and/or graphically describe how it will be taken from design to internal approval, QQI validation, delivery and graduation of a cohort of students in terms of educational and quality assurance processes.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been broadly met by the provider.

CEG has taken on board the panel's advice in section 6.2 of the previous report, to:

“Test out and refine the revised QA processes for programme development and approval. The College of Progressive Education's FET programmes and / or the HET programmes to be developed for validation could provide the 'raw material' to put through the processes”

During the second panel meeting, CPE's Academic Director presented the CEG programme design and approval process in detail, using the example of a level 7 programme in development at the provider. The learning that had taken place within the organisation as a result of this process was evident. Supplementary documentation outlining the process and its use was also provided to the panel members.



4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

Findings of the panel following the original re-engagement meeting – 06 July 2018

The panel was generally satisfied with the documentation on staff recruitment, management and development. It was also recognised that CCG has made a significant number of high-level appointments which will take time to settle into the organisation and it is an organisation undergoing significant change.

The panel recommend that CCG consider the following advice:

- The challenges faced by all institutions in adequately engaging and supporting part time staff in internal quality assurance systems is arguably more acute for CCG given its FT/PT staff numbers. The documentation should demonstrate how the panel of p/t staff will be kept informed and involved in quality assurance processes e.g. programme planning, monitoring and review.
- A “very robust teacher/lecturer/tutor recruitment process” is noted. More detail of this process would be beneficial.
- Include more details on how
 - peer observation of teaching is to be implemented.
 - third party assessors, who are not employees, are to be managed and developed in accordance with CCG’s QA policies on staff management and development.
 - all new members of staff receive professional advice and feedback on their progress during the early months of employment from the College Dean or CEO.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG’s resubmitted QA documentation and the panel’s second meeting with the provider’s representatives, the panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been broadly met by the provider.

Details of how peer observation is to be implemented at the provider are contained within the Peer Observation Handbook, submitted as part of the provider’s documentation ahead of the second panel meeting. Within the provider’s QA Manual (2019 Edition), performance review and appraisal procedures are outlined in sections 10.1 – 10.3. The recruitment, management and role of external examiners are discussed in section 8.



5 TEACHING AND LEARNING

Panel Findings:

Findings of the panel following the original re-engagement meeting – 06 July 2018

The panel concluded that the documentation on Teaching and Learning needed further detail. While accepting that programme specific strategies and policies would be developed to support individual programmes, the overarching policy needs to more closely align with QQI guidelines.

The panel recommend that CCG consider the following advice:

- The Teaching Strategy as presented, while committing to excellence, is not useful in terms of providing guidance. CCG require an explicit Teaching and Learning Strategy which will inform the development of each programme.
- The panel was of the view that the overall thrust and emphasis of the documentation reflected a HET approach with resulting inconsistencies and deficiencies in FET representation. The SMT acknowledged the significant task of addressing four distinct approaches and cultures across the Group. A clearer vision of what standardisation of Teaching and Learning across the Group will look like needs to be articulated.
- The monitoring and reporting cycle of Teaching & Learning in action needs to be expressed more clearly.
- CCG has considerable experience in delivering Blended Learning for short education programmes. The approach to Blended Learning as it will be deployed in degree programmes and how it will be quality assured are not clearly documented. QQI's new QA guidelines for Blended Learning should be used to inform the development of policy, teaching and learning strategy and QA for programmes which involve blended learning.
- A key aspect of the current Strategy is 'scholarship activity undertaken by teaching and support staff'. Greater clarity as to what form(s) this will take would more clearly illustrate its role and value to the CCG staff and student body.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been somewhat met by the provider.

A Teaching, Learning and Assessment (TLA) strategy document has been developed by CEG, and is presented alongside a suite of graduate attributes within the resubmitted QA documentation. Discussion of the TLA strategy's development during the site visit indicated that the process had invited input through consultation with staff at various levels of the organisation, and had provided the Senior Management Team with an internally cohesive direction to guide practice in this area. Monitoring and review practices are included within the CEG Quality Manual (2019 Edition).

The Panel noted the commitment to Quality Assured Blended Learning by CEG. While the written articulation of its policies and procedures needs to be strengthened, the Panel interrogated and was re-



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assured by the Provider representatives of its commitment and capacity to deliver Quality Assured Blended Learning at the site visit. However, the panel remains concerned that CEG's written articulation of its approach to the delivery of Blended Learning needs to be further developed in its current draft QA, and this is noted as an *advised change* in section 6.2 of this report.

**6 ASSESSMENT OF LEARNERS****Panel Findings:****Findings of the panel following the original re-engagement meeting – 06 July 2018**

The deficiencies noted previously in relation to the academic governance of the teaching and learning processes extended to the assessment of learners.

The panel recommend that CCG consider the following advice:

- Assessment quality assurance procedures need to be more explicit, including how each stage would be quality assured with associated reporting.
- The governance of assessment needs further clarity including:
 - the appointment of Chair of the Assessment Examination Boards;
 - how conflict would be managed if consensus is not reached in this forum or if there is disagreement between Internal and External Examiners;
 - management of assessment malpractice.
- The responsibilities and remit of the Pre-Examination Board needs further clarity including its authority to change marks.

If there is to be any difference between the results approval processes for FET and HET, these differences should be made explicit.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been broadly met by the provider.

As discussed in section 5.1 of this document, deficiencies in relation to the academic governance of teaching and learning processes have been addressed through significant revision of the governance structure.

The provider has included substantial detail in relation to examination boards, the management of internal and external examiners and the management of assessment malpractice within the CEG Quality Manual (2019 Edition).

During the panel meeting the wording of some areas of CEG's documentation pertaining to appeals and reviews was raised by the panel. It was suggested that the provider carefully review QA policies and procedures for appeals and reviews to ensure their full alignment to section 4.10 of the QQI Assessment and Standards Document (Revised 2013), and this is an *advised change* in section 6.2 of this document.

**7 SUPPORT FOR LEARNERS****Panel Findings:****Findings of the panel following the original re-engagement meeting – 06 July 2018**

Learner support systems are in place, appropriate to each institution within the Group. The panel was broadly satisfied with the documentation provided.

The panel recommend that CCG consider the following advice:

- Capture and analyse data on the usage of the various learner supports provided to give a fuller understanding of the learner experience.
- Various sources of student feedback are documented; i.e. questionnaires, the student-staff liaison committee, programme management committee, access to Programme Leader/Module Tutors etc. It would be helpful to illustrate diagrammatically how the various sources feed into programme review and remedial actions where required.
- The Student-Staff Liaison Committee (SSLC) is identified as one unified committee with student representatives drawn from each programme and each programme stage. The panel were concerned how realistic this is given the disparate nature of the programmes being offered across a range of levels and suggested this is considered further.
- A review of the effectiveness of existing student supports and services within each constituent college would be helpful in illustrating CCG's Group wide awareness of the distinct needs of different cohorts of learners and how these are appropriately resourced and met.
- CCG should consider the needs of learners with learning difficulties/challenges and how they will be met.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel continues to be satisfied that this dimension of QA has been broadly met by the provider.

**8 INFORMATION AND DATA MANAGEMENT****Panel Findings:****Findings of the panel following the original re-engagement meeting – 06 July 2018**

The panel was broadly satisfied with CCG's approach to Information and Data Management while recognising it is in the early stages of being streamlined across the Group.

The panel recommend that CCG consider the following advice:

- The Quality Manual makes a generic reference to the 'relevant Data Protection Act' and compliance with same. In light of GDPR and Ireland's subsequent data protection legislation (Data Protection Act 2018) CCG should make explicit reference and compliance to same. In particular, policies in relation to data retention, destruction, student script access and destruction etc need to be documented.
- The Quality Manual should have more detail on how data / indicators relevant to quality are captured, managed and analysed.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel continues to be satisfied that this dimension of QA has been broadly met by the provider.

Information and data management procedures are outlined in section 11 of the CEG QA Manual (2019 Edition).

9 PUBLIC INFORMATION AND COMMUNICATION**Panel Findings:****Findings of the panel following the original re-engagement meeting – 06 July 2018**

The panel was broadly satisfied with the documentation provided by CCG in relation to Public Information and Communication.

The panel recommend that CCG consider the following advice:

- In the interest of transparency and in line with QQI policy, CCG should commit to publishing reports arising from the operation of its quality assurance procedures. The types of reports to be published should be identified e.g. Programme Reviews, Academic Board Reports and Annual School Reports.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel continues to be satisfied that this dimension of QA has been broadly met by the provider.



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10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING

Panel Findings:

Findings of the panel following the original re-engagement meeting – 06 July 2018

The documentation in relation to Other Parties involved in Education and Training primarily referenced benchmarking standards and accreditation against QQI, professional bodies and/or national and international partners.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG's resubmitted QA documentation and the panel's second meeting with the provider's representatives, the panel continues to be satisfied that this dimension of QA has been broadly met by the provider.

**11 SELF-EVALUATION, MONITORING AND REVIEW****Panel Findings:****Findings of the panel following the original re-engagement meeting – 06 July 2018**

In light of the challenges noted previously in relation to overall academic governance structures and the operation of the Quality Assurance Framework, the panel concluded that processes for Self-Evaluation, Monitoring and Review need further development to ensure a coordinated and coherent system of quality assurance providing useful information to the SMT and Academic Board.

The panel recommend that CCG consider the following advice:

– The QF set outs broad statements such as:

“In relation to academic and professional programmes, the achievement of academic and professional standards is monitored within quality processes at programme level through.....

The confirmation of academic and professional standards by external examiners/accrediting body moderators

Regular annual and/or periodic review monitoring

Regular formal reporting mechanisms”.

These assertions of commitment need to be buttressed by details of how review processes operate, are captured and analysed.

-There is an over reliance on the use of ‘benchmarking’ without satisfactory explanation as to how it would be carried out, how data is captured and analysed; reported to and actioned by who.

- Considering its overall responsibility for quality assurance, the Academic Board schedule of two/three meetings per year appears light.

Findings of the panel following the second panel meeting – 07 May, 2019

Following review of CEG’s resubmitted QA documentation and the panel’s second meeting with the provider’s representatives, the panel is satisfied that concerns raised in its original report pertaining to this dimension of QA have been broadly met by the provider.

Improvements to academic governance structures have been discussed in section 5.1 of this report and are outlined in section 2 of the CEG Quality Manual (2019 Edition). The latter document also contains substantial detail on programme monitoring and review, the use of feedback, performance monitoring and appraisal.



Evaluation of draft QA Procedures - Overall panel findings

Findings of the panel following the original re-engagement meeting – 06 July 2018

The panel was impressed with the professionalism and aspiration to excellence in the CCG application and is confident that the organisation has the resources, capacity and ethos to move towards QQI validation and deliver quality programmes.

However, the panel was of the view that significant development of the quality assurance documentation is still needed. Its recommendation to QQI is to refuse to approve this application, but with recommendations as set out in section 6 below.

Findings of the panel following the second panel meeting – 07 May, 2019

The panel was impressed by the significant restructuring, development of processes and cultural transformation evident over the past 6 months at CEG. The provider's previously noted aspiration to excellence is now tangible and evident within its internal structures and procedures.



Part 6 Changes to Quality Assurance Procedures

6.1 Mandatory

Mandatory changes following the original re-engagement meeting – 06 July 2018

Taking into consideration the specific findings set out above, CCG should:

- review and further develop its corporate and academic governance structures. This review should include terms of reference, membership and reporting structures for boards, committees and sub-committees.
- document in more detail programme development, delivery and assessment policies and procedures in line with QQI guidelines and CCG's revised academic governance structure.

Findings of the panel following the second panel meeting – 07 May, 2019

There are no mandatory changes recommended.

6.2 Advisory

Advisory changes following the original panel meeting – 06 July 2018

Taking into consideration the specific findings set out above, CCG should consider the following advice from the panel:

- Test out and refine the revised QA processes for programme development and approval. The College of Progressive Education's FET programmes and / or the HET programmes to be developed for validation could provide the 'raw material' to put through the processes.
- Consult with other providers who already have HET validated programmes regarding governance and procedures for review, evaluation and monitoring.
- Create appropriate communications systems to include information dissemination, feedback from students and staff, and follow-up on feedback.
- Develop appropriate data collection methods and data management systems to ensure that the correct data is collected and analysed against agreed KPIs.

**Findings of the panel following the second panel meeting – 07 May, 2019**

Notwithstanding the significant achievements of CEG in developing fit-for-purpose governance and overall QA during the allocated six-month period between the original and second panel meetings, the panel suggest the following specific advices.

1. CEG should incorporate a clear articulation of its approach to the delivery of Blended Learning in its revision, and this should make evident that the policies and procedures for BL are benchmarked against the QQI (2018) Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes.
2. CEG's current QA documentation should be carefully reviewed and proofed for typographical errors and other inconsistencies. The QA Manual as currently presented is not ready for the public domain. The revision of this document is essential to ensure its usefulness as an accessible and practical resource for staff and learners within CEG.
3. It is suggested that CEG rethink the currently proposed composition of its advisory board. The advisory board's role is to ensure sufficient externality. To ensure this, the number of internal CEG staff members could usefully be decreased, and the number of external members proportionally increased.
4. CEG is recommended to ensure that the current decision to have the Director of Quality chair the provider's Academic Board be temporary, and to transition as early as possible to having a member of the academic staff take up this role. It is suggested that the expertise and experience of the Director of Quality could usefully be made available to this Board on an ongoing basis through the role of Secretary.
5. CEG is advised to review QA policies and procedures for appeals and reviews to ensure their full alignment to section 4.10 of the QQI Assessment and Standards Document (Revised 2013).

Part 7 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas	Modes of Delivery	Collaborative provision
8	Major	Bachelor of Arts (Business Studies)	Classroom-based teaching and learning, supplemented by online resources	No



8	Major	Bachelor of Early Childhood Care & Education	Classroom-based teaching and learning, supplemented by online resources	No
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N/A pending approval



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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 City Colleges Group.

Name:

Jack O'Herlihy

Date:



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

Document

Group Application Form for Approval of QA Procedures and Scope of Provision for Initial Programme Validation
Group Self-Assessment Report
Group Quality Manual
Group Academic and Professional Regulations
Group Staff Handbook
Additional Documentation Provided: May 2019 Panel Meeting
Copy of Provider's Presentation to Panel
Diagrammatic Representations of Programme Monitoring, Feedback Strategy, Peer Observation Framework, Strategic Direction and Staff Development (x 2)
ECEC Degree Programme Timeline
Documents outlining the professional development activities of CEG staff Members
CEG Programme Design and Approval Process for BA in Early Childhood Care and Application
City Education Group Risk Register Guidance

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

Name	Role/Position
Philip Burke	Group Chief Executive
Prof. Haydn Griffiths	Director of Academic Development



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Paschal O’Leary	Managing Director, College of Progressive Education
Dr. Finian Fallon	Dean of College of Business & Psychology
Karen Higgins	Academic Director, College of Progressive Education
Pamela Morton	Group Senior Registry and Administration Executive
Additional Staff Present: May 2019 Panel Meeting	
Dr Louise Heeran Flynn	Director of Quality City Education Group
Aidan O’Shea	Head of Academic Quality Oscars International



**Quality and Qualifications Ireland, Initial Access to Validation, Quality and Capacity Panel
Report from Visit on May 7th 2019**

I acknowledge receipt on Friday, May 17th 2019 of the Panel's Report drafted following the Panel's second visit to the Group's premises on May 7th 2019.

The Group wishes to thank the Panel for its time, consideration and the constructive approach it has adopted in all dealings with the Group and its staff. We are predictably delighted with the Panel's findings, and consider that the City Education Group is considerably stronger and better placed to deliver on our institutional objectives having undergone Quality and Qualifications Ireland's process for Initial Access to Validation.

Finally, as before, the Group wishes to pay special thanks to the Chairperson and the QQI panel members for the visit and for the production of the Report.

Yours sincerely,

Philip Burke

Chief Executive, City Education Group