



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

Registered Business/Trading Name:	Communications and Management Institute Limited
Address:	14A Cashel Business Centre, Cashel Road, Dublin 12
Date of application:	30 th September 2020
Date of resubmission of application:	24 th March 2021
Date of site visit (if applicable):	10 th December, 2020
Date of reconvene meeting (if applicable)	28 th April, 2021
Date of recommendation to the Programmes and Awards Executive Committee:	4 th February 2020 and 24 th June 2021

1.2 Profile of provider

The Communications and Management Institute was founded in 2004 and was incorporated into a limited company in 2006. The Institute was recognised by FETAC in 2008 and by HETAC in 2009 for a Higher Diploma in International Business (withdrawn in 2011). Currently, CMI offers ten QQI validated programmes leading to Minor component awards at Levels 5 and 6 on the NFQ across a range of domains. These include minor award programmes in Community Addiction studies, Environmental Studies, Event Management, Fashion Buying and Merchandising, Marketing Communications, Purchasing and Procurement, Child Psychology, Criminology, Business Management and Programme Management.

CMI has certified over 100 learners on QQI awards annually over the last three-year period. However, the number of enrolled learners on non QQI programmes is higher, with overall learner numbers ranging from 603 in 2018 to 464 in 2020. Learners at CMI are typically mature adults, with the majority being in full-time employment. A 2020 CMI survey indicates that 88% of current learners are native English speakers, and 12% are non-native speakers from EEA countries.



CMI primarily offers part-time, niche programmes. Many of these are recognized by awarding bodies other than QQI. These include the Chartered Institute of Procurement and Supply (CIPS), Awards for Training and Higher Education (ATHE), the Project Management Institute (PMI) and the Institute of Workplace and Facilities Management (IWFM). CMI additionally offers uncertified training to the corporate sector.

Part 2 Panel Membership

Name	Role of panel member	Organisation
Dr. Annie Doona	Chair	Emeritus President IADT & Independent Consultant
Dr. Catherine Peck	Report Writer & Panel Member	Independent Education Consultant
Pamela Skerrit	Panel Member	Independent Quality Consultant
Dr. Terry Twomey	Panel Member	Director of Technological University Development, Limerick Institute of Technology
Dr Thomas Delahunty	Observer	Higher Education Specialist



Part 3 Findings of the Panel

3.1 Summary Findings

At the outset, the panel would like to acknowledge the substantive documentation presented for evaluation by CMI as part of its application for reengagement, and the quality of that documentation. The panel note that the draft QA documentation was well organised and presented. This reflected well on the team at CMI and readily facilitated the panel's desk review prior to a site visit and meetings with CMI representatives. The panel would also like to acknowledge the constructive tone of its discussions with CMI representatives. During the site visit, the panel had the opportunity to engage in discussions with CMI's management as well as staff in teaching and learner support roles. These discussions enabled the panel members to pose questions arising from their review of the documentation. They also enabled the panel to gain insight into the extent to which an understanding of quality and the draft QA procedures was embedded within the organisation. Finally, the panel would also like to acknowledge that due to the restrictions imposed by the COVID-19 pandemic, the site visit was facilitated virtually by CMI.

CMI's application for reengagement entailed a proposed extension to the current scope of provision to include higher education programme offerings up to NFQ Level 7. At the conclusion of the virtual site visit, the panel was not in a position to recommend approval of this extension of scope. The panel's findings and recommendations are therefore summarised differentially in respect of the existing scope of provision and the extension request in the subsequent paragraphs and in Section 3.2.

With regard to the application by CMI for an extension of scope to include higher education programme offerings up to NFQ Level 7, the panel recommended that QQI refuse CMI's application at this time. The panel were not presented with sufficient evidence that the level of understanding within CMI of QQI's Core and Sector Specific Statutory Quality Assurance Guidelines (2016) was sufficient to ensure the development, support and quality assurance of programmes would reflect QQI's requirements. The panel's findings in relation to this aspect of the application are reflected within commentary throughout this report on specific dimensions of the evaluation.

With regard to CMI's current scope of provision with blended learning, the panel recommended a number of mandatory changes be made to the draft QA procedures. This was because in areas outlined within this report the draft QA procedures did not reflect sufficient alignment to QQI's requirements as outlined in the Core and Sector Specific Statutory Quality Assurance Guidelines (2016) and Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes (2018). However, the panel were of the view that CMI's draft QA procedures reflected well on the progress made by the organisation in preparation for reengagement and that the draft QA procedures reflected a sufficient understanding of the support needs of programmes of this profile. Therefore, the panel was of the view that CMI, given sufficient time, would be able to appropriately address the identified gaps in documentation and practice. The Mandatory Changes are listed in Section 7.1 of this report.

The panel reconvened on 28 April 2021 after conducting a desk review of the revised quality assurance procedures of CMI. The panel noted the substantial work undertaken by CMI during the interim period



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and the positive response of CMI to the panel's Specific Advice. Following this review, the panel was in a position to proceed with a recommendation to QQI to approve CMI's quality assurance procedures within its current scope of provision and for blended learning.



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

With regard to CMI’s application to offer programmes within its current scope of provision with blended learning.

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

With regard to CMI’s application for an extension of scope to deliver programmes of education and training up to NFQ Level 7.

	Tick <u>one</u> as appropriate
Approve CMI’s draft QA procedures	
Refuse approval of CMI’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 CMI’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	CMI has submitted a Certificate of Incorporation dated 2006.
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	CMI has a track record of provision at Level 6 with QQI and with other UK based accreditation bodies.
4.1.3(a)	Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	Yes	CMI has identified its relationships with accreditation bodies and with providers it leases space from to facilitate programme delivery.
4.1.4(a)	Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	Yes	CMI 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	CMI has submitted a copy of an insurance schedule inclusive of public liability and a Certificate of Incorporation to the panel. QQI have confirmed that alternative documentation relevant to this criterion has been submitted.
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	CMI has a track record of provision at Level 6 with QQI and has specified relationships with UK based accreditation bodies.

**Findings**

The panel is of the view that CMI has submitted sufficient evidence to meet 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>	-	CMI has submitted financial statements to QQI for review. The panel therefore defers any adjudication on this criterion to QQI.
4.2.2(a)	Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i>	Yes	CMI offers a range of programmes for part-time, mature learners. Learner numbers are indicative of a reasonable case for sustainable provision.
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 CMI's governance structure into alignment with QQI's guidelines pertaining to the separation of commercial and academic decision-making. This is discussed in Section 5.1 of this report and reflected a mandatory change in Section 7.1. CMI addressed this issue during the interim period by revising the terms of reference and membership of its units of governance.
4.2.4(a)	Criterion: <i>Are there arrangements in place for providing required information to QQI?</i>	Yes	CMI has a track record of certification with QQI, and formerly with FETAC and HETAC that is indicative of compliance with this criterion.

Findings

The panel is of the view that CMI has met criterion 4.2.2(a) and 4.2.4(a). However, following the initial evaluation, the Panel found that CMI needed to implement changes to its governance and decision-making structures before it could demonstrate criterion 4.2.3(a). The Panel is satisfied that these changes have now been appropriately made. The panel has not had sight of CMI's financial statements or related documentation, and therefore makes no adjudication on criterion 4.2.1(a). CMI has submitted financial statements to QQI for review. The panel therefore defers any adjudication on this criterion to QQI.

**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	CMI has a track record of provision of QQI and formerly FETAC programmes at Level 6 on the National Framework of Qualifications.
4.3.2(a)	Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	Yes	CMI has a complement of staff in place to facilitate its current provision. The panel is also satisfied that there are appropriate procedures 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, 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	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 CMI's premises. However, CMI presented visual and documentary detail to the panel for review. CMI delivers classes at a location in South William Street Dublin that it shares with an English Language School. A building use licence agreement is in place with a 6-month minimum notice clause. CMI sublets the building on evenings and weekends since 2016. Written exams are sat at a location in Aungier Street and computer-based exams are taken in Sandyford at a partner organisation The Exam Centre.



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 CMI'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 was initially of the view that mandatory changes were required in relation to assessment of learners to ensure that structures and processes in this area demonstrably excluded any undue influence from commercial decision-makers. CMI addressed this issue during the interim period by revising the terms of reference and membership of its Results Approval Panel in the interim period.
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	CMI offers QQI programmes of less than three months duration and is therefore exempt from this requirement. CMI has indicated its intent to put appropriate measures in place via insurance in the event that programmes of longer duration are offered in the future.

Findings

The panel was initially of the view that CMI needed to address concerns pertaining to criterion 4.3.6(a) before it could fully meet the criteria in Section 4. When the panel reconvened on April 28, the issues identified in relation to assessment of learners had been appropriately addressed.

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

The panel noted that relative to the size and nature of CMI's current scope of provision there was evidence of a genuine effort to comply with QQI's requirements for quality assurance and to implement procedures that comply with requirements for providers of blended learning programmes. The language of the documentation and policies indicated a sufficient understanding of QQI policy to provide confidence to the panel that, given sufficient time, CMI would be able to address the gaps identified. When the panel reconvened on April 28, the panel agreed that CMI had appropriately implemented the mandatory changes identified during the virtual site visit.

The panel noted that this finding did not pertain to CMI's application for an extension of scope to offer programmes of education and training up to NFQ Level 7, which was refused following the initial evaluation. The panel is of the view that the capacity to sustainably govern, develop, deliver, support and quality assure programmes at NFQ Level 7 was not demonstrated within CMI's application.



Part 5 Evaluation of draft QA Procedures submitted by CMI

The following is the panel's findings following evaluation of CMI'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:

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

QQI's guidelines require a provider's governance structures to enforce an appropriate separation between commercial and academic decision-making. During the virtual site visit the panel explored how CMI representatives felt this was demonstrated within the draft QA procedures. CMI acknowledged that the requirements of reengagement with QQI had prompted a significant transition within the organisation. One aspect of this had been to focus the Managing Director's role on commercial and operational aspects of the provider's activities and to delegate authority for academic decision-making to an Academic Board chaired by an appropriately qualified external person. The panel acknowledges the importance of this step and encourages CMI to continue its work of establishing and embedding distinct commercial and academic decision-making structures. The panel also acknowledges the challenge that demonstrating alignment to this principle poses for small providers where membership of committees may necessarily overlap.

However, QQI's guidelines state that where a provider's scale is such that it cannot fully support internal committees, the system in place for ensuring objective oversight should be documented. The panel therefore sought to understand how this was being achieved at CMI, noting that the inclusion of appropriately qualified experts and significant representation of teaching staff and learners is a common and effective mechanism to safeguard the integrity of committees tasked with academic decision-making. The panel undertook a detailed review of CMI's documentation pertaining to its governance structure and held discussions with CMI representative confirming aspects of the structure presented during the virtual site visit.

Following this, the panel concluded that the terms of reference presented for CMI's Academic Board did not demonstrate sufficiently that the committee could provide objective oversight of academic decision-making. This was, in part, because the three ordinary members of the Academic Board were also members of the Academic Operations Committee, which was tasked with operational and commercial considerations such as workload and facilities management as well as learner recruitment. This was also because the terms of reference included a provision for the Managing Director, to whom all the ordinary members directly or indirectly reported, to attend the Academic Board meetings. Moreover, the panel noted that there was no learner representative on the Academic Board and only one nominated academic representative from the provider's teaching staff. The panel also noted that the terms of reference for the Academic Operations Committee identified the Managing Director as a member with consultative input. As this committee oversees assessment procedures, including the collection of results, internal verification and preparing assessment information for the Results Approval Panel this committee's membership and/or terms of reference needed to be reconsidered. The panel therefore found that it was necessary for the membership of the committees within the CMI governance structure to be revised in



order for these to clearly demonstrate that a separation of commercial and academic decision-making is being enforced within the provider's processes.

Notably, QQI's guidelines in relation to this dimension of QA also require that there is a distinction between those who produce or develop material and those who approve it. Although this principle applies to multiple processes, for example, the production and revision of draft QA procedures, it must be visible within the procedures for developing new programmes. Regarding this, the panel notes that the membership of CMI's Programme Validation Committee also required review. The terms of reference presented for evaluation identified that this committee designed programmes and prepared them for validation prior to their submission to the Academic Board for approval. However, both the Academic Director and the Managing Director were identified in the terms of reference members. The Panel found that CMI must therefore consider the roles of those individuals in approving commercial and academic aspects of programmes, and the appropriacy of the Managing Director's participation in a committee tasked with the programme design process.

At the conclusion of discussions in relation to the governance structure and committees established within CMI, the panel identified a mandatory change pertaining to the issues discussed here (see 7.1.1). The procedure for new programme development is also discussed in Section 5.3 of this report.

Finally, QQI's guidelines under this dimension of QA 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. Throughout the discussions with CMI representatives during the site visit, the panel noted and clarified numerous references to roles and titles that appeared in various documents. These included references to Managing Director as Head of Centre, as well as reference to a Registrar, an Access Officer and a Learner Support Officer. The panel were able to confirm that these titles were primarily associated with dual roles within the organisation held by individuals the panel interacted with during the site visit. The panel notes that when asked why the Registrar was not present to engage in discussions with the panel, CMI representatives stated that the role of Registrar within CMI was not equivalent in scope to the functions typically associated with a Registrar's role in higher education. The panel accepted this explanation and recognizes that the need for individuals to contribute in multiple and distinct areas of operations within a provider of CMI's scale. However, the panel advised that CMI's processes will be more transparent to external evaluation if role/title references, including multiple roles/titles held by one individual, are clearly and consistently designated in the documentation. This transparency is particularly important where an individual holds multiple roles that may entail conflicting priorities. One example of this at CMI is the role of the Admissions Officer, who advises learners regarding access to programmes of education and provides advice on progression and careers, but also has responsibilities associated with sales and marketing. The panel has identified an item of Specific Advice pertaining to this for CMI.

When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted substantive enhancements had been made in relation to this dimension of QA. CMI had revised the terms of reference and membership of its various units of governance and taken steps to demonstrate a more appropriate separation of commercial and academic decision-making. The panel identified one item of specific advice in relation to the role of the External Evaluator as outlined in the revised documentation. This is included within Section 7.3 of this report.



2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

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

QQI's guidelines under this dimension of QA require a provider's policy and procedures to be translated into practice through a variety of internal quality assurance processes that allow participation by all staff within the organisation. CMI's documentation states that staff actively participate in the development of QA procedures and that the principle of subsidiarity is followed within the organisation. During the virtual site visit, the panel engaged in discussions with staff in administrative, support and teaching roles to explore how they had participated in the process of preparing for reengagement. CMI staff outlined a clear process of liaison with members of the academic management team to consult on key process areas. However, the panel noted that teaching staff the panel engaged with had not been directly involved in this process. Teaching staff representatives were asked how they were involved in the organisation's processes and governance. The teaching staff outlined their roles in relation to their responsibilities for teaching and assessment and attendance at programme board meetings as well as training opportunities.

QQI's guidelines also require providers to have a quality assurance system that is fully documented. During the virtual site visit the panel noted that CMI representatives directed their attention to a number of services, processes and supports that were not outlined in the documentation submitted. For example, a self-paced academic writing module made available to learners via the VLE was outlined to the panel. The panel were of the view that these examples of good practice could valuably be included within the draft QA and highlighted during external evaluation processes. The panel identified a mandatory change pertaining to this in Section 7.1 of this report.

When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted substantive enhancements had been made in relation to this dimension of QA. CMI had revised its QA documentation and included substantially more information in relation to the organisation's services, processes and supports.

3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

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

QQI's guidelines under this dimension of QA require the development of new programmes to be conducted systematically and that new programmes be evaluated by appropriate internal decision-making structures. The panel noted that CMI's process for Programme Design, Development and Approval demonstrated some awareness of QQI's requirements, for example, that programmes be designed with reference to award standards and be subject to ongoing monitoring and periodic review. However, the panel were unable to ascertain within the documented process presented for evaluation whether sufficient differential stages of internal approval would be entailed in the process and how these would be sequenced. For example, the process did not account for the role of the Academic Board in establishing



any resource requirements for the effective delivery of a new programme that would need to be approved by the Board of Directors. The panel also noted that within the procedure put forward by CMI, the decision to submit a programme to QQI for validation rested with the Academic Board with no involvement from the Board of Directors, despite the clear financial implications of this stage of the process. During the site visit, the panel therefore sought to clarify how this process was understood internally. Discussions with representatives from CMI reflected that understandings internally diverged somewhat from information within the documented process. For example, it was stated that the Managing Director and Board of Directors would be the proposers of new programmes. The panel also noted that this process did not highlight the implications of blended learning for programme design, for example, the need to include appropriate instructional design expertise within the programme validation committee or the identification of learning technologies required that may impact resource requirements. The panel therefore identified a mandatory change pertaining to this process in Section 7.1 of this report.

When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted substantive improvement in the processes surrounding programme design and development. However, the panel has identified one discrete condition of approval for CMI in relation to the internal stages of approval of new programmes.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

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

QQI's guidelines under this dimension of QA procedures require a provider to assure itself as to the competence of its staff, to address pedagogical standards and the maintenance of these, and to be inclusive of performance management and opportunities for professional development. Teaching staff at CMI are required to undertake a mandatory induction prior to preparing lessons and delivering programmes. Teachers are routinely monitored, including through observation of classes. During the virtual site visit, the panel had the opportunity to meet with two members of teaching staff at CMI. They outlined participation in internally facilitated professional development sessions during 2020 focused on assessment and the use of educational technology. Notably, teaching staff also expressed that they felt well-supported by the Education Officer.

5 TEACHING AND LEARNING

Panel Findings:

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

QQI's guidelines under this dimension of QA require 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. The panel noted during its review of CMI's documentation that a number of processes were in place to guide teaching staff in the production of lesson plans and work schemes, and that the implementation of these was monitored by CMI, including during observations of teaching. Other processes were reflected in the inclusion of resources such as pre-



course Moodle programme content checks and during/pre-delivery checklists provided for teaching staff. However, although the draft QA procedures contained substantive content related to functional and administrative aspects of teaching and learning, the panel was not able to identify an articulation of the approaches or philosophies that underpin this. The panel discussed this with CMI representatives during the virtual site visit. An orientation to active learning was mentioned by both teaching staff and staff in support and management roles during discussions, but this was not elaborated upon in any detail. Given the CMI utilises blended learning as a mode of delivery, and the provider's concurrent application to deliver programmes of education and training up to NFQ Level 7 (refused at this time) the panel identified a mandatory change pertaining to this in Section 7.1 of this report. This required CMI to expand its documentation to ensure that it fully and appropriately articulates the pedagogical approaches that inform teaching and learning practice within the organisation. The panel noted that this was also integral to the provider's application for approval of blended learning mode of delivery.

When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted additional documentation and evidence provided in relation to this dimension of QA. CMI is encouraged to continue the evolution of its teaching, learning and assessment strategy inclusive of blended learning, as this will underpin the development and documentation of programmes it submits to QQI for validation in future.

6 ASSESSMENT OF LEARNERS

Panel Findings:

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

QQI's guidelines under this dimension of QA require processes to be in place to ensure the credibility and integrity of assessment processes. During the site visit, the panel discussed assessment processes with representatives of CMI. The panel sought to understand how CMI's draft QA procedures would facilitate the provider to manage assessment processes, ensuring that no undue influence could be exercised from the commercial side of the business. The panel therefore discussed the functioning of the Results Approval Panel (RAP) and the role of External Assessors in this process, as well as guidance provided to tutors. CMI representatives confirmed that the RAP was attended by the Academic Director, Education Officer and External Assessor, with tutors available to be contacted by phone if required. Tutors who engaged in discussions with the panel during the site visit outlined that the importance of providing a justification for the grades they awarded and annotating marking schemes to reflect this was emphasized within CMI. The CMI staff the panel spoke with noted that they had limited experience of assessment appeals but were aware that a process existed for learners to follow if they elected to do so. The panel notes that these discussions were constructive.

However, at the conclusion of these discussions the panel remained of the view that the committee structures (including membership and remit) within CMI's draft QA procedures did not demonstrate an appropriate distance between academic and commercial decision-making. As discussed in Section 5.1 of this report, the Academic Operations Committee, including the Managing Director, took significant responsibility for assessment within the organisation prior to RAP meetings. The panel therefore identified a mandatory change pertaining to this in Section 7.1 of this report.



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When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted that its concerns with regard to the involvement of commercial decision-makers in the assessment process had been addressed.

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

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

QQI's guidelines under this dimension of QA require providers to have processes to be in place to ensure that all learner resources and supports are fit for purpose and accessible. During the virtual site visit, the panel attempted to trace the learner journey at CMI from first point of contact to gain insight into how the draft QA procedures functioned to support CMI's learners. The panel also sought to understand how the learner voice was heard within CMI, given there was no learner representation included within the membership of the Academic Board.

These discussions were broad ranging and included the decision to make drop-in support available on-site at the provider's teaching facilities in response to learner feedback, given the CMI offices are located elsewhere. CMI representatives also outlined the provision of online drop-in rooms at set times for learners during the Covid-19 pandemic. The panel sought to understand how different issues and concerns learners may present with would be dealt with at CMI, as this was not always clear within the draft QA procedures. For example, the panel queried whether a referral system to a professional service was in place for learners with mental health or general health concerns. CMI noted that no system was currently formalised for this. However, CMI staff noted that learners presenting with dyslexia and other disabilities or specific learning differences may be referred to organisations such as AHEAD for additional supports. The panel traced how learners would access processes for reasonable accommodation, special consideration and other forms of support, including career or progression advice. CMI representatives outlined some of these processes and described how access to relevant forms had been streamlined through the implementation of dynamic google forms to facilitate relevant administration.

Although the panel noted the commitment to supporting learners articulated by CMI staff and acknowledged that the small scale of the provider is helpful in fostering informal communication channels, at the end of these discussions the panel held ongoing concerns. Specifically, the panel felt that there was a lack of clarity regarding what professional learner support services were provided internally by qualified persons and what external professional services learners could be referred to. The panel noted that this is particularly important in relation to mental health support services, which a provider of CMI's scale would not be expected to provide internally.

The panel also sought to understand what support was available to learners in relation to the use of learning technologies and access to library resources. CMI's draft QA procedures identifies that learners at CMI are provided with access to the EBSCO research database via the provider's VLE. The Education Officer is charged with providing technical support to learners if they have difficulties accessing this resource, and also provides technical support in relation to Moodle or the use of learning technologies. The panel queried whether learners would be provided with guidance on the use of the database and how they would be supported to develop academic skills, including academic writing and citation/referencing. During these discussions, CMI representatives made the panel aware of a self-paced academic writing module provided to learners that was intended to address a self-identified gap in this area. The panel noted that this and other measures to develop learners' academic skills and safeguard academic integrity could usefully be included in/highlighted within the draft QA procedures.



During the virtual site visit, CMI representatives noted that requests for textbooks and other programme related expenditure were sent to the Managing Director for approval. The panel was not able to ascertain any planned involvement from Programme Boards or the Academic Board in making recommendations regarding this but noted that the learning resources required to deliver a programme would typically be considered and approved by both academic and commercial decision-makers.

Following these discussions, the panel identified a mandatory change for CMI pertaining to the management of learner support services, including clarity of roles and provision of clear information as well as appropriate referrals. When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted substantive improvement and additional documentation had been provided in relation to this dimension of QA.

8 INFORMATION AND DATA MANAGEMENT

Panel Findings:

The panel is of the view that this aspect of CMI'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. Within CMI the Managing Director is responsible for the oversight of the security and integrity of the IT- systems used. Information is managed through a shared physical document driver server and separately through a cloud-based SharePoint document library that facilitates remote working. CMI has submitted procedures that encompass document management, IT system maintenance and security, records management and retention, and data protection and privacy.

9 PUBLIC INFORMATION AND COMMUNICATION

Panel Findings:

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

QQI's guidelines under this dimension of QA require a provider to ensure that all information published is clear, accurate, objective, up to date and easily accessible. Moreover, information that is published in respect of programmes of education and training must comply with the spirit and requirements of the 2012 Act.

The panel discussed the information provided to prospective and enrolled learners with CMI representatives during the site visit and the channels for communication. The panel was generally satisfied that CMI provided learners with information that reflected the requirements of QQI's guidelines. However, the panel held concerns that the provider had not considered the implications of blended learning as a mode of delivery in relation to this dimension of QA. The panel refers CMI to Section 5.1 of QQI's Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes a clear outline of requirements in this area. The guidelines make clear that learners must be able to make



informed choices about participating in blended learning programmes. The panel has therefore identified a mandatory change pertaining to this in Section 7.1 of this report. Blended learning is discussed further in Section 5.12. When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted its concern in relation to this had been addressed.

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

Panel Findings:

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

QQI's guidelines under this dimension of QA require a provider to have procedures in place where external partnerships and collaborative provision arrangements are a feature of a provider's activities. CMI's application states that it has no collaborative provision arrangements in place with other providers, and clearly identifies its relationships with other accreditation bodies.

11 SELF-EVALUATION, MONITORING AND REVIEW

Panel Findings:

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

QQI's guidelines under this dimension of QA require a provider to have a system of appropriate quality measures in place, for the outcomes of provider-owned and external reviews to be considered and or follow-up actions to be taken. CMI's documentation outlines provision for a range of measures to monitor learner satisfaction and other indicators. The Academic Board is tasked with presenting an Annual Quality Report to the Board of Directors, which is planned to include a summary of Programme Review Reports, Programme Board Reports and Annual Programme Summary Reviews. Input will be made to this dimension of the provider's QA procedures by an External QA Expert.

12 TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING

Panel Findings:

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

QQI's guidelines under this dimension of QA require providers applying for approval to deliver programmes in blended learning modes to demonstrate a strategic approach to blended learning. The panel noted that the strategic rationale for providing programmes in blended learning delivery mode at CMI was not clearly articulated within the provider's strategy documentation. A further concern was that the strategy document referred to online learning only. However, QQI's current guidelines do not provide for this, stating that blended learning will always involve an element of face-to-face learning.

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. Providers are additionally required to develop processes that enable close collaboration between academic subject specialists and those responsible for online education technology and/or instructional design.

The panel acknowledges that at CMI investments have been made in the technology infrastructure required to support blended learning. The provider uses Moodle (supported by an external Moodle partner) as a VLE and has recently upgraded this platform. Big Blue Button is used to facilitate synchronous classes, and guidelines are provided for learners regarding the effective and appropriate use of learning technologies. IT support is provided for the first 30 – 45 minutes of every synchronous class session and staff training is provided in the use of technologies.

Nonetheless, the panel held concerns that the provider's operations were overdependent on key individuals to support blended learning. Specifically, the panel noted that the Education Officer, who is also tasked with a wide range of other functions within the organisation including learner supports, was solely responsible for providing technical support to staff and learners. The panel noted that this was understandable in the context of the contingency procedures activated during the Covid-19 pandemic. However, it was unclear to the panel whether additional investments were planned, for example in IT support or learning design expertise to inform the development of new programmes of blended learning, or whether this would also fall within the remit of the Education Officer.

Finally, QQI's guidelines require providers to demonstrate that their policies, regulations and processes are fit-for-purpose in the context of blended learning. Therefore, a provider's draft QA procedures should reflect a consideration of the implications of blended learning throughout the entirety of its process (inclusive of new programme development). The panel acknowledged that the implications of blended learning are visible within the provider's processes for staff recruitment, management and development. However, a consideration of blended learning needed to be made more visible across the documentation (see also Section 5.9 regarding information to learners).

When the panel reconvened on April 28, 2021 to undertake a desk review of the revised QA procedures submitted by CMI, the panel noted its concern in relation to this had been addressed. Notably, the documentation reflected a recognition of the implications of blended learning for the entirety of a provider's processes and included a stated rationale for utilizing blended learning.

Evaluation of draft QA Procedures - Overall panel findings

As noted at the outset of this report, the panel would like to acknowledge the substantive documentation prepared by CMI in support of its application for reengagement. The panel recognizes the significant work that was undertaken by the provider and the progress made in moving toward alignment with QQI's Core and Sector Specific Statutory Quality Assurance Guidelines (2016) and Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes.

The panel was not in a position to recommend outright approval of CMI's application for reengagement following the virtual site visit. As CMI's application included a proposed extension to its current scope of provision, the panel has treated this differentially in making its recommendations to QQI.

With regard to CMI's application for an extension of its scope of provision to include the delivery of HE awards up to NFQ Level 7, the panel is recommending that QQI refuse CMI's application.



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With regard to CMI's application for its current scope of provision with blended learning, the panel initially recommended that QQI refuse CMI's application with mandatory changes. This meant that CMI was granted six months to address issues identified by the panel and discussed with provider representatives. The changes required included the documentation of good practices outlined to the panel during the virtual site visit but not represented in the documentation.

The panel reconvened on April 28, 2021. The panel noted the substantial work undertaken by CMI in the interim period and the positive response of CMI to the panel's advice. The panel were therefore pleased to proceed with a recommendation that QQI approve CMI's application for approval of its QA procedures within its current scope of provision and for blended learning. The panel have included one discrete condition of approval within this report, and two additional items of specific advice.



Part 6 Conditions of QA Approval

6.1 Conditions of QA Approval

1. CMI must adjust the final stage of its programme development process. This must reflect that following approval of a developed programme by the Academic Board, a final approval of that programme and its associated resource requirements must be provided by the corporate decision-making body within the organisation. This must occur prior to the programme's submission to QQI.

Part 7 Mandatory Changes to QA Procedures and Specific Advice

7.1

Mandatory Changes to QA Procedures for current Scope of Provision including Blended Learning

7.1.1 CMI must review the membership of its governance committees and subcommittees to ensure that these structures enforce a transparent and clear separation of commercial and academic decision-making, and that there is a clear distinction between those who develop material and those who approve it within the organisation. This must encompass:

- Ensuring that membership of the Academic Board is appropriately distinct from membership of the Academic Operations Committee
- Ensuring that membership of the Programme Validation Subcommittee is distinct from membership of the Academic Board/that members of both do not vote on approval of programme documentation.

7.1.2 CMI must comprehensively revise its procedures for new programme development, and the presentation of the sequence of this process within the QA. This revision must reflect:

- distinct stages of programme proposal, design, development and approval from the academic and commercial governance committees
- the breadth of internal expertise that can inform proposals for new programmes
- the implications of blended learning as a mode of delivery for programme design and development

7.1.3 CMI review its capacity to offer programmes of blended learning and expand its documented QA in relation to blended learning mode of delivery. This review must focus on:

- Ensuring that the strategic rationale for adopting blended learning as a mode of delivery in the context of the provider's programmes and learner profile is made clear within the overall provider strategy.
- Expanding capacity to provide learner and staff supports sustainably.



- Expanding capacity in instructional design.
- Ensuring that all of the QA processes appropriately reflect the implications of blended learning
- Ensuring that clear and publicly available information is provided to prospective learners regarding any requirements for participation in a blended learning programme (e.g., bandwidth, software, hardware).

7.1.4 CMI must ensure that the full scope of its activities and processes are represented within the documented QA procedures to support external evaluation of these. For example, supports for academic writing and availability of library resources.

7.1.5 CMI must further develop its documentation to ensure that this articulates the pedagogical approaches that inform and underpin teaching and learning within the organisation.

7.1.6 CMI must review its assessment practices to ensure the Results Approval Panel has an appropriate membership, and that the authority of this committee to make decisions on assessment independently of the commercial side of the organisation is reflected in the QA documentation and in practice.

7.1.7 CMI must comprehensively revise its documented QA procedures in relation to the provision of learner supports. This must encompass:

- Clarity of roles in relation to the provision of professional learner supports internally.
- Clear information to learners regarding who the primary liaison is in relation to specific supports.
- Systematic and appropriate referrals to external services. For example, for mental health supports.

7.2 Specific Advice to CMI for QA Procedures for current Scope of Provision including Blended Learning

1. The panel advises CMI to review its draft QA procedures to ensure that roles and responsibilities are clearly and consistently identified across distinct documents (for example, the QA manual and the learner handbook) and to give consideration to areas of potential risk or conflict where individuals hold dual or multiple roles in the organisation.



7.3 Additional Specific Advice to CMI following the panel’s reconvened meeting in April 2021

1. In relation to the External Evaluator, the panel advises CMI to give further consideration to the role description and/or nomenclature. CMI is advised that informed externality is typically sought from individuals who maintain some distance from day-to-day operations or development projects within an organisation. This function is distinct from external expert consultancy, which would typically be engaged to play a more active role in assisting the development of an organisation.
2. In relation to the Results Approval Panel, CMI is advised to expand the membership to include the role of the External Examiner/Authenticator.

Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
5 - 6	Minor	Community Addiction Studies Environmental Studies Event Management Fashion Buying and Merchandising Marketing Communications Purchasing and Procurement Child Psychology Criminology Business Management Project Management
Blended Learning & Part-time		



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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 Communications and Management Institute.

Name: Dr Annie Doona

Date: 14th May 2021



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

Document

Related to

No additional documentation was provided to the panel in the course of the evaluation.

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

Name	Role/Position
John O'Toole	Managing Director
Thomas Mallon	Academic Director
Shane Downer	External Quality Advisor
Dr. Thomas Connolly	Education Officer,
Graham Moore	Admissions Officer
Heather Lamont	Tutor in Environmental Studies
Michael Boylan	Tutor in Procurement