



Liffey College Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	Liffey College Limited
Address:	The Maltings Business Park, Marrowbone Lane, D08 R822
Date of application:	23 rd of October 2020
Date of resubmission of application:	11 th August 2021
Date of virtual site visit (if applicable):	14 th December 2020
Date of reconvene meeting (if applicable)	31 st August 2021
Date of recommendation to the Programmes and Awards Executive Committee:	4 th February 2021 and 19 th October 2021

1.2 Profile of provider

Liffey College was established in 2009 and has been a QQI/FETAC provider since 2010. The College currently offers one QQI Award, a Certificate in Training and Development. Non QQI programmes include General English with TIE preparation, General English with Cambridge preparation and Foreign Language courses. Liffey College learners are primarily international and are required to be over the age of 18.

The Certificate in Training and Development is targeted at Irish, EU and International learners with a minimum English language requirement of C1. Liffey College has certified 5 learners on this programme in the last three-year period, which is run face to face and none prior to that since 2012. The provider is seeking an extension to its scope of provision through the reengagement process to enable delivery of that programme in Blended Learning mode. Liffey College intends to validate additional programmes, including a Certificate in International Foundation Studies for face-to-face delivery.



Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr. Annie Doona	Chair	Former President, IADT, Independent Consultant
Dr. Cathy Peck	Report Writer & Panel Member	Independent Education Consultant
Pamela Skerrit	Panel Member	Independent Quality Consultant
Dr. David McCarthy	Panel Member	National College of Ireland
Matthew Hurley	Observer	Independent Education Consultant



Part 3 Findings of the Panel

3.1 Summary Findings

At the outset, the panel would like to commend the team at Liffey College on the significant amount of work undertaken in preparation for reengagement, and the achievements the provider has made to date in its process of QA enhancement. In the course of the evaluation, the panel had the opportunity to engage in discussions with staff in leadership, management, operations, learner support and academic roles within Liffey College. These discussions were consistently open and constructive in tone and provided the panel with insights into areas of good practice at Liffey College that had not been immediately visible within the documentation submitted for review. Although the English Language Education (ELE) programmes at Liffey College are not within the scope of this evaluation, the significant experience and expertise that the team at Liffey College have developed through their provision of these to international learners was also noteworthy. The panel also note that during the Covid-19 pandemic, Liffey College was able to manage an effective transition to fully online and remote emergency teaching for those programmes. The representatives of Liffey College were open regarding the challenges and opportunities that the implementation of the contingency procedures had presented to the organisation.

The panel notes that Liffey College's application for reengagement entailed a proposed extension to the organisation's current scope of provision, which would enable Liffey College to additionally offer programmes through a blended learning delivery mode. As the panel were not in a position to make identical recommendations for Liffey College's current scope of provision and the application for an extension of scope, the panel's findings and recommendations are summarised differentially in the subsequent paragraphs (see also Section 3.2).

With regard to Liffey College's application for reengagement within its current scope of provision, the panel recommended a number of mandatory changes be made to the draft QA procedures. This was because the draft QA procedures did not yet reflect sufficient alignment to QQI's requirements as per the Core and Sector Specific Statutory Quality Assurance Guidelines (2016). However, the panel were of the view that Liffey College's draft QA procedures reflected well on the positive orientation toward enhancement within the organisation. Discussions between the panel and representatives of Liffey College during the virtual site visit reassured the panel that there was a sufficient understanding internally of the support needs of the international learners that the organisation aims to recruit. Therefore, the panel was of the view that Liffey College, given adequate time, would be able to address the gaps the panel identified in the QA documentation and practices. Those gaps are the focus of a number of mandatory changes listed in Section 7.1 of this report.

Liffey College was therefore required to resubmit its draft QA procedures, including evidence of the Mandatory Changes following an interim period of six months. The panel would reconvene at that time to review the evidence submitted, and, if required, to engage in further discussions with Liffey College representatives. At that juncture, the panel encouraged Liffey College to continue its QA enhancement process and build upon the significant foundations that have already been laid within the organisation.



With regard to the application by the provider for an extension of scope of provision to include blended learning, the panel have recommended that QQI refuse Liffey College's application at this time. This is because the panel were not presented with sufficient evidence that QQI's Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes (2016) had been integrated into the strategy, capacity planning and QA procedures of the provider. The panel's findings relating to this aspect of the application are reflected within commentary in Section 5.12 of this report.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted, the panel were of the view that Liffey College had made significant progress in relation to its QA enhancement. The panel noted and commended Liffey College on its commitment to the reengagement process. The panel was pleased to be in a position to make a recommendation to QQI to approve the QA procedures of Liffey College, with conditions. The panel identified the discrete conditions of approval, and these are listed in Section 6 of this report. The panel also identified items of additional specific advice, listed in Section 7.2.

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

With regard to Liffey College's application for reengagement with its current scope of provision.

	Tick <u>one</u> as appropriate
Approve Liffey College's draft QA procedures with conditions	X
Refuse approval of Liffey College'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 Liffey College's draft QA procedures	



With regard to Liffey College’s application for an extension of scope to deliver programmes through a blended learning mode of delivery.

	Tick <u>one</u> as appropriate
Approve Liffey College’s draft QA procedures	
Refuse approval of Liffey College’s 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 Liffey College’s draft QA procedures	X

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	Liffey College has submitted a Certificate of Incorporation dated 2008 and is an established provider of non QQI accredited English and Foreign Language Programmes.
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	As per 4.1.1(a), Liffey College is an established company in Ireland, operating since 2008.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	Liffey College states that it is not engaged in any form of collaborative provision.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	Liffey College has not identified any relationships that are incompatible with the scope of access sought.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	Liffey College has submitted a Public Liability Insurance policy. The evidence submitted is indicative of compliance with this criterion.



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	The evidence submitted by Liffey College is indicative of compliance with this criterion.
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Findings

The evidence submitted by Liffey College is indicative of compliance with the Criteria in Section 4.1.

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	The provider has submitted an accountant's letter dated October 2020, financial statements for the year ended 31 st December 2019 & April 2018, and a tax clearance certificate. These are indicative that the provider is in good financial standing.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	Liffey College has submitted an articulation letter from IT Carlow indicating the Institute will accept applicants from Liffey College's Certificate in International Foundation Studies pending validation of that programme, based on their merits and on a case-by-case basis. Liffey College's intended validation of a Certificate in International Foundation Studies will diversify its programme offerings and contribute to the sustainability and resilience of its business model.
4.2.3(a)	Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	Yes	The panel was initially of the view that mandatory changes were required to bring Liffey College's governance structure into alignment with QQI's guidelines This is



			discussed in Section 5.1 of this report and reflected in mandatory changes in Section 7.1. When the panel reconvened on August 31 st , 2021 to review the evidence submitted by Liffey College, the panel were of the view that the mandatory changes had been adequately addressed. The panel identified some additional and discrete conditions of approval relevant to this dimension of QA. These are listed in Section 6 of this report.
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	Liffey College has a well-qualified QA Director in post.

Findings

The panel is of the view that the evidence submitted by Liffey College is indicative of compliance with the Criteria in Section 4.2.

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	In the past three-year period, Liffey College have certified only 5 learners on a QQI validated programme. However, the provider has substantial experience of provision of ELE programmes for international learners studying in Ireland.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	Liffey College has a complement of staff in place to facilitate its current provision. The panel is of the view that there are satisfactory procedures in place for the recruitment, induction and management of education and training staff.



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 panel is satisfied that the provider's track record of certification reflects its capacity to co-operate with and assist QQI and provide QQI with information as specified in Section 45(3) 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 the premises where Liffey College is located in Dublin. However, Liffey College outlined its facilities and provided the panel with a video tour of these. The panel are satisfied these are appropriate to the requirements of its proposed scope of provision.
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 the arrangements presented for Liffey College's current scope of provision are in line with 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 is of the view that the QA procedures in this area are satisfactory. However, the panel notes the need for Liffey College to include associated policies and procedures pertaining to plagiarism and academic misconduct within the QA manual.
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	Liffey College have protection for enrolled learners in place for all learners enrolled in programmes of three months duration or more.

Findings

The evidence submitted by Liffey College is indicative of compliance with the Criteria in Section 4.3.



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

The panel was initially of the view that Liffey College had made significant progress toward successful reengagement and undertaken substantive improvements to its QA procedures. The panel was of the view that, given sufficient time, Liffey College would be able to address the gaps identified in Section 4.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted by Liffey College, the panel was of the view that the issues initially identified had been sufficiently addressed in the interim period.

The panel noted that this finding did not pertain to Liffey College's application for an extension of scope of provision to offer programmes of blended learning. The panel recommended that QQI refuse that aspect of the provider's application at this time.



Part 5 Evaluation of draft QA Procedures submitted by Liffey College

The following is the panel's findings following evaluation of Liffey College's quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016) and Topic Specific QA Guidelines - Blended Learning. 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 initially of the view that further development pertaining to this aspect of Liffey College's draft QA procedures was required.

QQI's guidelines require a provider's governance structure to enforce an appropriate separation between commercial and academic decision-making. Where a provider's scale is such that it cannot fully support internal committees to facilitate this, the system in place for ensuring objective oversight should be documented.

The panel acknowledges the challenges of implementing appropriate governance and management structures for small organisations and notes that for small providers objective oversight is typically achieved through the appropriate appointment of external members as well as tutor and learner representatives to key committees. The panel also acknowledges that in preparation for reengagement, Liffey College had undertaken significant work in this area. For example, in the process of preparing for reengagement Liffey College had identified the need to establish a committee structure within the organisation. The structure established included an academic committee, operations committee, quality committee and appeals committee. In addition, a clearer division of roles and responsibilities in the management structure was established than had previously existed. Liffey College representatives stated that this had been a welcome improvement. The panel endorses the actions taken by Liffey College in this regard. However, at the conclusion of the site visit the panel held some ongoing concerns.

The panel was of the view that the membership of the established committees did not yet reflect sufficient externality. The panel discussed with Liffey College representatives that informed externality is a positive and necessary aspect of governance and can contribute value to the organisation beyond the Academic Committee. For example, external members often offer valuable expertise to a Board of Directors. Such arrangements would enable the Liffey College to benefit from diverse insights and expertise. With regard to this issue, the panel notes that during the evaluation clarification was sought regarding whether an existing member of the committee (designated as an Academic Director in the QA manual) was internal or external to the management and operations structure. The panel notes and accepts that flexible arrangements were in place to facilitate this individual's involvement in the organisation. However, for the avoidance of doubt, the panel's view is that this individual represented the equivalent of an internal voice. This was due to the extent of their involvement in the organisation. The panel is therefore of the view that externality must be actively sought by Liffey College. The panel further requires Liffey College to ensure that learner representation is visible in the membership of the Academic Committee, as an appropriate reflection of a contemporary, learner-centred approach to provision.

The panel also identified enhancements needed to the presentation of Liffey College's governance within the documentation. The panel accepts that the reengagement process is forward facing, and that the establishment of governance committees is at an early stage within the organisation. However, the terms



of reference for committees must represent sufficient detail pertaining to membership, quorum, frequency of meetings and reporting relationships to other committees, as well as a clear outline of their remit. The published terms of reference must be sufficiently transparent to enable all stakeholders, including external evaluators, to comprehend the full scope of a committee's activities.

Further, when revising the terms of reference for its committees, Liffey College must review the membership of its Operations and Quality Committees. During the site visit, Liffey College representatives described the membership of these committees as effectively coterminous with the membership of the Board of Directors. These must be differentiated, with consideration given to the value of inviting further externality to contribute to the organisation at appropriate levels.

Under this dimension of QA, QQI's guidelines require a provider's QA procedures to identify roles and positions responsible for the implementation of QA and to ensure these are clearly described and designated. During the virtual site visit, some confusion arose regarding the role of the Academic Director within the organisation. This was outlined to the panel in a manner that conflicted somewhat with the presentation of this role in the QA manual. It was also difficult to ascertain where responsibility for different forms and levels of learner support rested. The Operations Director was identified in discussions as taking responsibility for this essential area of activities; however, this was not represented within the Operations Director's role description. The panel accepts that within a small provider, functional responsibility for learner support may be distributed across the team, and that some learner support may logically constitute referrals to external services. However, the panel was of the view that identifying responsibilities associated with this would ensure the availability and provision of these supports was transparent to learners as well as external stakeholders.

Finally, the panel notes that Liffey College has commenced a formal process for risk identification and management. The panel endorses this and notes that QQI requires providers to have a governance system in place that considers risk. The panel therefore views the continued development of processes in this area as essential to the provider's future QA system.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel noted that significant progress had been made in relation to this dimension of QA. This included the appointment of external persons to units of governance and a full review of the committee structure. Evidence was presented of learner representation in the membership of the Academic Committee, clearer lines or responsibility within the management structure and the further development of risk identification and management procedures. The panel has identified discrete conditions of approval pertaining to this in Section 6 of this report.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

The panel was initially of the view that further development pertaining to this aspect of Liffey College's draft QA procedures was required.

QQI's guidelines under this dimension of QA require providers to have a quality assurance system that is fully documented. During the virtual site visit, the panel engaged in wide-ranging discussions with Liffey College representatives. In several instances, gaps that the panel identified in the QA documentation were noted by Liffey College to be addressed in related documents, for example, the Learner Handbook. In other instances, the panel heard examples of good practice from Liffey College that were not documented.



The panel was therefore of the view that it was necessary for Liffey College to ensure that all of the QA procedures were fully documented within the QA manual.

Further, QQI's guidelines require QA procedures to be available to staff, learners, and other stakeholders in usable formats and be subject to periodic review. The panel noted that in some areas of Liffey College's documentation policy statements outlining the principles that would guide action in a particular area of practice were not accompanied by a full suite of associated procedures. Further, Liffey College's processes in some areas of the documentation were more descriptive than procedural in tone. The panel notes that for procedures to be consistently implemented they must present clear steps for those using them. They should also make the sequence of and responsibility for those steps clear. Procedures should therefore provide unambiguous information about actions to be taken in specific situations. Individual procedures should always relate to broader policy statements.

The panel was of the view that Liffey College would benefit from implementing a template across its documentation to ensure that the processes consistently identify not only the purpose and scope of a policy or procedure, but a version control mechanism and the responsibility within the organisation for any approvals required (academic, commercial or both). The panel noted that in addressing this Liffey College may find it useful to benchmark its QA documentation against the various formats for presenting procedures used by providers that have successfully reengaged with QQI, which are published and publicly available.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel noted that significant progress had been made in relation to this dimension of QA. This included the submission of a revised QA manual that was appropriately structured and contained key policies and procedures, presented with an appropriate level of detail and clarity.

3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

The panel was initially of the view that further development pertaining to this aspect of Liffey College's draft QA procedures was required.

QQI's guidelines require the new programmes to be developed systematically and evaluated by appropriate internal decision-making structures. The guidelines also require that within this process there is a distinction between those who produce or develop material and those who approve it. The panel noted that the procedures for new programme development submitted by Liffey College reflected a consideration of the implications of blended learning. During discussions with the panel at the virtual site visit Liffey College representatives also emphasized the importance of external subject-matter expert review and ensuring that proposed programmes align closely to QQI's validation criteria. However, the documented procedures did not clearly identify the distinct approvals that would be required at interim points within the process, for example, from both the Board of Directors and Academic Committee in relation to initial proposals and prior to submission of a developed programme for validation to QQI. Further, the panel was unable to ascertain that a clear process was in place to ensure those tasked with the development of new programmes were not involved in their approval. The panel notes that where membership of a programme development subcommittee overlaps with membership of an approving body such as the Academic Committee, it must be clearly identified that the members of both are unable to vote on any approval of their own work. The workflow for programme development must capture levels



of approval that include a separation between those who develop and those who approve material, and the role of the Board of Directors must be made explicit in the process as it makes the final approval to commit resources to a new programme at distinct stages. The panel notes that these issues are closely related to the panel's commentary in Section 5.1 of this report regarding Liffey College's governance and management of QA.

QQI's guidelines also require programme delivery to be monitored in a way which allows for the identification of needs and the modification and adjustment of programme delivery methods as appropriate. The panel explored the processes in place for programme monitoring at Liffey College. Representatives of the provider involved in the management of teaching outlined that learner feedback is systematically collected and considered. The capacity of the Liffey College information management system to capture information and generate reports on indicators such as enrolment, retention and completion was also discussed. However, these indicators were considered by the operational or commercial committees. The panel therefore held concerns that processes to ensure comprehensive reports on all indicators of academic quality were considered by the Academic Committee were lacking. Liffey College must therefore develop their procedures for the collecting, collating, reporting and communicating programme monitoring and review indicators to the relevant stakeholders.

The panel notes that within this dimension of QA, procedures for access, transfer and progression are also evaluated. These aspects of Liffey College's QA procedures should be benchmarked against those of other providers within the further development of the provider's documented QA procedures discussed in Section 5.2.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel noted that significant progress had been made in relation to this dimension of QA. This included a revision of procedures pertaining to new programme development and programme monitoring. The panel identified a discrete condition pertaining to the need to identify that final approval of new programmes was within the remit of the Board of Directors (see Section 6) and an item of specific advice pertaining to capturing how learner feedback was actioned within the organisation (see Section 7.2).

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

The panel is of the view that this aspect of Liffey College's QA procedures meets QQI's requirements.

QQI's guidelines under this dimension of QA require a provider to assure itself as to the competence of its staff, to address pedagogical standards and the maintenance of these. During the virtual site visit, the panel discussed recruitment procedures at Liffey College, and were satisfied that these were appropriate to the provider's context and needs.

Within this area of QA, QQI also require a provider's procedures to be inclusive of performance management and opportunities for professional development. Representatives of Liffey College outlined CPD that had been facilitated by the provider within the past 12 months. This included opportunities for training in the use of educational technologies and reflection on practice with peers. The panel were satisfied that there is a positive orientation to development at Liffey College and encourages the provider



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to continue to prioritise staff development as the organisation moves forward with the implementation of its strategic goals.



5 TEACHING AND LEARNING

Panel Findings:

The panel was initially of the view that this aspect of Liffey College's QA procedures required further development.

QQI's guidelines under this dimension of QA require providers to have processes in place to ensure that the content of programmes reflects advances in the relevant discipline and that the pedagogic style incorporates national and international effective practice. During the site visit, the panel discussed approaches to teaching and learning at Liffey College with the provider representatives. This discussion encompassed alignment to the curriculum, formative assessment practices within Liffey College's currently delivered ELE programmes and the pivot to online delivery during Covid-19. The panel notes that in proposing new programmes for validation, Liffey College will be required to articulate programme specific teaching, learning and assessment strategies for evaluation.

Within this dimension of QA, QQI's guidelines also require a provider to have procedures in place for dealing with learner complaints and appeals. The panel acknowledge that Liffey College have a mechanism for complaints to be submitted, logged, and addressed within the information management system and this was demonstrated to the panel during the virtual site visit. However, the panel identified that the procedures that guide the use of this system in the QA manual needed to be expanded to encompass a differentiation between informal and formal complaints and processes for escalation. The panel discussed the appeals process with Liffey College and was satisfied that the response from Liffey College's QA Director reflected an understanding of what is required to manage an appeal.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel noted that progress had been made in relation to this dimension of QA. The panel was satisfied that its concerns had been adequately addressed by Liffey College.

6 ASSESSMENT OF LEARNERS

Panel Findings:

The panel was initially of the view that this aspect of Liffey College's QA procedures required further development.

QQI's guidelines under this dimension of QA require providers to have procedures in place to ensure the credibility and integrity of assessment processes. Following a review of the documented procedures for internal verification, external authentication and results approval and discussion of these with Liffey College representatives during the site visit, the panel were of the view that these were appropriate for the provider context and reflected alignment to QQI's guidelines. As noted in Section 5.5, Liffey College will be required to bring forward programme specific assessment strategies and associated procedures when proposing new programmes for validation to QQI.

During discussions with Liffey College representatives, the panel noted that the QA documentation presented for evaluation did not include substantive processes or guidance for learners and staff in relation to plagiarism, avoiding academic misconduct and responding to instances of suspected plagiarism or misconduct. The panel acknowledges that Liffey College representatives identified that these existed



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within other documentation, such as the Learner Handbook. The panel has outlined in Section 5.2 of this report that Liffey College must address gaps in the overall QA manual and notes that the provider should ensure this area of procedures is considered within that.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel noted that progress had been made in relation to this dimension of QA. The panel was satisfied that its concerns had been adequately addressed by Liffey College.

**7 SUPPORT FOR LEARNERS****Panel Findings:**

The panel was initially of the view that this aspect of Liffey College's QA procedures required further development.

QQI's guidelines under this dimension of QA require providers to have processes to be in place to ensure that all learner resources and supports are fit for purpose and accessible, and that learners are informed about the full range of services available to them. Liffey College provides an induction for new learners and access to weekly progress reports for learners within its current ELE programmes. As the majority of Liffey College learners (for both currently delivered and planned future programmes) are international the panel explored support needs for learners of this profile. The panel note that Liffey College have a track record of supporting international learners, with support and information available in languages other than English if required and a body of knowledge held within the organisation relevant to the administration of ILEP programmes.

The panel discussion charted the learner journey at Liffey College in relation to various dimensions of QA, including learners supports. Learners are given the opportunity to identify additional support needs at the point of application and are supported where possible. Specific examples of accommodating the needs of learners with visual impairments, dyslexia and medical conditions were provided. Discussions reflected that Liffey College ensures its international learners have appropriate health insurance and are provided with guidance on how to interact with health services in Ireland. Learners are provided with information regarding local pharmacies and medical clinics. Learners experiencing mental health challenges are referred to appropriate professional services. However, Liffey College representatives noted that accessing these services for learners has been challenging in 2020 due to a high demand.

During the virtual site visit, the panel clarified with Liffey College representatives where responsibility lay within the organisation for the provision of supports for learners, as this was not clear within the roles and responsibilities outlined in the QA manual. The panel additionally sought to understand how specific supports and referrals to external professional services were managed within the organisation. The panel noted that the documentation pertaining to learner supports at Liffey College did not reflect the breadth of the provider's activities in this area discussed during the site visit. Therefore, the panel was of the view that Liffey College needed to identify more clearly within the QA manual where management and functional responsibilities for learner supports lay and how the monitoring and oversight of these was conducted. In addressing this, Liffey College should also ensure that current and prospective learners are able to clearly identify what supports are available and how these can be accessed.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel noted that responsibility for the provision of supports for learners was more clearly identified within role descriptions and the management structure. The panel identified a discrete condition of approval pertaining to the inclusion of oversight of learner supports within the remit of the Academic Committee.



8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel is of the view that this aspect of Liffey College's QA procedures meets QQI's requirements.

QQI's guidelines under this dimension of QA require a provider to ensure that reliable information and data are available to inform decision-making and to enable a provider to identify areas that require improvement within the organisation. During the site visit, the panel was provided with a virtual tour of the Liffey College Management System which facilitates the submission of online forms for a range of processes including complaints. Staff and learners can access information and track calendar events using the system, which facilitates the effective administration of a range of processes. Liffey College's QA Director confirmed that the system is capable of producing reports that can be used to inform processes including programme monitoring and review (see also Section 5.3).

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

The panel is of the view that this aspect of Liffey College's QA procedures meets QQI's requirements.

QQI's guidelines under this dimension of QA require a provider to ensure that all information published is clear, accurate, objective, up to date and easily accessible. As Liffey College learners are primarily international, the panel sought to understand how the provider works with agents and recruitment partners to ensure that learners are accurately informed. Liffey College confirmed that the provider works with a small and carefully selected group of agents and adheres to the London Statement in relation to ethical recruitment. Liffey College employs staff who speak languages other than English who are able to provide additional support and translation for learners with low levels of English proficiency, including remotely by phone or messaging services if required.

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

Panel Findings:

The panel is of the view that this aspect of Liffey College's QA procedures meets QQI's requirements.

Liffey College's application states that there are no collaborative provision arrangements in place. During the site visit, the panel discussed the provider's interaction with international recruitment agents and was satisfied that this is aligned to the guidelines provided by QQI (see also Section 5.9). Liffey College engage with communities of practice relevant to their current programme provision, for example, organisations such as ELT Ireland. Liffey College is encouraged to maintain and develop its participation in the broader education community as it moves forward and to take advantage of the freely available resources offered by the National Forum for Teaching and Learning.

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

The panel is of the view that this aspect of Liffey College's QA procedures meets QQI's requirements.

QQI's guidelines under this dimension of QA require providers to have a system of appropriate quality measures in place, for example, learner satisfaction ratings, completion rates and learner outcomes. The panel is satisfied that Liffey College have established processes for the collection and review of learner feedback and that other indicators are tracked and reported. The panel notes that it has identified a need for this to be more systematically reported and considered in relation to programme monitoring and review (see Section 5.3). However, the panel is satisfied that there is a positive disposition toward enhancement, self-evaluation and review within Liffey College that provides confidence the findings of internal and external quality assurance evaluations will be acted upon.

12 TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING**Panel Findings:**

The panel is recommending that QQI refuse to approve Liffey College's procedures pertaining to this dimension of QA at this time. This is because the panel is of the view that substantial further development pertaining to this aspect of Liffey College's draft QA procedures would be required before it could demonstrate appropriate alignment to the guidelines in this area.

QQI's guidelines under this dimension of QA require providers to demonstrate a strategic approach to blended learning. Liffey College provided a three-year strategic plan for review by the panel alongside its application. However, the panel noted that the strategic rationale for providing programmes in blended learning delivery mode was not clearly articulated within this. A presentation by the provider during the virtual site visit and discussions with Liffey College representatives during the site visit did not provide sufficient elaboration in this regard.

QQI's guidelines under this dimension of QA also require providers applying for approval to deliver programmes in blended learning modes to make appropriate investment in infrastructure and identify accountable key roles. The panel notes that Liffey College has adopted Moodle as a VLE and outlined how this is being used effectively to support the implementation of the contingency procedures in place for fully online remote teaching during the Covid-19 pandemic. However, the panel were not able to ascertain a planned approach to the provision of ongoing and sustainable technical support for learners and staff or for the maintenance and development of the platforms in use. The panel were also unable to identify where learning design expertise would be held within the organisation that would contribute to the development of new programmes for blended learning. The panel note that providers must be able to define and articulate how blended learning is approached within the context of their Teaching, Learning and Assessment strategy/approach and provide a rationale for why blended learning is appropriate for a particular programme and learner context.

The panel acknowledge that Liffey College included a policy for blended learning within the draft QA procedures submitted to the panel for review. This policy reflected cognisance of QQI's guidelines for



providers of blended learning programmes. However, the policy was not accompanied by the breadth of procedures (which may in this area include guidelines for staff and learners and minimum standards for online learning resources) that are required to support such a policy and would demonstrate sufficient capacity in this area. The panel noted that the provider's QA documentation pertaining to staff development stated that all academic staff will receive training for online/blended learning. Liffey College staff outlined technical training that had been provided to teaching staff during 2020 to support the pivot to online delivery and described additional supports and resources that were in production. The panel encourages Liffey College to continue these positive developments but notes that at present these are reactive rather than planned and strategic developments.

Finally, QQI's guidelines require providers to demonstrate that their overall QA procedures are fit-for-purpose in the context of blended learning. Although the documentation submitted reflected a consideration of the implications of blended learning in relation to the development of new programmes, the panel were not able to identify an appropriate consideration of blended learning throughout Liffey College's QA procedures. For example, documented procedures pertaining to assessment of learners and information provided to learners included insufficient detail on blended learning.

For the reasons outlined in this section, the panel were unable to recommend approval of Liffey College's extension of scope to include the delivery of programmes in blended learning mode at this time. However, the panel commend the team at Liffey College on the capacity demonstrated within the organisation to manage online delivery effectively during the emergence and would like to encourage Liffey College to enhance and promote the availability of online learning opportunities within their ELE provision moving forward.

Evaluation of draft QA Procedures - Overall panel findings

As noted in Section 3.1, the panel initially recommended a number of mandatory changes be made to Liffey College's draft QA procedures. This was because the draft QA procedures did not yet reflect sufficient alignment to QQI's requirements as per the Core and Sector Specific Statutory Quality Assurance Guidelines (2016). However, the panel were of the view that Liffey College, given adequate time, would be able to address the gaps the panel identified in the QA documentation and practices. Those gaps are the focus of a number of mandatory changes listed in Section 7.1 of this report.

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel noted that significant progress had been made by Liffey College. The panel was pleased to be in a position to recommend that QQI approve the QA procedures of the provider, subject to the discrete conditions listed in Section 6 of this report.

The panel would like to commend the open and sincere engagement of Liffey College with the panel throughout the evaluation. Liffey College representatives demonstrated a high level of commitment to the reengagement process and the enhancement of the organisation's QA. The panel also noted that



Liffey College had significant experience and a track record in the provision of English language programmes and associated supports, and that this was apparent to the panel.

Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

6.1.1 In relation to governance and management of QA, Liffey College must:

- Embed the management of risk within the terms of reference for its Board of Directors and Academic Committee and ensure that a risk register is actively maintained.
- Include oversight of learner supports within the remit of the Academic Committee.
- Include responsibility for the final approval of new programmes within the remit of the Board of Directors.
- Identify, where relevant, how learner representatives are selected, e.g., elected or nominated, and by whom.

6.1.2 Include a specification of the role and an outline of the profile of the role holder for the following appointments in the QA documentation:

- The external chair of the Academic Committee
- The external member of the Board of Directors

Part 7 Mandatory Changes to QA Procedures and Specific Advice

The mandatory changes below were identified at the conclusion of the virtual site visit in December 2020. When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted the panel was satisfied that the mandatory changes had been implemented by Liffey College and that its initial concerns had been adequately addressed.

7.1 Mandatory Changes with reference to current scope of provision

7.1.1 Liffey College must further develop its governance structures and expand the terms of reference for its committees to ensure the following:

- Membership, Quorum, Frequency of Meetings and Remit is clearly outlined for all committees



- Membership and reporting relationships between committees clearly reflect an appropriate separation of commercial and academic decision-making
- Learner representation is included within the membership of the Academic Committee
- Clear differentiation between the membership and remit of the Board of Directors and the Operations & Quality Committees

7.1.2 Liffey College must expand the representation of informed externality within its governance structures to ensure the following:

- The Board of Directors and Academic Committee benefit from suitably qualified and experienced independent and external expertise
- Appointment of a suitably qualified external chair to the Academic Committee

7.1.3 Liffey College must clarify and publish clear roles, responsibilities and reporting lines within its management structure to ensure clarity for learners and staff. This must ensure the following:

- Staff members tasked with learner supports are fully identified
- Staff members tasked with programme coordination are clearly and consistently identified within the internal management structure

7.1.4 Liffey College must continue the development of its processes for the identification, management and mitigation of risk, ensuring these encompass academic, reputational and financial risk.

7.1.5 Liffey College must revise its QA procedures to ensure the following:

- The inclusion of clear lines of responsibility and reporting pertaining to QA
- The QA procedures fully and comprehensively document all processes within the organisation
- All QA procedures are included in the QA manual, including issues pertaining to students, for example complaints and disciplinary procedures.
- The QA procedures are structured using a consistent format that ensures standardised implementation

7.1.6 Liffey College must ensure that the programme monitoring and review includes a systematic process to ensure key information is collected, collated, reported and communicated to the relevant stakeholders.

7.2 Specific Advice

When the panel reconvened on August 31st, 2021 to undertake a desk review of the evidence submitted by Liffey College the panel identified the following items of specific advice. The panel



encourages Liffey College to give consideration to these items in the course of the provider's ongoing enhancement of its QA.

7.2.1 Liffey College should consider developing a process map, workflow document or similar that will facilitate visibility of mechanisms for actioning student feedback. This would usefully facilitate the generation of case studies for the provider's Annual Quality Report.

7.2.2 The panel advises that although learner representation on the Academic Committee is essential, learner representation is not necessary on QA Committee or Operations Committee.

7.2.3 The panel advises that where any individual in the organisation holds dual or multiple roles, those individuals should be identified consistently within the QA documentation.

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
5 - 6	SPA Major	Training International Foundation Studies
Face to Face; Full-time and Part-time		



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Part 9 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 Liffey College.

Name: _____ Dr Annie Doona_____

Date: 14th September, 2020



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

Document

Related to

No additional documentation was provided to the panel during the evaluation.
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Annexe 2: Provider staff met in the course of the Evaluation

Name

Role/Position

Haseeb Ahmed	Centre Director
Tazila Ramputh	QA Director
Sanjiv Oberoi	Operations Director
Desmond Gargan	Academic Director
Dara Moran	Director of Studies
Gabriel Brindamour	Assistant Director of Studies
Everton Tadeu	Marketing & Sales Director

Appendix: Provider response to the Reengagement Panel Report



Programmes Awards and Executive Committee (PAEC)
Quality and Qualifications Ireland (QQI)

16th September 2021

This is to acknowledge receipt of the Reengagement Panel Report by Liffey College on the 14th of September 2021. I further confirm that the report has been evaluated and there are no suggested changes to be made.

Yours Sincerely,

A handwritten signature in black ink, which appears to read 'T Ramputh', is written over a horizontal line.

Tazila Ramputh
QA Director
Liffey College/Coláiste Na Life