



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

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| Registered Business/Trading Name: | G Holland Ltd trading as Holland Safety; Holland Training Ltd |
| Address: | 621 Jordanstown Drive, Greenogue Business Park, Rathcoole, Co. Dublin, D24 P622. |
| Date of Application: | 10 th June 2020 |
| Date of resubmission of application: | 30 th March 2021 |
| Date of evaluation: | |
| Date of virtual site visit (if applicable): | 30 th of July, 2020 |
| Date of panel reconvene meeting (if applicable) | 18 th May 2021 |
| Date of recommendation to the Programmes and Awards Executive Committee: | 10 th September 2020 and 24 th June 2021 |



1.2 Profile of provider

Holland Training is based in premises in County Dublin and delivers a specialist range of environmental health and safety management-related training programmes. The provider has worked with FETAC and QQI since 2009, and the scope of QQI programmes offered consist primarily of Minor and Special Purpose Awards at NFQ Levels 5 and 6.

Holland Training employs 10 full-time staff in roles including sales, administration, consultancy, and training provision and accesses a wider network of contract trainers who are subject-matter experts. Learners are diverse, and typically enrolled via their employers. The established client base for the trainer includes multi-national companies, energy and utility services providers, large and small construction firms and public bodies such as government departments and local authorities. A small number of learners are funded through employment support services.

In addition to its QQI activities, Holland Training delivers specialist environmental health and safety training-related courses accredited by other bodies. These include SOLAS, the Pre-Hospital Emergency Care Council, City & Guilds, the Engineering Construction Industry Training Board and the International Powered Access Federation.



Part 2 Panel Membership

| Name | Role of panel member | Organisation |
|-----------------|----------------------|--|
| Danny Brennan | Chair | Former Registrar, Letterkenny Institute of Technology; DNB Consulting. |
| Catherine Peck | Report Writer | Independent Education Consultant |
| Pamela Skerritt | Panel Member | Education Consultant |
| Dave Collins | Panel Member | Chevron Training and Recruitment |

Part 3 Findings of the Panel

3.1 Summary Findings

At the outset, the panel commend the commitment Holland Training (HT) has made to pursuing reengagement with QQI. Although the QQI validated programmes HT delivers do not represent the bulk of its training activities, HT recognizes the value of QQI recognition to its learners. The panel further commend the team at HT on the open and constructive nature of their dialogue with the panel during the evaluation process.

Nonetheless, at the conclusion of the virtual site visit, the panel were not in a position to recommend immediate approval of HT's QA procedures. This was because the draft QA procedures presented by HT did not reflect sufficient alignment to QQI's requirements as outlined in the Core Statutory Quality Assurance Guidelines (2016) and Sector Specific Statutory Quality Assurance Guidelines for Independent/Private Providers (2016).

Given the evident commitment of HT to enrolled learners, and to the delivery of high-quality training, the panel recommended a number of Mandatory Changes be made. The Mandatory Changes are listed in Section 7.1 of this report. HT was required to resubmit its draft QA procedures, including evidence of the Mandatory Changes following an interim period of up to six months.

The panel reconvened on May 18th 2021 to undertake a desk review of the evidence submitted. The panel noted that HT had undertaken substantial work to comprehensively address the panel's initial concerns. Following this review, the panel were sufficiently satisfied to make a recommendation to QQI to approve the QA procedures of HT with some discrete Conditions of Approval (see Section 6). The panel has also identified additional items of Specific Advice, listed in Section 7.3 of this report.

The panel acknowledges the good standing of HT within the sector and encourages HT to continue its development and enhancement of the draft QA procedures as it moves forward.



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

| | Tick <u>one</u> as appropriate |
|---|--------------------------------|
| Approve Holland Training's draft QA procedures | X |
| Refuse approval of Holland Training'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> | |
| Refuse to approve Holland Training's draft QA procedures | |



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

| | Criteria | Yes/No/ Partially | Comments |
|-----------------|---|------------------------------|--|
| 4.1.1(a) | Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i> | Yes | Holland Training's Certificate of Incorporation is included in its application. The provider has certified 2,386 learners with QQI over the past five years, and offers courses accredited by a range of other awarding bodies. |
| 4.1.2(a) | Criterion: <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i> | Yes | Holland Training is an established provider in Ireland. The provider and has formerly worked with FETAC (from 2009), and now provided certification for programmes via QQI. |
| 4.1.3(a) | Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i> | Yes | Holland Training has provided information regarding its company structure to QQI and to the panel during the course of the evaluation. |
| 4.1.4(a) | Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i> | Yes | Holland Training does not engage in collaborative provision, and has listed other accreditation bodies within its application. |
| 4.1.5(a) | Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i> | Yes | The provider's application contains a statement of compliance and declaration. |
| 4.1.6(a) | Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of</i> | Yes | Holland Training has a track record of certification in Ireland. The provider has worked with FETAC and QQI to certify learners since 2009, and additionally offers courses accredited by other bodies including SOLAS, the Pre-Hospital Emergency Care Council, City & Guilds, the Engineering Construction Industry Training |



| | |
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| <i>education and training, professional bodies and regulators.</i> | Board and the International Powered Access Federation. |
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Findings

The panel is of the view that the evidence submitted by Holland Training is wholly consistent with the provider meeting this criterion in full.

4.2 Resource, governance and structural requirements:

| | Criteria | Yes/No/ Partially | Comments |
|----------|--|------------------------------|---|
| 4.2.1(a) | Criterion: <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i> | Yes | A letter from the provider's auditor confirming the company is in good financial standing was submitted alongside the application, as well as abridged accounts for the years 2017 – 2019. |
| 4.2.2(a) | Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i> | Yes | Holland Training is a well-established provider offering programmes of education and training in areas of ongoing demand. |
| 4.2.3(a) | Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i> | Yes | At the time of the virtual site visit, the panel was not satisfied that Holland Training had governance structures in place that appropriately aligned to QQI's guidelines. The panel issued a number of Mandatory Changes in relation to this criterion in Section 7.1 of this report. When the panel reconvened in May 2021 the panel were of the view that the measures implemented by HT in the interim period had sufficiently addressed these concerns. |
| 4.2.4(a) | Criterion: <i>Are there arrangements in place for providing required information to QQI?</i> | Yes | The provider has a track record of validation and certification with QQI. |

**Findings**

The panel was initially of the view that further development was needed before Holland Training could demonstrate meeting Criterion 4.2.3(a) in full. The panel's concerns are discussed in Section 5.1 of this report. When the panel reconvened in May 2021 the panel were of the view that the measures implemented by HT in the interim period had sufficiently addressed these concerns.

4.3 Programme development and provision requirements:

| | Criteria | Yes/No/ Partially | Comments |
|-----------------|--|------------------------------|--|
| 4.3.1(a) | Criterion: <i>Does the applicant have experience and a track record in providing education and training programmes?</i> | Yes | Holland training has engaged with QQI since 2009, and has certified 2,386 learners over the last 5 year period. |
| 4.3.2(a) | Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i> | Yes | Holland training employs 10 full-time staff in a range of administration, consultancy and training roles, and accesses a wide network of contracted trainers who are subject matter experts. Although the panel acknowledge that the provider has access to appropriately qualified staff, the panel initially identified a Mandatory Change (7.1.9) relevant to this criterion. When the panel reconvened in May 2021 the panel were of the view that the measures implemented by HT in the interim period had sufficiently addressed these concerns. |
| 4.3.3(a) | Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality</i> | Yes | The panel is satisfied that the provider's track record of certification, and its approach to the re-engagement process reflects its capacity to co-operate with and assist QQI and provide QQI with information as specified in Section 45(3) |



| | | | |
|-----------------|--|------------|--|
| | <i>Assurance (Education and Training) Act (2012) (the Act)?</i> | | of the 2012 Qualifications and Quality Assurance (Education and Training) Act. |
| 4.3.4(a) | Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i> | Yes | Due to the Covid-19 pandemic, the site visit for this evaluation was conducted virtually, and the panel members did not undertake a site visit to Holland Training's premises. However, the training environment and facilities were discussed with the panel in the course of the evaluation. |
| 4.3.5(a) | Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i> | Yes | The panel is satisfied that Holland Training has arrangements in place that are appropriate to the context of its provision. The provider is encouraged to review the level of detail within these processes within its wider review of the QA documentation. |
| 4.3.6(a) | Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i> | Yes | The panel acknowledge areas of good practice at Holland Training within this dimension of QA. However, the panel initially identified two Mandatory Changes (7.1.3 & 7.1.11) relevant to this criterion. When the panel reconvened in May 2021 the panel were of the view that the measures implemented by HT in the interim period had sufficiently addressed these concerns. |
| 4.3.7(a) | Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i> | Yes | Holland Training programmes do not extend over three months in duration and therefore this criterion is not applicable to the current programmes of education and training delivered by the provider. |

Findings

The panel was initially of the view that further development was needed before Holland Training could demonstrate meeting Criterion 4.3.2(a) and 4.3.6(a) in full. The panel's concerns are discussed in Sections 5.4 and 5.6 of this report. When the panel reconvened in May 2021 the panel were of the view that the measures implemented by HT in the interim period had sufficiently addressed these concerns.



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

The panel was initially of the view that Holland Training met the majority of the Criteria in Section 4, which pertain to the provider's capacity to deliver sustainable programmes of education and training. Specific areas of concern for the panel fell under Governance and Management of QA, Staff Recruitment, Management and Development, and Assessment of Learners. These are discussed in Sections 5.1, 5.4 and 5.6 of this report. When the panel reconvened in May 2021 the panel were of the view that the measures implemented by HT in the interim period had sufficiently addressed these concerns.



Part 5 Evaluation of draft QA Procedures submitted by Holland Training

The following is the panel's findings following evaluation of Holland Training'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:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines require a provider's governance structures to enforce an appropriate separation between commercial and academic decision-making. During the virtual site visit, the panel discussed current arrangements at the provider with HT representatives. Although efforts had been made to ensure representation of academic personnel on HT's Quality Committee, the panel was of the view that the membership of the committee (which included the provider's commercial manager) did not demonstrate a sufficient separation between the commercial and academic functions of the business. Acknowledging the challenges inherent in achieving this separation for small providers, the panel engaged in constructive discussions with HT representatives as to how this might be achieved.

The panel was of the view that the appointment of an external chair to the Quality Committee would be of benefit to HT. An appropriately qualified person would assist the provider in demonstrating a distance between academic and commercial decision-making, and would also provide informed externality. The latter benefit may valuably assist HT in achieving its future ambitions, for example the development, validation and revalidation of programmes of education and training with QQI. The panel also noted the need for HT to formalise its presentation of the subcommittees of the Quality Committee within its draft QA procedures, and to ensure that appropriately detailed terms of reference are provided for these.

Notably, QQI's guidelines require providers to have a system of governance in place that considers risk. HT identified within a gap analysis exercise undertaken in preparation for reengagement that a risk management policy and risk register needed to be developed. The panel endorsed this commitment, and identified current risks for HT associated with the lack of comprehensive documentation delineating terms of reference for committees and outlining individual roles and responsibilities. The panel was of the view that this was an unsustainable risk for HT in relation to succession planning, as there was no substantive mitigation of the risks associated with unforeseen succession events for key personnel. The need for further development of documentation in this area was therefore required.

Providers must also demonstrate within their governance and management structures that quality systems are embedded within the organisation, and that all staff are involved in the enhancement of QA. The panel held some concerns that responsibility for QA at HT was delegated specifically to the QA Co-ordinator within the organisation, rather than operating as a shared and distributed concern. With regard to this, the panel noted that the further documentation by HT of terms of reference for committees, as



well as roles and responsibilities for individuals (discussed above) would provide an opportunity to address this. The panel was therefore of the view that identifying responsibilities for QA and continuous improvement will be an essential part of the revised documentation.

The panel identified Mandatory Changes relevant to this dimension of QA in Section 7.1 of this report, specifically, 7.1.1, 7.1.2, 7.1.3, 7.1.4 & 7.1.5.

When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted substantive enhancements had been made in relation to this dimension of QA. HT had substantially revised its governance structure, outlining a plan to appoint an external chair to the Quality Committee and making provision for learner representation at this level. The panel has identified some discrete conditions of approval pertaining to this criterion. These are listed in Section 6.1 of this report and require the inclusion of expanded terms of reference for the Operations Team, the appointment of the external chair to the Quality Committee and the adjustment of the quorum for the Quality Committee. The panel was of the view that HT had responded appropriately to the panel's concerns regarding risk management and succession planning.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines require robust, documented QA policies and associated procedures to be in place that are informed by QQI quality assurance guidelines and have formal standing within a provider. The panel acknowledged that the policy documentation submitted by HT had been structured to reflect the dimensions of QA presented in QQI's Core Statutory Quality Assurance Guidelines (2016) and established an appropriate foundation for further development. The panel also noted that HT had identified within the gap analysis it undertook in preparation for reengagement that continual development of the QA system was anticipated. However, the panel was of the view that the documentation needed to be expanded and to include significantly greater detail before the panel could recommend approval to QQI.

During the virtual site visit, the panel explored how various processes at HT were enacted in practice. Following these conversations, the panel concluded that the documentation did not fully represent the range of QA practices in operation at HT or present these in adequately detailed and usable formats for staff and learners. This needed to be addressed by HT. The panel was also of the view that expanding the QA documentation would provide HT with an opportunity to showcase good practice that occurs routinely



within the organisation but is not currently documented. The panel noted that Holland Training has stated its intention to publish the QA procedures within its application.

The panel identified a Mandatory Change relevant to this dimension of QA in Section 7.1 of this report, specifically, 7.1.6.

When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted the significant work undertaken by HT in relation to this criterion. HT had expanded its QA procedures and included substantially more detail in relation to several dimensions of QA, including Teaching and Learning, Learners Supports and the Recruitment, Induction and Management of Tutoring Staff.

3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the site visit, the panel explored the processes for programme design and approval at HT. HT confirmed that demand for new programmes was industry driven. New programme proposals may be prompted or informed by the provider's engagement with corporate clients or by changes to legislation. Programme viability is initially considered at operations meetings and moved forward by the QA committee. The initial development of a programme will include a consideration of the programme learning outcomes, methodologies and assessment methods as well as an evaluation of HT's capacity to deliver the training, the resources required and the logistical demands of delivery. HT representatives acknowledged that while efforts had been made to establish, as per QQI's guidelines, a clear separation between those who produce/develop material and those who approve it, these were not as robust as required. The panel noted that the required revisions to the HT's governance and management structure would more readily facilitate achievement of this principle. The panel identified a Mandatory Change relevant to this in Section 7.1 of this report, specifically, 7.1.7.

Under this dimension of QA, QQI require providers to have pre-defined and published regulations in place pertaining to admission, progression and recognition. Access policies, admissions processes and criteria must be established and implemented in a transparent manner. During the virtual site visit, HT representatives confirmed that almost all of their learners are enrolled in programmes via their employer. HT's first direct interaction with learners may occur at induction. HT proactively request information from companies regarding additional supports, for example literacy supports or reasonable accommodations. The programmes offered by HT are highly specific and discrete in nature, and progression opportunities therefore do not exist within the provider. HT representatives noted that some learners may be interested in undertaking further study, and in such instances informal advice could be given about external options, dependent on the domain and offering. The panel identified a Mandatory Change relevant to initial access



for learners in Section 7.1 of this report, specifically 7.1.8. This required HT to further formalise and document this important aspect of its practice within the overall QA system.

QQI's guidelines require programme delivery to be monitored in a way which allows for the identification of needs and the modification and adjustment of the programme and the delivery method as appropriate. During the virtual site visit, the panel explored how programmes were monitored at HT and how changes were made to programmes. HT representatives identified the role of standardisation meetings in providing a forum for tutors to raise issues regarding programmes and for decisions to be made regarding changes. The panel noted that HT will be able to make this aspect of practice more transparent through the formalisation of governance and management structures within HT, including detailed terms of reference for committees or teams (discussed in Section 5.1) and through expansion of the QA documentation overall (discussed in Section 5.2).

When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted that substantial revisions had been made to this dimension of HT's QA. HT had revised its programme development and approval procedures to ensure a separation between those who develop and those who approve material. The panel has identified one item of additional specific advice pertaining to the sequencing of approvals within this procedure.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

HT confirmed that of the large network of trainers the provider contracts (150+), a significantly smaller number (approximately 10) are directly involved in delivery of QQI validated programmes. The panel therefore explored HT's practices under this dimension of QA with specific reference to staff involved in QQI programmes. Specifically, during the discussions with HT representatives the panel traced the processes by which staff were recruited, inducted, performance managed and developed.

HT confirmed that specifications for tutors flow from the component specifications of a programme, but would typically require the tutor to hold a training qualification and a minimum of 3 – 5 years of experience. Trainers are often sourced through the existing network, and reference checks may be both formal and informal. Potential new tutors meet with the training coordinator, and these meetings may also involve a subject matter expert if available or required. New tutors receive a copy of the training materials and have the opportunity to discuss the programme with the training coordinator and internal verifier. No formal process is currently in place for mentoring or supporting new tutors. However, their performance is monitored via learner feedback, and issues arising are followed up. A programme for Continuing Professional Development (CPD) is in place at HT, which requires tutors to undertake a



minimum of 40 hours per year. HT representatives discussed an identified need to vary the criteria by which CPD was defined to ensure this encompassed appropriate forms of activity.

The panel identified a Mandatory Change relevant to this dimension of QA in Section 7.1 of this report, specifically, 7.1.9. This pertained to the need for HT to further formalise and document its processes under this dimension of QA.

When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted that the QA procedures in this area had been expanded and strengthened. For example, performance management processes were noted to have been implemented and a mandatory induction process was outlined.

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

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

QQI's guidelines under this dimension of QA require processes to be in place to ensure that the content of programmes reflect advances in the discipline area and that the pedagogic styles incorporate national and international effective practice. HT's programmes are informed by industry demand and legislation, and the panel did not hold any concerns pertaining to the currency of the subject matter. However, the panel were not satisfied that HT's draft QA documentation reflected a pedagogic approach (or set of approaches) informing the practices of tutors on HT programmes.

The panel noted that documentation submitted under this dimension of QA referenced HT's commitment to the provision of learning materials, as well as fair and consistent assessment, and indicated that tutor feedback to learners is encouraged. However, the panel were unable to identify a stated theory or philosophy of learning at HT relevant to this specific dimension of QA, or references to specific strategies or methods tutors were asked to employ in the delivery of HT programmes. During discussions at the virtual site visit the panel therefore sought to gain further insight into the nature of teaching and learning at HT. This discussion made evident that HT emphasizes the achievement of learning outcomes and closely monitors learner feedback.

At the conclusion of discussions in this area, the panel were of the view that the revised draft QA procedures would be strengthened by the inclusion of a stated approach to teaching and learning at HT within the teaching and learning policy. This would also enhance HT's guidance to tutors and offer useful information to prospective learners or client companies regarding the education and training services offered by the provider. The panel identified a Mandatory Change relevant to this dimension of QA in Section 7.1 of this report, specifically, 7.1.10.

When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted that further documentation appropriate to the provider's context had been included within the documentation. That documentation outlined the pedagogic principles underpinning training delivery at HT.



6 ASSESSMENT OF LEARNERS

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel explored how assessment processes worked in practice at HT. Discussions encompassed the communication to learners regarding assessment at the outset of programmes, submission, marking, internal verification and the issuing of provisional marks as well as the role of the External Examiner. The panel were satisfied that good practice was occurring at HT pertaining to assessment, but was of the view that this aspect of HT's QA system could benefit from more comprehensive documentation, as per commentary in Section 5.2 of this report. The panel also noted that within Mandatory Change 7.1.3 the integration of a process of benchmarking grades against national averages would be valuable for HT.

The panel held some concerns regarding the appeals process. Due to the relatively small scale of HT there was a possibility within the current process that in some instances the adjudication of a grade related appeal may be undertaken by individuals who had previously been involved in a grade review or who held a commercial remit. Therefore, the panel identified a Mandatory Change pertaining to this in Section 7.1 of this report, specifically, 7.1.11.

When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted that HT had made significant efforts to address its initial concerns. A process of benchmarking grades against national averages was reflected within the remit of the Quality Committee and the appeals procedure clearly stated that the adjudication of grade reviews would not be heard by any individual involved in the original decision. The panel identified additional specific advice for HT pertaining to its appeals procedures, outlined in Section 7.3.

7 SUPPORT FOR LEARNERS

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel discussed the supports available to learners at HT, and the communication of these to learners. HT endeavours to make reasonable accommodations for learners and provide supports if learners are identified to have learning difficulties, language issues or physical disabilities. HT extends some flexibility to its learners in relation to assignment deadlines, and provides



additional tutor supports if needed. The panel was of the view that the range of supports provided by HT to learners are appropriate to the context of its education and training provision.

As noted in discussion in Sections 5.2 and 5.3 of this report, the panel was of the view that the procedures for the communication of available supports to learners at the point of initial access needed to be reviewed, and practices in this area further documented.

When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted that HT had significantly expanded its documented process in relation to this criterion. These effectively addressed the panels initial concerns.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel is of the view that Holland Training has satisfied the requirements of QQI's Core and Sector Specific Quality Assurance Guidelines under this dimension of QA.

During the virtual site visit, the panel explored the processes for information management at HT, including data protection. The panel was satisfied that HT takes its obligations in relation to data protection seriously. HT provides appropriate information to learners at orientation and on the company website, and a notice including a reference to the privacy policy is included on every form. Data is processed on the basis of contractual and legitimate interests, and the majority of HT's clients require them to have data processing agreements in place. The panel has identified an item of Specific Advice pertaining to this in Section 7.2 of this report. The panel was of the general view that this aspect of HT's QA system could benefit from more comprehensive documentation, as per commentary in Section 5.2 of this report.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The panel is of the view that Holland Training has satisfied the requirements of QQI's Core and Sector Specific Quality Assurance Guidelines under this dimension of QA.

During the virtual site visit, the panel discussed the processes for access to information for learners and the publishing of information on the website with HT representatives. Programme information on the website is published in alignment with programme information as per validation forms. HT representatives indicated that there was a willingness at the organisation to publish the outcome of QQI reviews and to make such information publicly available through adding a section to the website. The



panel was of the general view that this aspect of HT's QA system could benefit from more comprehensive documentation, as per commentary in Section 5.2 of this report.

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

Panel Findings:

The panel is of the view that Holland Training has satisfied the requirements of QQI's Core and Sector Specific Quality Assurance Guidelines under this dimension of QA.

Holland Training does not engage in any collaborative provision arrangements. Other accreditation bodies the provider works with are identified within the application form.

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

At the time of the virtual site visit, the panel was of the view that further development of this aspect of HT's draft QA procedures was required in order to reflect a clear alignment to QQI's Core Statutory Quality Assurance Guidelines.

During the virtual site visit, the panel explored processes for self-evaluation, monitoring and review with HT's representatives. HT asks learners to evaluate their experience on each programme and provide feedback, and also receives feedback via company clients and informal mechanisms. As discussed in Sections 5.1 and 5.3, the panel was of the view that the formalisation of HT's governance and committee structures would bring further enhancement to this area of the provider's practice.

The panel was of the general view that this aspect of HT's QA system could benefit from more comprehensive documentation, as per commentary in Section 5.2 of this report. When the panel reconvened on May 18, 2021 to undertake a desk review of the revised QA procedures submitted by HT, the panel noted that HT had further formalised processes and responsibilities relevant to this dimension of its QA. The panel was satisfied that the overall enhancements made to HTs documented QA procedures reflected good progress in this area.



Evaluation of draft QA Procedures - Overall panel findings

As discussed in Section 3.1 of this report, the panel acknowledges the good standing of HT within the sector. Following the virtual site visit, the panel was of the view that implementation of the Mandatory Changes and items of Specific Advice would support HT in developing an appropriately robust and comprehensive QA system that will support its future ambitions and growth. When the panel reconvened on May 18th 2021 to undertake a desk review of HT's revised QA procedures, the panel noted the substantial work undertaken by the provider during the interim period. HT had satisfactorily addressed the panel's initial concerns and significantly enhanced its overall QA system. The panel was therefore pleased to recommend that QQI approve HT's QA procedures, with the conditions outlined in Section 6 of this report.



Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

1. Holland Training must proceed with the appointment of the Independent Further Education Professional to Chair its Quality Committee within a time frame of one month following QQI's approval of the Quality Assurance procedures. A profile of the Independent Chair must be included within the documented QA procedures.
2. Holland Training must include detailed terms of reference for the Operations Team within its draft QA, including reference to the direct line of communication between the Quality Committee and the Operations Team.
3. Holland Training must amend the terms of reference for the Quality Committee to raise the quorum to 4.

Part 7 Mandatory Changes to QA Procedures and Specific Advice

7.1 Mandatory Changes

7.1.1

Holland Training must revise its current arrangements to ensure that an appropriate separation of commercial and academic decision-making is enforced by the governance and management structure. This could be achieved, for example, by:

- Ensuring that the Quality Committee for Holland Training has a membership that excludes individuals tasked with commercial functions within the organisation.
- Formalising the Operations Team as the commercial decision-making unit within the organisation. In the process of this, reviewing and documenting the membership and terms of reference of the Operations Team.

7.1.2 To ensure an appropriate level of separation between those who produce material and those who approve it (for example, new programmes or QA documentation), Holland Training must appoint an appropriately qualified external expert to chair the Quality Committee. The external Chair must have a clear line of communication with the Operations Team.

7.1.3 The sub-groups of the Quality Committee that currently take responsibility for new programme development, as well as standardisation and internal monitoring must be formalised by Holland Training. Appropriate terms of reference including membership must be drafted for the



subgroups and included in the resubmission of the QA procedures. Within this, Holland Training must, within its wider processes of internal monitoring and programme review, integrate benchmarking of grades against national averages.

- 7.1.4 Holland Training must review its risk management to include a consideration of the risk of failure in QQI processes, and risks associated with succession planning. The latter risk should be partly mitigated by the inclusion of clearly documented roles and responsibilities of individuals and comprehensive terms of reference for committees within the draft QA procedures.
- 7.1.5 Holland Training must demonstrate how responsibility for QA is embedded across the organisation at all levels within its documented processes. Responsibility for QA should be visible in terms of reference for units of governance and individual roles and responsibilities.
- 7.1.6 Holland Training must adapt the draft QA processes to align more closely to the Core Statutory Quality Assurance Guidelines and Sector Specific Statutory Quality Assurance Guidelines for Independent/Private Providers.
- 7.1.7 Holland Training must demonstrate within its procedures for new programme design and development how the interaction between the Quality Committee and the Operations Team is managed to ensure that there is no undue commercial influence on academic decision-making. This procedure must also demonstrate how a distinction is made between those who produce/develop material and those who approve it.
- 7.1.8 Holland Training must revise its draft procedures with regard to information and supports provided to learners on initial access to all programmes. Processes in this area must be formalised and documented within the draft QA procedures. This must also include further documentation of practices in relation to Learner Supports.
- 7.1.9 Holland Training must formalise the processes for recruitment, induction, monitoring, and performance management of tutoring staff, and include these within the documented QA.
- 7.1.10 Holland Training must develop an effective Teaching and Learning Policy within its draft QA procedures. This should be appropriate to the context of the organisation and encompass a consideration of the learner profile and needs.
- 7.1.11 Holland Training must ensure that within the appeals process, any appeal pertaining to an assessment grade is adjudicated by individuals who have not previously been involved in either grading or reviewing a grade, or by individuals who hold a role with a commercial remit.



7.2 Specific Advice

- 7.2.1 Holland Training should assure itself that its data processing activities in all areas of operations are GDPR compliant and demonstrate best practice. Consideration should be given to sensitive areas, for example, reporting of failure or academic misconduct to a learner's employer.
- 7.2.2 Holland Training is advised that with regard to Mandatory Change 6.1.6, the review of QA documentation could usefully be informed by a review of the published QA procedures of other providers who have successfully reengaged with QQI.

7.3 Additional Specific Advice

These items of Specific Advice are provided to guide Holland Training in its ongoing development over the longer term. The panel does not require these items to be addressed prior to recommending approval.

- 7.3.1 The panel notes the substantial progress made by Holland Training in the development of its programme development and approval procedures. Holland Training is advised that the final stage of its programme development process could be further enhanced. This should reflect that following approval of a developed programme by the Quality Committee, a final approval of that programme and its associated resource requirements must be provided by the Operations Department and Managing Director. This sequencing is important to capture any additional resource requirements that may be conditions of the Quality Committee's approval, and that these are able to be fully considered by the corporate decision-makers.
- 7.3.2 Holland Training is advised to refine its procedure for Assessment Appeals to include the following adjustments:
- Remove the learner representative from the Appeals Committee to safeguard against potential conflicts of interests;
 - Remove reference to a QQI National Appeals process;
 - Align the description of the grounds for appeal within the QA and Learner Handbook with those outlined in the appeals form, which are clear and appropriate;
 - Align the stages and descriptions of of Recheck, Review and Appeal as per QQI's Assessment and Standards, Revised 2013.
- 7.3.3 Holland Training is advised to give consideration to implementing a system of hyperlinks across the documents where QA procedures are presented. This will ensure that if a QA procedure is updated it will be consistent across all sources of information.



7.3.4 Holland Training is advised to continue its development of documented QA for Blended Learning. Holland Training is further advised to consult with QQI as to how best to proceed with an application for an extension of scope to include Blended Learning if that is within the provider's longer-term strategy. Within the scope of this evaluation, the panel has not undertaken an evaluation of Holland Training's procedures for Blended Learning.

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

| NFQ Level(s) – min and max | Award Class(es) | Discipline areas |
|---------------------------------|-----------------|--|
| 5 - 6 | Minor/SPA | Construction/Health & Safety/Management |
| Face to Face and Part-time Only | | |



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 Holland Training.

Name:

Date: 28 May 2021

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

| Document | Related to |
|--|------------|
| No further documentation was provided. | |

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

| Name | Role/Position |
|----------------|-------------------|
| George Holland | Managing Director |
| Bryan Holland | QA Coordinator |

Appendix: Provider response to the Reengagement Panel Report

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

Date: 4th June 2021

Ref: Reengagement Panel Report – Assessment of Capacity and Approval of QA Procedures.

Dear Ms. Cotter,

Firstly, we would like to thank you, Dr. Deirdre Stritch and the Reengagement Panel members for the time and effort invested in this reengagement process and for your recommendation for approval to the Programmes and Awards Executive Committee of QQI.

We have reviewed the reengagement panel report and have made the following amendments in line with its conditions and specific advice:

- Addition of Terms of Reference for the Operations Department.
- Amendment of Terms of Reference for the Quality Committee raising the quorum to 4.
- Removal of the learner representative from the appeals process.
- Removal of reference to the QQI National Appeals process.
- Alignment of QA manual and Learner Handbook with Appeals form.
- Alignment of terminology within the appeals areas.

We can confirm that we will proceed with the appointment of the Independent Further Education Professional to Chair our Quality Committee within a time frame of one month following QQI's approval of the Quality Assurance procedures. A profile of the Independent Chair will be included within our documented QA procedures.

We thank you again for your guidance and assistance throughout this process and look forward to working closely with QQI in the coming years.

Yours sincerely



Eoin Kirby