



## Reengagement Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

##### 1.1 Applicant Provider

Registered Business/Trading Name:	Children's Therapy Centre Ltd.,
Address:	Slievenagorta, Ballymore, Mullingar, Westmeath N91CC65
Date of Application:	September 18 <sup>th</sup> , 2019
Date of resubmission of application:	
Date of evaluation:	15 <sup>th</sup> November 2019
Date of site visit (if applicable):	15 <sup>th</sup> November 2019
Date of Reconvene Meeting (if applicable)	17 <sup>th</sup> January 2020
Date of recommendation to the Programmes and Awards Executive Committee:	6 <sup>th</sup> February 2020

##### 1.2 Profile of provider

The Children's Therapy Centre is a private limited company which was incorporated in May 2004. Located in a purpose-designed facility in Ballymore, Mullingar, and in a number of centres country wide, the Children's Therapy Centre delivers training courses in counselling, play therapy, psychotherapy, child psychotherapy and clinical supervision. The Children's Therapy Centre agreed QA policies with FETAC in 2008 and with HETAC in 2009.

The Provider's programmes include:

MA in Creative Psychology (Humanistic and Integrative Modality) Level 9

Advanced Certificate in Play and Creativity Studies (Level 6)

Advanced Certificate in Therapeutic Play Practice and Child Development (Level 6)

Advanced Certificate in Therapeutic Play Skills (Level 6)

Principles of Art Therapy (Collaborative Provider with CIT) Level 8



## Short CPD Programmes

Responsibility for academic decision making and delivery of education and training programmes at The Children's Therapy Centre rests with the Academic Council and the Director of Academic Affairs. Programme Management Teams administer and provide each programme. Programmes are delivered and learner evidence assessed by a team of Course Leaders, Subject Leaders and Tutors who deliver at a number of sites, including the centre in Ballymore, Mullingar. There are four full-time employees, with the majority of the teaching staff are employed on a contract basis. In 2015, there was one full-time staff member.

Learners engaging in the Masters programme will typically have achieved a QQI award at Level 8 before accessing the Level 9 programme. Learners participating in the three programmes leading to Level 6 awards are typically employed in the ECCE sector, or are working professionally with children, and are seeking CPD in the field. In the last five years, 300 learners have availed of programmes delivered by The Children's Therapy Centre.

The centre ethos is based on the principles of humanistic psychology and on the provision of an inclusive, supportive learning environment where communication is key to successful delivery and positive experience for learners.

There is a strong emphasis on experiential learning and incorporation of professional requirements, supervised clinical practice and personal psychotherapeutic learning.

The centre staff are committed to the evaluation of their programmes and continuous improvement. The centre has working relationships with international organisations, and all staff are encouraged to participate in their own further training, to publish their work, and to participate in national and international events.



## Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr. Michael Hall (Chairperson)	Panel Member	Registrar/Head of Department of Health and Leisure Studies, Institute of Technology, Tralee.
Ms. Angela Higgins (Report Writer)	Report Writer	Education Development Officer/QA Officer, KWETB
Dr. Lee Richardson	Panel Member	Senior Psychology Lecturer, Data Analytics and Reporting Officer, Dublin Business School
Ms. Niamh Coughlan	Panel Members and Student Representative	Hibernia College
Ms. Aoife Prendergast	Panel Member	Lecturer, Limerick IT

## Part 3 Findings of the Panel

### 3.1 Summary Findings

The purpose of the re-engagement process is to evaluate providers' QA procedures to ensure public accountability and to provide public confidence in them. The formal published evaluation of provider QA procedures by QQI improves public confidence in the programmes offered by providers e.g. that they enable learners to achieve intended learning outcomes and provide them with a well-supported learning experience.

The Panel has received The Children's Therapy Centre's Application Form for Re-engagement, their Quality Manual and other relevant documentation. The Panel would like to thank The Children's Therapy Centre for the provision of documentation as required, and for their participation in the re-engagement process.

The Panel commends The Children's Therapy Centre on the following:

1. The Children's Therapy Centre's mapping of delivery to professional standards.
2. The established links with international higher education institutions with respect to peer grading, comparisons and staff development.
3. The Children's Therapy Centre's annual process of review, evaluation and reflection.
4. The integration of feedback, annual monitoring and review of delivery and QA procedures, which is actively used to determine changes in internal practices.



5. The provider's commitment to regularly capturing feedback from a range of stakeholders, both internal and external, and to applying the learning from that feedback to their practice and to quality enhancement.
6. The Children's Therapy Centre's genuine analysis of its own situation and identification of area of vulnerability.

However, at the conclusion of the site visit, the panel had concerns about the following:

1. The governance structure: The Children's Therapy Centre will need to further separate commercial and academic roles.
2. The structure of the QA Manual submitted.
3. Lack of clarity in the policies and procedures presented – these need to be presented as discrete, precisely outlined procedures incorporating a title page and measures for version control.
4. Arrangements for Learner Appeals.
5. Absence of a section on marks and standards in the QA Manual.
6. Membership of the Academic Council is currently weighted in favour of ex-officio members.
7. While risks were identified through the gap analysis, a formal risk register should be put in place to mitigate risks.

Proposed mandatory changes in relation to these items were identified and are outlined in detail in Section 6.1 of this report. Additional items of specific advice are included in Section 6.2. However, given that these issues were discrete, and in the panel's view could be addressed quickly by the provider, the panel availed of the option to defer its overall decision for a period of six weeks, and allowed The Children's Therapy Centre this time to submit evidence to the panel that the changes identified had been satisfactorily addressed.

The panel reconvened on 17<sup>th</sup> January 2020 to undertake a desk review of the evidence subsequently submitted by CTC. It is the panel's view that CTC has satisfactorily addressed the proposed mandatory changes and has responded appropriately to the panel's initial specific advice. The panel consequently recommends that QQI approve CTC's QA procedures.



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

	Tick <u>one</u> as appropriate
<b>Approve</b> [the provider's – insert name] draft QA procedures	✓
<b>Refuse approval</b> of Children’s Therapy Centre Limited draft QA procedures <b>pending mandatory changes</b> 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>	
<b>Refuse to approve</b> [the provider's – insert name] draft QA procedures	



## Part 4 Evaluation of provider capacity

### 4.1 Legal and compliance requirements:

	<i>Criteria</i>	<i>Yes/No/ Partially</i>	<i>Comments</i>
4.1.1(a)	<i>Criterion: Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	The Children's Therapy Centre (CTC) provided evidence of their legal status in the form of registration with the Companies Registration Office and a Certificate of Incorporation.
4.1.2(a)	<i>Criterion: Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	Yes	CTC's presence is relevant to the scale of its operation in what is a 'niche' market in Ireland.
4.1.3(a)	<i>Criterion: Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	CTC has signed Terms of Engagement and Terms of Business with Cork Institute of Technology (CIT), establishing CTC as a partner for the provision of the CIT Special Purpose Award: Certificate in Principles of Art Therapy (10 credits), which was developed in collaboration. CTC has relationships with the professional bodies IAHIP and IAFTP, and learners receive accreditation for membership of these bodies when participating in CTC programmes.
4.1.4(a)	<i>Criterion: Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	CTC has a relationship with Irish Association for Play Therapy and Psychotherapy (IAFTP) and the Irish Association of Humanistic and Integrative Psychotherapy (IAHIP). They also maintain relationships with groups such as CARI, and Blue Box who provide suitable accommodation for courses from time to time.
4.1.5(a)	<i>Criterion: Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	The CTC applies applicable regulations in Ireland and maintains internationally recognised ethical behaviour in relation to the field in question.



<b>4.1.6(a)</b>	<b>Criterion:</b> <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>	<b>Yes</b>	Professional validation – Level 9 has full recognition from professional bodies (IAHIP and IAPTP).  The CTC originally agreed QA policy and procedures with FETAC in 2008 and HETAC in 2009. CTC have achieved validation of programmes at Levels 9, 8 and 6 through previous (2010) QQI validation policy.
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**Findings**

The panel finds that CTC is compliant with legal standards and is eligible to apply for reengagement with QQI.



#### 4.2 Resource, governance and structural requirements:

	<i>Criteria</i>	<i>Yes/No/ Partially</i>	<i>Comments</i>
4.2.1(a)	<b>Criterion:</b> <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	Yes	CTC Company accounts were provided. The company has no debt and is of good financial standing.
4.2.2(a)	<b>Criterion:</b> <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	The provider demonstrated a realistic approach to their business, which is within the scale of their provision.
4.2.3(a)	<b>Criterion:</b> <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	Following, the initial site visit in November 2019, the panel recommended the revision of the QA Manual (see notes below) clarifying language; applying consistent structures and templates; consistent terminology; improved sequencing of procedures; and introduction of version control and tracking. The panel has also found that CTC needed to make additional adjustment to further separate commercial and academic roles, and that a risk register would support the identification and implementation of mitigation actions. Following a review of revised documentation subsequently submitted by CTC, the Panel is satisfied that these issues have been satisfactorily addressed.
4.2.4(a)	<b>Criterion:</b> <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	The provider has systems in place for providing data to QQI.

#### Findings

The Panel finds that CTC has the resources required, is stable and in good financial standing.

Following a restructuring of the QA Manual; reducing the quantity of narrative information used, and devising a standard approach to documenting policies and procedures and implementing organised version control to allow for ease of review and update of documentation, the panel finds that CTC now meets criterion 4.2.3

CTC was also required by the Panel to further separate commercial and academic decision making by addressing the weighting of membership of the Academic Council and ensuring that roles within committees are well-defined and allow for escalation and oversight of decisions. The Panel is satisfied that this has been achieved.

**4.3 Programme development and provision requirements:**

	<i>Criteria</i>	<i>Yes/No/ Partially</i>	<i>Comments</i>
4.3.1(a)	<b>Criterion:</b> <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	Yes	CTC was established in 2004 and is a recognised provider of professional education and training in the field.
4.3.2(a)	<b>Criterion:</b> <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	CTC is staffed by four full-time personnel, and a team of contracted staff who deliver programmes. In their presentation, CTC illustrated their commitment to creating new roles in order to update their systems in order to support quality assurance.
4.3.3(a)	<b>Criterion:</b> <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	CTC has cooperated with QQI in the submission of this application, and in previous applications for validation. CTC has described processes to assure fair and consistent assessment of learners and arrangements for PEL.
4.3.4(a)	<b>Criterion:</b> <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	The CTC main centre is in a quiet rural location, fitted out with the specialist equipment and resources necessary for practical training provided. Arrangements are in place to ascertain the suitability of external locations. Where CTC programmes are provided off-site, CTC ensure that equipment and



			<p>facilities are suitable for the programme being delivered. Through relationships with external organisations, CTC ensure that there is access to child therapy rooms in order to enhance realistic training and experience for learners. Campus size is perceived as a vulnerability – space is limited at the main location, but is balanced by the use of other suitable venues – designed to meet the requirements of the teaching content. Backup locations arranged in advance in case other arrangements fall through – CARI site and Blue Box creative collective available as suitable premises just in case and all venues are booked to end of academic year to 2021.</p>
4.3.5(a)	<p><b>Criterion:</b> <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i></p>	Yes	<p>Recording of, and follow through of graduates' progression is to be commended. Some alumni apply to do the course in Creative Supervision. CTC organise specialised training with international trainers to support learners to extend their experience and knowledge. Transfer – this is the only course provider of its kind in Ireland. Access: Information giving. Open and honest approach to information giving about what the training entails and requires. There is a well-designed selection process.</p>



<b>4.3.6(a)</b>	<b>Criterion:</b> <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	<b>Yes</b>	At the site visit in November 2019, the panel queried the role of CEO on Examinations Committee and Appeals committee and made recommendations that structures be changed to address vulnerabilities. The panel is satisfied that this has now been addressed.
<b>4.3.7(a)</b>	<b>Criterion:</b> <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	<b>Yes</b>	Insurance cover is in place through O’Driscoll O’Neill.

**Findings**

The panel commends the provider’s commitment to the development and delivery of quality programmes in the fields of play therapy and psychotherapy, and acknowledges the enthusiasm and passion demonstrated by management and staff at the site meeting. The panel acknowledges the significant contribution of the management and staff in preparing for the reengagement process.

The panel commends the location, equipment and resources provided at the provider’s main centre at Ballymore, which align with the purpose of the programmes delivered, and their approach to ensuring that off-site locations are suitable for the learner cohort and the specialist nature of the delivery.

The panel finds that processes for programme development and delivery are in place. Following the site visit in November 2019, the panel recommended changes to chapters 4, 9 and 10 to rationalise the procedures. This has been addressed by the provider. The provider has also taken the necessary steps to become compliant with Criterion 4.3.6.

The panel recommended changes to the role of the CEO on the Examinations Board and Appeals to ensure that fairness and consistency are assured and that there is an appropriate hierarchy for escalation and oversight. This was satisfactorily addressed by CTC.

Following the site visit, the panel also recommended mandatory restructuring of the QA Manual to remove narrative passages and replace with clearly detailed procedures will further enhance accessibility and management of processes for development and delivery of programmes. This was satisfactorily addressed by CTC.



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

The Children's Therapy Centre has demonstrated that it has the capacity to provide sustainable education and training in the fields of play therapy and psychotherapy.

The panel recognises that the submitted QA Manual accurately reflects the context of the organisation, and includes the information required about quality assurance. The panel has determined that corresponding procedures are known and followed by the provider management and staff.

The panel commends the focus of CTC on providing education and training underpinned by a positive, learner-centred humanistic ethos.

The panel would like to commend the commitment, energy and professionalism of the tutors; course leaders and subject leaders at CTC that we met at the centre on the day of the site visit.

The panel commends the fact that care and consideration expressed for learners within the QA Manual models the expected approach learners will take on practising the skills learned during their programmes.

The panel commends the evident enthusiasm, dedication to learners and learning, commitment and mutual support shown by the staff team in their input.

The provider has a number of established external relationships including a relationship as a collaborative provider with Cork Institute of Technology, and with IAHIP and IAPTP, which are professional bodies for psychotherapy and play therapy. Involvement with these bodies includes representation on training standards committees; membership of the association; professional accreditation arrangements. The panel commends the fact that the CTC is well networked and influential in the field.

Following a review of revised documentation submitted by the provider, and a meeting on 17<sup>th</sup> January 2020, the panel is satisfied that the outstanding issues identified below at the conclusion of the site visit in November 2019 have been satisfactorily addressed by CTC: the provider's QA Manual can be improved by substantial review and reorganisation to reduce the quantity of narrative text, and to ensure that governance procedures are sustainable, clear and accessible and easily followed by all stakeholders, recognising that QA must be 'institution-wide'. This can be achieved by dividing the manual into discrete sections procedure by procedure, incorporating a title page and details of version control for each. Templates should be included as appendices to each section to allow for revision and changes to these if necessary.

##### ***Issues Identified at Site Visit:***

- terminology needs to be clarified – e.g. 'delegated authority' of Academic Council vs 'delegated responsibility'.
- The panel finds that the provider has put in place multiple appeal mechanisms, potentially leading to confusion. There should be a distinction between 'recheck of results' and appeal. The panel recommends that this ambiguity in the QA Manual be resolved.
- The QA Manual is highly narrative which may result in differences of interpretation and ambiguity in the application of procedures. The panel recommends that the QA Manual be rewritten as a set of instructions for how to address the QA requirements to eliminate ambiguity of interpretation as much as possible. The QA manual is the 'one-stop shop' and is the definitive source of information for all stakeholders.



- The panel finds that the provider must put in place clear version control and tracking mechanisms in order to secure efficient management of the QA policies and procedures in future.
- The QA manual is a living document, which if it needs to be changed, can be changed. Format and layout of the manual needs adjustment in order to make it manageable, and to encourage embedding of the QA in the practices of the organisation.
- The panel commends the efforts of the CTC to put in place Governance structures. The panel recommends that CTC put in place clear terms of reference for each of the committees and sub-committees within the QA system. CTC should apply a standard template to defining the purpose, role, membership, quorum, proceedings for the committees (the panel detailed a step by step template using the material submitted in relation to the Exam Board). The panel recommends that all templates and forms should be included as templates at the end of the relevant QA Manual section. Special considerations for distinct sectors should be included as a note.
- The panel recommends removal of references to CIT/Crawford, and replacement with policy and procedures for engagement with other entities.



## Part 5 Evaluation of draft QA Procedures submitted by Children’s Therapy Centre Ltd.

*The following is the panel’s findings following evaluation of Children’s Therapy Centre Ltd.’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:*

#### **Organisational Chart**

The panel finds that the organisational chart provided illustrates some separation of corporate and academic decision-making. The Academic Council and the Chief Executive both report to the Board of Directors. The process of reengagement has led to the recruitment of a full-time Course Leader, and the establishment of the position of Director of Academic Affairs (DAA). The DAA reports to the Academic Council.

#### **Board of Directors**

The Board of Directors has delegated responsibility for academic decision-making to the Academic Council. The Internal Quality Assurance Team and Examinations Board are two standing sub-committees of the Academic Council. There is provision for establishment of other sub-committees on an ad hoc basis, as these are required.

#### **Academic Council**

The Academic Council includes an Independent Chairperson and a Student Representative. The CEO and the DAA are ex-officio members of the Academic Council and the CEO is the Secretary.

#### **Programme Management Team**

There is also a Programme Management Team, which reports to the Director of Academic Affairs. This team is responsible for operational aspects of programme delivery.

At the conclusion of the site visit in November 2019, the panel finds that the QA Manual would benefit from the inclusion of an Organisational Chart that clearly illustrates the membership of each committee within the organisation, clarifying reporting lines and dependencies. This would help to identify overlaps which may constrain independent decision-making. This was subsequently supplied by CTC.

The panel also found that CTC should develop clear terms of reference for each group within the organisational structure in order to provide clarity regarding roles, the function of the group or committee, and information about operating procedures for each group/committee.

Following that meeting, the panel found that the Chief Executive Officer should not be a Chair or member of the Examinations Board, nor carry out desk reviews of learner appeals. This is not appropriate. The Chief Executives’ role in this Board and in appeals potentially limits the independence of the Board, and does not provide for any escalation of cases where this may be required. It was recommended that the Chief Executive should be replaced with another individual in these roles to allow for greater separation, independence and neutrality.



The panel recommended that an individual should have overall responsibility for ensuring the integrity of exam processes. The panel recommended that escalation routes should be identified where these are likely to be required.

### **Management and Staffing**

The panel finds that the Provider's efforts to separate the commercial operation from academic operations are a positive development. These include recruitment of a Business Operations Manager, who is responsible for corporate and commercial operations and the creation of the post of Director of Academic Affairs, who holds executive responsibility for management of quality, development and delivery of programmes in accordance with QA documentation.

In the gap analysis, the organisation, identified that the scale of the organisation is both a strength and a challenge. Its small size enables constant communication, but the small scale represents a challenge in terms of separation of roles and responsibilities. The use of graphics to identify clear reporting structures and roles would help the organisation to develop structures which best suit their scale. The panel commends the fact that the CTC strives to organise and plan well in advance in order to mitigate likely risks associated with their scale.

### **Membership of the Academic Council**

The panel finds that the current membership of the Academic Council is biased towards the commercial/corporate business of the provider. At the conclusion of the site visit, the panel recommended that the membership of the Academic Council be rebalanced to include one more academic, thus weighting the decision-making role towards academic concerns.

Following a review of revised documentation and related evidence submitted by CTC, the panel is satisfied that the governance structure has been refined appropriately. For example, the CEO no longer holds the role of Exam Board Chair. The CEO also no longer deals with appeals. The panel is satisfied that CTC acknowledged and undertook the changes set out by the panel at the conclusion of the site visit and this is clearly evidenced in the revised documentation.

## **2 DOCUMENTED APPROACH TO QUALITY ASSURANCE**

### ***Panel Findings:***

The panel recognises that the submitted QA Manual accurately reflects the context of the organisation, and includes the information required about Quality Assurance. The panel has determined that corresponding procedures are known and followed by the provider management and staff. In the meeting with staff, they described the consultation process for the Quality Assurance Manual – This was achieved during team days. In the consultation, processes were 'tightened up'. For example, the process for giving extensions to students was improved recognising the need for boundaries between staff and learners. More formal procedures for extensions were introduced. Tutors and teachers are asked to contribute to documents and do so through meetings; e-mails; telephone calls; zoom meetings. Opinions about QA



documents are elicited from staff. The panel commends the consultative process as it ensures that all staff have ownership of the policies and procedures.

The Children's Therapy Centre staff and management demonstrated a strong commitment to evaluation and feedback loops, interacting with a range of stakeholders both national and international to inform development and delivery and use this feedback to inform improvements. The Panel recommended that the CTC should include these processes in the Quality Assurance Manual.

However, the Quality Assurance Manual evaluated by the panel in advance of the site visit in November 2019 was predominantly narrative in design and structure. The panel found that the provider's QA Manual could be improved by substantial review and reorganisation to reduce the quantity of narrative text, and to ensure that governance procedures are sustainable, clear and accessible and easily followed by all stakeholders, recognising that QA must be 'institution-wide'. The panel recommended that this could be achieved by dividing the manual into discrete sections procedure by procedure, incorporating a title page and details of version control for each. It was advised that templates should be included as appendices to each section to allow for revision and changes to these if necessary. The provider submitted additional items which are associated with quality assurance. It was recommended that, where appropriate, information in these documents should be included in the Quality Assurance Manual, making it a 'one-stop shop' where all users and stakeholders can access clearly detailed policies and procedures. Through the process of a gap analysis, the provider became aware that some additional procedures are required – for example, a procedure is needed for making minor programme adjustments. The panel recommends that CTC ensures that all relevant policies and procedures are included in the single Quality Assurance Manual. The panel recommended that process maps be developed for the purpose of illustrating procedures. Developing these could help in the description of the processes and the elimination of any ambiguities. The panel recommended that the QA Manual should accurately reflect the breadth of delivery within the centre, covering the Level 9, Level 6 and CPD programmes. Procedures could be written so that specific advices for different levels can be included in notes for the relevant procedure.

The panel notes that the Provider has devised clear systems for learner applications and selection for access to programmes. The panel recommended that the 10 criteria for entry be included in an appendix in the QA manual.

Following a review of the revised documentation subsequently submitted by CTC, the panel is satisfied that the issues identified above have been satisfactorily addressed by CTC. The panel commended the work that CTC undertook on the restructuring of the QA manual within the six-week period allowed. The panel was impressed both with the volume and quality of work achieved by CTC on revising the Quality Assurance Manual as per the panel's feedback. The panel finds that the QAM is now well designed and very clear and is a lot more accessible. Policies and procedures are now clearly outlined and there is uniformity in the templates used for each section of the QAM.



### 3 PROGRAMMES OF EDUCATION AND TRAINING

#### *Panel Findings:*

The Children's Therapy Centre provides the following programmes of education and training:

- MA in Creative Psychology (Humanistic and Integrative Modality) Level 9
- Advanced Certificate in Play and Creativity Studies (Level 6)
- Advanced Certificate in Therapeutic Play Practice and Child Development (Level 6)
- Advanced Certificate in Therapeutic Play Skills (Level 6)
- Principles of Art Therapy (Collaborative Provider with CIT) (Level 8)
- Short CPD Programmes

The provider's originally validated programmes were developed without procedures in place. The gap analysis identified a need to put procedures reflecting the 2017 Policy for the Validation of Education and Training Programmes (QQI). The process is detailed in the submitted QA Manual. As referenced in Section 2, the panel recommends this process, and other processes should be detailed using step by step procedures and a process map.

The panel finds that the management and staff of CTC have put in place a rigorous process for the recruitment of learners to ensure that learners are properly matched with the programmes provided. The panel commends the detailed supportive approach to the recruitment of learners, and the provision of transparent information to prospective learners. There is a process in place for learners to appeal the decision of the selection board.

Learners are given as much information about the programme as possible to inform them to be able to make their own decisions about participating in the programme. There are scoring criteria (10 points) for learner selection, and learners are provided with a literature list, a core text book, advance reading and activities and literature from accrediting bodies on selection, and before starting the programme.

Learners may be assessed through RPL. A separate application form is completed, and a mentor assigned. Clear guidelines are given to the learner and the mentor.

The panel commends the provider's commitment to information provision and the detailed approach taken. Learners are given as much information as possible regarding the programme. Learners are informed of PEL, GDPR and privacy policies/policies for records retention. Academic records are retained indefinitely.

The panel commends the provider's detailed approach to planning the delivery of programmes. This is achieved through regular communications between the Programme Management Team, the Subject Leaders and the Tutors. It was apparent that there is a high level of teamwork in the delivery of the programmes. Programmes are designed for delivery using a range of delivery methods and are assessed using a variety of assessment instruments. The Programme Teams ensure that there is a balance between theory and practice within the delivery. Issues and gaps identified are referred to the Academic Council. There is a highly organised approach to preparation for delivery, coordinated by the Programme Management Team and Subject Leaders.



The panel commends the learner life cycle described, including reference to processes for recruitment, participation, assessment, and evaluation. The panel would like to commend the provider's commitment to recording the impact of the programme on alumni.

The panel commends the strong collaborative and communicative approach taken to the planning, preparation, delivery and assessment of the CTC programmes.

#### 4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

##### *Panel Findings:*

The panel commends the way in which the provider values communication, which supports the staff in the centre. This is effective and necessary in a context where the teaching staff are contracted trainers, and may be involved in other work as well as delivery of CTC programmes.

Long term staff that is almost 'family like' There is a committed staff team with deep knowledge of the programmes. The established team members are committed to supporting new team members.

The panel commends the clearly detailed recruitment procedures available in the QA Manual. The panel recommends however, that a standardised approach be taken throughout the QA Manual to detailing the procedures, removing the bulk of the narrative detail.

The panel commends the supportive approach taken to induction of new staff, which includes the assignment of a mentor and peer observation. Double marking is also used as a training practice. The team met by the panel was committed to the provision of humanistic support to one another, modelling the attitudes and values which learners will need to learn.

The panel recommends that a plan for dissemination of the QA Manual be put in place and followed through when the full version is approved.

The panel commends the exemplary support given to staff to develop their own knowledge and experience through further engagement in learning, and through participation in national and international events. Staff are also supported to publish their academic writing, and are nominated to participate and present at conferences.

Internal CPD certification achieved by staff are recognised by approving bodies. All evaluation forms for these courses must be retained for five years.

The panel commends the participatory approach to the development of the QA Manual, and to review and evaluation of programmes and activities at the CTC, reflected in the description of team meetings and zoom conferences.

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

The panel thanks the staff for meeting with them, and commends the level of knowledge and awareness of quality demonstrated by the staff. There are clearly identified roles, which are complementary. Trainers are confident they are covering the correct content because the criteria are clearly set out in the Learning Outcomes. Module delivery is planned by Subject Leaders and there is a clear collegial and positive interpersonal approach to ensuring that learner needs are met.

The staff met described an environment where teaching and learning is supported by continuous communication, both face to face and via Zoom conferencing. The Programme Team includes all of the trainers involved and the Subject Leaders. The teachers and trainers described a solid line of communication from trainers to Subject Leaders to the Director of Academic Affairs. There is a lot of coordination to ensure that there are no overlaps and that content flows easily and logically. Constant feedback loops ensure the delivery of the best teaching and learning possible. 'Cohesiveness and flow' were identified by staff as a 'unique component of CTC', with modules 'building on one another'. The staff described a transformation occurring for learners in the third year of the MA programme, and reflected that this occurs through integration of learning, building on experience, clinical practice and reflection.

The panel commends the integrated nature of the programme delivered at Level 9, and the way in which the module learning outcomes reflect the programme learning objectives.

The teachers and trainers described how they are free to engage in peer observation, which is used both for teacher induction, and to support first time delivery of a module by an existing teacher/use of new strategies, or to revitalise teaching. This illustrated a high level of commitment to collegiality. Panel commends CTC's commitment to collaboration, team teaching, co-facilitation and peer observation.

The QA Manual is distributed to new teachers. One teacher described referring to the manual to clarify the difference between formative and summative feedback. Similarly, a teacher used the manual to understand transferable skills.

The teachers, trainers and Subject Leaders presented a culture within the organisation where values include commitment to the professional principles of psychotherapy and play therapy; learner-centredness; belief in a process of experiencing then extrapolating the theory; the development of positive relationships between students and staff; clarity of criteria; care for students complemented by integrity of delivery and assessment.

The discussion with the teachers, trainers and Subject Leaders reflected the content of the CTC Teaching, Learning and Assessment Strategy document provided to the panel.

**Inclusion**

During the site visit, it was clear that the CTC is committed to inclusion, and staff described how they facilitate the different needs of learners.

**Work Placement**

2016 QA guidelines – each programme's learning environment is appropriate – The panel recommends a work placement policy that refers to the QQI 2016 core QA guidelines and links the T&L strategy and includes how learning is scaffolded. The panel recommends that there should be a clear process for assuring the suitability of the work placement location.



The course leader approves the work placement in first year, and the supervisor in second and further years. The panel recommends the creation of a sub-committee to approve work placements. Where there are difficulties on placement, this goes to the Course Leader in first year, and to the Supervisor in second year and further. Where difficulties arise, a relational approach is taken to finding a solution. Sometimes where a client is involved –the timeline for completion needs to be observed. Student practice is guided by the code of ethics for the professional bodies. Students sign a professional declaration before participating in work experience.

Where issues occur, the process is for the Course Leader/Supervisor to engage directly with the placement to resolve the issue.

There are placement handbooks for each year including criteria for placements and criteria for selection of the sites. This handbook also guides the Supervisors.

The panel recommends that the core principles of teaching, learning be extracted from the Teaching, Learning and Assessment Strategy and crystallised, outline the signature pedagogy in CTC. This should illustrate the approach across all of the levels delivered.

## 6 ASSESSMENT OF LEARNERS

### Panel Findings:

Trainers are not involved in assessment. Subject Leaders are responsible for assessing evidence submitted by students and for devising assessment instruments.

Subject Leaders attend the examination board.

CTC does not have an institutional Marks and Standards document. QQI information regarding standards is included in the student handbook. The panel recommended that a Marks and Standards document should be developed for the institution and included in the QA manual in an assessment section appendix called 'Marks and Standards'. This has since been actioned by CTC.

The Examination Board sits annually. There are two exit points in the MA – second year and fourth year. Marks are agreed at exam board and entered in QBS, but not are not submitted to QQI for certification until the end of the process for the MA (Year 2 and Year 4). Learners can appeal a result as soon as they receive it (within 14 days). Where there is an appeal, a second marker is assigned. The External Examiner is given a copy of three reports on the assignment (original assessment; appeal outcome and report of the second marker). The External Examiner makes the final call, and the learner is notified of the decision of the Exam Board.

The panel recommended that this unusual appeal stage be removed, and opportunity provided for learners to receive feedback on their mark instead. There should be three grounds for appeal – process; irregularity/significant variation; personal information the exam board had but did not take into account. This has since been carried out by CTC and the new QA document reflects a better process.



When discussing what happens in relation to repeats and resits of exams, it emerged students don't fail their assessments often – possibly because of the level of interest and motivation associated with the subjects. Sometimes learners do fail a module. Where a student fails a module, they can repeat the module and resit the assessment elements.

Sometimes people take time out, and there are mechanisms in place to support students making these decisions. There are opportunities for learners to take a break/leave in year 2 of the MA if necessary, resulting in the partial achievement and recognition of, credits towards the Level 9 award.

Assignment submission - learners will submit soft copies through the plagiarism package.

Examination papers are devised by the Subject Leader with the Course leader, and is set before the course is delivered. The Course Leader gathers feedback from tutors in relation to delivery, and this is fed back in. The trainer is given the exam on the day of the exam. Exam paper is drawn on a bank of questions.

At the conclusion of the site visit in November 2019, the panel were of the opinion that the process for managing the appeal of results was inappropriate. The QA Manual is an official document, and the process as it was stated in the manual conferred an entitlement to appeal a mark. The panel recommended that this section of the Manual needed to be rewritten, clearly stating that a learner can appeal the process of assessment following the issuing of results. The panel was also of the opinion that the person reviewing appeals applications should not be the Chief Executive Officer. It is advisable that students can request feedback on results to inform their understanding of the assessment and marking process.

The panel also recommended that the Assessment section of the QA Manual be restructured as a set of clear procedures for each element of the assessment process, as recommended for the whole QA Manual.

Following a review of the revised documentation, the panel is satisfied that the issues above have been satisfactorily addressed by CTC.

The panel commends the level of detail provided about assessment in the documentation provided, and during the site visit.

**7 SUPPORT FOR LEARNERS***Panel Findings:***Information and support to learners**

Prospective learners and enrolled students are provided with comprehensive information throughout their engagement with the centre. The focus is on providing clear information to all students. There is a robust and detailed approach to giving learners accurate information about what is to be expected during the courses, and a positive, supportive environment is created to support students during their learning.

The Panel commends the CTC's thorough approach to access and the support provided to prospective learners making decisions about accessing the programmes. The centre applies an ethical approach to this process, ensuring that prospective learners have received clear information about the programmes and are well-informed about the likely challenges and impacts of participation in the programme.

**Learner Support Officer**

The CTC has appointed a Learner Support Officer (LSO) to provide support in academic writing and other areas. The LSO is currently preparing resources to support learners.

**Class and learner representation**

Through the gap analysis process, CTC discovered a gap in learner representation, probably due to the scale of the organisation – all staff are on 'first name basis' with learners due to size of groups.

CTC has introduced a system in which each group will have an elected representative who will be a 'first port of call' for learners to communicate with the Programme Management Team, and for the transmission of responses from the Programme Management Team in relation to issues affecting the group. The intention is that the overall teaching and learning experience can be monitored and improved. A Learner Representative pack has been developed, which includes Course Handbooks, guidelines on the online portal and assignment guidelines to enable them to support their peers to access information. A Student Representative sits on the Academic Council.

**Submission of assignments**

The CTC is currently building capacity for, and trialling the use of, an online system for the submission of assignments. It recognises that they are 'paper people,' and paper copies of assignments are printed in advance of the External Examiner visit all assignments and these are laid out in sequence from lowest to highest mark.

**Personal Support for Learners**

Due to the nature of the programmes delivered by CTC, there is high emphasis on tutor support.

Every learner is assigned a support tutor and has access to review meetings with the tutor. There is an emphasis on regular feedback. Learners can discuss support needs with the assigned tutor/Subject Leader or Course Leader. In the Level 9 programme, students participate in 30 sessions of personal therapy as a professional requirement. All learners participate in group therapy.

Learners participating in work placements are supported to ensure that work engaged in is appropriate for the stage of the learner and to protect the clients of the placement organisation. Clinical supervision is provided by CTC appointed supervisors.



## 8 INFORMATION AND DATA MANAGEMENT

### *Panel Findings:*

#### **General Data Protection Regulations**

The CTC relies on a number of systems for gathering data, including systems for gathering data on prospective learners; learner personal records; assessment results; alumni records and the QQI Quality Business System (QBS). The organisation engages in evaluation, and gathers data from learners and stakeholders about the quality of their services. It also gathers and holds data in relation to work placements.

CTC Management has put in place an Information Management policy in order to comply with the General Data Protection Regulations (GDPR 2016/679). The centre management has acknowledged that implementation is a 'work in progress' and requires ongoing development.

The Chief Executive is named as the 'Data Protection Contact' in the QA Manual. The Chief Executive is named as the Data Controller on the CTC website. The panel recommends that all role titles in centre documentation be checked and standardised across all of the documentation. Similar to the role of the CEO on the Examinations Board, CTC should consider the role of the Chief Executive Officer in Data Protection and review whether it would be possible to introduce an avenue for escalation/oversight in instances where there are data breaches or suspected data breaches.

The panel acknowledged that implementation of GDPR is a work in progress, and recommended that CTC should have a plan in place for the monitoring, implementation and evolution of their systems. This has since been addressed by CTC.

The Chief Executive Officer is responsible for entering learner results data in the QBS and submitting approved results for certification. He is also responsible for entering results in the Europass system in order to generate Europass Diploma supplements to facilitate progression options for learners nationally and internationally. This has now been addressed by CTC – the Programme Administrator is now a back-up person in relation to data input in the QBS system.

CTC gathers data from alumni through a career impact survey. CTC allows graduates to retain access to the student portal in order for them to have access to academic papers and publications, receive information and details about forthcoming CPD.

The panel recommended that CTC should review the security of the student portal to mitigate any likelihood of data breaches. Since the site visit, there is now clarity in the documentation on the role of 'data controller' and as well as consistency in these roles. The Director of Academic Affairs is now explicitly responsible for 'integrity of exam processes'.

The panel commends the practice of gathering this alumni data because it illustrates the impact of the programmes on graduates and informs planning.

The panel commends the fact that CTC has a retention policy and a schedule for destruction of records.

#### **New systems**

CTC is in the process of introducing a CRM system, including an online application system, moving away from paper records.



CTC described the Learning Management System and demonstrated it to a number of panel members. This is being introduced to learners, and will allow the submission of soft copies of assignments. There is a built-in plagiarism package in the system.

The panel commends the CTC's efforts to modernise and reduce the quantity of paper in circulation.

### **CTC Website**

The website was relaunched last month and includes an FAQ tab, and is undergoing further development. Course offerings have been defined and categorised, and clearly defined CPD and Supervisor listings added, QQI validated programmes are listed. The on-line booking facility has been built in and additional online application processes are being developed. There is a direct link to the learner online portal. There are direct links to the centre's social media platforms. These are considered as essential to providing and developing an online community for learners and alumni. There is provision for independent sign up to the CTC mailing list to fulfil GDPR requirements.

### **Risk Register**

Through the gap analysis, CTC management and staff identified a number of vulnerabilities through the process, and through the development of the QA Manual.

At the conclusion of the site visit in November 2019, the panel recommended that the CTC develop a risk register, including strategies to mitigate against risk, starting with the vulnerabilities identified through the gap analysis process. A schedule for review and updating of the risk register should be put in place.

Following a review of the revised documentation submitted by CTC, the panel is satisfied that a formal risk register has now been included in the QA Manual. Section A10 includes policies on Child Protection, Garda Vetting etc. The QAM also includes a schedule for annual review of the Risk Register by the Board of Directors.

**9 PUBLIC INFORMATION AND COMMUNICATION***Panel Findings:***Communication of the QA Manual and procedures**

The CTC QA Manual is available to learners and staff on the online portal and will be available to stakeholders on the website. New tutors are provided with induction training including information about Quality Assurance. New students are provided with a power point presentation giving an overview of policies. The panel is of the opinion that the structure and layout of the QA Manual needs to be addressed, including the development of clear sections which each feature title pages; procedures; additional notes where specific procedures are associated with individual programmes; use of appendices for templates in each section to allow for amendments. The information contained in the procedural documents should be written in plain, accessible English, keeping in mind the diversity of the likely audience for the document.

At the conclusion of the site visit, the panel recommended a proposed mandatory change in the form of restructuring and rewriting of the QA Manual to feature clear procedures associated with each of the section headings and a removal of narrative details. The panel is satisfied that these actions have been taken by CTC (see Part 5, Section 2 for more details).

The panel recommends that a process be put in place to inform stakeholders of the QA Manual, and of how to use the manual.

**CTC Website and Social Media Presence and Marketing**

The CTC website is a primary facility for engaging with prospective learners. Learners are also attracted to the centre through its reputation, which is strong. CTC have ensured that links to their website are included on the websites of professional organisations. Recently, CTC has increased its social media presence, and has 4,000 Instagram followers, and 6,500 – 7,000 followers on Facebook.

Other marketing strategies include managing enquiries by e-mail and phone. CPD courses yield enquiries about other programmes and provide face to face opportunities to provide information. Course documentation and fliers are prepared and distributed at conferences, events and through information stands.

The panel commends the range of communications avenues utilised by CTC, and the recent website update and improvement.

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

CTC has established relationships with professional therapy association and incorporate their requirements into programmes, applying both academic and professional standards. These associations include the Irish Association of Humanistic and Integrative Psychotherapy (IAHIP) and the Irish Association for Play Therapy



and Psychotherapy (IAPTP). Graduates of the MA programme are entitled to immediate recognition by IAHIP as a Certified Associate.

The Postgraduate Diploma in Play Therapy is recognised for accreditation as a play therapist by the IAPTP.

**Crawford College of Art and Design/CIT**

CTC is a second provider of the Level 8 Principles of Art Therapy Programme and are collaborating providers.

The panel commends the commitment of CTC to engaging with external professional and education institutions.

The panel recommended that reference to specific partners be removed from the QA Manual, creating more generic procedures about how external relationships are managed. This has since been addressed by CTC.

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

The panel commends the passion and commitment of CTC to its business and the delivery of its programmes, and its approach to regular self-evaluation, monitoring and review. The provider demonstrated confidence in seeking feedback from internal and external sources, and in evaluating their practices.

CTC personnel conduct regular monitoring of programmes; procedures; results; and health and safety, focussing on the programmes delivered and the institution. QA procedures are reviewed and monitored with reference to statutory requirements.

This provider is expert in self-reflection, and this was evident in the approach they took to the gap analysis, and in their description of feedback loops, which were described both by management and staff. The staff and management of the Children's Therapy Centre are open and transparent about ensuring that standards are comparable internationally and engage with international practitioners in this respect. This is an important factor for an organisation which is the sole provider of this type of education and training in the Republic of Ireland.

In preparation for a programmatic review, CTC staff engaged in a reciprocal arrangement to second mark dissertations for Deacon University in Australia, with the Australian University marking CTC work. Through the process, CTC confirmed that their standards were on a par with those of the Australian institution.

CTC also ensures that its standards match with European standards for psychotherapy training. These European standards are integrated throughout the four-year MA programme. Unusually, all of the standards are integrated over the four years. This reflects the part-time nature of the programme in CTC and takes account of the fact that participants are practicing while training.

CTC's Academic Council produces an annual report in July every year, following systematic annual review, and spot checks. The Internal Quality Assurance Team (IQAT) and the Academic Council constantly gather data and carry out spot checks. They prepare IQAT; Health and Safety; and Equality and Diversity Reports. All procedures are reviewed for the annual report. The format of the IQAT report will be adjusted to reflect recently adopted policies and procedures. Reports include findings from External Examiner and External Authenticator Reports.

The Programme Management team gathers feedback from trainers and learners. These written evaluation forms are completed at the end of each teaching block, and include data about content, quality of instruction, trainer communication, time management and facilities and supports. The Management Team reviews feedback from graduates, and utilises data gathered through the career impact surveys to inform evaluations and reports. Data from learner evaluations and feedback and from staff feedback is included in reports. Staff engagement in CPD and contributions to journals and conferences are reviewed, and findings included in reports

Course Leaders compile data on learner enrolment, retention, completion and progression rates. This data is presented to the Director of Academic Affairs.

Data gathered informs programme improvement plans and changes to practices.



The CTC team conducts a self-evaluation every five years. Programme Management Teams are responsible for reviewing programme evaluations, and for compiling data gathered and details of action planning and its implementation, and for reporting on this in the self-evaluation.

The panel commends the CTC commitment to gathering feedback about its service and delivery; reviewing of data; and monitoring of efficiency and effectiveness of their procedures and practices; improvement planning and reporting on outcomes.

## Evaluation of draft QA Procedures - Overall panel findings

The panel wishes to offer a number of commendations to CTC:

The integration of feedback and annual monitoring and review into QA procedures which is used to determine changes to practice.

Annual process of review, self-evaluation and reflection.

Mapping of delivery to professional standards.

Links with international higher education institutions with respect to peer grading and comparisons.

The panel is of the opinion that this provider is highly committed to regularly capturing feedback from a range of stakeholders, and to applying the learning from that feedback to their practice and to quality enhancement.

The panel is satisfied that CTC has carried out a genuine Analysis of its own situation and identified potential areas of vulnerability,

The panel is of the opinion that the provider has the capacity to carry out the mandatory changes and to follow the specific advice identified in this report.

Nonetheless, at the conclusion of the site visit in November 2019, the panel had concerns around governance, the structure and format of the QA Manual and the recording and management of risk. These are outlined in section 6.1 of this report and identified as *proposed mandatory changes*. Additional items of *specific advice* are included in Section 6.2. Given that these issues were discreet, and in the panel's view could be addressed quickly by the provider, the Panel availed of the option to defer its overall decision for a period of six weeks, and allowed CTC this time to submit evidence to the panel that the changes identified have been satisfactorily addressed.

The panel confirms that CTC effectively addressed and provided evidence addressing the proposed mandatory changes outlined in Section 6.1 within the allocated 6-week period. As a consequence, the panel recommends that QQI approve CTC's QA procedures.



## Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following proposed mandatory changes were identified at the conclusion of the site visit on November 15th, 2019. The panel availed of the option to defer its decision to allow CTC an opportunity to address these issues within a six-week period. The panel requested that these amendments to the existing Draft QA be implemented and approved by the provider's Academic Council within that timeframe. Upon receipt of the Academic Council minutes (or relevant extract thereof) confirming that the required actions had been taken, the panel would be pleased to approve the provider's application. The panel reconvened on 17 January 2020 to evaluate evidence submitted by CTC in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that CTC has adequately addressed the issues set out in Section 6.1 below.

### 6.1 Proposed Mandatory Changes

1. Change the governance structure of the organisation to further separate commercial and academic roles, for example, separation of the role of Exam Board Chair from the role of CEO. ***This has been completed.***
2. Restructure the QA Manual to include redesign of Chapters 4, 9, and 10 to rationalise procedures related to Programme Development, Design and Validation into one section of the manual; removal of the pre-Examination Board Appeals process and addition of clearly articulated procedures for post-Examination Board Appeals. Include a section on Marks and Standards in the QA Manual. ***This has been completed. The revised document is very clear and acceptable to the panel. The panel commends the level and quality of documentation submitted in response to the panel's feedback.***
3. Improve the clarity of policies and procedures presented in the QA Manual through the use of standard templates ***This has been completed. The revised document is very clear and acceptable to the panel. The panel commends the level and quality of documentation submitted in response to the panel's feedback.***
4. Compile the vulnerabilities identified into a formal risk register, with a review schedule, to assist in the mitigation of the risks identified through the gap analysis process. ***The panel is satisfied with the CTC response in this regard and expects that CTC will use a Risk Register document to record and monitor risk mitigation measures.***

### 4.2 Specific Advice

1. When restructuring the QA Manual divide it into discrete sections for each quality area. Each section should follow the same template, with a title page and a version control mechanism; precise procedures which are easily understood, transparent and accessible and regularly used forms included as appendices to allow for ease of amendment. Terms of reference for



- committees and responsibilities of named roles should also be included in the manual. *The panel is satisfied with the CTC response in this regard.*
2. Ensure that consistency of terminology and language is applied across the QA Manual – e.g. ‘delegated authority’ vs ‘delegated responsibility’ and ‘appeal’ vs ‘recheck’. *The panel is satisfied with the CTC response in this regard.*
  3. Ensure that terms of reference for committees and sub-committees detail the purpose, specific functions, membership; frequency of meetings; standing orders; and quorum. *The panel is satisfied with the CTC response in this regard.*
  4. Publish the QA Manual on the website. *The panel is satisfied with the CTC response in this regard.*
  5. Develop a formal teaching, learning and assessment strategy for CTC. *The panel is satisfied with the CTC response in this regard.*
  6. Improve work placement policy and procedures to clearly articulate the roles and responsibilities of learners, supervisors and placement providers. *The panel is satisfied with the CTC response in this regard.*
  7. Remove references to specific organisations from the QA Manual and replace with policy and procedures for engagement with other organisations. *The panel is satisfied with the CTC response in this regard.*
  8. The Academic Council should meet to approve all changes. *The panel is satisfied with the CTC response in this regard.*

## Part 7 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 9	Major	MA in Creative Psychotherapy (Humanistic and Integrative Modality)
Level 8		Principles of Art Therapy
Level 6	Minor	Advanced Certificate in Therapeutic Play Skills
Level 6	Minor	Advanced Certificate in Therapeutic Play Practice and Child Development
Level 6	Minor	Advanced Certificate in Play and Creativity Studies



**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 Children's Therapy Centre Ltd.

Name: Michael Hall

Date: 27<sup>th</sup> January 2020.



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

Document	Related to
QQI Reengagement Application Form	Application
CTC QA Manual	Quality Assurance
Cork Institute of Technology Agreement	Collaborative Provider arrangement for Level 8 programme in the Principles of Art Therapy
Companies Registration Office	Incorporation document
Insurance Certificate	Protection of Enrolled Learners
Organisation Structure	Organisation map detailing QA committees /QA Manual
Principles of Art Therapy Brochure	Marketing Brochure
PEL Letter	Agreement with Insurance Company for the protection of learners in the event that delivery of a programme ceases mid-programme.
Programme Development Programme Map	Programme Development, Delivery and Review/ Programme Validation/QA Manual
Checklist of documents enclosed with application	Application for Reengagement
Statutory accounts	Legal compliance
Tax Clearance Certificate	Legal compliance
Statutory Declaration	Legal compliance
Garda Vetting Procedure	Protection of children and vulnerable adults
How QA procedures are made available to learners	Information to learners
Independent representatives in CTC	Independent Chair of Academic Council and other roles
Selection of Teaching and Learning Venues	Procedure for ensuring off-site locations are suitable for delivery of programmes/QA Manual



Teaching, Learning and Assessment Strategy	Programme Delivery and Fair and Consistent Assessment of Learners/QA Manual
Roles for QA	Description of roles
Work Placements	Quality Assurance Manual
Academic Council Chair Criteria and CV	Details of the Independent Chair of the Academic Council
Contract Staff and Implementation of QA Procedures	Quality Assurance Manual
Minutes of Academic Council Meetings	18/7/18 and 18/2/19.

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

Name	Role/Position
Noel Prendiville	CEO
Eileen Prendiville	Director of Academic Affairs
Siobhain Prendiville	Course Leader
Anne Brennan	Member of Internal Quality Assurance Team
Carol Duffy	Lecturer/Tutor
Damian Logan	Business Operations Manager
Laura Coleman	Lecturer/Tutor
Monique McEvoy	Lecturer/Tutor
Emer McDonagh	Lecturer/Tutor
Majella Ryan	Lecturer/Tutor



CHILDREN'S THERAPY CENTRE  
Training – Consultancy – Therapy  
for adults and children

Children's Therapy Centre  
Tír na nÓg  
Slievenagorta  
Ballymore  
Mullingar  
Co. Westmeath  
N91 CC65  
Ireland

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**Response to the report of the independent review panel convened to consider Children's Therapy Centre's re-engagement with Quality and Qualifications Ireland.**

The Children's Therapy Centre (CTC) welcomes the report of the independent panel convened to consider CTC's re-engagement with QQI. CTC greatly appreciates the time and the commitment given by the panel members to the review process as well as the constructive, supportive and professional manner in which they undertook the very comprehensive review.

CTC welcomes the panel's findings in respect of mandatory changes, specific advices, recommendations and commendations as well as its overall recommendation to QQI's Programme and Awards Executive Committee to approve CTC's Quality Assurance Manual.

CTC greatly values the opportunity provided by the re-engagement process to strategically consider its institutional strengths, weaknesses and capacity limitations, to reflect at length on its quality assurance procedures, to focus on the process involved in seeking to continually enhance quality assurance policies and procedures.

It has been a time consuming but extremely valuable process that was conducted openly and enthusiastically with CTC staff in keeping with the ethos of the organisation. CTC gratefully acknowledges the many commendations from the panel, in particular the commendations given to our staff.

It has been an illuminating, rewarding and informative process which, with the constructive, professional, insightful interaction that the panel provided, will undoubtedly result in a better CTC and a better experience for our learners.

CTC wishes to sincerely thank QQI, its staff and the external panel members for the manner in which the re-engagement process was conducted.

Noel Prendiville  
C.E.O.

Eileen Prendiville  
Director of Academic Affairs

## **Mandatory Changes**

The panel report identified four proposed mandatory changes. These are presented below with CTC's response.

*6.1.1 Change the governance structure of the organisation to further separate commercial and academic roles, for example, separation of the role of Exam board Chair from the CEO.*

CTC welcomes and supports this mandatory change.

The CEO no longer holds the role of Examination Board Chairperson.

An additional academic has been added to the Academic Council so that it is now weighted in favour of academic rather than ex-officio members.

The CEO is no longer involved in the desk review of appeals.

*6.1.2 Restructure the QA Manual to include re-design of Chapters 4,9 and 10 to rationalise procedures related to Programme Development, Design and Validation into one section of the manual; removal of the pre-Examination Board Appeals process and addition of clearly articulated procedures for post-Examination Board Appeals. Include a section on Marks and Standards in the QA Manual.*

CTC welcomes and supports this mandatory change.

The QA Manual has been redesigned to rationalise procedures related to Programme Development, Design and Validation which are now set out in Section A4.

The pre-Examination Board Appeals process has been removed and the procedures for post-Examination Board Appeals have more clearly articulated in Section A9.3.

A Marks and Standards section (A7.9 MSD) has been added to the manual.

*6.1.3 Improve the clarity of policies and procedures presented in the QA Manual through the use of standard templates.*

The manual has been re-structured, a standard template format has been implemented and it is now divided into discrete sections for each area of Quality Assurance with a title page and version control.

*6.1.4 Compile the vulnerabilities identified into a formal risk register, with a review schedule, to assist in the mitigation of risks identified through the gap analysis process.*

A Risk Register has been compiled and will be reviewed annually - Section A10.3.

## Specific Advices

The panel identified and offered 8 specific advices. CTC welcomes and supports all eight specific advices. These are presented below with CTC's response.

*4.2.1 When restructuring the QA Manual divide it into discrete sections for each quality area. Each section should follow the same template, with a title page and a version control mechanism; precise procedures which are easily understood, transparent and accessible and regularly used forms included as appendices to allow for ease of amendment. Terms of reference for committees and responsibilities of named roles should also be included in the manual.*

The QA Manual is now divided into discrete sections for each quality area, presented through use of a standard template with a title page and version control. More precise procedures have been set out and excessive narrative removed. Regularly used documents have been included in Appendices to the relevant sections.

Terms of reference for committees and responsibilities of named roles are set out in Section A.2.

*4.2.2 Ensure that consistency of terminology and language is applied across the QA Manual – e.g. 'delegated authority' vs 'delegated responsibility' and 'appeal' vs 'recheck'.*

Terminology and language have been clarified and consistently applied in Sections A2.2 and A7.11

*4.2.3 Ensure the terms of reference for committees and sub-committees detail the purpose, specific functions, membership, frequency of meetings, standing orders and quorum.*

Terms of reference for committees and sub-committees in accordance with the specific advice of the panel are set out in Section 2.

*4.2.4 Publish the QA Manual on the website.*

The Academic Council have decided that the QA Manual will be published on the CTC website, with guidance on its use, when formally approved by QQI.

*4.2.5 Develop a formal teaching, learning and assessment strategy for CTC.*

A formal Teaching, Learning and Assessment Strategy is now included in the QA Manual – Section A7.1.

*4.2.6 Improve work placement policy and procedures to clearly articulate the roles and responsibilities of learners, supervisors and placement providers.*

The Work Placement Policy and Procedure set out in Section A7.3 now clearly describes the roles and responsibilities of CTC, the learner, the supervisor and the placement provider. This section and Appendix A7.3 WP&CPL now clarifies the requirements and the process to ensure the suitability of the specific placement for the associated stage of the practise.

*4.2.7 Remove references to specific organisations from the QA Manual and replace with policy and procedures for engagement with other organisations.*

Section A2.7 now sets out the policy and procedures for engagement with other providers and parties involved in education and training with no references to specific organisations.

*4.2.8 The Academic Council should meet to approve all changes.*

The Academic Council met on January 5th 2020 to approve the revised QA Manual.

#### **Additional Recommendations**

The panel report included a number of additional recommendations which are not specified as either mandatory changes or specific advices. CTC welcomes and supports these recommendations which are presented below with CTC's response.

Page 15, paragraph 1 of the report

*The panel recommended that an individual should have overall responsibility for ensuring the integrity of exam processes.*

The Director of Academic Affairs now has overall responsibility for ensuring the integrity of exam processes (Section A2.5)

Page 18, Section 4, paragraph 5 of the report

*The panel recommends that a plan for dissemination of the QA Manual be put in place and followed through when the full version is approved.*

Learners and staff will have access to the Manual and associated documents in the online learning portal.

When formally approved by QQI the Manual will be published on the website with guidance on its use so that third party stakeholders have access to the Manual.

Page 24, Section 8, paragraph 3 of the report

*The panel recommends that all role titles in centre documentation be checked and standardised across all documentation.*

All role titles have been checked for consistency and the specific title of 'Data Controller' has been replaced with 'Data Control Contact' where it referred to the role of the CEO.

Page 24, Section 8, paragraph 5 of the report

*The Chief Executive Officer is responsible for entering learner results data in the QBS and submitting results for certification.*

The Programme Administrator is now a back-up person in relation to data input in the QBS system (Sections A2.5 and A7.14).

### **Addendum**

CTC also welcomes and supports the generalised comments and advice from the panel in discussions during the course of their visit which resulted in a more user-friendly document with some sections of narrative being removed, a reduction in the incidence of repetition and the incorporation of additional documents as appendices in the manual itself making it a much more useful document for users and stakeholders alike to access policies and procedures.