



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	Security Institute of Ireland
Address:	Unit W6D, Ladytown Business Park, Naas, Co. Kildare
Date of Application:	11 October 2019
Date of resubmission of application:	
Date of evaluation:	
Date of site visit (if applicable):	22 nd January, 2020
Date of recommendation to the Programmes and Awards Executive Committee:	9 June 2020



1.2 Profile of provider

The Security Institute of Ireland (SII) was established in 1981, after being granted a licence by the Minister for Industry, Commerce and Tourism. The purpose of the institute was to provide recognised education and training programmes for persons employed in the field of security. Following the establishment of the National Council for Vocational Awards (NCVA), SII was recognized by that body in 1999. SII was later recognised by QQI's predecessor body, The Further Education and Training Awards Council (FETAC).

SII is wholly owned by its members and has no shareholders or share capital. The principal activities of SII relate to training and certification, and include publishing training manuals and maintaining a register of professional security practitioners including members, companies, trainers and consultants. SII operates a delivery model in which SII is the provider, and approved training companies recruit and register learners as well as delivering the approved programme. It is a Private Security Authority (PSA) approved provider and is the sector body for training and education in the security industry in Ireland. SII therefore works closely with the PSA on programme development and other initiatives.

QQI programmes are offered by SII at Level 4 on the National Framework of Qualifications (NFQ) for the private security industry. A range of non QQI programmes are also offered by the provider. In total, SII certifies an average of 2000 learners annually. Of these, approximately 1000 are enrolled on its QQI validated programmes. Learners at SII are described by the provider as typically being from 20 to over 50 years of age, medium skilled and in possession of basic levels of formal education and qualifications. SII's learners go on to seek employment in the private security industry, and participation in the provider's programmes is often linked to mandatory requirements for licensing employees in the sector. SII states that the vast majority of its learners are therefore not seeking opportunities to progress educationally. Rather, they are motivated to obtain the required Award certification that will enable them to apply for a licence and subsequently obtain employment in the sector.

While training is delivered at various locations around Ireland, SII is centrally administered from a fully equipped suite of offices in Naas, Co. Kildare. These premises are owned by the provider.



Part 2 Panel Membership

Name	Role of panel member	Organisation
Danny Brennan	Chair	Former Registrar, Letterkenny IT
Catherine Peck	Secretary	Independent Education Consultant
Pam Skerritt	QA Expert	Independent Education Consultant
Siobhan Magner	QA Expert	Mayo Sligo Leitrim ETB
Michael Kelly	Training Expert	Chevron Training & Recruitment

Part 3 Findings of the Panel

3.1 Summary Findings

At the outset of this report, the panel would like to make an unreserved commendation to the representatives of SII with regard to the provider's open and honest engagement with the panel during the site visit. SII's transparent approach to the reengagement process promoted a constructive and fruitful dialogue.

The panel further acknowledges and commends the longstanding dedication of SII to providing recognised education and training pathways to personnel entering the private security industry or up-skilling within the sector. SII programmes offer valuable opportunities to learners who may be re-entering education after a significant gap, or otherwise possess limited levels of formal education. The programmes offered by SII enable those learners to work toward recognition of their learning through certification, and also to progress into employment pending approval of their licence from the PSA. In developing and delivering the programmes, SII has made a significant contribution to the professionalization and quality standards of the industry.

Nonetheless, at the conclusion of the site visit the panel held a number of specific concerns in relation to areas of ongoing development in the provider's QA. These relate, in the main, to the alignment of SII's QA with the requirements of QQI's 2016 Core Statutory Quality Assurance Guidelines (hereafter CSQAG). These specific concerns are outlined by the panel in Sections 5.1 – 5.11 of this report. The panel was of the view that the provider was capable of implementing the changes needed to address these issues. The panel therefore availed of the option to defer its decision for a period of six weeks to enable SII to implement a number of proposed mandatory changes and reflect on items of specific advice. These are listed in Sections 6.1 and 6.2 of this report.

Following that six week period, the panel reconvened to review SII's updated submission. It was the view of the panel that SII had worked to address the issues identified during the site visit in the intervening time period. The panel felt that the resubmitted documentation represented sufficient alignment to the CSQAG to allow the panel to make a recommendation to QQI that it approve SII's draft QA procedures at that time. Alongside this recommendation, the panel has issued a number of items of specific advice to SII in Section 6.2 of this report. The panel is of the view that implementing this advice will support SII in its ongoing quality enhancement process, and also help prepare SII well for participation in QQI's provider monitoring processes.



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

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

	Tick <u>one</u> as appropriate
Approve Security Institute of Ireland draft QA procedures	X
Refuse approval of Security Institute of Ireland 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 Security Institute of Ireland draft QA procedures	



Part 4 Evaluation of provider capacity

4.1 Legal and compliance requirements:

	Criteria	Yes/No/ Partially	Comments
4.1.1(a)	Criterion: <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	Yes	SII has submitted a Certificate of Incorporation and has a track record of certification and operations in the education sector in Ireland.
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 the evidence cited directly above, the provider is a legal entity with a substantial presence in Ireland.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	SII does not have any collaborative provision arrangements in place. The provider has provided appropriate information to the panel with regard to the company structure and membership.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	SII does not engage in partnerships or collaborations that impact the scope of access sought by the provider. SII is a PSA approved provider, and engages contracted trainers to deliver its programmes.
4.1.5(a)	Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	Yes	SII has provided evidence indicative of compliance with Irish/EU legislation.
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	SII has a track record of certification, formerly with NCVA and FETAC, currently with QQI.

Findings

The panel is satisfied that SII has met Criteria 4.1, and has provided appropriate evidence indicative of compliance with the listed sub-criteria.

**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	SII operates from user-owned premises in Naas, and has submitted appropriate evidence alongside its application to demonstrate it has met this criterion. This evidence includes a tax clearance certificate, a copy of the SII's insurance policy and a letter from the provider's accountants
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	SII has experienced consistent growth in numbers on its QQI validated offerings since 2013. There is ongoing demand for the currently validated Level 4 Private Security Services Certificate.
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 adjustments were required in relation to this criterion. The panel's concerns in relation to governance were addressed by SII in the six week interim period, and SII's revised governance structure has subsequently been evaluated as fit-for-purpose.
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	SII has a track record of certification with QQI. SII has also previously engaged with FETAC and the NCVA.

Findings

The panel is satisfied that SII has met Criterion 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	SII has a track record of providing education and training programmes in Ireland within the domain of security.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	The panel was initially of the view that adjustments were required in relation to this criterion. The panel's concerns in relation to education and training staff were addressed by SII in the six week interim period, and SII's revised QA has subsequently been evaluated as fit-for-purpose.
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 SII's track record of certification, and its approach to the re-engagement process reflects its capacity to co-operate with and assist QQI and provide QQI with information as specified in Section 45(3) 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	SII operates from user-owned premises in Naas, and utilizes contracted trainers and premises for the delivery of training programmes.
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 was initially of the view that adjustments were required in relation to this criterion. The panel's concerns in relation to access, transfer and progression were addressed by



			SII in the six week interim period, and SII's revised arrangements have subsequently been evaluated as fit-for-purpose.
4.3.6(a)	Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	Yes	SII has appropriate structures in place for internal and external verification of its assessments, and is proactive in monitoring the quality and effectiveness of assessment tools and strategies within its programmes.
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	SII's QQI validated programmes are of short duration and therefore exempt. The provider has indicated that a fund is being established for anticipated future exposure.

Findings

The panel is satisfied that SII has met Criterion 4.3.



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

During the site visit, the panel identified some areas of vulnerability, largely in relation to the requirements of QQI's guidelines in relation to Governance and Management of Quality and Documented Approach to QA. These and other areas for refinement in the provider's QA system initially identified by the panel are discussed in subsequent sections of this report, and were addressed by SII during the six week interim period. Upon review of the evidence submitted by SII following that six weeks, the panel was satisfied that SII had sufficiently met the Criteria in Section 4.



Part 5 Evaluation of draft QA Procedures submitted by The Security Institute of Ireland

The following is the panel's findings following evaluation of Security Institute of Ireland's (SII) quality assurance procedures against QQI's Core Statutory Quality Assurance Guidelines (April 2016). Sections 1-11 of the report follows the structure and referencing of the Core QA Guidelines.

1 GOVERNANCE AND MANAGEMENT OF QUALITY

Panel Findings:

At the conclusion of the site visit, the panel found that QQI's guidelines under this dimension of QA had not yet been fully addressed.

Discussions between the provider representatives and the panel during the site visit were wide-ranging and conducted in an open and constructive way. These discussions illuminated the regulatory and employment context of the private security industry in which SII operates, and allowed the panel to gain insight into how the current governance and management structure had emerged over time. SII's structure has adapted as necessary to serve SII's members and fulfil the evolving requirements of recognition and certification bodies (the NCVA, FETAC and currently QQI). An outcome of this dialogue is that the panel notes and commends the obvious commitment of SII's representatives to their members and the quality of the training and education services provided. The panel further commends the provider's efforts to ensure its operations benefit from appropriately expert externality, and the impact of the provider's work in the private security industry. Finally, the panel acknowledges that the current CSQAG demand significantly more from providers in relation to this dimension of QA than was previously expected by the NCVA or FETAC.

In the following subsections, the panel identified where significant gaps existed between SII's draft QA and the CSQAG at the time of the original site visit. The panel noted proposed mandatory changes for SII which would enable the provider to address these issues, keeping in mind the principles of proportionality and the contextual particularities of the provider's operations. The view of the panel was that SII had the capability to implement the changes needed to fulfil QQI's guidelines, and was positively predisposed to working with QQI going forward. Implementing the proposed mandatory changes would enable SII to continue to serve its members while being appropriately recognised as a quality provider. The panel was confident that the team at SII would continue to demonstrate the provider's capacity to evolve and meet the changing demands of the Irish education and training sector.

5.1.1 QQI requires providers to have a system of governance established which protects the integrity of academic processes (CSQAG p.6).

This aspect of QQI's guidelines requires academic decision-making to be demonstrably independent of corporate decision-making within a provider's governance structure. At SII, the Academic Board of Governors as it functioned at the time of the site visit evaluation, was focused on the design of programmes offered by the provider, and offered expert advice and guidance in relation to the content of these. However, this group did not review feedback on the programmes delivered, or engage in decision-making based on the outcomes of programme monitoring and review processes. Nor did this group provide direction on quality assurance related events such as the process of reengagement for QA with QQI. At SII, these activities fall within the remit of the Management Committee. The panel notes that this is unusual, as these are the type of activities and areas of decision-making that are typically the responsibility of the academic arm of governance within an education and training organisation.



The panel recognizes that due to the nature of the provider's corporate structure and membership, commercial considerations do not unduly influence decision-making at SII. Therefore, the panel does not see any cause for concern in this regard. However, corporate decision-making may also be motivated by operational or reputational considerations, and these concerns may exist in tension with considerations of academic quality. The panel was therefore of the view that some adjustments were needed at SII to ensure that the provider's governance structure demonstrated an appropriate level of distance between these domains, and in doing so reflects the CSQAG published by QQI. The panel issued a proposed mandatory change (see 6.1.1) for SII in relation to this.

5.1.2 QQI's guidelines require groups or units responsible for the oversight of education and training to be identified, and terms of reference for these groups to be documented and published (CSQAG p.5). Further, the guidelines require roles and positions responsible for the implementation of quality assurance policies and procedures to be clearly described and designated (CSQAG p.7).

SII representatives took a commendably transparent approach to interactions with the QQI appointed panel during the site visit, and in the course of discussion were able to provide the panel members with a clearer view of how the various units of governance interacted, and how individual responsibilities were allocated. However, the panel noted that this information was not presented in sufficient detail in the draft QA documentation. The panel therefore issued a proposed mandatory change (see 6.1.2) in relation to this. The inclusion of further detail in the draft QA should also reflect the amendments made to address the issues outlined in point 5.1.1.

5.1.3 QQI's guidelines require providers to have a system of governance that considers risk, and procedures to be in place for this (CSQAG p.6).

During the panel's discussion with SI representatives at the site visit, it was evident that the provider's management committee and Board of Directors do consider and actively manage risk in decision-making. However, this process of assessing and managing risk is not currently formalised or documented. Consequently, the panel issued a mandatory change in relation to this (see 6.1.3).

Following the six week interim period allocated, SII submitted evidence to the panel that indicated it had sufficiently addressed these concerns. The Terms of Reference for the Academic Board of Governors were amended to reflect responsibility for academic and quality related matters, and the functions of academic decision-making previously exercised by the Management Committee were transferred to the Board. Risk management was given greater prominence within the remit of various committees, and the Management Committee confirmed to be responsible for ongoing review of a risk register.



2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

At the conclusion of the site visit, the panel found that QQI's guidelines under this dimension of QA had not yet been fully addressed.

QQI's guidelines require a provider's QA system to be fully documented, and to ensure that necessary information is available to staff and the public as required. The QA system must also cover any elements of the provider's activities that are subcontracted to other parties, and be informed by QQI quality assurance guidelines (CSQAG p.9).

SII's draft QA did not fully align with QQI's criteria as per the CSQAG. This resulted in the omission in the initial submission of some information and documented processes in areas that are required, for example staff recruitment and development. During the site visit, it was evident to the panel that, in practice, procedures did exist in these areas and were routinely followed within SII's operations. However, these had not all been formalized in the draft QA presented. In other areas of the documentation, further detail was needed (as discussed in point 5.1.2). The panel also notes that some areas of the documentation were more descriptive than procedural. That is, what generally occurs in a situation was outlined, but step by step procedures which enable a member of staff, learner or external evaluator to easily follow a process were sometimes lacking. This could be addressed by systematically following policy statements (focused on what should occur in a given situation) with sequential procedures (focused on how things should be done, and identifying who, what, where, when and in what order they occur). The panel issued a proposed mandatory change (see 6.1.4) in relation to this.

The panel notes that QQI's CSQAG requires that QA systems must be fit for purpose and appropriate to the provider context (p.9). The CSQAG also emphasizes that QA systems should be proportional, and states "A successful quality assurance system will be efficient, well communicated and integrated into the normal activities of the provider" (p.2). In keeping with the principle of proportionality, the panel was of the view that the changes required of SII in relation to this dimension of QA did not demand an entirely new, elaborate or unwieldy document and QA system to be produced. Rather, some changes may involve formally documenting practices that are established but not written down, and including them in the QA manual. Other changes may require adding detail to existing documentation or reconsidering how it is written and presented from the perspective of the end user or audience.

Following the six week interim period allocated, SII submitted evidence to the panel that indicated it had sufficiently addressed these concerns. Changes to the Quality Assurance System documentation were evident, and a commitment to aligning the documentation with QQI's CSQAG moving forward was made. The panel has offered Specific Advice to SII pertaining to enhancing this dimension of its QA moving forward.



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed, and notes one specific area to be addressed.

During the site visit, the panel discussed processes at SII pertaining to programme development and approval. These discussions made clear that SII undertakes broad consultation with various stakeholder groups, including the PSA, Gardai, military and industry groups to inform programme proposals. Proposals typically originate with the Management Committee, and input and approval is sought from the current Academic Board of Governors prior to a proposed programme progressing toward validation or implementation. While there are no profit motives for proceeding with a new programme at SII, the final approval of programmes in relation to costs and resource implications rests appropriately with the Board of Directors. During the site visit, SII representatives stepped the panel through the process of proposing, developing and commencing a particular programme that had involved extensive consultation, a two year development process and multiple levels of approval prior to delivery.

The panel also discussed procedures for access, transfer and progression with SII's representatives. The provider ethos emphasises helping prospective learners into the programmes, and supporting learners who may struggle with literacy issues or be unfamiliar with the structures of formal education. The panel commends SII's commitment to enabling access to its programmes. A demonstration of communications skills is currently entailed in the application process for all potential learners (regardless of first language). The panel advises that SII should confirm and clarify in its documentation what evidence a potential learner for whom English is a foreign/second language should provide to gain entry to an SII programme. Specifically, this should indicate the level of English language proficiency required, measured according to the Common European Framework of Reference for Languages (CEFR), for example 'B1'. It should also identify how that level of proficiency should be verified, as per Annex B of the PSA Requirements for Training Providers (2018). Similarly, the panel advises that SII clarify in its documentation the processes for prospective learners who declare disabilities or additional support requirements at the time of application. The panel noted a proposed mandatory change (see 6.1.5) in relation to integrated systems of learner support that has specific relevance to access.

Dialogue with the SII's representatives during the site visit reflected a positive disposition toward the continual improvement of programmes, and a willingness to work flexibly and responsively to address problems or issues. An annual review is undertaken of programmes to identify gaps or areas for update. This may be mediated by email and remote communications. Every two years a more substantial review process is undertaken. These reviews do not typically result in major changes, but may incorporate changes due to amendments in legislation (for example, data protection) or adjustments made to specific features of the programme to enhance effectiveness. Maintaining currency of the programmes and training provided in relation to the implications of the legislative context is the role of the management team.

Following the six week interim period allocated, SII submitted evidence to the panel that indicated it had sufficiently addressed these concerns. Notably, a commitment was made by SII to upskilling trainers in relation to English language requirements.



4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

At the conclusion of the site visit, the panel found that QQI's guidelines under this dimension of QA had not yet been fully addressed.

QQI's guidelines require that a provider assures itself as to the competence of its staff, and that its procedures for recruitment address technical and pedagogical standards for any persons employed to teach learners (CSQAG p. 12).

The draft QA submitted by SII and reviewed by the panel prior to the site visit lacked detail of how the provider achieved this. Given SII's delivery model, in which SII is the provider, but contracts approved training companies to recruit and register learners as well as delivering its programme, the panel sought to understand SII's practices in greater detail. During the site visit, discussions with SII representatives confirmed that a robust set of recruitment criteria is used in practice. All contracted trainers must have a minimum L6 training qualifications, a guarding and door qualification and a minimum of five years of experience in the industry. Additionally, trainers must hold indemnity insurance and tax clearance, and be in possession of their own vehicle. Potential trainers sign declarations of compliance which are forwarded to the PSA as part of the application process. Following recruitment, processes of internal monitoring contribute to performance management. Learner feedback, internal and external verification of assessments and learner outcomes are all considered in reviews of trainer performance. Consequently, the panel identified a proposed mandatory change for SII that requires this process of due diligence to be included in the draft QA (see 6.1.7).

QQI's guidelines also require that providers be concerned with the responsibilities and conduct of persons employed to teach, and provide opportunities for staff development that are systematic. Planning and resources must be committed to identifying and addressing staff training needs (CSQAG p.13).

Given that trainers on SII programmes are subcontractors to the provider, the panel held concerns that insufficient mechanisms were in place to ensure that contracted trainers engaged, informed and supported learners in a manner that reflected the ethos and mission of the Security Institute of Ireland. The panel acknowledges that trainers are supported through provision of detailed schedules and lesson plans, and that assessment is centrally devised. These measures notwithstanding, the panel was of the view that current practices could be further augmented, and issued a proposed mandatory change pertaining to this (see 6.1.6).

Following the six week interim period allocated, SII submitted evidence to the panel that indicated it had sufficiently addressed these concerns. SII included documentation pertaining to the trainer application and approval process, including improvements made. SII also confirmed that trainer upskilling was mandatory and would take place at least annually, with seminars and briefing sessions taking place more frequently.

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

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed.

During the site visit, the panel discussed approaches to teaching and learning with SII's representatives, including two trainers who deliver a QQI validated Level 4 programme. While trainer autonomy is reasonably limited due to the centralised provision of lesson plans, assessment tasks and learning materials, trainers are encouraged to draw upon their experience in industry in their interactions with learners. Trainers discussed how they use anecdotes and examples from their own experience in industry to illustrate the programme content, and bring a sense of authenticity to their delivery.

QQI's guidelines in relation to this dimension of QA also require that a provider ethos promotes learning, and that there are processes in place to ensure that the content of programmes reflects advances in the relevant field (CSQAG p.13). SII representatives noted that in addition to delivery of the documented programme, learners and trainers at SII have opportunities to listen to topical guest speakers and lecturers. A trade show is hosted once every two years, and SII trainers are encouraged to attend and hear speakers representing Gardai as well as prison officers and professionals in crime prevention.

6 ASSESSMENT OF LEARNERS***Panel Findings:***

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed.

During the site visit, SII representatives stepped the panel members through the processes for ensuring the security and integrity of assessment. This included the design of assessment, the processes of marking, internal and external verification, results approval and the administrative functions associated with this. Both internal and external verifiers randomly sample from the full range of assessments submitted. Learners are issued with provisional results, and have the opportunity to appeal.

Discussions with SII also encompassed the provider's assessment strategy. Assessments on SII's programmes are continually updated and changed. Learners are able to undertake assessments through a variety of modes. SII representatives provided an example of videos of skills demonstrations, and amendments that had been made to a task in which learners needed to perform a dynamic risk assessment. The ratio of skills demonstration and theory on current QQI validated programme is 50/50.



7 SUPPORT FOR LEARNERS

Panel Findings:

At the conclusion of the site visit, the panel found that QQI's guidelines under this dimension of QA had not yet been fully addressed.

At the site visit, the panel explored this dimension of SII's QA by inviting training and administration staff to step the panel through the learner journey at SII as they engage with them. The subsequent discussion charted the learner's personal interaction with a trainer prior to enrolling on a programme, and the processes that would be enacted if the trainer had concerns or doubts regarding the learner's capabilities, for example, English proficiency. Learners are supported on a case by case basis to address special needs identified, and advised regarding the minimum literacy level demanded by the learning activities and assessments.

Through this discussion, it was clear that SII is deeply committed to supporting learners as far as is practicable to enter and successfully complete its programmes. However, the panel held concerns that due to the significant role subcontracted trainers played in providing learner support, this area of the provider's activities was vulnerable to inconsistency in interpretation and application across locations. Consequently, the panel noted a proposed mandatory change in this report to address this (see 6.1.5).

Following the six week interim period allocated, SII submitted evidence to the panel that indicated it had sufficiently addressed these concerns. SII confirmed a commitment to mandatory upskilling of trainers, including in relation to learners' English language proficiency.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed.

During the site visit, SII outlined how GDPR legislation has impacted record keeping practices at Security Institute of Ireland, by reducing the data collected and the period of time for which it is kept. Hard copy data is destroyed by a registered contractor on site. Assessment results are received manually in hard copy by registered post and entered into the database at the central administrative offices in Naas. All computers are password protected, and situated in securely locked offices. IT audits occur twice per year, and all hard copy records are held in a strong room on site. Collection of data is limited to that which is absolutely necessary, and kept for the minimum time required by relevant authorities or certification bodies.

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

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed.

The panel notes that SII will need to ensure that, where relevant, updates to SII's draft QA that are made to comply with the proposed mandatory changes in this report are also reflected in the information provided on SII's website and within the learner handbook.

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

The panel is generally satisfied that QQI's criteria in relation to this dimension of QA have been addressed.

SII does not engage in any collaborative or transnational provision. The QA implications associated with subcontracted trainers have been addressed in Section 5.4 of this report.

During the site visit, the panel discussed with SII's representatives how the provider interacts with the PSA and various other stakeholders. The relationships outlined to the panel were appropriate and reflected the provider's proactive approach to bringing external perspectives and opportunities for learning into the organisation. SII representatives also discussed a range of research and development projects that members of the institute engage in with various partners, including counter-terrorism initiatives. The panel was of the view that these activities would effectively contribute to enhancing and informing practice and development at SII.



11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

The panel is generally satisfied that QQI’s criteria in relation to this dimension of QA have been addressed.

During the site visit, the panel discussed various dimensions of self-evaluation, monitoring and review with SII’s representatives. It was noted that within the context of the programmes offered by the provider, significant measures of effectiveness include completion rates, learner progression to employment, and industry satisfaction. SII representatives associate the positive outcomes of standards being maintained and pass rates being high maintained and the pass rate is high because the programmes delivered are appropriately written and delivered for the cohort. SI representatives also consider learners’ expressions of interest in progressing to further training programmes upon completion to be an indirect measure of the effectiveness of trainers and programme quality.

Learners on SI programmes are invited to provide feedback, which can be anonymous, on a hard copy form at the conclusion of training courses. The provider has also trialled eliciting learner feedback via an online survey tool, with limited success. During discussions with the panel at the site visit SII representatives noted that challenges exist in obtaining substantive feedback from learners, as the learners enrolled in the provider’s programmes may not have significant experience in further education to draw upon for comparison. Additionally, they are often motivated instrumentally. This is because the successful completion of an SII programme enables a learner to apply for a licence and gain employment in the industry. Consequently, learners are not typically oriented toward undertaking reflection on the quality of the learning experience. The panel acknowledges the issues raised with regard to obtaining learner feedback, and demonstrated willingness to pursue options for improving the reliability and validity of this data. The panel has provided an item of specific advice pertaining to this (see 6.2.3).

Evaluation of draft QA Procedures - Overall panel findings

As noted in Section 3.1 of this report, the panel has made a number of commendations to SII. These pertain specifically to the provider’s candid and open approach to its interactions with the panel, and the commitment of the provider to the provision of training that enables learners to develop their industry relevant skills and have these formally recognized. The provider’s programmes are well-informed through a process of extensive consultation, and SII has ensured that appropriately qualified externality contributes to its academic decision-making via its Academic Board of Governance. The panel also acknowledges that the reengagement process is hugely challenging for small providers, and represents a significant shift from the requirements of NCVA and FETAC.

Nonetheless, the panel was of the view that a number of proposed mandatory changes required implementation prior to a recommendation for approval of SII’s QA, and these are listed in the following sections of this report. The panel reconvened onthe usual commentary confirming that the provider satisfactorily addressed the issues.



Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following proposed mandatory changes and items of specific advice were identified at the conclusion of the site visit on 22nd January, 2020 by the panel. As these issues were considered discrete, and the panel was of the view they could be addressed relatively quickly by SII, the panel availed of its option to defer its decision for six weeks.

The panel reconvened on the 12th of March to evaluate the evidence submitted by SII that it had implemented the required changes. The panel was satisfied at that time that SII had adequately addressed the issues set out in Section 6.1 of this report.

The panel was of the view that SII's representatives had demonstrated professionalism in their interactions with the panel and receptivity to the panel's feedback. The panel encourages SII to give priority to the implementation of the items of ongoing Specific Advice identified in Section 6.3 of this report to enable further and appropriate enhancements to the provider's draft QA as it moves forward.

6.1 Mandatory Changes (22nd January, 2020)

- 6.1.1 SII must take measures to ensure that an appropriate separation of academic and corporate decision-making exists within the organisation. SII must further ensure that this is visible within the documented QA it presents to QQI. This could, for example, be achieved by:
- (a) Amending the Terms of Reference of the Academic Board of Governors to establish it as having primary responsibility for academic matters and quality within the institution, including evaluation and review.
 - (b) Transferring the functions of academic decision-making currently exercised by the Management Committee to the Academic Board of Governors, thus establishing the latter as the responsible unit for quality assurance and academic development.
- 6.1.2 Review and update the chapter of the QA manual outlining Management and Governance of QA. This should include detailed terms of reference for all units of governance, outlining membership, quorum, frequency of meetings, and be accompanied by a clear visual representation of the overall governance and management structure.
- 6.1.3 SII must formalize and document its current risk management practices. This should, at a minimum, include producing and maintaining a documented risk register, and delineating within role descriptions and Terms of Reference for various committees or boards where responsibility for identifying, managing and reviewing risk lies within the organisation.
- 6.1.4 The QA documentation presented to the reengagement panel by SII does not accord with QQI's criteria as outlined in the Core Statutory Quality Assurance Guidelines. The documentation needs to be comprehensively revised to demonstrate better alignment. The panel advises this process should focus on ensuring that policy statements and associated procedures are readily accessible and easy to navigate to within the main QA document. A move away from descriptive content in places and towards a more procedural tone in the document would facilitate this.
- 6.1.5 SII needs to work toward developing a comprehensive learner support system, which includes clear processes for access for learners for whom English language support is required or who need to access reasonable



accommodations. Contracted trainers need to be supported and up-skilled where necessary in integrating these processes to programme delivery consistently across locations.

- 6.1.6 SII needs to formalize staff development in relation to teaching and learning, and best practice in association with learner supports, assessment and other dimensions of training and education provision. This should, at a minimum, involve an annual training and development day that all contracted trainers are required to attend.
- 6.1.7 SII must include its processes for due diligence in relation to engaging contracted trainers in the QA Manual.

6.2 Specific Advice (22nd January, 2020)

- 6.2.1 SII is advised to establish links with ETBs to facilitate access for learners to free English language and literacy supports.
- 6.2.2 SII is advised to seek assistance from state supported training and development organisations in its provision of professional development for its contracted training staff.
- 6.2.3 SII is encouraged to continue its efforts to improve the reliability and validity of learner feedback.

6.3 Specific Advice (12th March, 2020)

- 6.3.1 SII is encouraged to continue to revise and develop its QA , with a focus on the visibility and readability of information to learners. Within this SII should aim to:

- Identify key information that needs to be communicated to learners and ensure this is visible within the documentation learners receive. This could be achieved by, for example, mapping the SII learner journey, and by reviewing the published QA resources of other established providers that have successfully reengaged with QQI.
- Clearly and systematically distinguish between 'policy' and 'procedure' throughout the QA manual (and associated resources, for example, learner handbooks). Present policies and procedures in readable and readily navigable formats. SII may find the following definitions useful in this process:

Policy: A policy sets out the general principles that inform decision-making. The policy informs 'what to do' in a situation. For example, a policy statement on assessment may identify that SII will ensure assessment is fair, equitable and facilitates access to learning and assessment for a diversity of learners.

Procedure: A procedure sets out the mechanisms for the principles to be applied in practice. The procedure informs 'how to do something' in a situation. For example, a procedure for learners applying for a reasonable accommodation in assessment will identify step by step *who* does *what*, *how*, and *in what order* (and, if there are exceptions, how these may be dealt with).

- 6.3.2 SII is advised on an ongoing basis that the development of clear links with ETBs to facilitate access for learners to free English language and literacy supports will enhance the experience of its learners.
- 6.3.3 SII is advised on an ongoing basis to seek assistance from state supported training and development organisations in its provision of professional development for its contracted training staff.
- 6.3.4 SII is encouraged to continue its efforts to improve the reliability and validity of learner feedback.

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

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 4	Minor	Security

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 Security Institute of Ireland

Name:

Date: 3 February 2020

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

Document	Related to
N/A	

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

Name	Role/Position
John Byrne	Chief Executive Officer
Larry Quinn	Deputy Chair Governors
Joe Leahy	Chair Management Committee
Caroline Lacey	Head of Administration
Sangetta Udin	Trainer
Maurice Hickey	Trainer

Appendix: Provider response to the Reengagement Panel Report

23 April 2020

Marie Cotter
Quality and Qualifications Ireland
26/27 Denzille Lane
Dublin 2.

Security Institute of Ireland Re-engagement

Dear Marie,

We are very happy with our engagement with the panel and all others associated with QQI during this process. We are delighted that we have satisfied the criteria for approval. We are happy with the panel report and have no further comment to make on it.

Yours sincerely



John Byrne
Chief Executive Officer