



## Reengagement Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

Registered Business/Trading Name:	Home Care Training (Elevation Training)
Address:	Unit 1 & 2 Woodford Court, Woodford Business Park, Santry  Dublin 17
Date of Application:	12 December 2018
Date of resubmission of application:	19 September 2020
Date of evaluation:	3 September 2019/16 October 2020
Date of site visit (if applicable):	3 September 2019/16 October 2020
Date of recommendation to the Programmes and Awards Executive Committee:	5 December 2019/3 December 2020

#### 1.2 Profile of provider

Elder Home Care Ltd was incorporated in 2005, trading as Comfort Keepers. The owners of Elder Home Care Ltd established a training company in 2009 called Home Care Training. Elder Home Care and Home Care Training are separate legal entities.



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In 2010, Home Care Training achieved FETAC / QQI accreditation. In 2014, the trading name of Home Care Training was changed to Elevation Training and this was amended on all QQI systems. The role of this company is to train home care workers in skills for caring for the elderly and it is Elevation Training that is the registered provider with QQI.

In 2015, Sodexo acquired both Elder Home Care (trading as Comfort Keepers) and Home Care Training (trading as Elevation Training). Despite this, Home Care Training continues to trade as Elevation Training. During discussion with QQI, prior to the initial submission, it was agreed that the application could be made under the name of Comfort Keepers as both entities of Elder Home Care and Home Care Training were now owned by the one company. The panel recommended that this be formalised in discussion with QQI. In response to the findings by the panel following the initial site visit in September 2019, the provider has re-established the training company as Home Care Training and is now trading as Elevation Training and will hence be referred to as such throughout this report.

Since May 2010, Elevation Training has been approved by FETAC / QQI to provide Community Health Services and Healthcare major awards at Level 5 and submits approximately 500 minor awards for certification to QQI per year over 6 certification periods. The learner profile ranges from young carers just finished secondary school right through to retired workers looking for a part-time job while adjusting to retirement. Learners present with a vast range of abilities; some may be relocating to Ireland from overseas and have previous academic qualifications, while others come without having completed second level education.

As it supplies carers to the tender contract for HSE home care services nationwide, there are several non accredited HSE approved training programmes that must be completed by employees which are delivered by Elevation Training. These include an induction course, dementia care training, safeguarding of vulnerable adults, child protection training, manual handling and people moving training. Elevation Training also offers a range of in-house, non-accredited training programmes as a means of up-skilling its workforce. Such programmes include relevant industry specific topics such as Catheter Care, Stoma Care, Managing Behaviour that Challenges and Food Hygiene. Elevation Training has implemented an online learning management system, providing short courses for all of its staff to use as an extra resource while they are working. The long-term aim is to use this management system for as many courses as possible.

Elevation Training endeavours to provide its learners with the up to date skills, knowledge and tools required to improve both their own individual and organisational performance within a rapidly changing industry.



## Part 2 Panel Membership

Name	Role of panel member	Organisation
Danny Brennan	Chairperson	Former Registrar, LYIT and Principal, DNB Education Consultants
Lorraine Halpin	Panel Member	SQT Training Ltd
Jeanette Haughey	Panel Member	The Rehab Group
Naomi Pasley	Panel Member	Hibernia College
Noel McStay	Report Writer	Quality & Training Consultant

## 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 Elevation Training against QQI guidelines with a view to recommending to QQI whether these quality assurance procedures should be approved.

At the initial panel meeting, the panel recognised the work that Elevation Training had done at that time in developing its QA processes; however issues were identified that needed to be addressed before the panel could recommend Elevation Training’s QA procedures for approval.

QQI statutory QA guidelines for private providers require that “academic decision-making (matters relating to education and training) is independent of commercial considerations or the undue influence of business owners.” Following the review of the proposed governance arrangements presented by Elevation Training at the initial site visit, the panel were of the view that they did not comply with this requirement. The panel found that the membership and terms of reference for the governance entities, as set out in the draft procedures, needed to be re-considered and a mandatory change was identified by the panel.

At the initial site visit, the panel also recommended that the provider should review its documented QA manual to ensure it is presented in a user friendly, consistent style and is fit for purpose. The policies



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and procedures also required a comprehensive review to reflect a consistent format, using a standard template.

The panel reconvened on 16 October 2020 and reviewed the provider's revised QA documentation. The panel was satisfied that the mandatory changes identified in 2019 had been satisfactorily addressed by Elevation Training and recommends approval of the provider's QA procedures to QQI. The panel has identified a number of conditions of QA approval, intended to ensure that Elevation Training's QA infrastructure continues to robust and be fit-for-purpose into the future.



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

	Tick <u>one</u> as appropriate
Approve Elevation Training's draft QA procedures, with conditions	✓
Refuse approval of [the provider's – insert name] draft QA procedures with mandatory changes set out in Section 6.1  (If this recommendation is accepted by QQI, the provider may make a revised application within six months of the decision)	
Refuse to approve [the provider's – insert name] draft QA procedures	



## Part 4 Evaluation of provider capacity

### 4.1 Legal and compliance requirements:

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.1.1(a)</b>	<b>Criterion:</b> <i>Is the applicant an established Legal Entity who has Education and/or Training as a Principal Function?</i>	<b>Yes</b>	Elevation Training certifies that it is compliant with all relevant legislation and regulatory requirements applicable to the provision of education and training in Ireland
<b>4,1,2(a)</b>	<b>Criterion:</b> <i>Is the legal entity established in the European Union and does it have a substantial presence in Ireland?</i>	<b>Yes</b>	Elder Homecare Ltd is a privately owned limited company which, in 2009, established a separate training company (Homecare Training trading as Comfort Keepers Training) to work alongside its homecare company. It is based in Santry in Dublin and offers Level 5 Awards in Health Care and Community Health Services. A copy of the Certificate of Incorporation for Elder Homecare Ltd's has been submitted with this application
<b>4.1.3(a)</b>	<b>Criterion:</b> <i>Are any dependencies, collaborations, obligations, parent organisations, and subsidiaries clearly specified?</i>	<b>Yes</b>	At the time of the initial site visit, the panel found that there needed to be a clearer specification of the parent organisations and dependencies in Elevation Training's documented procedures to better reflect the governance of the organisation. On review of the resubmitted QA documentation, the panel commends the work that has



			been carried out in this regard. However, in the interests of clarity and transparency, the Panel is recommending a condition of QA approval in this regard.
<b>4.1.4(a)</b>	<b>Criterion:</b> <i>Are any third-party relationships and partnerships compatible with the scope of access sought?</i>	<b>Yes</b>	<i>There are no third-party relationships or partnerships compatible with the scope of access sought.</i>
<b>4.1.5(a)</b>	<b>Criterion:</b> <i>Are the applicable regulations and legislation complied with in all jurisdictions where it operates?</i>	<b>Yes</b>	All regulations and legislation are complied with.
<b>4.1.6(a)</b>	<b>Criterion:</b> 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	<b>Yes</b>	Elevation Training (previously operating under the name 'Comfort Keepers Training') has been in operation since 2009 and has had a programme validated by FETAC / QQI since 2010. It currently offers Level 5 Awards in Healthcare and Community Health Services and submits approximately 500 learners for certification to QQI per year over 6 certification periods. It also provides a range of industry specific nonaccredited training programmes.

## Findings

At the initial meeting on 3 September 2019, the panel was satisfied that the legal and compliance requirements outlined in Section 4.1 were being met, but recommended that the documented QA policy provide more clarity on the inter-relationships between companies in the group, including the role of



the Boards of Directors and any proposed delegation of functional responsibility to the units of governance.

Since the initial panel meeting, the provider has re-established the training company as Home Care Training, trading as Elevation Training and which is no longer managed by Elder Home Care. The panel commend the provider on this development but concerns still remain regarding the clarity of academic governance structures within the organisation and the functions, roles and cross membership within these entities.

The panel has recommended a condition (Proposed Condition 1a) in this regard.

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

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
4.2.1(a)	<b>Criterion:</b> <i>Does the applicant have a sufficient resource base and is it stable and in good financial standing?</i>	<b>Yes</b>	The application form for reengagement is accompanied by statements regarding the financial standing of the business.
4.2.2(a)	<b>Criterion:</b> <i>Does the applicant have a reasonable business case for sustainable provision?</i>	<b>Yes</b>	The Head of Training and Quality and the Programme and Compliance Manager complete an annual audit of training venues and resources with the training resource budget confirmed at the beginning of each financial year. Approval is sought from Elevation Training's Board of Directors for anything outside of this budget agreement.
4.2.3(a)	<b>Criterion:</b> <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	<b>Yes</b>	At the time of the initial site visit, the panel found that clear and unambiguous units of governance needed to be established, with appropriate external independent membership to ensure no undue influence will be exercised by any commercial imperative over



			academic decision making in the organisation.  Following the review of the resubmitted provider's QA documentation, the panel is satisfied this criterion has been met having regard to the points raised in section 4.1.
4.2.4(a)	<b>Criterion:</b> <i>Are there arrangements in place for providing required information to QQI?</i>	<b>Yes</b>	There are effective communication mechanisms in place to ensure the timely and effective provision of required information to QQI.

### Findings

Elevation Training has adopted a number of key principles of good governance in the development of its draft Quality Assurance Manual including the establishment of a Programme Design Team, Programme Development Team and Programme Review Team. At the time of the initial site visit on 3 September 2019, the provider indicated that it gained external, independent insights and suggestions on its programme content and quality assurance processes from an external advisor. While the panel welcomed this external involvement, it was not at the appropriate level to satisfy requirements. QQI statutory QA guidelines for private providers require that academic decision making is independent of commercial considerations or undue influence of business owners. On review of Elevation Training's governance arrangements at the initial site visit, the panel were of the view that they did not comply with this requirement. Clear and unambiguous units of governance needed to be established, with appropriate external independent membership to ensure that no undue influence is exercised by any commercial imperative over academic decision making in the organisation.

Since the initial site visit, the provider has established an Academic Board with Terms of Reference established to bestow responsibility to it for academic decision making within Elevation Training. As recommended by the panel following the initial site visit, two external independent members have been included on the Academic Board; an Independent Occupational Expert and an Independent Education and Training Expert. The panel commend the provider for this development and agree that this will help protect the integrity of the academic decision-making process undertaken by the Board. However, the panel had concerns about the proposal that the chair of the Academic Board would rotate. It has decided therefore to recommend a condition (Proposed Condition 2) that the Terms of Reference be amended to incorporate the appointment of one of the external members as Chair, on a non-rotating basis, to further strengthen and protect the independent oversight of this academic governance structure.



The panel would also have particular concerns regarding the Terms of Reference of the Academic Board and the powers invested in the Board of Directors to “alter the operations of the Academic Board and can, at its discretion, disband or reconstitute it at any point” (Quality Assurance Manual V1, ETTR 1.2, Page.14). The panel requires this to be reconsidered in order to protect the academic decision making of the Academic Board and ensure it is independent of commercial considerations or the undue influence of the Board of Directors. The panel has recommended a condition (Proposed Condition 1b) in this regard.

#### 4.3 Programme development and provision requirements:

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
4.3.1(a)	<b>Criterion:</b> <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	<b>Yes</b>	Elevation Training (previously operating as ‘Comfort Keepers’) has been in operation since 2009 and has had programme validation by FETAC / QQI since May 2010.
4.3.2(a)	<b>Criterion:</b> <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	<b>Yes</b>	A compliment of education and training staff is well established with a relief panel in place which can be drawn from when required.
4.3.3(a)	<b>Criterion:</b> <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>	<b>Yes</b>	At the time of the initial site visit, the panel found that policies and procedures needed to be more fully aligned to QQI guidelines to ensure the effective management of quality assurance.



			Following the review of the resubmitted provider's QA documentation, the panel is satisfied this criterion has been met. However, in order to refine the programme development process and in the interest of underpinning the quality assurance processes in Elevation Training, it recommends a condition be imposed to ensure the appropriate involvement of both the academic and corporate units of governance in this decision making process.
<b>4.3.4(a)</b>	<b>Criterion:</b> <i>Does the applicant have the fit-for-purpose premises, facilities and resources to meet the requirements of the provision proposed in place?</i>	<b>Yes</b>	There are sound processes in place to ensure the timely and effective planning and delivery of courses.
<b>4.3.5(a)</b>	<b>Criterion:</b> <i>Are there access, transfer and progression arrangements that meet QQI's criteria for approval in place?</i>	<b>Yes</b>	At the time of the initial site visit, the panel found that there needed to be more clarity in access arrangements in terms of the selection and eligibility criteria used to make selection for programmes offered. The panel also recommended more



			<p>explicit signposting of progression opportunities for learners to higher level awards.</p> <p>The panel is satisfied that the revised documentation addresses its original concerns.</p> <p>In order to embed the revised QA procedures, the panel recommends that Elevation Training present its programmes to QQI for revalidation.</p>
<b>4.3.6(a)</b>	<b>Criterion:</b> <i>Are structures and resources to underpin fair and consistent assessment of learners in place?</i>	<b>Yes</b>	<p>At the time of the initial site visit, the panel found that the structures in place in Elevation Training in respect of assessment were generally appropriate. However, in the re-submitted documentation that the panel considered, it noted that the Results Approval Panel was chaired by the Head of Training and Quality. The panel believes that good practice would indicate this role would be better assigned to one of the independent members of the Academic Board. The panel has imposed a</p>



			proposed condition in this regard.
<b>4.3.7(a)</b>	<b>Criterion:</b> <i>Are arrangements for the protection of enrolled learners to meet the statutory obligations in place (where applicable)?</i>	<b>Yes</b>	Elevation Training (previously operating as 'Comfort Keepers Training') currently has a bank guarantee in place to protect any learner against the loss of fees paid in advance of programme completion. The panel would recommend QQI review the adequacy of this provision.

### Findings

The learning and development team is led by a Manager and Assistant Manager and supported by 3 core trainers who are well qualified and have up to date industry experience. There is also a team of Associate Trainers who operate nationwide and a relief panel which can be drawn on when required, again all suitably qualified and experienced. 2 up-skilling days are organised per year to ensure the currency of the team's occupational competence and there are procedures in place to monitor and review staff performance to ensure that quality standards are maintained. Elevation Training also has a documented process in place to ensure the effective recruitment of new staff when required.

Elevation Training has access to 9 training locations nationwide. At the time of the initial site visit, the panel were given a tour of one of the training locations which is well resourced with up to date equipment and facilities, conducive to learning and which reflects current industry standards.

The panel met to review the revised documentation submitted by Elevation Training. It noted the process of programme development outlined in that documentation. The panel is of the view that the system described did not appear to have a formal approval step by the Board of Directors during the process. The panel believes the system would be strengthened through a review of the process to ensure the **appropriate** involvement of both units of governance in decision-making processes. The panel has recommended a condition (Proposed Condition 1c) in this regard.

There are sound assessment practices in place at Elevation Training and a rigorous process of cross-marking and internal verification to reinforce the integrity of assessment decisions made is in place. Although reasonable accommodations have been provided to support learners with particular literacy needs, following the initial site visit, the panel felt the initial assessment process for reasonable accommodations could be further strengthened so as to identify student support needs in a timely manner. On review of the resubmitted QA documentation, the panel commend the work that has been



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done by the provider in this regard. Responsibility for the area of learner support has now been assigned to the Programme and Compliance Manager. The sections in both the Learner and Tutor Handbooks 'Support for Learners' have been updated to better document student support and the Induction presentation has been amended to reflect these changes.

The panel notes noted in the revised documentation that the Results Approval Panel was chaired by the Head of Training and Quality. The panel believes that good practice would indicate this role would be better assigned to one of the independent members of the Academic Board. The panel has recommended a condition (Proposed Condition 3) in this regard.



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

Elevation Training has a committed Learning and Development team that supports learners in their quest for the achievement of QQI qualifications. There are processes in place to promote the quality of the provision of education and training programmes and a well-established team of qualified and experienced teaching staff who are committed to both their learners and to the ethos of the organisation.

Notwithstanding this, following the review of the providers QA documentation following the initial site visit, the panel were of the view that the governance and academic structures of Elevation Training needed to be reviewed to underpin and further strengthen the work that is being carried out by the Learning and Development team. Documented quality assurance procedures needed to be further developed to provide a coherent, fit for purpose QA system which protects the integrity of the academic processes and standards.

Since then, developments have been made in Elevation Training's QA systems and procedures and the panel recognises the work that has been carried out since the initial visit. Following the review of the provider's resubmitted QA documentation, the panel is satisfied that the original mandatory changes identified have been satisfactorily addressed and, therefore, recommends approval of Elevation Training's QA procedures to QQI. Nonetheless, the panel is of the view that Elevation Training would benefit from a comprehensive self-evaluation of its QA processes, involving an independent external review (as outlined in Policy 10.2 Self Evaluation), to ensure the ongoing effectiveness of its policies and procedures with a view to their further detailed development in order to underpin and assure the quality of their education programmes and associated services. The panel has recommended a condition (Proposed Condition 4) in this regard.

In order to help embed Elevation Training's new procedures, the panel recommends that it should present their programmes to QQI for revalidation within a timeframe to be agreed with QQI.



## Part 5 Evaluation of draft QA Procedures submitted by Elevation Training

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

### 1 GOVERNANCE AND MANAGEMENT OF QUALITY

#### **Panel Findings**

At the time of the initial panel meeting in September 2019, Elevation Training was the training company with the responsibility for training home care workers in skills for caring for the elderly. At that time, it was agreed during discussions with QQI, as part of the reengagement process, that the application could be made under the name of Comfort Keepers.

The panel noted that Elevation Training had no involvement in the recruitment of home care workers for Comfort Keepers. The legal directors of both companies were the same and both companies were owned by the multi-national corporation, Sodexo.

On review of Elevation Training's governance arrangements in September 2019, the panel were of the view that in order to comply with the QQI requirement for private providers that "academic decision making is independent of commercial considerations or undue influence of business owners", clear and unambiguous units of governance needed to be established. The panel found that this was particularly important in the context of this provider, where one company had responsibility for care delivery and the associated company had responsibility for training. Both companies had a common set of legal directors. The panel recommended that a unit responsible for academic decision-making and a separate unit responsible for commercial decision-making, each with formal delegation of functional responsibility from the legal Board of Directors, might be considered. The panel also recommended the deployment of an appropriate external independent chair of the academic decision-making unit, who might also be a member of the Board, thus providing the conduit between both bodies. This would help ensure that no undue influence would be exercised by any commercial imperative over academic decision making in the organisation.

The panel also found that documented procedures needed to provide more clarity on the inter-relationships between companies in the group, including the role of the Boards of Directors and any proposed delegation of functional responsibility to the units of governance. In addition, Terms of Reference for all governance units and individuals involved in the QA systems needed to be clearly documented.

In response to the findings by the panel following the initial site visit, the panel finds that the provider has addressed all of the mandatory changes identified in these areas. The provider has re-established the training company as Home Care Training and is now trading as Elevation Training and is referred to as such throughout this report.



The provider has also revised its governance structures. It has established an Academic Board, including two external independent members, with responsibility for academic decision making. Following the review of the provider's QA documentation, the panel has some remaining concerns regarding the systems currently in place to effectively oversee the quality of the education and training programmes. Sections 4.1 and 4.2 articulate the panel's views in this regard. The panel has identified a number of proposed conditions to address these concerns.

## 2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

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

Having reviewed the draft QA manual as presented at the time of the initial site visit, the panel believed it was not consistently written in a user-friendly style. It needed to be comprehensively edited to ensure that it is informational in tone, easy to navigate, comprehensive and fit for purpose for the size and context of the organisation. The panel found the use of templates, process maps and flowcharts would help in this regard.

As part of that exercise, policies and procedures needed to be comprehensively reviewed to reflect a consistent format, using a standard template. The provider was advised that good practice would be to have a single, clearly written source from which documents, such as the student handbook content, are linked. For example, the student handbook should link to relevant components of the QA policies and procedures.

Following the panel's review of the resubmitted QA documentation, the panel commend the work that has been done and the manual is now presented in a more user-friendly manner. However, the panel found that some procedures require further development. This is further articulated in section 4.4 above. The panel has recommended a condition (Proposed Condition 4) in this regard.



### 3 PROGRAMMES OF EDUCATION AND TRAINING

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

Elevation Training has developed education and training programmes to meet industry demand in the caring for the elderly sector. All programmes are classroom based mainly in Elevation Training premises, but there are processes in place to source alternative accommodation when required. Learners come mainly from within the recruitment entity of the business but there is a small proportion of learners who self-refer to Elevation Training.

Learners who are referred to Elevation Training will have completed and passed an English competency test in order to reach that stage of the process. Learners who self-refer to Elevation Training are asked to self-declare their proficiency in written and spoken English. The trainer will assess them verbally on the first day of their programme and will discuss any potential issues with the Learning and Development Manager and Assistant Manager. Where there are concerns raised regarding a learner's level of English competency and their resulting ability to successfully complete the programme, the learner will be assisted in sourcing another provider where they can improve their English competency and will be given an opportunity to enrol in a later programme with Elevation Training. Where it is felt the learner does not meet the required level of proficiency to meet the demands of their proposed course, they may be directed to support agencies where this need can be addressed prior to commencing the programme. Part of the initial induction process also includes the learner self-declaring their prior experiences and although they do not receive any recognition for this learning, it is used by Elevation Training staff to instil confidence in the learner in the early stages of the programme. In some cases, however, if the Learning and Development Manager deems that the previous experience can be appropriately aligned to the target qualification, this may result in the learner being exempt from the teaching and learning activities and move directly to summative assessments.

At the time of the initial site visit, the panel found there were appropriate mechanisms in place to support learners while on the programme, but the panel were of the view that policies and procedures regarding access and progression arrangements required a more formalised approach and be better aligned with QQI Guidelines. The panel were also of the opinion that the Appeals Process needed to be more clearly defined to ensure that a more comprehensive process was in place with clear lines of responsibility and decision making.

During the review of the resubmitted QA documentation, the panel noted that explicit minimum entry requirements are stated for its programmes. In addition, a detailed Recognition of Prior Learning (RPL) policy and procedure is articulated, which formalises the processes described above. The panel commends Elevation Training on the level of support provided for its learners. Although issues highlighted during the initial site visit and documented above have been addressed by the provider and remedial work carried out, the panel have identified interventions, as detailed in Section 4.4 of this report, to further refine and develop and embed their QA processes.



## 4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT

### **Panel Findings:**

During the initial site visit the panel met with the core training staff and all demonstrated a commitment to both their learners and to the ethos of the organisation.

The Quality Manual documents Elevation Training's recruitment and management process and includes a Learning & Development Staff Development Policy. All employees are provided with a role-specific handbook, training on company policies and procedures and a copy of the QA manual.

All new staff complete an "on-boarding programme" for their new role, to promote consistency of course delivery and development, assessment and record keeping in line with QA policies and procedures. New staff shadow existing trainers and complete their first programme under supervision to promote uniformity across all sites of programme delivery.

Twice yearly, trainers attend up-skilling days and trainers are asked to provide a self-evaluation prior to the content of the up-skilling day being developed. The information from these evaluations are be used to create relevant content for the day. An annual training needs analysis is carried out by the Learning and Development Manager and the Assistant Learning and Development Manager and the results of this analysis is used to determine the areas for staff development for the team for the forthcoming year.

## 5 TEACHING AND LEARNING

### **Panel Findings:**

Elevation Training recruit a wide and diverse range of learners with differing levels of competency and previous attainments. Discussions with staff at both meetings demonstrated a commitment to facilitating a welcoming and inclusive learning environment for all. It was apparent that the teaching staff have a strong ethos of learner support and were able to identify a number of interventions which demonstrate this. Feedback is sought from learners on the completion of each cohort or module and this feedback is disseminated up to management to monitor the teaching and learning experience.

Elevation Training provides a well-equipped learning environment with up to date ILT facilities and current industry standard specialist equipment. This provides learners with a positive learning experience and the opportunity to gain the skills and competencies needed to carry out their role in the sector. A minimum of 3 learners is required for a class to run, otherwise the start date is deferred. Class sizes are capped at 12 to ensure appropriate levels of support can be provided for each learner. Courses are delivered over a 6 week period with classroom contact of one day per week and a second day being



made up of directed learning tasks. Learners work towards achievement of 2 modules which are holistically delivered but assessed separately.

From the discussions held at the initial site visit, it was evident there is good practice being carried out but the panel felt the quality of the teaching and learning would be further enhanced with a documented Teaching and Learning Policy which outlines the approach and underpins the ethos and philosophy of the organisation. A Teaching and Learning Policy is now in place and documented. The QA Manual references a Teaching and Learning Strategy and the panel feel the inclusion of this strategy within the manual and on the website, would further enhance the quality of the learning experience. The panel has offered a specific advice in this regard.

## **6 ASSESSMENT OF LEARNERS**

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

Following the initial site visit, the panel were of the view that sound assessment practices are well established and support the fairness and consistency of the assessment processes at Elevation Training. A diverse range of assessment methods are used to ensure fair access to assessment and there are documented systems in place to ensure the security of assessment materials. Documented assessment procedures are detailed in the Learner Handbook. A rigorous system of cross marking, internal verification and external authentication is in place to protect the reliability and integrity of assessment decisions made at Elevation Training with all results being authenticated through the Results Approval Panel. To further strengthen the academic integrity of this panel, the panel recommend the Terms of Reference for the RAP should be amended to appoint one of the external independent members of the Academic Board as Chair.

The panel recommends that the assessment procedures are reviewed in line with current best practice with due regard to QQI guidelines for Quality Assuring Assessment 'Quality and Qualifications Ireland (2013) Quality Assuring Assessment – Guidelines for Providers. Dublin: Quality and Qualifications Ireland'.

Since the initial site visit, Elevation Training has included a new Fair and Consistent Assessment of Learners Policy in the QA Manual and the panel is satisfied with this addition to the provider's assessment processes.



## 7 SUPPORT FOR LEARNERS

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

From discussions with the teaching and learning staff at Elevation Training, it is evident that the diverse needs of the learners are considered and staff are keen to ensure these needs are met and that all learners have access to a supportive learning environment.

Potential learners are provided with an initial information pack before they enrol on a programme at Elevation Training and on completion of the enrolment process, they are provided with a Learner Handbook. The handbook documents the supports systems in place to enable learners to successfully participate in Elevation Training programmes.

The panel recognised the good work that has been undertaken but, following the initial site visit, recommended that current good practices in relation to student support should be documented within the QA Manual as policies and procedures to ensure clarity and transparency to all learners and other stakeholders.

On review of the resubmitted QA documentation, the panel commend the work that has been done by the provider in this regard. Responsibility for the area of learner support has now been assigned to the Programme and Compliance Manager. The sections in both the Learner and Tutor Handbooks 'Support for Learners' have been updated to better document student support and the Induction presentation has been amended to reflect these changes.

A course handbook has been developed to provide learners with a functional source of pertinent information on their course of study and which is e mailed to learners following enrolment onto the programme. However, the panel find that there needs to be links to policies and procedures within the handbook to ensure a single source of relevant information which is accessible to learners and consistent for all. On review of both the submitted learner and tutor handbooks, the links to key documents embedded within the text are not hyperlinked and do not provide access to the external information. This should be addressed by Elevation Training.

## 8 INFORMATION AND DATA MANAGEMENT

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

The panel is satisfied that QQI Core Guidelines in relation to Information and Data Management are being complied with at Elevation Training. There is currently a data management system in place, but the panel commend and encourage their move to a more formalised database to enhance their data



collection and evaluation process. The panel also recommend that policies and procedures in relation to GDPR and data backups should also be clearly documented.

## **9 PUBLIC INFORMATION AND COMMUNICATION**

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

Following the initial site visit, the panel recommended Elevation Training develop a dedicated section to its website which is easily accessible for both existing and potential learners and provides current, accurate and accessible information on their education and training programmes. The panel also recommended that procedures should be in place to ensure clarity on the identification of individuals who approve public information.

Since the initial site visit, responsibility for the approval of public information relating to programme provision including quality assurance policies and reports has been assigned to the Head of Training and Quality and this procedure has been documented in the QA Manual. The panel is satisfied that these changes address its concerns.

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

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

Not applicable

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

The self-evaluation and review process currently takes place at programme level with information gathered during the monitoring process being discussed and evaluated at programme review meetings to bring about improvements at this level. Learners also feed into the evaluation process with feedback being sought at the end of each programme.

Following the initial site visit, the panel advised that more rigour needed to be applied to the-evaluation process to ensure a systematic review and evaluation of the quality assurance systems and procedures that underpin the organisation's education and training programmes. This includes more effective use of data to better inform the quality improvement process. This requires a whole organisation approach and involvement of key stakeholders at all levels of the organisation. The provider now has a documented Programme Monitoring and Review policy and procedure within its Quality Manual. Following the review of the resubmitted QA documentation, the panel is of the view that the provider would benefit from this procedure being invoked.

The panel is of the view that a comprehensive review of procedures as documented in the QA Manual needs to take place with a view to their further development and refinement.

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

The panel would like to commend Elevation Training for its positive engagement during both the site visit and follow up review and receptivity to the work of the panel. The panel recognises the work Elevation Training has done to date in developing its quality assurance systems and processes to meet the requirements of their further education and training programmes. Following the initial panel meeting, the panel had concerns in relation to the governance of the organisation and identified mandatory actions to be addressed before it would be in a position to consider recommending approval of Elevation Training's QA procedures.

The panel commends the work the provider has done and the developments that have been put in place to address its concerns. It, therefore, recommends approval of Elevation Training's draft QA procedures to QQI, with conditions and specific advice. These conditions and specific advice are aimed at clarifying and refining elements of the policies and procedures and should result in a more comprehensive QA system that is fit for purpose for Elevation Training.



## Part 6

### Conditions of QA Approval

#### 6.1 Conditions of QA Approval

**Conditions:**

1. Elevation Training must review the governance arrangements as documented in the QA Manual to:
  - a. clearly detail the cross membership (if any) of the Boards of Directors of the different companies in the Group, in the interest of clarity and transparency.
  - b. reconsider the powers of the Board of Directors to disband or reconstitute the Academic Board.
  - c. clearly detail the interlinking relationship between commercial and academic decision-making in the programme development process, in the interest of ensuring the **appropriate** involvement of both units of governance in decision-making processes.
2. The Terms of Reference for the Academic Board must be amended to appoint one of the external independent members as Chair, on a non-rotating basis.
3. The Terms of Reference for the RAP must be amended to appoint one of the external independent members of the Academic Board as Chair.
4. Invoke the procedure as documented in ETPR 10.5 on Page 178 of the QA Manual to engage the services of an external quality assurance expert to conduct a review of the procedures included in the Manual with a view to their further detailed development. This should be put in place without delay.

## Part 7

### Mandatory Changes and Specific Advice

#### 7.1 Mandatory Changes

**Governance:**

The panel notes that a number of changes are required before it can be satisfied that the groups or units responsible for the oversight of the provider's activities are clearly identified in the provider's Draft QA procedures pertaining to governance. The following mandatory changes are therefore



required:

1. Provide clarity on the inter-relationships between companies in the group, including the role of the Boards of Directors and any proposed delegation of functional responsibility to units of governance established under 2.
2. Establish clear and unambiguous units of governance, with appropriate external independent membership that will ensure that no undue influence may be exercised by any commercial imperative over academic decision making in the organisation.
3. Include clear and specific Terms of Reference for all units of governance that demonstrate the separation of financial and academic decision making. These should include:
  - Purpose, including scope of responsibilities
  - Appropriate titles, roles and responsibilities of the officers of the unit, including membership and tenure
  - Additional human resources as required
  - Operating procedures
  - Powers of decision making
  - Reporting relationships

#### **Documented QA Procedures**

1. The provider's QA manual needs to be presented in plain language and easy to navigate formats. The document in its current form is not consistently written in a user-friendly style. It needs to be comprehensively edited to ensure that it is informational in tone and fit for purpose. The use of templates, process maps and flowcharts would help in this regard.
2. Policies and procedures need to be comprehensively reviewed to reflect a consistent format, using a standard template. The provider is advised that good practice would be to have a single, clearly written source from which documents such as the student handbook content is linked to.

## **7.2 Specific Advice**

Specific Advice identified in October 2020:



1. Elevation Training is strongly encouraged to present its programmes to QQI for revalidation as part of the overall process of embedding its QA systems.
2. Include Elevation Training's documented Teaching & Learning Strategy within the QA Manual.

Specific Advice identified in 2019:

1. Comfort Keepers needs to document a Teaching and Learning Policy which outlines the approach and underpins the ethos and philosophy of the organisation.
2. The assessment procedures are reviewed in line with current best practice with due regard to QQI guidelines for Quality Assuring Assessment.
3. Student support needs to be documented as policies and procedures to ensure clarity and transparency to all learners and other stakeholders.
3. Procedures need to be in place to ensure clarity on the identification of individuals who approve public information.

## Part 8 Proposed Approved Scope of Provision for this provider

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
5	Major	Community Health Services and Healthcare

## 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 Elevation Training.

Name: Danny Brennan

Date: 28 October 2020



**QQI**

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Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann



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

Document	Related to
QA Manual	Quality Assurance Procedures
Application Form and Supporting Evidence	Organisational information and capacity
Learner Handbook	Learner guidance and support
Re-submitted QA Manual	Quality Assurance Procedures

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

Name	Role/Position
Brid Gould	Chief Executive Officer
Katie McManamin	Learning and Development Manager
Joanna Murphy	Assistant Learning and Development Manager
Anne Broderick	Tutor
Jason Hagan	Tutor
Julie Anne Dalton	Tutor

*Appendix: Provider response to the Reengagement Panel Report*



Unit 1 & 2 Woodford Court,  
Woodford Business Park,  
Santry,  
Dublin 17

Marie Cotter  
Quality and Qualifications Ireland (QQI),  
26-27 Denzille Lane,  
Dublin 2

Date: 17/11/2020

**RE:** Elevation Training – Reengagement Panel Report

Dear Marie,

The management and staff of Elevation Training would like to thank you for your assistance and support throughout the reengagement process.

This has been an invaluable experience for us, both as a provider and as a team. The feedback from our initial site visit gave us a great insight as to how to improve and develop our quality assurance system into one that was fit for purpose. We dedicated ourselves to implementing the recommendations and mandatory changes that were required and are delighted that the panel have recognised and acknowledged our commitment to improvement.

We would also like to thank the panel for the time and attention they gave to our submissions. We appreciate their feedback and insight into further developments that can be made.

We look forward to implementing the final recommendations of the panel and enhancing our quality assurance system for all of our staff and learners.

Kind regards,

Katie McMenamin  
Head of Training and Quality  
Elevation Training