



## Initial Access to Validation Quality and Capacity Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

##### 1.1 Applicant Provider

Registered Business/Trading Name:	Life Insurance Association Ireland CLG
Address:	LIA House, 183 Kimmage Road West, Dublin 12
Date of Application:	5 <sup>th</sup> May 2018
Date of resubmission of application:	N/A
Date of evaluation:	12 July 2018
Date of site visit (if applicable):	N/A
Date of recommendation to the Approvals and Reviews Committee:	20 September 2018

##### 1.2 Profile of provider

Life Insurance Association CLG (LIA) was originally established in 1978 as a membership organisation. In 1983 it entered the education space. It was established as a company limited by guarantee in 1993. LIA has over 10,000 members and provides education and training with approximately 7,000 student registrations per annum.

Since 2003, it has been offering the QFA, the primary qualification required of people working in the Financial Services industry, in conjunction with The Institute of Banking. This qualification has been linked to the NFQ as a UCD Level 7 special purpose award since 2009.

Since 2003, LIA has worked in partnership with The Institute of Banking (IOB) and all its courses have been offered in conjunction with IOB's College of Professional Finance, a recognised college of UCD. Graduates of the programmes have received level 7 special purpose awards made by UCD.



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Since the introduction in 2006 of Minimum Competency Requirements (MCR) by the Central Bank, LIA has been providing a suite of courses, recognised by the Central Bank of Ireland (CBI), to meet the MCR

LIA is now requesting validation of these courses from QQI independently of IOB. This initiative arises because of recent UCD regulations introduced to prevent 'serial franchising' of programmes i.e. delivery of UCD awarded programmes by providers more than one remove from UCD itself.

In taking this step, LIA is seeking to take full responsibility for its programmes and the associated NFQ awards and to become independent of IOB in terms of the quality assurance and academic governance of its educational activities.



## Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr. Marion Palmer	Chair	Former Head of Department of Technology and Psychology, IADT
Mr. Hugh McBride	Secretary / SME	Senior Lecturer in Business, GMIT
Prof. Brian O’Kelly	SME	Professor of Finance, DCU
Prof. Pauline Weetman	SME	Emeritus Professor of Accounting, Edinburgh University
Prof. Grainne Conole	SME	DCU – visiting Professor.
Mr. Noel Cunningham	Industry	New Era Support Ltd
Mr. Patrick Mangan	Student	Zurich Insurance plc.

## Part 3 Findings of the Panel

### 3.1 Summary Findings

The panel is of the view that LIA, a successful and respected professional body with extensive experience in programme delivery and examining, has the potential to become a provider of validated programmes. However, it considers that LIA’s governance and other processes need significant further development before they would be deemed strong enough successfully to replace the quality assurance infrastructure previously provided through IOB.

Therefore, the recommendation of the panel is to refuse approval of the application but with recommendations to the provider for changes to its application. The panel would welcome a revised application for consideration within six months of QQI’s decision on this report’s findings.

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

The panel advises QQI that it refuses this application for approval but with recommendations, (listed in Part 6 of this report). This will enable LIA to revise its application and resubmit for approval within six months of the formal decision made by QQI.



## Part 4 Evaluation of provider capacity

### 4.1 Legal and compliance requirements:

- 4.1.1(a) **Criterion:** *Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?*
- 4.1.2(a) **Criterion:** *Is the legal entity established in the European Union and does it have a substantial presence in Ireland?*
- 4.1.3(a) **Criterion:** *Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?*
- 4.1.4(a) **Criterion:** *Are any third-party relationships and partnerships compatible with the scope of access sought?*
- 4.1.5(a) **Criterion:** *Are the applicable regulations and legislation complied with in all jurisdictions where it operates?*
- 4.1.6(a) **Criterion:** *Is the applicant in good standing in the qualifications systems and education and training systems in any countries where it operates (or where its parents or subsidiaries operate) or enrolls learners, or where it has arrangements with awarding bodies, quality assurance agencies, qualifications authorities, ministries of education and training, professional bodies and regulators.*

### Findings

***Does the provider's application provide evidence that these criteria have been met?***

The documentation and supporting evidence provided by LIA in its application was more than adequate in assuring the panel of its legal standing and good reputation both within the financial services industry and with its partners in education provision i.e. IOB.

***Where criteria are not met, please identify and state the reason(s) why.***

N/A

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

- 4.2.1(a) **Criterion:** *Does the applicant have a sufficient resource base and is it stable and in good financial standing?*
- 4.2.2(a) **Criterion:** *Does the applicant have a reasonable business case for sustainable provision?*
- 4.2.3(a) **Criterion:** *Is the applicant fit-for-purpose governance, management and decision-making structures in place?*
- 4.2.4(a) **Criterion:** *Are there arrangements in place for providing required information to QQI?*

**Findings*****Does the provider's application provide evidence that these criteria have been met?***

4.2.1 / 4.2.2 The information supplied by LIA demonstrated a very sound resource base which is sustainable and capable of growth.

LIA has invested in new IT infrastructure and committed to further develop it to meet requirements of QQI validation.

The Board of Directors has considered succession issues and three years ago appointed a deputy CEO. The senior management are also seeking to ensure coverage of critical responsibilities by requiring managers to cover roles and take additional responsibilities through rotation.

***Where criteria are not met, please identify and state the reason(s) why.***

4.2.3 / 4.2.4 While there were no questions about LIA's corporate governance, the panel had significant concerns about the structures and systems for academic governance.

The panel recognised that this is a new role for LIA and that a lot of work has already been completed. LIA demonstrated a willingness to adapt to its new responsibilities as an independent provider of higher education and training, but there is a need for further development and clarity.

- The composition of the Academic Council and its relationship to both the Senior Executive Team and the Board of Directors needs to be clarified.
- While all the application documentation refers to a Chief Academic Officer, it became clear during the panel meeting that a Registrar is to be appointed with a role different to that of the CAO. It is important that a new application for approval should more definitely describe the role of Registrar.

**4.3 Programme development and provision requirements:**

- 4.3.1(a) **Criterion:** *Does the applicant have experience and a track record in providing education and training programmes?*
- 4.3.2(a) **Criterion:** *Does the applicant have a fit-for-purpose and stable complement of education and training staff?*
- 4.3.3(a) **Criterion:** *Does the applicant have the capacity to comply with the standard conditions for validation specified in Section 45(3) of the Qualifications and Quality Assurance (Education and Training) Act (2012) (the Act)?*
- 4.3.4(a) **Criterion:** *Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?*
- 4.3.5(a) **Criterion:** *Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?*
- 4.3.6(a) **Criterion:** *Are structures and resources to underpin fair and consistent assessment of learners in place?*
- 4.3.7(a) **Criterion:** *Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?*

**Findings*****Does the provider's application provide evidence that these criteria have been met?***

4.3.1 Yes. LIA is a very experienced provider and examining body. It is well recognised as such within the industry and by academics in the field.

4.3.3 Yes. LIA has procedures for Access, Transfer and Progression and has evidenced its wherewithal to provide Protection for Learners on QQI validated programmes.

4.3.4 Yes – appropriate to its model of programme delivery. LIA currently delivers most of its programme material online with regional lectures in rented facilities. While its online platform has scope for improvement, there was nothing emerging to indicate facilities are inadequate for current programmes.

4.3.5 The panel was concerned about the entry requirements for the proposed NFQ Level 7 programmes and the implications of same for quality assurance of the programmes. This would be an issue in programme development and management.

4.3.6 Yes – As an examining body, LIA is experienced and respected in its assessment activities. It devotes significant resources and expertise to the quality assurance of assessment.

4.3.7 Yes. Documentary evidence was supplied of insurance-based protection for learners on any programmes to be validated by QQI.

***Where criteria are not met, please identify and state the reason(s) why.***

4.3.2 Although the academic staff complement appears strong and stable, the nature of the lecturers' contracts was a cause for concern for the panel. While it is recognised that part-time lecturers bring with them the benefits of current industry participation as well as programme knowledge, it is important that LIA demonstrate that contract employees are staff of an equal academic footing to other staff with



stronger employment rights. It would be appropriate that roles with significant academic responsibility e.g. Programme Manager(s) and Registrar, would be filled by LIA staff rather than contractors.

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

The panel finds that LIA is a reputable and sustainable organisation with the capacity and *potential* to become a provider of QQI validated higher education and training programmes.

For the potential to be realised, the panel recommends:

- a review of the academic structures
- the appointment of a Registrar in advance of delivery of any validated programme, if not before.
- the clear demarcation of the academic and business elements of LIA
- the employment as staff of key academics.



## Part 5 Evaluation of draft QA Procedures submitted by Life Insurance Association

*The following are the panel's findings following evaluation of Life Insurance Association's quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016). This section of the report follows the structure and referencing of the guidelines.*

### 1 GOVERNANCE AND MANAGEMENT OF QUALITY

#### **Panel Findings:**

- LIA has existing QA appropriate to its current role. It recognises the need to replicate on an appropriate scale the current IOB governance committees and functions in which it has been a participant up to now.
- The panel was concerned about the lack of clear demarcation of the academic and business governance in LIA. This primarily related to the autonomy of the Academic Council (AC). The AC needs to report directly to the Board of Directors which in turn needs to include the relevant skillsets to work with those reports.
- LIA confirmed that the membership of the AC will be updated to include more stakeholders, including an external academic advisor. It also confirmed that there are to be new nominations to the Board of Directors this year, which can include academics.
- While there is no designated Registrar in the current LIA documentation, much of that role is assigned to the Chief Academic Officer who, in the documentation, is also heavily involved in LIA programmes.
- The panel welcomed LIA's stated intention to, if validated, appoint a Registrar and made clear the necessity to have Registrar and Programme Manager roles which can, with authority, represent programmes and learners.
- It is important that the Registrar is independent of the programmes and the CEO and can act unhindered by either.
- The provider should map out the academic structure, showing the functional and reporting inter-relationships of the various components.
- The role of a programme board(s) in respect of overall quality assurance needs to be clarified.





## 2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

### *Panel Findings:*

- LIA's documentation shows a commitment to quality within its current remit as provider and examining body under the umbrella quality assurance infrastructure of IOB.
- The QA manual needs revision to reflect the proposed academic structures, especially in relation to the Registrar and Academic Council.
- The QA manual needs to demonstrate clear references to the relevant QQI Guidelines and should show more clearly how each section of the Guidelines is addressed by their QA policies and practices.
- There should be clear policy statements for each of the sections in QQI's Core, Topic and Sector Guidelines which are relevant to LIA's proposed context and scope of provision.
- The Quality and Standards Committee of IOB is not currently reflected in the LIA structures. It needs to be clear whether that committee's role will be dispersed or is missing.

## 3 PROGRAMMES OF EDUCATION AND TRAINING

### *Panel Findings:*

- LIA has a very defined scope of provision based on its current offering and has no intentions to extend that scope.
- The panel commended the recognition and reputation of the current programmes and the quality of the students' learning materials.
- Programmes are updated annually to reflect changes in regulatory or revenue practices. Learner and industry feedback is facilitated through member surveys and feedback systems.
- The role and responsibilities of programme manager should be considered by LIA.
- Currently programmes are managed by authors who coordinate the module writers. The ongoing management of programmes through a programme board(s) is unclear in the documentation. The composition, coordination and reporting of a programme board(s) need to be set out more clearly in the QA documentation.



#### 4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

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

- The demarcation between the business and academic work of the provider was unclear. The number and role of academic staff was also unclear. While it was recognised that there are benefits associated with having contracted lecturers who are also industry practitioners, it was the panel opinion that key academic staff with specific quality assurance responsibilities should have the employment status of 'staff'.
- LIA does invest in the continuous professional development of lecturers, who meet regularly together and with module authors. As practitioners in the industry themselves, lecturers are required to take professional CPD also which is of benefit to the programmes.
- The panel recommended continued and extended training for authors, lecturers and correctors in the use of on line materials and content delivery systems and also in organisational QA processes.
- Lecturers' performance in content delivery is monitored by LIA through learner feedback and the use of 'mystery students'. The management and deployment of mystery students may need to become part of the monitoring role of the programme manager / programme board.

#### 5 TEACHING AND LEARNING

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

- The provider has a specific teaching and learning approach that suits the learners, most of whom are working in the financial services industry. The approach is didactic and directed with a combination of face-to-face and online resources. Student independent learning is required and there is little or no student interaction outside the face-to-face sessions, other than intra-company study groups
- The model of teaching and learning is more clearly described as part-time distance learning rather than blended learning as stated in the application. It was suggested by the panel that the provider state its model clearly and own it.
- The panel recommended, and LIA accepted, the need for a more extensive library facility than is currently provided.
- A generic policy on balancing of workload between directed and self-directed learning needs to be developed that can be applied to the process of module development.



## 6 ASSESSMENT OF LEARNERS

### *Panel Findings:*

- The assessment of learners is through examinations as is required by the Central Bank of Ireland Minimum Competency Code. It is clear, and the associated processes are clear.
- The role of academic staff in the development and correction of the exams and how they relate to programme and module learning outcomes needs to be clarified and appropriate policies defined.
- While the importance of maintaining existing levels of confidence in the programmes is recognised by the panel, it recommends that LIA consider using alternative methods of assessment on its programmes, particularly those which would facilitate / require application of acquired knowledge to the learner's workplace activities.
- A policy facilitating opportunities for formative assessment is required.
- As a provider assessing for QQI awards, LIA needs a policy which will ensure that assessments address the programmes' minimum intended module, and ultimately programme, learning outcomes.
- LIA policy and practice on assessment and its regulations for same should be informed by QQI's publication on Assessment and Standards. The policy should address repeat assessments.

## 7 SUPPORTS FOR LEARNERS

### *Panel Findings:*

- The supports for learners outlined at the panel meeting was excellent. It reflected the LIA's establishment as a members' organisation. Supports are wide-ranging and multi-dimensional.
- The panel requests that these supports are fully documented and linked to the management of the programmes.
- Entry requirements for programmes need to be reconsidered to reflect the reality of employment in the industry and the provision of opportunities to relate learning to practice.

## 8 INFORMATION AND DATA MANAGEMENT

### *Panel Findings:*

- The panel was satisfied with the provider's approach to information and data management. It recognises LIA's commitment to and capacity in IT provision.
- Regarding data analytics, the panel recommends that LIA consider all the sources of information potentially available to it regarding student attendance, engagement, assessment etc with a view to providing such information to programme boards to inform monitoring.
- The panel also suggested that LIA consider giving customised information to students to enhance their experience and engagement.

**9 PUBLIC INFORMATION AND COMMUNICATION****Panel Findings:**

The panel was satisfied with the provider's approach to public information and communication.

**10 OTHER PARTIES INVOLVED IN EDUCATION AND TRAINING****Panel Findings:**

The panel recognises that LIA is tightly connected to the industry and to the regulator (CBI) and will need to maintain these connections. This reinforces the need for it also to maintain its academic independence.

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

- The approach to self-evaluation monitoring and review is unclear and will be part of the development of the academic processes of the provider. At present all this is done by administrative staff who carry out the functions well. The quality of the programme, its teaching, learning and assessment must be monitored and reviewed regularly by academic staff and appropriate provider-owned policies are required.
- A policy setting out how monitoring and review processes are carried out by programme board(s), reported to AC and acted on is required.

**Evaluation of draft QA Procedures - Overall panel findings**

The panel recognises the reputation and standing in which LIA is held in the financial services industry, its members and peer professional bodies.

It considers that LIA has the potential and willingness to become an independent provider of higher education and training programmes but has identified several mandatory actions, listed in section 6 below, which it should take before that position can be achieved.

The panel recommends that LIA reviews its currently documented structures, policies and procedures with reference to QQI's QA Guidelines and Validation policy, updates them as recommended and reapplies for approval of QA.



## Part 6 Changes to Quality Assurance Procedures

### 6.1 Mandatory

1. The QA manual needs to demonstrate a clearer relationship to the QQI Quality Assurance Guidelines, explaining how LIA sets and implements policies consistent with those guidelines. Policies are required to address all the relevant sections of the guidelines.
2. The composition of the Academic Council and its relationship to both the Senior Executive Team and the Board of Directors need to be clarified.
3. Revised QA documentation should reflect the critical roles of Registrar and Programme Manager.
4. The compositions of the Academic Council and Board of Directors need to be refreshed to reflect the new responsibilities associated with being an independent provider.
5. QA documentation should include a clear map of the academic structure, showing the functional and reporting inter-relationships of the various components.
6. The role of programme board(s) in respect of overall quality assurance needs to be clarified.
7. A policy is required which will ensure that assessments address the programmes' minimum intended module, and ultimately programme, learning outcomes.
8. LIA policy and practice on assessment and its regulations for same need to be informed by QQI's publication on Assessment and Standards.
9. A policy setting out how monitoring and review processes are carried out by programme board(s), reported to AC and acted on is required.

### 6.2 Advisory

1. While it is recognised that lecturers can be part-time and bring the benefits of industry participation, it is important that key staff responsible for programmes be staff of the provider, whether part-time or full time.
2. The panel recommended continued and extended training for authors and lecturers in the use of on line materials and content delivery systems.
3. The library of materials available to students needs to be enhanced when access to IOB and UCD libraries is no longer automatic.
4. A generic policy on balancing of workload between directed and self-directed learning should be developed which can be applied to the process of module development.



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

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 7	Special Purpose	Business and Finance

**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 Life Insurance Association

Signed:

Date:

27 July 2018



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

Application Form	Self-Assessment Report
Quality Manual and appendices	Minutes of Board and Academic Council Meetings
Organisational Structure Chart	Financial Statements
Public Liability Insurance	Student and Staff Handbooks
Assessment policies	Committee Structures

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

Name	Role/Position
Pat O' Sullivan	CEO
Joanne Keane	Deputy CEO
Elaine Culligan	Relationship and Events Manager
Rebecca McGee	Head of IT, Privacy and Risk
William Hannan	Chief Academic Officer
Willie Holmes	Subject Matter Expert
Bryan Johnston	Lecturer