



Reengagement Panel Report

Assessment of Capacity and Approval of QA Procedures

Part 1 Details of provider

1.1 Applicant Provider

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| Registered Business/Trading Name: | Hughes Consultancy and Training Ltd |
| Address: | Unit 2 Purcellinch Business Park, Dublin Road, Kilkenny |
| Date of Application: | 25 November 2018 |
| Date of resubmission of application: | 26 September 2019 |
| Date of evaluation: | 15 April 2019 |
| Date of site visit (if applicable): | 15 April 2019 Second Evaluation took place on 7 th November 2019 |
| Date of recommendation to the Programmes and Awards Executive Committee: | 5 th December 2019 |

1.2 Profile of provider

HCT (Hughes Consultancy & Training), a privately-owned limited company was established in 2008. It is based in the South East of Ireland providing part-time training programmes to community and voluntary organisations nationwide. HCT provides adult education to individuals who may have been out of education for a number of years or who want to update their skills and progress into different areas of work. It works with 985 Community Employment Schemes with an average of 15 learners on each scheme working in a range of sectors.

HCT became a recognised FETAC centre in 2009 and from that date up to June 2018 it has entered over 28,000 learners nationwide for FETAC and subsequently QQI certification. The projected achievement



QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

rate for this year is 4000 awards and the current total to date is at 3610. HCT delivers project-led hands-on training leading to minor awards. The horticultural sector has been the main area of training, but it also offers a range of personal and professional development programmes ranging from level 3 to level 6 on the NFQ.

It has built a database of over 50 fully qualified trainers across a variety of skill areas who deliver a wide range of programmes specialising in non-major (component) awards at industry request, but it also collaborates with a number of permanent trainers who provide advisory services to the HCT team.

The current staff team consists of a Centre Manager, Directors, Training Coordinator, Administrative Department, Sales Department, IT Department, and QQI Department, which further consists of full-time assessors, QQI Administrator and QQI Coordinator, and Accounts Department.



Part 2 Panel Membership

| Name | Role of panel member | Organisation |
|----------------|----------------------|-------------------------------|
| Danny Brennan | Chairperson | DNB Education Consultants |
| Angela Higgins | Panel Member | KWETB |
| Sean O'Connor | Panel Member | CMIT |
| Donna Deegan* | Panel Member | Teagasc |
| Noel McStay | Report Writer | Training & Quality Consultant |
| | | |

*Donna Deegan was unavailable to participate in the second panel evaluation, which took place in November 2019

Part 3 Findings of the Panel

3.1 Summary Findings

The purpose of the Re-engagement process is to evaluate the institutional capacity and quality assurance systems of HCT Learning against QQI guidelines with a view to recommending to QQI whether these Quality Assurance procedures should be approved.

Following the first panel visit in 15 April 2019, the panel recognised the work that HCT had done at that time in developing their QA processes; however further developments had been identified that needed to be addressed before their QA procedures could be recommended for approval. The panel recommend that HCT Learning's QA procedures be refused pending mandatory changes. HCT Learning submitted revised documentation in September 2019 addressing these mandatory changes. Following a review of the QA documentation, which was discussed by the panel on 7th November 2019, the panel is happy to recommend approval of HCT's draft QA procedures with specific advices set out in Section 6.1 of this report.



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

| | Tick <u>one</u> as appropriate |
|---|--------------------------------|
| Approve Hughes Consultancy and Training Ltd's draft QA procedures | ✓ |
| Refuse approval of HCT Learning'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 [the provider's – insert name] 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 | HCT states that it is compliant with all relevant legislation and regulatory requirements applicable to the provision of education and training in Ireland, in particular all employment, health and safety, equality, data protection, and financial regulatory requirements applicable to HCT's operations. |
| 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 | HCT is a privately owned limited company, established in 2008. It is based in the South East of Ireland and offers part-time training programmes to community and voluntary organisations nationwide. |
| 4.1.3(a) | Criterion: <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i> | Yes | The HCT application states that it does not currently have any collaborations/partnership arrangements in place, but has the systems and processes in place to clearly define any required arrangements and ensure due diligence to establish the legal/regulatory, commercial and academic practicalities of the partnership arrangements. |
| 4.1.4(a) | Criterion: <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i> | | <i>As above</i> |
| 4.1.5(a) | Criterion: <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i> | Yes | At the initial meeting, the panel advised HCT that it needed to further strengthen its IT security controls to protect information held, particularly on its web application. Following the review and evaluation of the |



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| | | | provider's resubmitted QA documentation, the panel commend HCT's deployment of an external company to review its IT security systems and is satisfied that a range of improvements have been made. However, the panel would advise that these controls need to be better proceduralised within the QA documentation. . |
| 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 | HCT provides adult education to adults who want to update their skills and progress into different areas of work. HCT became a recognised FETAC centre in 2009 and from that date up to June 2018 it entered over 25,000 learners nationwide for certification to FETAC and subsequently QQI. It does not have any other accreditation than that currently held with QQI. It is currently only offering minor awards and has no plans to develop beyond this. |

Findings

At the initial meeting, the panel was satisfied that the legal and compliance requirements outlined in Section 4.1 were being met but recommended the further strengthening of HCT's IT security controls to protect information it holds, particularly on its web application. At that time, the panel felt HCT had significant unexplored and unmitigated data protection risks with the web application, with high likelihood of occurrence and high impact on the organisation and wider QQI community if realised. Since that time, the provider has invested in IT security and deployed an external company to review its IT security systems. A comprehensive review took place and changes were implemented to appropriately protect the security of the data held by the provider. This now includes encrypted servers that host the web application and database, fire walls, secure data transfer, user authentication and management and data back up and disaster recovery solutions. Notwithstanding this, the panel advises that these controls are translated into lucid stepped actions that better capture these processes and clearly articulate them within the QA documentation.

**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> | | The panel is not in a position to make comment on the financial standing of the organisation. |
| 4.2.2(a) | Criterion: <i>Does the applicant have a reasonable business case for sustainable provision?</i> | Yes | HCT Programme of Education and Training Appendix includes the requirement for a cost analysis during the development stage of all programmes to ensure the programme's viability and projected profitability. This analysis is carried out by the Academic Board. |
| 4.2.3(a) | Criterion: <i>Are fit-for-purpose governance, management and decision making structures in place?</i> | Yes | Following the review and evaluation of the resubmitted QA documentation, the panel is now satisfied the provider has fit for purpose governance, management and decision making structures in place. |
| 4.2.4(a) | Criterion: <i>Are there arrangements in place for providing required information to QQI?</i> | Yes | HCT's Organisation Chart identifies a QQI Department which includes a QQI Co-ordinator and Administrator. All interaction between HCT and QQI on the reengagement has been positive and timely. |

Finding

HCT has adopted a number of key principles of good governance in the development of its draft Quality Assurance Manual. These include the establishment of appropriate entities including a Board, an Academic Council, a Quality and Monitoring Committee and a Programme Development and Review Committee. It has also included in the draft procedures, proposed external membership of these entities in the form of an External Quality Assurance Advisor and a representative from a training organisation such as City and Guilds. It also proposes to include learner representatives on Its Academic Council. The panel welcomes this as indicating that HCT is open to involving external persons and learner representatives in its governance structures.

However, at the initial meeting, the panel believed that the membership and terms of reference for the governance entities, as set out in the draft procedures, needed to be re-considered. The panel is aware of the challenges associated with establishing robust governance structures in a small provider given the relatively low numbers of internal personnel available.



However, the panel must have regard to the QQI statutory QA guidelines for private providers which require that ‘academic decision-making (matters relating to education and training) is independent of commercial considerations or the undue influence of business owners.’ Having reviewed the proposed governance arrangements presented by HCT at the initial meeting, the panel were of the view that it did not comply with this requirement.

The panel therefore determined that HCT needed to re-consider the terms of reference and re-structure the proposed membership of the Board, the Academic Council, the Quality & Monitoring Committee and the Programme Development and Review Committee, to clearly define and reinforce the separation between the commercial and academic sides of the enterprise. At the time of the first meeting, the panel recognised this could be achieved in a number of ways and the panel’s role was not to dictate a specific model to the provider, it believed that the establishment of terms of reference and appropriate membership for the Board, which has a commercial and financial remit, and terms of reference and appropriate membership for the Academic Council that assigns responsibility for academic quality and decision-making would be beneficial.

A significant element of a model that would accord with the requirements of externality and separation of academic and corporate decision-making, might include the appointment of a Chair of the Academic Council who is wholly external and independent, with appropriate qualifications and experience and who does not hold any other responsibilities in the organisation. This person would act as a conduit between the academic and commercial aspects of the business, for example by delivering a report from the Academic Council to meetings of the Board, which will have a commercial and financial decision-making role. Furthermore, dual membership of the Board and the Academic Council on the part of senior staff in the organisation might be seen to conflict with the requirements of the statutory QA guidelines, referred to above.

The panel at that time also stated that HCT should also take the opportunity that this restructuring would provide to clearly indicate which persons are permanent members of the entity and which are attending in an advisory capacity. It should further take the opportunity in determining the terms of reference to ensure that decisions arising from the various QA processes are signed off by the appropriate entity, having regard to the principle of subsidiarity.

Since that time and as a result of the panel’s recommendations, HCT Ltd has carried out a full review of membership of all governance entities. One of the previous Directors, who also acted as Training Manager, has left the company since the first meeting and there is now only one sole owner. Any staff with a financial interest in the organisation have been removed from the Academic Council, Monitoring Committee and Programme Development and Review Committee. The position of Training Manager has been filled through an internal promotion and two new members of staff have also been appointed.

The person who was identified in the original application as the ‘External Quality Assurance Advisor’ has been appointed as Independent Chair of the Academic Council. The provider clarified in its discussion with the panel on 7 November that this person does not and will not hold any other position or exercise any other role in the organisation.

The panel was informed that the provider has identified an external person with non-FET educational expertise, whom it entitles ‘External Educational Background Representative’, to sit on the Academic Council, thus further enhancing the externality principle and confirming the separation between the commercial and academic sides of the enterprise. Both these persons will also sit on the provider’s Board. The panel welcomes these appointments, which will support the alignment of the provider’s



governance arrangements with QQI statutory QA guidelines for private providers. However, the job titles need to be reconsidered to better reflect the job role.

The panel would also recommend the Learner Representative on the Academic Council is awarded equal status with all other members of the council and should be a constant attendee at meetings and not on an 'as required basis' as currently identified in the QA documentation.

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 | HCT became a recognised FETAC centre in 2009 and from that date up to June 2018 it entered over 25,000 learners nationwide for certification to FETAC and subsequently QQI. |
| 4.3.2(a) | Criterion: <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i> | Yes | HCT has a sufficient complement of suitably qualified, skilled, and experienced staff to meet the demands of the education and training courses it delivers. At the initial meeting, the panel felt that the education and training team at HCT would benefit from the deployment of additional expertise in programme development and design. On the review of the resubmitted QA documentation, the panel is satisfied this has been addressed through the appointment of a new and suitably |



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| | | | qualified full time QQI Programme Evaluator (See previous comments on Job Title). |
| 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 draft procedures show that the Academic Council approves new programmes based on a completed cost analysis carried out by the Board |
| 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 | There are sound processes in place to ensure the timely and effective planning and delivery of courses. |
| 4.3.5(a) | Criterion: <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i> | Yes | Policies and procedures have been developed to ensure that during the programme development stage, access and progression arrangements are established. Progression routes are identified and information given on options open to all learners on completion of their programme. |
| 4.3.6(a) | Criterion: <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i> | Yes | Sound assessment practices are embedded within HCT to protect the consistency and fairness of assessment decisions. At the initial meeting, the panel felt that more opportunities to provide formative feedback to learners needed to be taken, particularly following submission of |



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| | | | assessment. The resubmitted QA documentation articulates how the provider has introduced systematic formative assessment opportunities across all their programmes to underpin fair and consistent assessment of learners |
| 4.3.7(a) | Criterion: <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i> | | HCT is not subject to Section 65 of the Qualifications Act as no programme of learning exceeds three months in duration. |



Findings

HCT currently has 50 trainers on its data base, fully qualified in their area of expertise and all have completed an induction to HCT systems and procedures. There are processes in place to monitor and review staff performance to ensure that quality standards are maintained. HCT also has sound contingency arrangements in place to prevent teaching and learning activities being disrupted as a result of unforeseen circumstances.

There are systematic processes in place for the timely and effective planning and delivery of courses. HCT makes effective use of a 6-week lead-in process to ensure the logistical arrangements are in place prior to a course being started. This process allows for an evaluation of the site and provision of the equipment and resources required for each course.

There are sound assessment policies and practices in place at HCT and there is a rigorous process of internal verification to reinforce the integrity of assessment decisions made. At the initial meeting in April 2019, the panel recognised that the organisation is clearly committed to fair and consistent assessment of learners. However, it recommended more opportunities to provide formative feedback to learners needed to be taken, particularly after submission of assessment. The resubmitted QA documentation articulates a system of providing formative feedback during the learner's programme with them being assessed against 4 performance areas and measured across a 6 point scale. The panel is satisfied with the structures that have been put in place in the QA documentation to underpin fair and consistent assessment of learners. At the initial meeting, the panel also felt more insight was required into whether the technical aspects of carrying out assessment offer the best opportunity for learners to benefit/develop as a result of participation in assessment. The panel feel these additional opportunities for formative assessment will allow the learner to reflect on, and address shortfalls in their performance in a timely manner.

Adjustments to assessment methods have been introduced to support learners with particular literacy needs but at the initial meeting, the panel felt the initial assessment process to determine support needs could be further strengthened so as to identify specific issues that may prevent access to fair assessment in a timelier manner.

At the time of the initial meeting, the panel also had concerns regarding the internal capacity of HCT in relation to knowledge of education and training matters which inform programme development and assessment. The panel recommended that HCT needed to access an appropriately qualified and experienced further education and training expert to support the programme development, design and assessment processes. The panel is satisfied the provider has addressed this issue as documented in Section 4.2 of this report and that there is now an appropriately qualified and experienced education and training expert in place to support the programme development, design and assessment processes.



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

The panel finds HCT to be a reputable and well-established organisation with the capacity to continue to offer QQI validated further education and training programmes. At the time of the initial meeting, the panel recommended that HCT deploy an experienced and appropriately qualified person with wider knowledge of pedagogy and curriculum development and assessment to further enhance the quality of their provision and inform the quality assurance processes. The panel is satisfied the provider has addressed this issue as documented in Section 4.2 of this report and that there is now an appropriately qualified person in place with wider knowledge of pedagogy and curriculum development and assessment to further enhance the quality of their provision and inform the quality assurance processes.



Part 5 Evaluation of draft QA Procedures submitted by HCT Learning

The following is the panel's findings following evaluation of HCT Learning 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:

HCT has adopted a number of key principles of good governance in the development of its draft Quality Assurance Manual. These include the establishment of appropriate entities including a Board, an Academic Council, a Quality and Monitoring Committee and a Programme Development and Review Committee. It has also included in the draft procedures, external membership of these entities in the form of an External Quality Assurance Advisor and a representative from a training organisation such as City and Guilds. It also proposes to include learner representatives on Academic Council. The panel welcomes this as indicating that HCT is open to involving external persons and learner representatives in its governance structures.

Notwithstanding this, at the time of the first meeting, the panel believed that the membership and terms of reference for the governance entities, as set out in the draft procedures, needed to be re-considered. The panel is aware of the challenges associated with establishing robust governance structures in a small provider given the relatively low numbers of internal personnel available. However, the panel must have regard to the QQI statutory QA guidelines for private providers which require that 'academic decision-making (matters relating to education and training) is independent of commercial considerations or the undue influence of business owners.' Having reviewed the proposed governance arrangements presented by HCT at the first meeting, the panel were of the view that it did not comply with this requirement.

The panel therefore determined that HCT needed to re-consider the terms of reference and re-structure the proposed membership of the Board, the Academic Council, the Quality & Monitoring Committee and the Programme Development and Review Committee, to clearly define and reinforce the separation between the commercial and academic sides of the enterprise. At the time of the first meeting, the panel recognised this could be achieved in a number of ways and the panel's role was not to dictate a specific model to the provider, it believed that the establishment of terms of reference and appropriate membership for the Board, which has a commercial and financial remit, and terms of reference and appropriate membership for the Academic Council that assigns responsibility for academic quality and decision-making would be beneficial.

A significant element of a model that would accord with the requirements of externality and separation of academic and corporate decision-making, might include the appointment of a Chair of the Academic Council who is wholly external and independent, with appropriate qualifications and experience and who does not hold any other responsibilities in the organisation. This person would act as a conduit between the academic and commercial aspects of the business, for example by delivering a report from the Academic Council to meetings of the Board, which will have a commercial and financial decision-making role. Furthermore, dual membership of the Board and the Academic Council on the part of senior staff in the organisation might be seen to conflict with the requirements of the statutory QA guidelines, referred to above.



The Panel also advised that HCT should take the opportunity that this restructuring provides to clearly indicate which persons are permanent members of the entity and which are attending in an advisory capacity. It should also take the opportunity in determining the terms of reference to ensure that decisions arising from the various QA processes are signed off by the appropriate entity, having regard to the principle of subsidiarity.

The panel at that time also stated that HCT should also take the opportunity that this restructuring would provide to clearly indicate which persons are permanent members of the entity and which are attending in an advisory capacity. It should further take the opportunity in determining the terms of reference to ensure that decisions arising from the various QA processes are signed off by the appropriate entity, having regard to the principle of subsidiarity.

Since that time and as a result of the panel's recommendations, HCT Ltd has carried out a full review of membership of all governance entities. One of the previous Directors, who also acted as Training Manager, has left the company since the first meeting and there is now only one sole owner. Any staff with a financial interest in the organisation have been removed from the Academic Council, Monitoring Committee and Programme Development and Review Committee. The position of Training Manager has been filled through an internal promotion and two new members of staff have also been appointed.

The person who was identified in the original application as the 'External Quality Assurance Advisor' has been appointed as independent chair of the Academic Council. The provider clarified in its discussion with the panel on 7 November that this person does not and will not hold any other position or exercise any other role in the organisation.

The panel was informed that the provider has identified an external person with non-FET educational expertise, whom it has entitled 'External Educational Background Representative', to sit on the Academic Council, thus further enhancing the externality principle and confirming the separation between the commercial and academic sides of the enterprise. Both of these persons will also sit on the provider's Board. The panel welcomes these appointments, which will support the alignment of the provider's governance arrangements with QQI statutory QA guidelines for private providers. However, the job panels need to be reconsidered to better reflect the job role.

The panel would also recommend the learner representative on the Academic Council is awarded equal status with all other members of the council and should be a constant attendee at meetings and not on an 'as required basis' as currently identified in the QA documentation.

2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

Panel Findings:

HCT has demonstrated a commitment to embedding quality assurance systems across its provision of education and training. It has developed a comprehensive Quality Assurance Manual and associated forms designed to provide guidance on policy and practice relevant to its teaching and learning programmes.

The panel commends HCT on the presentation, scale and detail of this document. However, at the time of the first meeting, it felt there was a need to review and rewrite key processes to make them more



accessible to users. The panel felt the QA manual would benefit from a more systematic articulation of the QA processes, for example, the description and illustration of sequential flows of activities to provide more clarity and direction to the decision making process and to inform understanding of the system and processes by users of the manual. Following review and evaluation of the re-submitted QA documentation, the panel is still of the view that there is further work to be done to more fully address the issue of documenting and proceduralising key processes to provide clarity and ease of use for users. At the first meeting, the panel also felt the document would benefit from the introduction of a system of version control to enable key changes to be tracked as the document evolves. The panel is satisfied the provider has addressed this issue within their resubmitted QA documentation and a system of version control within the QA documentation is now in place.



3 PROGRAMMES OF EDUCATION AND TRAINING

Panel Findings:

HCT provides a comprehensive range of industry led programmes to develop the skills and knowledge of its target cohort of learners. It has demonstrated successes in the numbers of learners who have been certified since its inception as a FETAC / QQI centre in 2009.

All learners complete an induction programme on the first day and are given information packs and assessment plans for their relevant programmes. Attendance on programmes is closely monitored and a rigorous system has been put in place to capture feedback from key stakeholders triangulating between learners, trainers and clients. The introduction of an 'End Submission Cycle Feedback' after results have been processed allows for a more honest and holistic review of the learning experience from those who have completed the programme. Results from feedback are used effectively to identify any associated risk through the development of their red flag system with subsequent interventions put in place.

At the initial meeting in April 2019, the panel commented that, although there appeared to be robust systems in place to support the education and training programmes at HCT, issues were identified in the report concerning governance which impact on the overall effectiveness of the processes. Following the review of the re-submitted QA documents, the panel is now satisfied that there is fit-for-purpose governance, management and decision making structures in place to effectively support HCT's programmes of education and training. See Section 4.2 of this report for an overview of the provider's new governance arrangements.

4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

Panel Findings:

HCT has built up a database of over 50 fully qualified trainers across a variety of skill areas. A one day induction programme is carried out with all trainers before a programme commences. There is a rigorous process of monitoring and review of trainer performance using a range of methods, including a red flag system, to ensure the consistency and adherence to the quality standards set by HCT and there are effective contingency arrangements in place to ensure there is no disruption to teaching and learning programmes in unforeseen circumstances. Staff are given the opportunity to avail of CPD activities organised both in house and externally and staff training has taken place on Standard Operating Procedures including training on the company information systems.

HCT has reviewed and implemented new processes for staff recruitment, management and development practices, including updating staff appraisals. These new processes now include the outsourcing of the HR function and this is viewed as a positive initiative by the panel which will help identify and recruit high calibre staff and assist with the retention of existing performing members of the team. It has also introduced an Employee Assistance Programme to provide well being support to their staff.

The provider has shown its capacity to take responsibility for the quality of its staff and provide them with a supportive environment that allows them to carry out their roles effectively. Notwithstanding



this, at the time of the initial meeting, the panel advised HCT Learning to develop a recruitment policy for External Authenticators to ensure it is sourcing appropriately qualified and experienced experts who will add value to their quality assurance processes. Following the review and evaluation of the re-submitted QA documentation, the panel is satisfied that an appropriate process has been developed to identify, recruit and utilise External Authenticators to ensure the integrity of the provider's assessment processes.

5 TEACHING AND LEARNING

Panel Findings:

HCT has implemented methodical processes to ensure timely and effective planning and delivery of its courses. It makes effective use of a 6-week lead-in period to ensure the logistical arrangements are in place prior to a course commencing. This process allows for the evaluation of the site and provision of equipment and resources required for each course. It includes the completion of a risk assessment with identified control measures being introduced, including the provision of Personal Protective Equipment when, and if required.

There is a very strong definition of responsibilities within the Quality Manual of staff, trainers and learners and HCT has developed a standardised approach to development of its teaching and learning resources and a systematic approach to capturing feedback on the learning experience. As mentioned previously, the introduction of the Red Flag system enhances the programme review processes and allows for timely interventions to be put in place when shortfalls are identified in the teaching and learning experience or in administrative processes.

HCT has demonstrated to the panel its openness to engage with national communities of practice in its area of provision and this is to be commended. It has joined the Irish Institute of Training and Development and this will augment its capacity to network with the wider educational community.

At the initial meeting, the panel determined that HCT has very robust administrative systems that facilitate effective programme delivery; it was felt the overall learner experience would be enhanced through more focus being placed on pedagogical issues. This would be facilitated through the engagement of appropriately qualified and experienced further educational and training expertise to support the programme design, development and assessment processes.

The panel is satisfied the provider has addressed this issue as documented in Section 4.2 of this report and that there is now an appropriately qualified person in place to support the programme design, development and assessment processes.

6 ASSESSMENT OF LEARNERS

Panel Findings:

The panel finds that HCT has clearly defined and robust quality assurance processes in place to ensure the fairness, consistency and integrity of the assessment decisions made across their assessment team.



Performance data is used effectively to identify trends and patterns from exam results to analyse individual performance across the assessment team and measure the effectiveness of programme delivery. A more diverse range of assessment techniques have been introduced to support learners who have particular assessment requirements including those with a literacy need.

At the time of the first meeting, the panel believed that these assessment processes should be further strengthened through the use of more timely formative assessment opportunities. These opportunities would enable the effective monitoring of progress towards achievement and provide a measure of the quality of the teaching and learning experience. On review and evaluation of the resubmitted draft QA documentation, the panel is satisfied with the additional mechanisms that have been put in place to strengthen the assessment processes. See Section 4.3 of this report for an overview of these changes.

7

SUPPORT FOR LEARNERS

Panel Findings:

Learners go through an induction in the early stages of their programme, and this includes a clear definition of their responsibilities and the support services that are available to them. All learners are provided with the resources they need to complete their programme including Personal Protective Equipment (PPE) and there are timely opportunities for learners to express their views on learning experiences. HCT has indicated its intention to introduce a class representative role for every programme.

At the time of the first meeting the panel recognised that, although there are strong pastoral care systems in place and learners are well supported, HCT should review the formative assessment processes to ensure consistency and rigour. At that time, the panel also felt the initial assessment process could be further strengthened to identify specific issues that may prevent fair access to assessment in a timelier manner. Following the review and evaluation of the resubmitted draft QA documentation, the panel is satisfied these issues have been addressed and both the formative assessment practices and initial assessment processes have been further strengthened to identify specific issues with reasonable accommodations being put in place in a timely manner to ensure fair access to assessment for all enrolled learners. See Section 4.3 of this report for an overview of these changes.

8

INFORMATION AND DATA MANAGEMENT

Panel Findings:

HCT has invested in a bespoke information and data management system which is aligned to and fully compliant with their QA systems and provides effective support for the delivery, evaluation and review of its education and training programmes. The system is linked to the company website and is 'live' with statistical information, grades analysis, annual feedback and summary of programmes. The system is backed up each day to a secure on-line server.



At the time of the first meeting, the panel commended HCT on the development of this system. Notwithstanding this, the panel believed the procedure for the management and protection of the data management system needed to be further strengthened and clearly articulated in the QA manual. Following the review and evaluation of the resubmitted draft QA documentation, the panel is satisfied that key issues have been reviewed by an external IT company and a range of improvements have been made to enhance confidentiality, integrity and availability of the data held by HCT. See Section 4.1 of this report for an overview of these changes.

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

HCT has developed a very comprehensive and informative website that effectively communicates information on HCT as a QQI accredited centre. The website includes information on current provision as well as planned developments to the current offering and allows visitors to the website to access real time performance reports on its provision.

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

Not applicable

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

The panel has found HCT to be committed to on-going, forward-looking monitoring of its provision with a view to improving the overall effectiveness of its further education and training programmes and the internal quality assurance processes that underpin these. A number of positive interventions have been identified and embedded into the QA procedures which demonstrate the rigour of this process. The panel is confident HCT has the capacity to conduct a rigorous self-evaluation of its provision. HCT proposes to conduct self-evaluation on a 3 yearly cycle which the panel deems to be appropriate in its particular context. Following the review and evaluation of the resubmitted QA documentation, the panel advice that the implementation of the **Specific Advices** documented in Section 6 of this report should be monitored as part of the internal self evaluation, monitoring and review processes.

Evaluation of draft QA Procedures - Overall panel findings

Throughout this re-engagement process, HCT has shown a commitment to quality assurance and a drive towards quality improvement. The panel recognises and commends the work HCT has done to date in developing their quality assurance systems and processes to meet the requirements of its further education and training programmes. However, at the time of the first meeting, the panel had identified three mandatory changes to be made before it would be in a position to recommend approval of HCT's QA procedures.

Following the review and evaluation of the resubmitted draft QA documentation, the panel is satisfied these conditions have been met and the panel is now in a position to **Approve** Hughes Consultancy and Training Ltd's draft QA procedures.

Notwithstanding this, the panel have identified a number of **Specific Advices** to be addressed by the provider to further strengthen their QA processes. The panel recommend the implementation of these Specific Advices is monitored through the provider's own self evaluation mechanisms and QQI's monitoring processes.



Part 6 Mandatory Changes to QA Procedures and Specific Advice

The following mandatory changes were identified at the conclusion of the site visit on 15th April 2019 by the panel. Following decision by QQI, HCT Learning had six months within which to address the mandatory changes identified. The Panel reconvened on 7th November 2019 to evaluate evidence submitted by HCT Learning in support of the mandatory changes. Following an evaluation of the evidence submitted, the panel is satisfied that HCT Learning has adequately addressed the issues set out in Section 6.1 below.

1. Having reviewed the proposed governance arrangements presented by HCT, the panel is of the view that it does not comply with statutory QQI guidelines. The panel has therefore determined that HCT needs to re-consider the terms of reference and re-structure the proposed membership of the Board, the Academic Council, the Quality & Monitoring Committee and the Programme Development and Review Committee, to clearly define and reinforce the separation between the commercial and academic sides of the enterprise.
2. The overall learning experience would be enhanced through more focus being placed on pedagogical issues. The panel believes this would be facilitated through the appointment of an appropriately qualified and experienced further education and training expert to support the programme development/design and assessment processes.
3. HCT needs to further strengthen its IT security procedures to protect the information held on its web application. These updated procedures need to be clearly articulated in the QA manual.

6.2 Specific Advice

1. Policies and procedures within the draft Quality Assurance Manual need further refinement. The document needs to provide a more systematic articulation of the QA processes and become a more accessible document that allows users to practically navigate the organisation's QA processes. The panel recommends that this should be prioritised by the newly appointed Academic Council.
2. HCT Learning will need to review all documentation to ensure there is separation of 'QQI' from 'HCT', recognising the distinct roles of both organisations. Quality Assurance is 'provider owned', and thus the terms 'QQI Programme Evaluator' or 'QQI Assessment Verifier' are incorrect.
3. Job Titles within the Quality Assurance Manual need to be reconsidered to more clearly define and accurately determine the specific role and responsibilities of the position.
4. The QA Manual refers to the QQI National Appeals Process; this needs to be removed as this is no longer current and should not be documented as part of HCT's internal procedures.
5. The Learner Representative on the Academic Council should be awarded equal status with all other members of the council and should be a constant attendee at meetings and not on an 'as required basis' as currently identified in the QA documentation.



6. HCT need to review and check all information in the QA documentation prior to publication to ensure accuracy and correctness.

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

| NFQ Level(s) – min and max | Award Class(es) | Discipline areas |
|-----------------------------------|------------------------|--|
| Level 3 | Minor | 3M0874 General Learning |
| Level 6 | | 3M0935 Employability Skills |
| | | 4M0857 Employment Skills |
| | | 4M1994 Horticulture |
| | | 5M1997 Office Administration |
| | | 5M2586 Horticulture |
| | | 6S3372 Training and Development Leadership |

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 HCT Learning.

Name:

Date: 19 November 2019



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

| Document | Related to |
|---|------------------------------|
| QA Manual | Quality Procedures |
| Application Form and Supporting Documents | Quality Procedures |
| Trainer Performance Document | Staff Performance Monitoring |
| Powerpoint Presentation | Quality Procedures |
| GDPR Document | Data Protection |
| Reviewed QA Manual | Quality Procedures |

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

| Name | Role/Position |
|------------------|------------------------------------|
| Colette McColgan | Director/Centre Manager |
| Deirdre Horan | Training Manager |
| Niall Brophy | External Quality Assurance Advisor |
| Amy Bagnall | QQI Administrator |
| | |

Appendix: Provider response to the Reengagement Panel Report

21/11/2019

HCT Learning,
Unit 2 Purcellsinch Business Park,
Dublin Road,
Kilkenny

Quality and Qualifications Ireland (QQI),
27 Denzille Lane
Dublin.

Dear Sirs,

HCT Learning would like to thank the panel for the hard work they have inputted into this process and the learning they have provided to HCT Learning. HCT feel that as a result of the feedback, improvements have been made in order to enhance our learners experience. HCT Learning would also like to thank its staff, trainers and external parties that have been involved in the development of our Quality Assurance Manual and relevant documentation.

Please see below our responses to the specific advice from the panel:

| Panel Findings | HCT Learning Response |
|--|--|
| Policies and procedures within the draft Quality Assurance Manual need further refinement. The document needs to provide a more systematic articulation of the QA processes and become a more accessible document that allows users to practically navigate the organisation's QA processes. The panel recommends that this should be prioritised by the newly appointed Academic Council. | HCT Learning has already started this process of a more systematic approach towards our QA documentation, this can be seen in a number of Policy's including Programme of Education and Training and Assessments of Learners. During each Academic Council as part of their role is to review a policy and as a result this will naturally happen. HCT Learning does feel that due to this new approach towards its QA, it will be better easier to understand for those needing to access the information |
| HCT Learning will need to review all documentation to ensure there is separation of 'QQI' from 'HCT', | During the next Academic Council meeting which will take place in February 2020 – the names of Job Titles will be |

| | |
|---|---|
| recognising the distinct roles of both organisations. Quality Assurance is 'provider owned', and thus the terms 'QQI Programme Evaluator' or QQI Assessment Verifier' are incorrect | updated |
| Job Titles within the Quality Assurance Manual need to be reconsidered to more clearly define and accurately determine the specific role and responsibilities of the position | Same as above |
| The QA Manual refers to the QQI National Appeals Process; this needs to be removed as this is no longer current and should not be documented as part of HCT's internal procedures | This has now been removed from our Quality Assurance Document |
| The Learner Representative on the Academic Council should be awarded equal status with all other members of the council and should be a constant attendee at meetings and not on an 'as required basis' as currently identified in the QA documentation | HCT Learning will facilitate for a Learner Representative to attend all Academic Council meetings ensuring that they have a equal status. |
| HCT need to review and check all information in the QA documentation prior to publication to ensure accuracy and correctness | The QA Document will be proofed again to ensure any errors have been corrected |

Trusting all is in order, please feel free to contact us if your need further information of any of the above mentioned.

Yours Sincerely,

Colette McColgan