



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Provider Access to Initial Validation of Programmes leading to QQI Awards

Report of the Quality and Capacity Evaluation Panel

Stage 1

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of applicant provider and its proposed education and training provision

1.1 Applicant Provider

Registered Business/Trading Name:	Holmes Institute Ireland Limited / Holmes Institute Dublin
Address:	The Brickworks, Brickfield Lane, Dublin 8 <i>(lease currently being executed)</i>
Date of Application:	17 April 2019
Date of resubmission of application:	28 January 2020
Date of evaluation:	10 December 2019 06 March 2020
Date of site visit (if applicable):	N/A
Date of recommendation to the Approvals and Reviews Committee:	25th March 2020



1.2 Profile of applicant provider

Holmes Institute Australia (HI) was established in 1963 as a business college and has had the same ownership structure since 1989. Its parent company is the Holmes Education Group (HEG), which has expanded to become a transnational education services company that provides education in English language training, schools, vocational and higher education and training. HEG operates in the United Kingdom, the United States of America, Canada, Hong Kong, China and Australia. It has also established an English language school in Ireland – OHC (Oxford House) which is based on Capel Street in Dublin.

HI is a private higher education provider. It offers a range of awards under the Australian Qualification Framework (AQF) from vocational education and training to undergraduate programmes through to masters' degree. HI offers these programmes in business, accounting, fashion business, and information systems. At present HI delivers its higher education programmes to domestic and international learners at campuses in Melbourne, Sydney, Brisbane, the Gold Coast, Cairns and Hong Kong. In Australia it is regulated by the Tertiary Education Quality and Standards Agency (TEQSA) and in Hong Kong it is regulated by the Hong Kong Council for Accreditation of Academic and Vocational Qualifications (HKCAAVQ). HI's accounting programmes are accredited by Australian professional associations including the Certified Practising Accountants and the Institute of Chartered Accountants (CPA / ICAANZ). HI has also recently opened a Cybersecurity and Innovation Research Centre staffed with full-time researchers.

This application for initial access to validation is made for a proposed higher education provider to be named Holmes Institute Dublin (HID). HID has applied to offer Level 7 and Level 8 degrees in business studies. The Panel evaluation on 10 December 2019 was attended by representatives from HI who have been instrumental in developing the plans for HID and some of whom will be locally based in establishing the institution.

1.3 Proposed education and training provision

NFQ Level	Award Class	QQI Award / Proposed Programme Title
7	Bachelor of Arts	Bachelor of Arts in Business
8	Bachelor of Arts	Bachelor of Arts (Hons) in Business



Part 2 The Quality and Capacity Panel Membership

Name	Role of panel member	Organisation
Professor Brian Bowe, Head of Academic Affairs and Assistant Registrar	Chair	Technological University Dublin
Maria Maguire	Student Representative	Dundalk Institute of Technology
Hugh McBride, Senior Lecturer in Business	Teaching, Learning and Assessment Expert	Galway-Mayo Institute of Technology
Sinéad O’Sullivan, Director of Quality	National QA Expert	University of Limerick
Dr Trish O’Brien	Independent Report Writer	O’BRIEN / Governance Design

Walter Balfe, Head of Awards, QQI, attended the evaluation as an observer.

Part 3 Findings of the Panel

3.1 Summary Findings

Following its meeting with HI representatives, the Panel was very satisfied that HI is an institution with long-standing and significant experience in higher education, and that it has the skills, resources and experience to establish a higher education provider in Dublin. HI conveyed a reflective approach to quality assurance and has improved its systems through a series of iterations since its establishment. The Panel was also impressed with the collegial and open manner in which the HI representatives engaged during the evaluation meeting.

Overall, however, the Panel considered that aspects of its meeting with HI were more illuminating regarding the quality of the processes envisaged for HID than the submitted QA Manual communicated. In addition, it had concerns regarding the gap analysis conducted to inform the QA Manual; particularly the extent to which it has had regard to QQI assessment policies and procedures. As a result, the Panel identified some proposed mandatory changes to HI on these and other matters and offered other specific advices to the institution.



The Panel reconvened on 06 March 2020 to undertake a desk review of the evidence subsequently submitted by HI in response to its proposed mandatory changes. It is the Panel’s view that HI has satisfactorily addressed the proposed mandatory changes and it notes the progress made by HI in responding to the specific advices offered. The Panel is convinced of the capacity of HI to provide learners with *a well-supported learning experience which will allow them to achieve the learning outcomes for the type and level of QQI award sought* (Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards QQI, 2013, p.5). The Panel notes that in the second part of this process, the application for programme validation under the Policies and Criteria for the Validation of Programmes of Education and Training (QQI, 2017), HI will be required to contextualise its quality assurance policies and procedures and to illustrate their implementation in a local context. The Panel consequently recommends that QQI approves the QA procedures of HI.

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

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



Part 4 Evaluation of the capacity of the applicant to provide quality education and training to learners

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	HI provided a Certificate of Incorporation for Holmes Institute Ireland Limited. Education and training is its principal function.
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	HI has established a legal entity in Ireland that will be based in Dublin. A company registration number was provided. Holmes Group has a presence in Ireland currently via an English language school. HI is at an advanced stage in securing a lease for a premises for HID and will confirm same in the event that it is successful in its application for initial access to validation.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	The parent company of HID is Holmes Institute Holdings Ireland Limited, which has been established by Holmes Education Group.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	N/A	It is not currently intended that HI will enter into third-party relationships or partnerships.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	HI has confirmed that it is in good standing as a corporation and as a higher education provider in all of the jurisdictions in which it operates. The Panel has indicated 'yes' to this



			critterion based on the assurances provided by HI; it has not carried out an independent assessment.
4.1.6(a)	Criterion: <i>Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.</i>	Yes	HI has confirmed that it is in good standing as a corporation and as a higher education provider, in all of the jurisdictions in which it operates. The Panel has indicated 'yes' to this criterion based on the assurances provided by HI; it has not carried out an independent assessment.

Findings

The Panel is satisfied that this application meets all of the criteria specified under *Legal and compliance* requirements.

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	HI has an extensive resource base and is of good financial standing. It provided audited accounts and income and expenditure reports / projections as part of its application.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	HI has presented a reasonable business case for sustainable provision. It characterises its growth projections as conservative as it acknowledges that it is new to the Irish higher education sector. HI



			emphasised that its plans for HID are long-term.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	HI has extensive governance and management arrangements in place for its operations in other jurisdictions. It will base the management and governance of HID on these models. More information was requested by the Panel regarding what structures will be in place at the outset of HID's establishment and as it evolves. Having reviewed the additional information provided by HI, the Panel is satisfied that HI has met this criterion. This is further commented upon under Part 5, sections 1 and 4.
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	LUNA, HI's learner management system, will record all HID learner data and will be used to produce management information reports on key learner information, such as enrolments and progression. It can provide this information to QQI to meet its requirements.

Findings

The Panel identified a proposed mandatory change regarding the provision of information on the governance and management systems that will be in place when HID is established, and as it evolves. Having reviewed HI's response to this proposed mandatory change, the Panel is now satisfied that HI's application meets each criterion under *Resource, governance and structural requirements*.

**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	HI has grown and expanded over the last 55 years. It has a substantial track record in providing higher education programmes across a number of jurisdictions.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Partially	HI has detailed plans for staffing HID in the event that it is successful in achieving initial access to validation. In the interim the Director of Holmes Education Group Ireland is based in Dublin and is working to establish HID in conjunction with colleagues in HI. It is also planned that the current Dean of Operations at HI's Head office in Melbourne, will relocate to Dublin for a six-month period in the event that HI is successful in securing initial access to validation. A priority is being placed by HI on recruiting experienced staff within as short a time period as possible. HI provided an update on its progress for the Panel's consideration at its reconvened meeting on 06 March 2020.
4.3.3(a)	Criterion: <i>Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?</i>	Yes	The standard conditions for validation specified in the 2012 Act include co-operation with and assistance to QQI in the performances of its functions; the establishment of procedures for the fair and consistent assessment of learners; and provisions for the protection of enrolled learners. The Panel is satisfied that HI has the capacity to comply with these standard conditions.
4.3.4(a)	Criterion: <i>Does the applicant have the fit-for-purpose premises, facilities and</i>	Partially	HI is currently in the process of executing a lease for a property at The Brickworks in Brickfield Lane, Dublin 8.



	<i>resources to meet the requirements of the provision proposed in place?</i>		In the event that its application for initial access to validation is approved by QQI's Approval and Reviews Committee, it will implement its plans for fitting this new building with the resources required and appropriate to a higher education institution.
4.3.5(a)	Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	Yes	HID has ATP policies and procedures in place that can meet QQI's criteria.
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	The Panel requested that HI review the assessment procedures particular to QQI and to the Irish context. Having reviewed its response to this proposed mandatory change, the Panel is satisfied that this criterion has been met. This is further commented upon under Part 5, section 6.
4.3.7(a)	Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	No	In the event that HID is successful in its application for initial access to validation, it will execute its plans to secure PEL either in conjunction with other private higher education institutions, or via insurance.

Findings:

The Panel is satisfied that this application meets criteria 4.3.1(a), 4.3.3(a), 4.3.5(a) and 4.3.6 (a) under *Programme development and provision requirements*.

Criteria 4.3.2(a) and 4.3.4(a) address premises, facilities, resources and staffing. Whilst HI is at an advanced stage of negotiations regarding premises and their resourcing, and has a human resource plan for HID, these plans will only be realised if HI's application for initial access to validation is approved. However, the Panel requested, through a *proposed mandatory change* that HI provide updated information on progress made in terms of these issues and it is satisfied that appropriate progress has been made and can be advanced in the event of approval to progress to programme validation application.



Similarly, whilst HI has researched its options regarding the satisfaction of PEL (criterion 4.3.7(a)) it will not finalise these arrangements unless it is successful in its application. It is proposed by the Panel that this criterion be considered satisfied for the purposes of this initial access to validation application and that, in the event that a validation panel is established to address an application by HI, it becomes the role of the validation panel to satisfy itself that appropriate PEL is in place for the submitted programme validation application.

4.4 Evaluation of capacity to provide the proposed education and training provision - Overall finding:

The Panel is satisfied that HI has the capacity to provide the proposed education and training provision. It has a long track record and has evolved its QA policies and procedures to reflect its learning and experience. It is a financially stable organisation that is prepared to make a significant investment in founding and establishing HID. HID exists only in legal form currently; however, the Panel is satisfied from speaking with HI, and through the documentation it has submitted, that it has made detailed and substantive plans for securing and resourcing suitable premises. It has informed itself of its options regarding PEL and is pursuing those options. HI has also proven itself capable of developing new institutions, having expanded its Australian operation across a number of jurisdictions. As noted above, HI has addressed the *proposed mandatory changes* regarding the governance and management plans for HID and its assessment procedures.



Part 5 Evaluation of draft QA Procedures submitted by Holmes Institute Dublin

The following is the panel's findings following evaluation of Holmes Institute Dublin'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:

The Panel was informed that the established governance and management structures of HI will be modified for the Irish context. The HID Governance Charter was provided to the Panel and is referenced within the QA Manual. It sets out the roles and responsibilities of each governing body illustrated on an organisational chart within the Charter. These units of governance and management include a Board of Directors; Senior Management Group (SMG); Industry Advisory Group; an Academic Board with external representatives; an Academic Management Committee reporting to the Academic Board; and three standing committees reporting to the Academic Management Committee (these committees oversee teaching and learning, research and staff development, and programme development). A Programme Committee will be established to oversee each degree offered.

HI stated that while it intends, over time, to have all elements of this management and governance structure operating in Ireland, its initial priority for HID is the establishment of the Academic Board and the SMG, and the appointment of an Academic Dean. It has identified these elements as essential to the academic and operational governance of HID. The Academic Board will be delegated responsibility for determining academic matters. HI asserted the importance of separating commercial and academic matters and assured the Panel that the Academic Board will independently monitor the academic quality of HID's provision; this separation is also reflected in their terms of reference. As Holmes Education Group has a presence in Ireland and the UK, HI is confident that the Academic Board can be populated by experienced individuals drawn from the higher education sectors of both countries. In this regard, the Panel has requested further information on the criteria that will be applied when populating the Academic Board of HID. In terms of learner representation on governance committees, HI described learners as partners in the oversight of the quality of its provision. It described how learner representatives are elected within the current systems of HI. The Panel considered that HI's thinking on how learner representation will be secured for HID, and what training will be provided, could be further developed and it offered a specific advice in that regard. In HI's resubmitted documentation, the Panel noted that HI has now further articulated how it intends its learner representation system to evolve over time from the selection of learner representatives, to establishing an election system as its learner numbers grow.



The Panel spent some time discussing with HI how its governance and management systems function in other jurisdictions and how these would apply in Dublin. As HI has acknowledged, HID will not initially have the extent of the governance and management structures that were presented to the Panel. As a result, the Panel requested, through a *proposed mandatory change*, that the arrangements that will be in place initially, and as HID evolves, be clarified. The Panel acknowledges the efforts of HI in capturing this information in its resubmitted documentation. The intended evolution of HID's governance system is described and illustrated in the revised QA Manual. In some cases, the representation of executive roles and academic committee structures together is somewhat complex (e.g., p.23 of the revised QAM) and there are some anomalies between the descriptions of roles and responsibilities and the diagrams presented. A specific advice has been made to review and align this material. The revised documentation has also addressed a second *proposed mandatory change* which was the documentation of the criteria for the selection and composition of the Academic Board of HID. The profile of Academic Board members has now been included in the revised QA Manual and the Panel is satisfied with this information. How this governance system, including the Academic Board, will operate and evolve in practice will be more evident at the point of HI's application for programme validation.

The Panel was informed that the appointed Board of Directors will approve the Strategic Plan for HID, oversee and review risk, and determine priorities for resourcing; the oversight of the utilisation of these resources will be at SMG level. The Panel offered a *specific advice* that further research be conducted about current provision in Ireland, to inform the direction of HID's strategic planning. The Panel notes the benchmarking exercise since conducted by HI across a wide range of BA in Business Studies (Honours) programmes. Again, this will be a key aspect of HI's application for programme validation.

Specific advice:

- Review the governance descriptions in the current draft of the QA Manual and ensure that the diagrams included in the QA Manual are fully aligned with this text.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE**Panel Findings:**

The Panel was provided with a QA Manual for HID, that reflects the quality assurance systems that have been developed and implemented by HI and have been adapted for HID. The QA Manual is set out following the sections of QQI's *Core Statutory Quality Assurance Guidelines* (2016) and is informative and reasonably comprehensive. HI confirmed that staff will be made aware of the QA Manual through induction and via their Position Descriptions. It also intends that QID will feature the QA Manual as part of staff meetings and professional development sessions. In its application form, HI noted that a Quality Management Working Group will be established by the SMG of HID. It is intended that this Working



Group will include representation from learners and all levels of management and administration, and it will annually review policies and procedures to ensure they are fit for purpose.

HI acknowledged that while it is fully proficient in the principles of quality assurance, it is continuing to familiarise itself with the language and policies that will apply to HID in an Irish setting. This has presented it with some challenges in adapting its QA Manual. In discussion with the Panel it was evident that current quality assurance norms for HI regarding, for instance, grading bands, repeat assessment, external examination, access to scripts, and award classifications, will differ for HID. The Panel also noted an absence of detailed reference to the relevance of the Irish National Framework of Qualifications (NFQ) in the programme development process described. As a result, the Panel made a *proposed mandatory change*, in which it requested that HI conduct a gap analysis between the documentation presented and key quality assurance documents, including: *Assessment and Standards* (QQI, Revised 2013), *Effective Practice Guidelines for External Examining* (QQI, Revised 2015), and *Policies and criteria for the validation of programmes of education and training* (QQI, 2017). The Panel notes the gap analysis subsequently undertaken by HI and considers that the updated QA Manual is significantly better in its representation of these key documents. It considers that there is scope for HI to make further explicit connections within the text of the QA Manual to these policies, including by naming policy sections that have influenced the composition of HID's QA policies; this might also aid the understanding of those implementing the QA Manual of the specific requirements of the local context and regulator. Some further comments are made in section 6 below, re HID's assessment policies. Overall, however, the Panel is satisfied that HI has addressed this proposed mandatory change and it recognises that the QA Manual of HID is likely to evolve as the QA policies and procedures are applied in the context of programme validation and delivery.

On a more general level, the Panel was impressed with the enhancement approach to quality assurance that HI has evolved: in particular in terms of its teaching and learning approach. Again, through a proposed mandatory change, the Panel requested that HI review the submitted QA Manual and take opportunities to better reflect the approach to teaching and learning that was described to the Panel during the review event. HI made several revisions to its QA Manual in this regard and the Panel believes that the tone and content now better reflect this positive and enhancement-led approach.

3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

As noted above, HI plans that HID will initially apply for validation of business studies degrees at NFQ Levels 7 and 8; it is deliberating whether it will offer a Level 7 programme or a Level 8 programme only. It has indicated that after it has successfully delivered one or both programmes it will apply to extend its



provision in the business studies discipline through a Higher Diploma in Business and an MBA. At a later stage of development, HI has ambitions that HID will expand its provision, including through a BSc and MSc in Information Systems.

The QA Manual for HID includes Processes for Approval of New Programmes; this includes how ideas for new programmes are managed and the governance that applies. Section 3.1 of HID's QA Manual describes and illustrates the process for new programme approval. As noted under the Documented Approach to Quality Assurance section above, the Panel has requested that HI has more detailed regard to the NFQ and to the *Policies and criteria for the validation of programmes of education and training* (QQI, 2017) in this section of the QA Manual.

To develop academic programmes, HI stated its intention to recruit well qualified Irish academic staff who will work with the support of colleagues in Australia. As HI is currently offering business studies modules and degrees, it is anticipated that significant existing content can be made available to the Programme Development Committee that will establish the first programmes of HID for validation. HI confirmed that it does not intend connecting what is delivered by HI and by HID, but it will avail of cross-fertilisation opportunities that can lead to programme improvements. The governance of HI will be utilised to support the development of the first programmes of HID. After the work of the PDC and the External Programme Advisory Committee (EPAC), the Academic Board in HI will approve the programme document for submission to QQI. HI described for the Panel the review process it has in place for its programmes; this is revisited in section 11 Self-Evaluation, Monitoring and Review.

HID anticipates that the majority of its learners will be international. It works with an extensive network of education agents across the world, several of whom have experience of recruiting for higher education institutions in Ireland. Its English language school experience also positions it well with regards to assessing IELTS requirements. It does, however, also wish to attract domestic learners, and considers that a balance within its learner body is important. The QA Manual of HID includes its access, transfer and progression procedures. In addition to direct entry, it intends making its programmes available through the Central Applications Office (CAO). HID will also recognise prior learning in its admission of learners, subject to a detailed process of analysis against required learning outcomes.

In its initial report the Panel made a specific advice that HI should further consider its approach to marketing HID; specifically, the factors that would be attractive to domestic learners. HI has responded to this specific advice and has further documented its approach: including appointing experienced marketing staff, targeting its marketing and building marketing intelligence. The Panel also notes that HI intends that HID will join the 'SAP University Alliance' and recognises that this may prove a point of interest for domestic learners investigating their higher education options. The Panel identified that there are some discrepancies within the documentation regarding the make-up of the anticipated learner recruitment numbers for HID; HI may wish to review and align this material in preparation for its



application for programme validation.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

Currently HI is represented in Ireland by the Director of Holmes Education Group Ireland, who is a resident of Dublin. The Director will be supported by HI's academic and operational expertise in Australia and the UK in the initial stages of establishing HID. He will be joined by the Dean of Operations from HI's Head office in Melbourne, who intends to relocate to Dublin for six-months. HID will then commence recruitment of staff, prioritising the appointment of an Academic Dean and seeking to appoint Academic Programme Managers for its programmes. In terms of its overall staffing plan, HI informed the Panel that it is planning a staff to learner ratio of 20:1. It is anticipated that a full transfer of HID to Dublin management will be possible within a 12 to 18 month period.

The QA Manual for HID includes procedures regarding appointment and induction, performance management, and staff development. HI confirmed that academic staff will be required to hold a relevant qualification at least one NFAQ level above the programme on which they are teaching, or equivalent. HID will provide internal training for staff on pedagogy and will encourage and support attendance at conferences and seminars. It has allocated a budget to contribute to the funding of professional development acquired by staff through formal education.

It was noted during the meeting that a 'Registrar', in an Australian higher education context, is a senior administrative role. The Panel advised that HI should change this title when recruiting, as the role of Registrar in an Irish context is substantially different; HI has since followed this advice. Overall, the staffing plans for HID appear robust and will be influenced by the delivery model chosen that will be elaborated by HI during the validation process.

5 TEACHING AND LEARNING

Panel Findings:

HI has found that taking a holistic and detailed approach to teaching and learning has effectively safeguarded standards. In addition to programme design, teaching and delivery tools for HID will also be developed and approved centrally. As a result, whilst lecturers bring their own experiences and styles to the delivery of modules, they are supported by, for instance, a set of agreed slides. HID will be delivering its programmes on a face-to-face basis only, but delivery will be supplemented by e-learning



resources/media aimed at enhancing the teaching and learning experience. The integration of ‘flipped learning’ into HID’s delivery will be managed by an E-Learning Advisory Group (e-LAG) under the oversight of the Academic Board. The effectiveness of these resources will be kept under review and feedback will be sought from learners and staff. Whilst favouring a managed approach to teaching and learning tools, HI assured the Panel that it intends its lecturers to be engaged personally in improving those tools and feedback will be formally and regularly sought by Programme Managers and through review processes.

HI states in its application for initial access to validation, that it is committed to inclusive pedagogical design and that it will make reasonable adjustments to accommodate all learners, consistent with the *AHEAD Charter of Inclusive Teaching and Learning 2009*.

The Panel was impressed with the teaching and learning processes that were described by HI. As noted under section 2, Documented Approach to Quality Assurance, it has requested that HI reviews the policies and procedures on teaching and learning included in HID’s Quality Assurance Manual, and more comprehensively represents the quality enhancement approach that it has developed. This is further described under section 11 below, Self-Evaluation, Monitoring and Review.

6 ASSESSMENT OF LEARNERS

Panel Findings:

As with teaching and learning approaches, assessment methods for HID programmes will be determined centrally during the development of the programme; this provides assurance that the assessment methods chosen can effectively enable learners to demonstrate their achievement of the required learning outcomes.

HID’s Quality Assurance Manual includes an Assessment Policy that outlines the standards and principles guiding HID’s assessment processes and how these are quality assured. HID will monitor and moderate learner assessment outcomes to ensure that academic standards are being maintained. External moderation processes are also implemented. HI is conscious of the threat to standards represented by failures in academic integrity and has developed an Academic Integrity Policy and related procedures to address cases of academic misconduct. It is intended that HID will maintain an Academic Misconduct Register to analyse trends and to mitigate associated risks.

All assessment grades will be reviewed and approved by a Board of Examiners prior to the release of results. Records of grades will be recorded on HI’s existing student management system, LUNA. HID has



a Complaints and Appeals Policy that enables learners to dispute or lodge a grievance about their grades. This policy and associated procedures will be available via the HID website, when established, and on Blackboard, and will be made known to students at orientation and through the student handbook. HID will monitor the appropriateness of its assessments through learner and lecturer evaluations. Changes to assessment methods are implemented by the relevant Academic Programme Manager under the oversight of the Academic Board.

During the discussion with the Panel, some local differences in assessment processes were identified. Areas for review included how external examiners operate; grading bands; opportunities for repeating assessments; learner access to examination scripts; and award classifications. The Panel emphasised the importance of having detailed and transparent assessment regulations within HID's QA Manual, that are aligned with relevant QQI policies and it set a *proposed mandatory change* in this regard under section 2, Documented Approach to Quality Assurance. As noted above, the Panel is satisfied with the subsequent gap-analysis conducted by HI. However, it considers that the narrative in the QA Manual on the importance of learning outcomes will need to be further reconciled with its implementation of its procedures on, for instance, recognition of prior learning and repeat assessment. These are matters that will require revisiting during HI's application for programme validation.

7 SUPPORT FOR LEARNERS

Panel Findings:

As referenced under Programmes of Education and Training above, HID wishes to attract a diverse mix of learners from Ireland, from other EU countries, and from non-EU countries. Its experience in working with international learners in other settings will be applied to the supports that will be available through HID.

HID will provide all learners with an orientation programme before they commence study. This will include information about HID programmes, facilities and support services. A Student Handbook will be provided to learners and will include information about learner rights, roles and responsibilities, learner supports, feedback opportunities, and contact details. It will also include information about study skills and advice, on maintaining satisfactory academic progress, and on key quality assurance policies and procedures. Practical supports will include academic skill classes covering topics such as academic writing, research skills, presentation skills, intercultural training for working in groups, and time management techniques. In its application for initial access to validation, HI states that HID will also endeavour to organise co-curricular and extra-curricular activities to help embed a sense of belonging in its learners. During its meeting with the Panel, HI also identified the importance of pastoral care and early intervention strategies for learners with personal and mental health issues.



HI is currently in the process of securing a lease for a property at The Brickworks in Brickfield Lane, Dublin 8. This is a new building with access to transport links. It is a vacant space that will be fitted out as a higher education institution. A library will be included, with access to hard copy and online resources; library resources will be monitored and formally reviewed annually. In terms of IT, the Holmes Group already engages with IT contractors through its English language school in Dublin. It is intended that HID learners will bring their own devices and that HID will support them in the use of those devices. Other floors in The Brickworks building have been developed as student accommodation by unrelated property developers, and the building includes other services including a gymnasium. HI considers that whilst it is not developing these resources, they will be advantages to those of its students who secure accommodation in the building and will contribute to creating a campus atmosphere. For its meeting on 06 March 2020, the Panel was provided with updated information on HI's progress on physical infrastructure, human and other resources, and it notes developments since its initial meeting with HI in December 2019. The arrangements made by HI will be confirmed through its programme validation application process and in the context of its programme delivery format and learner numbers.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

LUNA, the student management system currently used by HI, will be extended to HID and modified as necessary. It will be used to record all learner data and to produce reports on key areas, including enrollment, progression, and assessment. Based on these reports, recommendations will be made through the governance structure for quality improvements.

Collection, storage, retention and use of learner data will be managed in accordance with HID's quality assurance procedures and its obligations under General Data Protection Regulations (GDPR). In its application form, HI refers to the measures that will be instituted by HID to protect data. These include, implementing a hierarchical, directory intranet system to enable the secure storage of confidential and privileged information; minimising the number of users with access to confidential information; using computer networks and databases with built in secure login and password systems; and automatically identifying and logging each operator when data entry is undertaken in HID' systems. HID learners will also be able to access and verify their personal information and learner records at any time via LUNA.



9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The HID QA Manual includes *Provision of Information to Students Policy and Procedures*. These detail the learner information that will be published about HID programmes and commits HID to publishing on its website, and in other materials, programme information that is required under the Qualifications and Quality Assurance (Amendment) Act (2019). HI has undertaken that the QA Manual for HID will be published on the HID website; it states that for ease of access, HID policies and procedures will also be made available individually.

The Academic Board of HID will be responsible for assuring the accuracy and currency of information published by HID. Each Academic Programme Manager will review and approve updates to programme materials.

10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING

Panel Findings:

It is not intended that HID will participate in any collaborative arrangements initially. During its meeting with the Panel, HI indicated its wish for HID to engage with other higher education providers nationally and for its lecturers to share practice with fellow academics, including through conferences and seminars.

As referenced under section 3, Programmes of Education and Training, an External Programme Advisory Committee will contribute to the development of HID programmes. It is also intended that the governance structure of HID will include an Industry Advisory Board. HID's Quality Assurance Manual describes the Industry Advisory Board as providing advice on demand for programmes, employment opportunities for graduates, the marketing of programmes, and delivery and assessment strategies.

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

HID's QA Manual sets out its self-evaluation, monitoring and review procedures. It will manage and



monitor the quality of the learning experience through a number of continuous improvement mechanisms. It is also intended that HID will identify performance indicators against which it can evaluate itself. These will include retention, progression rates, grade distribution, and acceptable learner evaluation ratings.

Programme monitoring and review at HID will be undertaken formally and informally and at different points in the programme delivery cycle. It will be informed by learner, lecturer, industry and other stakeholders. Ongoing module feedback will be sought from learners through Student Evaluation of Teaching (SET) - SETs invite learners' opinions on module content, on the teaching and learning experience, and on facilities - and through focus groups and learner representation on governance structures. Lecturers will also be represented on HID's governance structures and their views will be canvassed via Subject Evaluation and Review (SER) processes. Mid-term programme monitoring and review processes will be achieved through a biennial cycle of External Moderation. The outcomes of evaluation are ultimately reported to the Academic Board, to inform its ongoing oversight and improvement role.

Prior to seeking renewal of the validation of its programmes from QQI, it is intended that HID will internally review its programmes at least twice during an accreditation cycle to ensure that they remain pedagogically sound and continue to be relevant to the needs of learners, industry and the wider community. Records of changes to curricula and its delivery will be maintained by the Academic Programme Manager.

During its meeting with the Panel, HI emphasised the importance of closing the loop on feedback sought and described how HID will use its governance system to report actions that have been taken in response to feedback. HID will also inform the next cohort of learners about changes that have been made to modules in accordance with the previous cohort's feedback.

Evaluation of draft QA Procedures - Overall panel findings

Following its meeting with HI representatives, the Panel was very satisfied that HI is an institution with long-standing and significant experience in higher education, and that it has the skills, resources and experience to establish a higher education provider in Dublin. HI conveyed a reflective approach to quality assurance and has improved its systems through a series of iterations since its establishment. The Panel was also impressed with the collegial and open manner in which the HI representatives engaged during the evaluation meeting.

Overall, however, the Panel considered that aspects of its meeting with HI were more illuminating



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regarding the quality of the processes envisaged for HID than the submitted QA Manual communicated. In addition, it had concerns regarding the gap analysis conducted to inform the QA Manual; particularly the extent to which it has had regard to QQI assessment policies and procedures. As a result, the Panel identified some proposed mandatory changes to HI on these and other matters and offered other specific advices to the institution.

The Panel reconvened on 06 March 2020 to undertake a desk review of the evidence subsequently submitted by HI in response to its proposed mandatory changes. It is the Panel's view that HI has satisfactorily addressed the proposed mandatory changes and it notes the progress made by HI in responding to the specific advices offered. The Panel is convinced of the capacity of HI to provide learners with *a well-supported learning experience which will allow them to achieve the learning outcomes for the type and level of QQI award sought* (Policy and Criteria for Provider Access to Initial Validation of Programmes Leading to QQI Awards QQI, 2013, p.5). The Panel notes that in the second part of this process, the application for programme validation under the Policies and Criteria for the Validation of Programmes of Education and Training (QQI, 2017), HI will be required to contextualise its quality assurance policies and procedures and to illustrate their implementation in a local context. The Panel consequently recommends that QQI approves the QA procedures of HI.



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 10 December 2019 by the Panel. The Panel availed of the option to defer its decision to allow HI an opportunity to address these issues within a six-week period. The Panel reconvened on 06 March 2020 to evaluate evidence submitted by HI in support of the proposed changes. Following an evaluation of the evidence submitted, the panel is satisfied that HI has adequately addressed the issues set out in Section 6.1 below.

6.1 Proposed Mandatory Changes

- Provide updated details on progress made towards opening HID, with particular emphasis on physical infrastructure, human resources, and other resources.
- Provide an updated organisational chart and governance system description, which reflects what will be in place at the outset of the establishment of HID, and how these structures are expected to evolve over the first 3 years of its operation.
- Document the criteria for the selection and composition of the Academic Board of HID and include it in the QA Manual.
- Review the HID QA Manual and take opportunities to better reflect the quality enhancement approach to teaching and learning that was described by HI to the Panel.
- Incorporate the local context and regulations that will apply to HI if operating in Dublin. This requires a gap analysis between the documentation presented and key quality assurance policies, including: *Assessment and Standards* (QQI, Revised 2013), *Effective Practice Guidelines for External Examining* (QQI, Revised 2015), and *Policies and criteria for the validation of programmes of education and training* (QQI, 2017).



The following *specific advices* were identified at the conclusion of the site visit on 10 December 2019 by the Panel. The Panel notes the progress of HI in responding to these specific advices:

6.2 Specific Advice

- Consider and document for the QA Manual how the governance system of HID will include learner representation and what training will be available for these learners.
- In the development of a strategy for HID, undertake further research and benchmarking on higher education programmes available in Ireland.
- Consider further the approach to marketing HID; specifically, the factors that would be attractive to domestic learners.
- Revisit the use of the title ‘Registrar’ when recruiting for HID.

When the Panel reconvened on 06 March 2020 to evaluate evidence submitted by HI, it proposed a final specific advice, as detailed below:

- Review the governance descriptions in the current draft of the QA Manual and ensure that the diagrams included in the QA Manual are fully aligned with this text.

Part 7 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
7	Bachelor Arts	Bachelor of Arts in Business
8	Bachelor of Arts	Bachelor of Arts (Hons) in Business



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Part 8 Approval by Chair of the Panel

This report of the Quality and Capacity Panel is approved and submitted to QQI for its decision on the recommendation to approve the draft Quality Assurance Procedures of provider and approve its progression to Stage 2 of the initial programme validation process.

Name:



Date:

13/3/20



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

- Initial Access to Validation application details, including:
 - The completed application form
 - Company information
 - Financial viability information
 - Governance Charter

- The Holmes Institute Higher Education QA Manual

- Additional information was also provided to the Panel by Holmes Institute, including on:
 - Governance roles and responsibilities
 - Documented approach to QA
 - Programme development

- In its resubmitted documentation provided to the Panel, HI provided:
 - A letter directing the Panel to amendments made to its QA Manual
 - A revised Holmes Institute Higher Education QA Manual

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

Name	Role/Position
Mr Stephen Nagle	Executive Director
Professor Paul Hawking	Dean, Academic
Dr Anja Fladrich	Dean, Operations
Mr Alex Anderson	COO
Ms Georgie Collier	Director, Northern Hemisphere
Mr John Dixon	Director, Admissions
Mr Paul Corbett	Director, Ireland



16 March 2020

Dr Deirdre Stritch
Approval and Monitoring Manager – QQI Awards
QQI
26/27 Denzille Lane
Dublin 2, DO2 P266
IRELAND

Dear Deirdre

Response to the report of the independent review panel convened to consider Holmes Institute Dublin's Initial validation of Programmes leading to QQI Awards.

Holmes Institute Dublin (HID) welcomes the report of the independent panel convened to consider HID's initial validation. HID 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.

HID 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 HID's Quality Assurance Manual.

HID 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.

The panel initially proposed five mandatory changes and two specific advices following its evaluation of 10 December 2019. After having received an amended Quality Assurance Manual the panel was satisfied that all of the mandatory changes had been made and that the specific advices had been followed. In its evaluation of 6 March 2020 the panel made one specific advice:

- *Review the governance descriptions in the current draft of the QA Manual and ensure that the diagrams included in the QA Manual are fully aligned with this text.*

HID thanks the panel for identifying the inconsistencies in its QA Manual in regard to governance descriptions and assures QQI that these will be reviewed and amended as per the specific advice.

The panel also noted several issues which it has asked HID to address should its application proceed to a validation panel:

- Assurance that appropriate PEL is in place for the submitted validation programme validation application.
- Making further explicit connections within the text of the QA Manual to:
 - Assessment and Standards (QQI, Revised 2013);
 - Effective Practice Guidelines for External Examining (QQI, Revised 2015); and

- Policies and criteria for the validation of programmes of education and training (QQI, 2017).
- Revising the QA Manual section related to Processes for Approval of New Programmes to ensure that it has more detailed regard to the NQF and to the Policies and criteria for the validation of programmes of education and training.
- Discrepancies within the documentation regarding the make-up of the anticipated learner recruitment numbers.
- The need for the narrative in the QA manual on the importance of learning outcomes to be further reconciled with its implementation of its procedures on, for instance, recognition of prior learning and repeat assessment.
- Updated information on physical infrastructure, human and other resources.
- Further contextualisation of HID's quality assurance policies and procedures and illustration of their implementation in an Irish context.

HID will ensure that each of these issues is addressed in its application for programme evaluation.

HID wishes to, once again, sincerely thank QQI, its staff and the external panel members for the manner in which the initial validation process was conducted.

Kind regards

A handwritten signature in black ink that reads "Stephen F. Nagle". The signature is written in a cursive style with a large, stylized 'S' and 'N'.

Stephen F. Nagle
Chief Executive Officer
Holmes Institute Dublin