



## Reengagement Panel Report

### Assessment of Capacity and Approval of QA Procedures

#### Part 1 Details of provider

##### 1.1 Applicant Provider

Registered Business/Trading Name:	Harvest Resources Limited
Address:	Block 4, 37 Northwood Ave, North Wood, Santry Demesne, Dublin 9
Date of application:	28th September 2020
Date of resubmission of application:	15th September 2021
Date of site visit (if applicable):	16th December 2020
Date of reconvene meeting (if applicable)	23rd September 2021
Date of recommendation to the Programmes and Awards Executive Committee:	8th April 2021 and 19th October 2021

##### 1.2 Profile of provider

Harvest Resources Limited is a people development consultancy firm with a training and development function and over thirty-five years' experience in people development, bespoke learning solutions, organisation development, executive coaching, mentoring and digital learning. Harvest Resources Limited is part of a group of connected companies, one of which is an e-learning consultancy with expertise in digital learning and innovative new methods of integrating technology and learning and provides expertise in this regard to Harvest Resources Limited.

Harvest Resources Limited has had a relationship with QQI (formerly FETAC) for 12 years and currently delivers one Level 6 programme leading to the QQI Award (6M4587) Management. However, only one module is currently in delivery as part of the programme in Leadership which leads to the QQI Level 6 Component Award in Leadership (6N2191).

This programme is aimed at staff in nursing homes, primarily nurse managers, to provide those occupying the role of 'person in charge' with the key management skills that will allow them to build a high-quality team that delivers excellent care for residents and their families in a culture of review and improvement aimed to drive forward best practice. The qualification enables nursing homes to evidence regulatory requirements in terms of minimum qualification specifications prescribed by Health Information & Quality Authority (HIQA) for the 'person in charge' role within nursing homes although the latter does not go so far as to specify exact qualifications required.

In the last 6 years, this is the only QQI programme delivered by Harvest Resources Limited and 501 learners were put forward for certification.



## Part 2 Panel Membership

Name	Role of Panel member	Organisation
Prof. Martin McKinney,	Chair	University of Ulster, (Emeritus)
Treasa Brannick O’Cillin BL	Secretary	The Law Library
Michael Kelly	Panel Member	Wildgeese Training & Quality Solutions
Louise Clarke	Panel Member	Cavan Institute

## Part 3 Findings of the Panel

### 3.1 Summary Findings

The Panel acknowledges the track record and established good standing of Harvest Resources Limited and equally the positive, professional and open attitude of the provider to the reengagement process, taking the view that it presented a valuable learning opportunity to improve the manner in which it delivers training services to learners. The positive disposition of the provider’s team aided the examination of quality assurance processes conducted by the Panel in conjunction with the provider, in particular, as part of the full-day online meeting. The commitment, passion and experience of the management and support team was clearly evident.

The reengagement process has involved a comprehensive review by the Panel of Harvest Resources Limited’s quality assurance (QA) manual, related documentation and a lengthy and robust evaluation meeting. During the latter, the Panel engaged directly with key members of staff working at both executive and operational and across different areas, achieving triangulation of information/documentation provided as part of the review. A learner-centred approach was evident across the organisation as a whole, with a clear commitment to supporting learners.

At the conclusion of the meeting with the provider, a number of areas of vulnerability were identified with the provider which related to:

- 1. Governance Structures.** the Panel were of the view that the structures needed more development to achieve higher levels of clarity, connectivity, accountability and to ensure academic decision making was protected within the structures from undue influence of commercial considerations. Equally, separation between those that develop, and report into structures and those that approve as part of decision making within the governance structures needs clear separation and clarity.
- 2. The Documented Approach to QA.** The content of the QA manual needs to be updated to have sufficient policy and procedural specificity to inform day to day work in a meaningful



manner. It also needs to be strengthened in terms of its layout, consistency of language, role focus and lend itself to updates and version control. The specificity of Quality Improvement Plans and the Risk Register also needs improvement to be more meaningful and measurable to ensure performance can be accurately assessed.

3. **Collaborative Provision/Information to the Learner and Management of Learner Data.** The contractual arrangement with LHP Skillnet needs to be strengthened with greater levels of detail in terms of roles, process and responsibilities and in particular who is ultimately responsible for quality of the learner's experience and how the quality of this experience is ensured. How such collaborative agreements are communicated to the learner needs to be clearly provided for so that the learner is clear with whom they are contracting and their entitlements under such agreements.
4. **Assessment.** Work-based assessment needs to be strengthened.
5. **Publication and Communication.** All of the above need to be reflected in the QA documentation, subject to publication and communicated clearly to all staff at all levels, learners and relevant stakeholders.

The Panel was of the view that the issues identified could not be addressed by the provider in a short time frame and therefore recommended that QQI refuse approval pending mandatory conditions prescribed, in order to allow Harvest Resources Ltd sufficient time to submit evidence to the Panel that the mandatory changes identified had been satisfactorily addressed.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



**QQI**

Quality and Qualifications Ireland  
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

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

	Tick <u>one</u> as appropriate
Approve Harvest Resources Ltd's draft QA procedures	✓
Refuse approval of Harvest Resources Limited's draft QA procedures pending mandatory changes set out in Section 7.1 <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 Harvest Resources Limited 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>	There are a number of companies in the Harvest Group. However, re-engagement is only occurring with Harvest Resources Limited (CRO Number: 222511) as the legacy provider.
<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>	Based on the information presented to the Panel the provider is established in the EU and has a substantial presence in Ireland. CRO Number: 222511.  The provider also indicated that to the best of its knowledge this criterion is met.
<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>	The connected companies in the Harvest Group are specified in the audited accounts.  The collaboration with Leading Healthcare Providers Skillnet (LHP) was specified, however, the documentation governing the collaboration has been sufficiently strengthened following the recommended mandatory changes.
<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>	As above. The primary contractual relationship should be between the learner and the provider validated to deliver the programme of education and training. This needs to be made be clear to the learner and the partner organisation.



<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>	Based on the process undertaken, evidence provided in writing/orally, in general there would not seem to be any issues in relation to regulatory and legal compliance in the broad sense.  However, while the provider was not initially in a position to demonstrate full compliance with the relevant law on data protection as vulnerabilities were identified in relation the arrangement with LHP in terms of learner permissions and concerns have now been addressed.
<b>4.1.6(a)</b>	<b>Criterion:</b> <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>	<b>Yes</b>	Based on the process undertaken, evidence provided in writing/orally, there would not seem to be any issues in relation to standing of the provider within the Irish qualifications system.  The provider also confirmed to the best of its knowledge this criterion is met.

**Findings**

The provider has been established for quite some time, with a long-standing track record in the industry in addition to being a FETAC/QQI accredited provider since 2008. However, a number of vulnerabilities were identified that had not been sufficiently ameliorated at the time of evaluation of the application for re-engagement. Despite, there being commercial arrangements in place with another organisation to deliver a validated programme on behalf of the applicant provider, there was a significant lack of detail and clarity in relation to the following:

- Which entity the learners had a contractual relationship with and who is ultimately responsible for the learner and delivery of programmes as validated?
- The delineation of roles and responsibilities in relation to the programme and the management of the contractual relationship, how quality of the validated programme was being assured by the applicant provider in terms of recruitment and selection of learners.

There was a lack of clarity in relation to the above in terms of information and communication with learners seeking to participate on the programme. Finally, there was also lack of clarity in relation to adherence to GDPR obligations. While it was indicated by the provider that data processing agreements were in place, the provider was not in a position to confirm that learners understood how their data was being used and shared between the parties and clearly gave permission for same.

Vulnerabilities in the new academic governance structure were initially identified with the provider. However, these vulnerabilities have been addressed as evidenced by an updated submission from Harvest Resources Limited including a more comprehensive quality assurance manual and learner handbook.

The Panel recommends that QQI can be satisfied that Harvest Resources Limited meets resource, governance and structural requirements after evaluating updated documentation subject to recommended conditions of QA approval and specific advices.

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

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.2.1(a)</b>	<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>	<p>Based on the process undertaken, evidence provided in writing/orally, there would not seem to be any issues in relation to this criterion. Evidence submitted is indicative that this is the case. Evidence included current public liability insurance and a letter from the company's accountants confirming that the accounts are up to date with returns required by the Companies Registration Office (CRO). The accountant's letter also confirmed that the provider's tax affairs are up to date and that it holds a valid tax clearance certificate.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>
<b>4.2.2(a)</b>	<b>Criterion:</b> <i>Does the applicant have a reasonable business case for sustainable provision?</i>	<b>Yes</b>	<p>Based on the process undertaken, evidence provided in writing/orally, the provider is a well-established provider in the sector, with a strategy for growth. The provider in the main delivers programmes for the corporate sector as part of upskilling and personnel development, and other programmes which lead to non-QQI accreditation. In terms of QQI the provider delivers a qualification that is required for compliance as part of the regulation in relation to the healthcare sector.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>





<b>4.2.3(a)</b>	<b>Criterion:</b> <i>Are fit-for-purpose governance, management and decision making structures in place?</i>	<b>Yes</b>	Based on the process undertaken, evidence provided in writing/orally, at the conclusion of the site visit the Panel was not wholly satisfied with the governance structures of the provider.  The provider's response to the Panel's recommended mandatory changes has fully addressed these concerns.
<b>4.2.4(a)</b>	<b>Criterion:</b> <i>Are there arrangements in place for providing required information to QQI?</i>	<b>Yes</b>	Based on the process undertaken, evidence provided in writing/orally, there is evidence of processes in place to provide QQI with information as required, including the holding of Results Approval Panels.  The provider also confirmed to the best of its knowledge this criterion is met.

## Findings

At the conclusion of the initial evaluation, the Panel was of the view that the provider's governance and decision-making structures needed to be further developed, clarified and strengthened in the following areas:

- the roles of the different governance units and their relationship to another
- the communication, reporting lines and accountability mechanisms
- the roles of the members and any restrictions on role combinations
- how members are recruited, selected and appointed
- how the structures underpin a clear separation between commercial and academic decision making.
- the sources of information and data that are used to measure success within the governance units
- the monitoring and review activities assigned to governance units
- the frequency of meetings.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate. Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

**4.3 Programme development and provision requirements:**

	<b>Criteria</b>	<b>Yes/No/ Partially</b>	<b>Comments</b>
<b>4.3.1(a)</b>	<b>Criterion:</b> <i>Does the applicant have experience and a track record in providing education and training programmes?</i>	<b>Yes</b>	<p>Based on the process undertaken, evidence provided in writing/orally, the provider has been registered with QQI (formerly FETAC) since 2008 and has been delivering accredited further education and training programmes since then.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>
<b>4.3.2(a)</b>	<b>Criterion:</b> <i>Does the applicant have a fit-for-purpose and stable complement of education and training staff?</i>	<b>Yes</b>	<p>Based on the process undertaken, evidence provided in writing/orally, the provider has a core management and administrative team, many of whom are industry professionals with a background in training/people development. The provider relies on a cohort of training staff to deliver programmes. The Panel met with an experienced trainer that had been with Harvest for quite some time.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>



<b>4.3.3(a)</b>	<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>	<p>Section 45(3) of the Act prescribes the following:</p> <p>The provider of the programme concerned shall—</p> <p>(a) co-operate with and assist the Authority in the performance of the Authority’s functions in so far as those functions relate to the functions of the provider,</p> <p>(b) establish procedures which are fair and consistent for the assessment of enrolled learners to ensure the standards of knowledge, skill or competence determined by the Authority under section 49 (1) are acquired, and where appropriate, demonstrated, by enrolled learners,</p> <p>(c) continue to comply with section 65 in respect of arrangements for the protection of enrolled learners, if applicable, and</p> <p>(d) provide to the Authority such information as the Authority may from time to time require for the purposes of the performance of its functions, including information in respect of completion rates.</p> <p>Based on the process undertaken, evidence provided in writing/orally, the Panel is of the view that the provider, and the core team, have the capacity to comply with the requirements set out in Section 45(3). It would be remiss of the Panel not to highlight the need for the provider to strengthen its programme governance function within the provider, to ensure full compliance with existing conditions of QQI validation, as it was clear</p>
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			<p>there was some lack of adherence to same in relation to the collaborative arrangement with LHP, in particular the primary contractual relationship with learners did not seem to be with the applicant provider, upon whose validated programme they were participating.</p> <p>The provider's response to the Panel's recommended mandatory changes has fully addressed these concerns.</p>
<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>	<p>A site visit could not occur due to adherence to public health guidelines, in response to Covid-19.</p> <p>The provider confirmed to the best of its knowledge this criterion is met.</p>
<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>	<p>Based on the process undertaken, evidence provided in writing/orally, there are quality assurance procedures in place in relation to ATP. However, there are issues in relation to access arrangements with LHP as second provider and the evaluation of learner needs to determine suitability for entry onto the provider's programmes.</p> <p>The provision of progression route options also needed to be strengthened and this was completed to the satisfaction of the Panel in their response to the Panel's recommended mandatory changes.</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>Based on the process undertaken, evidence provided in writing/orally, assessment instruments are devised and reviewed centrally in conjunction with training staff. The provider has processes in place for both internal verification and external authentication.</p>



			<p>The provider also conducts Result Approval Panels.</p> <p>The provider also confirmed to the best of its knowledge this criterion is met.</p>
<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>	<p>Based on the process undertaken, evidence provided in writing/orally, PEL is not applicable due to the short nature of the single module delivered on the only QQI validated programme (less than 3 months duration)</p> <p>The provider confirmed this to the best of its knowledge and this criterion is met.</p>

## Findings

The Panel was not in a position to conduct a physical site visit due to restrictions under public health requirements: a virtual, full-day meeting was held instead. The provider is well established with a strong team, a developed infrastructure and resource base in place

At the conclusion of the evaluation, the Panel was of the view that there were vulnerabilities in terms of access to programmes in particular in the following areas:

- In relation to the provider's programme it emerged that the arrangement is that another organisation is permitted to advertise and recruit onto the programme and is also permitted to charge learners directly for course fees. While the applicant provider still delivers the programme to the learners and quality assures this aspect of it, it would seem that there are separate and distinct contractual relationships being formed with the learners and the other organisation which is recruiting them and not with the applicant provider. Although there is some benefit to the learners as a result of this arrangement, as they benefit from a state subsidy provided through the other organisation there is a lack of detail or governance of the recruitment and selection process employed by the other organisation. It would certainly be likely to cause confusion with learners as to who their primary relationship is with. Such an arrangement in its current form would not seem permissible as the applicant provider has ultimate responsibility for their validated programme and the learners which participate on such programmes.
- The provider confirmed that there is not a single formal learner selection process and interviews are not conducted routinely. There is no detail in the QA manual as to how learners are assessed for suitability for entry or the procedure by which this is established. More detail and documentation are needed in relation to entry requirements and the assessment of the learners to determine their suitability for programmes, including in relation to English language requirements as part of entry



criteria and verification of same. This should be clearly reflected in procedures and information to learners including on the website. Monitoring and review of the effectiveness of such measures should be reported on and overseen by the relevant governance unit while ensuring academic decision making is not unduly impacted by commercial considerations.

The initial concerns of the Panel were fully addressed in the documentation subsequently submitted by Harvest which included a comprehensive quality assurance manual and learner handbook and following further engagement with the provider at a reconvened meeting on the 23 September 2021.

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

The provider is well resourced, with a strong management, administrative team, experienced and committed trainers and access to external expertise so capacity is present; however, ensuring compliance with certain regulatory requirements needs to be strengthened through enhancing academic governance structures and activities in the key areas outlined in this report. The Panel this recommends that QQI refuse to approve Harvest Resource's QA procedures pending mandatory changes.

Appropriate evidence was submitted as part of the provider's resubmission for reengagement, to indicate that the provider clearly has the capacity to provide sustainable education and training within its current scope of provision. This is evidenced through the documentation submitted by Harvest which included a comprehensive quality assurance manual and learner handbook and confirmed through the Panel meeting with the provider at a reconvened meeting on the 23 September 2021.



## Part 5 Evaluation of draft QA Procedures submitted by Harvest Resources Limited

The following is the Panel’s findings following evaluation of Harvest Resources Limited quality assurance procedures against QQI’s Core Statutory Quality Assurance Guidelines (April 2016) and Topic Specific QA Guidelines for Blended Learning. Sections 1-11 of the report follows the structure and referencing of the Core QA Guidelines.

### 1 GOVERNANCE AND MANAGEMENT OF QUALITY

#### Panel Findings:

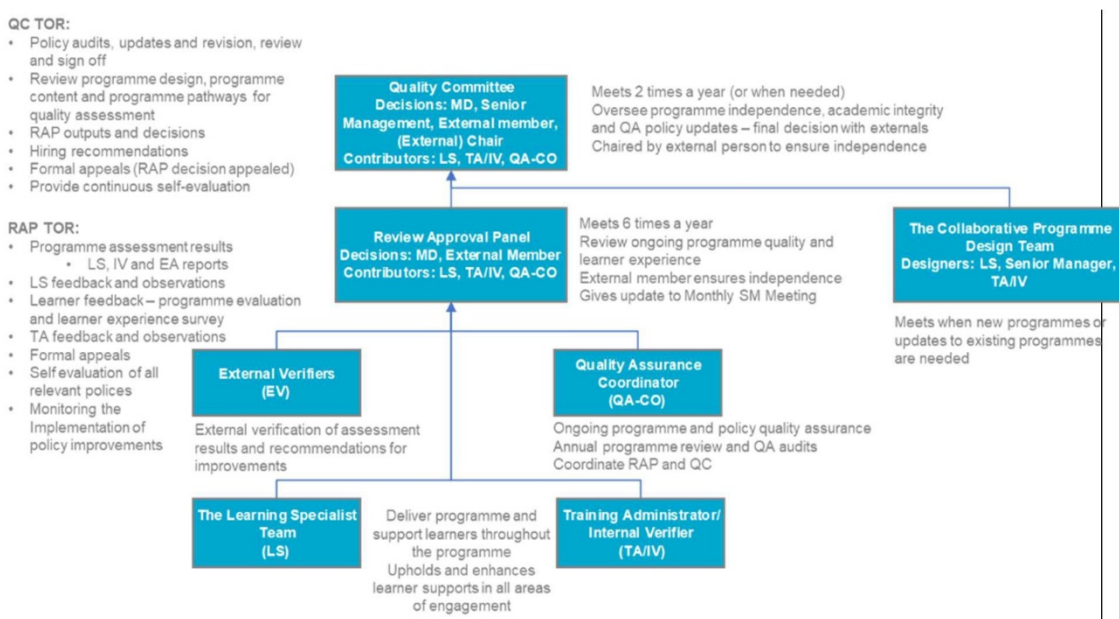
The Panel had noted that there was a complex company structure within the provider, and there was a number of connected companies in the group. At the site visit the provider was requested to go through its company structure, which was presented as three separate companies as follows:

- Harvest Resources
- Flex Labs
- Harvest Training Academy

Harvest Resources Limited is the main company and the company which holds the status as a legacy provider and is subject to reengagement and is the only entity, subject to reengagement being successful, that can apply and secure QQI validation for programmes of education and training. Flex Labs is Harvest’s e-learning company that provides support to Harvest Resources and Harvest Training Academy is a smaller company engaged in delivery but not with QQI validated programmes.

The Panel examined the membership and Terms of Reference (TORs) of all governance units prior to the meeting with the provider. It was clear that the provider was attempting to create a comprehensive system of governance to support quality programme delivery. It was understood by the Panel that the development of governance systems is a newer dimension to quality assurance policies and procedures and can be particularly challenging for smaller providers. It is emphasised that the governance system for a small provider needs to fit its context and therefore does not have to be the same as for other larger providers.

The governance structures were presented as follows:







The Panel noted that in the documentation there was reference to a collaboration with Newcastle University in the area of e-learning and were interested in how this may have informed its approach to reengagement and academic governance. The provider advised the Panel that this had occurred with Flex Labs and Newcastle University and DCU but as a separate company, and also that it was geared mainly towards the corporate learning setting. Harvest Resources benefits from being able to tap into the expertise of Flex Labs to improve delivery, but it is operated as a separate entity within the group.

The governance structures of Harvest Resources were explored with the provider. There were a number of positive aspects to the structures including an independent external chair on the Quality Committee which has decision making powers and there was demarcation in terms of roles in the governance structures between decision makers and contributors when units are in session. The Chief Executive did express a commitment to externality as part of governance by having an external Chair, that has the final say on the Committee. While the membership of the Quality Committee is heavily populated with personnel from senior management, with potentially strong commercial aspects to their roles, the Panel were satisfied that the Committee would not be unduly influenced by such considerations.

The provider was asked to 'walk' the Panel through policy development, and there was a clear understanding of identifying a need, then depending on the nature of the policy the appropriate working group would be selected for developing it, and if an appropriate working group wasn't in place, a new one could be established, the importance of consulting all relevant stakeholders as part of development was emphasised and then it would go to the Quality Committee for approval and then post approval it would be disseminated, become part of documented QA and then become subject to auditing (as part of monitoring and review). How monitoring and review processes operated was then explored, and this was identified as a gap area which the new QA Co-ordinator would be taking to the Quality Committee. It wasn't clear whether the new QA Co-ordinator would be doing this as part of a working group or in conjunction with a working group. Agreed models for policy development should be utilised and consistently applied as part of governance structures and this should be reflected on by the provider.

It was not completely clear from the documentation initially supplied, how the academic governance structure interacted with the management structure of the company. Working groups and operational groupings seemed to also be represented as governance units. In addition, in certain parts the QA Co-ordinator was reporting directly to the Managing Director and then in other aspects of the documentation the role reports to the Quality Committee. It was not initially clear who should be directing/informing the work of the QA Co-ordinator in terms quality assurance and enhancement initiatives; is it working groups, governance units, the Managing Director or a combination (and if so, how was this reflected in terms of the division of responsibilities and functions in terms of quality assurance in terms of governance). It was also noted that the Managing Director is also participating on the Quality Committee as are other Directors. It was also not clear how the work of the working groups was being informed and directed as part of quality improvement cycles. Some of the governance units despite having an important and significant workload were ascribed meeting schedules that did not seem to correspond with their role and function. How the different governance units interacted within one another also needs further development as it was not clear. The initial concerns of the Panel were, however fully addressed in the documentation submitted by Harvest in particular through a comprehensively revised quality assurance manual and further engagement with the provider at a reconvened meeting on the 23 September 2021.





In addition, reflection was also required in terms of who should head up working groups, and then restriction on role combinations needed clarity to ensure personnel involved in development do not end up on governance units as part of decision making in relation to policies/procedures/resources they had been part of developing. The Panel emphasised the need especially in small providers to avoid 'group think' and ensure full separation between those that develop and those that approve.

In relation to this, there was a discussion around how candidates are selected for participation on governance units; whether selection criteria had been devised and also whether there were limits on tenure, especially for external candidates. This was identified as a gap, and in addition, the Panel advised that transitional arrangements should be in place, to allow for external members to be replaced at the same time and for 'hand over' and 'extension' periods to be prescribed to allow smooth transitions. The provider identified selection criteria such as learning and development experience and experience in accreditation and using interviews as part of selection procedures. The Panel pointed out that specificity in this regard would be required, e.g. what qualifications, what length of experience and also setting out the recruitment and selection process in detail in order to assess candidates effectively against the agreed criteria. It would also be important that the external members are not in the employ in other ways with the provider that would impact on their level of independence.

A system of governance within a provider of education and training programmes must ensure sufficient separation between commercial and academic decision-making, in order to protect the integrity of academic processes and standards. In this report, the Panel makes no suggestion that commercial interests have unduly interfered with academic decision making, and it further notes that the provider is reputable and held in high regard in the sector, but academic governance and decision making requires strengthening and clearer separation from commercial decision-making.

The task for the provider within the educational context is to move to an enhanced system of academic governance which is clearly embedded into the decision-making processes of the organisation. Academic governance should provide for restrictions on role combinations to ensure appropriate separation of decision-making functions. This includes a function in relation to the consideration of risk and the monitoring and review of operational activities. The Panel was initially of the view that academic governance units should be empowered to formulate appropriate responses to risk, ensuring academic standards and assuring and enhancing quality in aspects of service and in light of self-evaluation (monitoring and review processes), and be empowered to ensure follow-up occurs at the operational level thereby promoting transparency and accountability within the organisation. It should be clear what monitoring and review functions are assigned to which governance units. However, for example it was unclear what governance unit is charged with the function of ensuring compliance with programme validation agreements in particular as they related to collaborative provision as certain aspects of the arrangement with LHP would not seem to be consistent with QQI programme validation. The initial concerns of the Panel were, however fully addressed in the documentation submitted by Harvest in particular through a comprehensively revised quality assurance manual and following further engagement with the provider at a reconvened meeting on the 23 September 2021.

The requirement under governance of having appropriate separation of academic decision making and commercial decision making was explored with the provider. It was clear that the management take their roles very seriously and within that role would find themselves attempting to quality assure service delivery from this perspective. It was clear from speaking with staff, that the first avenue in terms of informing their work and decision making would be to go to management.

However, it is important that academic governance is fully embedded within the provider. As a result, the academic governance unit should have assigned functions in terms of maintaining oversight and being



responsible for academic decision making in relation to academic standards and the quality assurance of the processes within underpin this that are not unduly influence by commercial considerations. It is important to note that the provider did emphasise the proposed mechanism that external parties within the current governance structure can escalate issues without the need for management agreement, however, with strong management presence in every governance unit as a smaller provider, how this could operate in practice is worthy of reflection.

The Panel was initially of the view that the clarity and precision of the governance structures and their terms of reference need to be strengthened in relation to:

- the roles of the different governance units and their relationship to another
- the communication, reporting lines and accountability mechanisms
- the roles of the members and any restrictions on role combinations
- how members are recruited, selected and appointed
- how the structures underpin a clear separation between commercial and academic decision making.
- the sources of information and data that are used to measure success within the governance units
- the monitoring and review activities assigned to governance units
- the frequency of meetings

The Panel noted that from speaking to staff at different levels of the organisation, there were different names given to the governance units, some used Results Approval Panel versus Review Approval Panel and there was not always clarity at all levels in terms of the function of the units, and 'what' went 'where' under governance structures. The Panel encouraged the provider to fully implement recommended changes and ensure that new governance processes would be embedded in the organisation for staff at all levels with clear communication and participation opportunities thereby further promoting a 'quality culture' within the provider.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the concerns that resulted in mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



## 2 DOCUMENTED APPROACH TO QUALITY ASSURANCE

### **Panel Findings:**

Harvest Resources Limited documents its QA system within its Quality Assurance Manual, with policies and related operating procedures, handbooks and forms. In addition to the Manual, there is also a learner handbook and training staff are provided with teaching and learning resources and assessment instruments. The provider uses an online system to support its quality assurance activities.

Initially, there were key areas of vulnerability identified in the documented approach in that it was difficult to navigate and lacked procedural specificity. While there was some evidence there was some regard to the applicable statutory QA Guidelines, it was difficult to see how they had been interpreted in a manner that would meaningfully inform the day-to-day work in the provider and enhance quality. The manual was more a series of statements on 'what will be achieved' and less about 'how it will be achieved' which involves setting out a clear process and procedure that will inform the staff of the provider in terms of carrying out their work and also how the success of such processes and procedures will be measured, monitored as part of quality improvement cycles supported by the academic governance structures. In addition, documents that are more appropriate to appendices such as learner handbooks should be presented in this manner. For example, the learner handbook should be extracted from the QA manual. Language and terms need to be used consistently and roles should be used and not the names of individuals.

However, it is important to point out that the management and administration team and the teachers interviewed are highly committed and learner focused. From discussions with staff, it emerged that there were additional areas of good practice that were informal in nature, and which need now to be formalised and reflected in the QA manual. The Panel was initially of the view that the documentation needed to 'catch up' with some areas of practice.

The provider also indicated that the learner handbook was still under review and that it would be the responsibility of the QA Co-ordinator to complete this process. This seemed to have been carried out as a management function and there was little reference to how this exercise was connected to the academic governance structure, and whether the Quality Committee should actually sign off on this, rather than the QA Co-ordinator or Managing Director in a siloed fashion to the governance structures.

The content of the QA manual must have sufficient policy and procedural specificity to inform day to day work in a meaningful manner and all areas in line with the thematic areas of the statutory QA guidelines needed to be reviewed in this regard. Updates had already been identified.

The content of the QA manual also needed to be strengthened in terms of being more:

- accurate
- user friendly
- role-driven

The presentation of the QA manual needed to:

- be laid out in a user-friendly manner
- lend itself to future updates
- be consistent in its use of terminology
- be suitably indexed (including appendices)



The Panel also reviewed the provider's Quality Improvement Plan and Risk Register and made the following observations:

The Quality Improvement Plan needed to be strengthened in terms of:

- clarity on what needs to be achieved
- metrics used
- time frames
- priorities

The Risk Register needed to be strengthened to be:

- role-driven
- prioritised
- clearer on the maintenance of the register in terms of inputs and outputs e.g. a clear process for determining how risks are included and how risks are addressed and removed, and the implementation of same.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



### 3 PROGRAMMES OF EDUCATION AND TRAINING

**Panel Findings:**

The provider has a very limited scope of provision in terms of QQI validated programmes, which takes in one Level 6 programme in management but of which only one module in leadership is delivered leading to a component award. All programmes are legacy programmes which were validated prior to 2018. The style of delivery is in the main short courses, often offered on a part-time basis with higher frequency. The programme is currently delivered over 5 days, generally over a 5 week period.

It was clear from the meeting with the management team and trainers that the ethos for programme delivery is learner centred. A tangible passion for helping the learner progress through education and training was evident from the team.

The provider described to the Panel the learner life cycle from recruitment to progression on their programme and there was a lot of emphasis on communication and care for the learner. In general, the potential applicant will express an interest in a programme and will then be spoken with directly to answer any questions. While the provider advised that guidance was offered to the learner as an applicant to the programme, there seemed to be no formal, documented assessment of needs, and selection process. Initially, assessments, including those in relation to English language proficiency, were carried out on a more informal basis. The approach taken seemed to be mainly in the form of guidance rather than specific assessment. One of the main reasons for this, was because the only programme delivered by the provider is a singular Level 6 module, which is directed at persons holding a management role in nursing homes, the majority of applicants would in all likelihood have a third level degree and be proficient in English. While that may be the case for this programme, the provider also indicated that they intended to develop more programmes for QQI validation in the future and thus more procedural and process orientated approach to access would be required, including the assessment of the suitability of learners based on their educational experience, language proficiency and learning needs.

RPL was explored, and the Panel was advised that this would be centrally managed through the QA Co-ordinator but at the moment with the only programme in delivery being one singular module at Level 6, no demand for RPL had really arisen as the applicants are pre-qualified by virtue of their profile and role and qualifications required for such appointments. It was highlighted that in terms of future proofing, a clear process for reviewing the different types of RPL and confirming where the final decision as to whether it could be offered would lie. If it lay with the Quality Committee, then as it only met twice a year currently this would be problematic.

The Panel was of the view that it would be important for the provider to have clear entry criteria on its website for each programme, which included English language proficiency requirements so that learners would be empowered to make informed choices at the outset. In addition, applicants should have their suitability assessed against such criteria as part of a formal process to ensure programmes applied for meet their learning needs. Learners accessing programmes through other organisations such as LHP should have the same level of information and be subject to the same access processes as set out in the provider's QA manual.

The management of access to the programme when advertised by LHP was identified as problematic and potentially very confusing for the learner. Learners are being recruited and selected by LHP and



the contractual relationship is forming with LHP as they are in receipt of course fees. However, the provider was adamant that the learner was recognised by the provider as being *their* learner from the start to the finish of the programme, and that any queries arising in selection processes were referred to Harvest.

There was also a discussion in relation to the quality assurance processes for work-based elements of programme delivery. The provider works with a network of nursing homes within which the learner is working. The provider confirmed that work based assessment took place as part of the programme, however, a quality assurance gap was identified which is dealt with in more detail later in this report. Staff described an open and communicative approach being maintained with both trainers and learners as part of programme delivery. It was also clear from the discussions with the provider's management team that there is an emphasis on a collaborative approach being taken with learners, tutor and supervisor, with significant value placed on both formal and informal communication, taking feedback and reflecting on same.

The area of progression opportunities and guidance provided in relation to same was also explored, with the provider. As the programme delivered leads to a single component award, further accredited training opportunities with the provider are very limited. Learners are advised of opportunities in third level sometimes are referred to PLC colleges to complete a full Level 6 award. There was some formal information to learners on progression opportunities but it was quite limited. It was recognised that more thought and direction was required in the area to guide learners better in terms of progression opportunities.

In terms of programme development, the 'Collaborative Programme Design Team' has been prescribed a programme development function. The process was outlined by the Learning Specialist as he had direct involvement in redesigning the QQI validated programme for online delivery with the Programme Design Team, supported by FLEX labs. The outputs of this team go for approval to the Quality Committee. Subject to recommendations that had been made previously in relation to governance, the provider should have had in place a programme development process, which ensured separation between those that developed and those that approved and this principle also applied to the development of resources for programmes. It should also have been ensured that internal approval of new programmes developed occurred prior to a submission to QQI for programme validation. With the Quality Committee meeting twice a year, and with a learning resources approval function as espoused by the provider, this seemed to be an infrequent meeting schedule for such a function.

Finally as part of the response to the Covid-19 crisis, the Panel were advised that the programme had been subject to redesign in conjunction with FLEX labs for online delivery subject to bi-lateral agreements with QQI which permitted same in the current public health crisis. Learners were recruited as class under the model and had access to a VLE and learning hub.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest





Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document cross referencing appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate. Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.

#### **4 STAFF RECRUITMENT, MANAGEMENT AND DEVELOPMENT**

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

There was focus in this area by the Panel on the recruitment and selection of teaching staff. The provider has a stable pool of learning specialists from which to draw. There was evidence of Harvest's approach to recruitment and selection when sourcing a new learning specialist. This included establishing criteria for the role by programme area, including specific qualifications, experience, an ability to deliver utilising their qualifications and experience, and that the candidate demonstrates an attitude which values the learner. The applicant will then be subject to an interview and if successful will take part in an induction process and the opportunity to link in with more experience members of staff. In terms of managing staff, there was evidence of monitoring systems including a mechanism for taking feedback at the end of programme delivery from the learning specialist also. Formal and informal meetings occur with training staff to discuss any issues arising and the core team with core contracted trainers will often work together to develop resources for teaching and learning. Many of the members of the management and administration team had experience in training and development and this is utilised to support training staff. EA reports are shared with training staff, demonstrating a collaborative approach to continuous professional development.

During the meeting, the Panel met with a learning specialist with particular regard to teaching and learning approaches. The interviewee had significant experience in training and development and was also mentoring newer staff and is the main learning specialist on the QQI validated programme. He confirmed that he felt supported in terms of pursuing professional development and also spoke of a positive work culture. Staff are also given opportunities to engage in devising assessment, teaching and learning resources, programme/module content and programme development.

The Panel also explored the supports provided to assist learning specialists transition to remote delivery, and the provider advised that as their sister company Flex Labs with expertise in the area of e-learning, upskilling programmes had been commenced with staff prior to the Covid-19 crisis and associated public health restrictions. Staff had been, and are currently being up-skilled in the use of TEL tools to create more interactivity as part of teaching and learning in the VLE. After the full move to remote teaching, these upskilling events were escalated.

From the information the provider has furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.



The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.

## 5 TEACHING AND LEARNING

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

Multiple examples of good practice in teaching and learning were provided by management and training staff during the meeting with the provider. The provider's teaching staff outlined practices that were indicative of learner-centred pedagogy. The passion of management and training staff in terms of supporting the development of their learners and facilitating progression really shone through in the discussions. The provider develops teaching and learning resources based on the relevant learning outcomes centrally and administers them to training staff. When content, assessments etc. are developed they are shared with training staff for consultation and comment.

During the meeting, the Panel met with a member of the provider's training staff with regard to teaching and learning approaches. The learning specialist interviewed identified the biggest challenges in the area as being the move from face to face to online but did emphasize that the teaching staff had started using TEL tools prior to the emergency remote learning response, and this had been supported by their sister company FLEX labs which is a connected digital learning company. The learning specialist had indicated that there had been previous resistance to a move online within the nursing home sector but with the crisis there was no choice but to move online.

The Panel invited the learning specialist to walk them through his pedagogical approach for delivering the QQI validated programme. He advised the Panel of the following which occurs whether Harvest recruit and select directly or LHP does:

The following sets out the approach to teaching and learning on the programme leading to the QQI award, including the use of a flipped classroom model and engagement with learners in terms of their progress:

1. Learners have an opportunity as part of access procedures to identify whether they have any special learning needs and this information is shared with the Learning Specialist.
2. A 'Tech Check' is completed with each learner in advance to induct them into the VLE, and any TEL Tools that will be used and to ensure they can log in and access the relevant resources. It is at this session that the contact details of the course administrator and Learning Specialist is provided.
3. A WhatsApp group is established for the learners with their consent. Access to the tutor and other participants is provided via this chat group.
4. Notification via email of course commencement and pre-set assignment issued.





5. The Learning Specialists gives feedback on the pre-set assignment completed by each learner and directions are given on developing an improvement plan coming out of this. Doing this work remotely then allows live sessions via Webinars to be used most effectively.
6. Learners are also directed to the Learning Hub on the VLE for additional resources
7. Mentoring calls are made to individual learners to ensure they are up to date with the work they are completed asynchronously, and if there are missing anything the Learning Specialist will follow up with them directly. Access to the Course Administrator and the Learning Specialist is provided to learners between live sessions. Learners can contact them directly and privately of their volition to request additional support. Where learners are anxious about the online learning environment or have additional learning needs, slides can be sent on in advance of live sessions.

Arising out of this discussion, the Panel queried how it was ensured that there was the appropriate level of engagement by the learner in the VLE. In other words, what was put in place by the provider to mitigate a lack of confidence and engagement of a learner. The learning specialist emphasised that due to the profile of the cohort of learners for the QQI validated programme, confidence with learning was generally not the issue, but engagement especially with online delivery was the key challenge. The learning specialist emphasised the importance of the 'Tech Check' induction for learners as being very important, having the support of an administrator who is also online and can assist learners with technical difficulties. From a pedagogical perspective, the learning specialist emphasised the importance of using the correct TEL tools with the learners and not using too many different types and this becomes counterproductive. Live sessions on Zoom are limited to 1 hour and using tools that are interactive such as Padlet. Sessions are designed to be in a ratio of 2:1 of experiential learning with peers in breakout rooms and using interactive tools, to presentation style delivery by the learning specialist. The learning specialist sets up the break-out rooms to have a mix of learners with different profiles and then checks in with the different break out rooms when they are being used, providing support where necessary to ensure all learners are contributing.

The extent to which the learning specialist had to upskill for online delivery was also queried, however, the learning specialist with whom the Panel met was very experienced and as he had been doing upskilling sessions with Flex Labs, he had developed quite a lot of capability for online delivery prior to the emergency remote teaching response which became operational due to the Covid-19 crisis. The Programme Design Team supported the learning specialist in converting the course for online delivery.

The issue was raised by the Panel as to how quality delivery would be supported if another Learning Specialist or contracted trainer were to be used to deliver the programme/module. The Panel was informed that there was another learning specialist who also delivered the programme/module leading to the QQI award, and they had shadowed the more experienced learning specialist as part of online delivery and the use of TEL tools, and they had also been subject to induction and orientation training. Internal verification of standards occurs, and External Authenticators provide feedback on programmes and assessment processes. The learning specialist confirmed that feedback of this nature is acted upon and learning specialists are encouraged to keep up to date in terms of the knowledge, skills and competences. Learning specialists also complete a programme evaluation report upon completion of the programme, and the learning specialist was confident that the feedback was considered. It was clear that the learning specialist was certain which governance unit had responsibility to receive such feedback and ensure that it was acted upon.



The learning specialist was asked whether teaching and learning was subject to learner feedback and it was confirmed that it was as part of the learner survey at the end of the programme, the last learner survey had an uptake of 80% of the learners. The question was also posed as to whether issues had been raised by learners and if so, what they were and whether they were acted upon. The learner specialist advised that there had been negative feedback around technical issues such as background noise during live sessions, which was taken onboard by the learning specialist, but the majority of the feedback was very positive.

Overall, the Panel was impressed with the knowledge and commitment of the learning specialist, and the good practices outlined. It was recommended that inductions to TEL tools should be phased and not occur all in one go at the beginning i.e. there is an induction just prior the introduction of the new TEL tool (to support any provided at the start of the programme), as learners can only take in so much as part of the initial induction.

The Panel recommended that the good practices outlined would be reflected in the quality assurance documentation to ensure that they would not rely on an individual learning specialist on an individual basis, and that quality would be promoted and supported as part of the quality assurance system. This would become increasingly important where the provider pursued more QQI validated programmes in the future.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



## 6 ASSESSMENT OF LEARNERS

### **Panel Findings:**

Policies and procedures on fair and consistent assessment of learners are set out in the QA manual. The updating of assessments occurs centrally, where necessary. The Programme Design Team oversees the quality assurance of the assessments and resources developed for programmes. From discussions with training staff, the above approach to assessment seemed to be favoured; however, the training staff were also keen to point out that new ideas in terms of developing assessments and resources are welcomed. New tutors are mentored in relation to the marking of assessments during their induction phase.

It was confirmed to the Panel, that work based assessment for the module is occurring. However, it is not subject to formal quality assurance procedures. This had been identified as a gap which would need to be addressed, which would include identifying the qualifying criteria for work based assessors, procedures for conducting work based assessments, verification of same, and training for work based assessors to ensure adherence.

For QQI programmes, Internal Verification (IV) occurs and the relevant forms are distributed to the appointed internally verifiers. External Authenticators (EA) are selected for the examination of learner evidence at the end of a programme cycle. However, there did not seem to be a formal process recorded for the appointment of EAs or restrictions on their tenure despite it being confirmed that EAs were selected based on their qualifications and experience. Indeed, a new EA has just been selected as part of the Panel for the provider and was approved by the management team rather than by a governance unit. The Panel currently has two EAs and multiple certification periods are utilised. Borderline grades are dealt with as part of the IV and EA process, and form part of the sampling strategies for the provider. It is recommended that should the provider increase programme delivery for QQI validated programmes this pool would have to be increased in a pro rata fashion to the scope of delivery. Moreover, the appointment of EAs should be examined by the relevant governance unit, and subject to recommendation/approval within such a governance unit.

The provider also has a policy for learner appeals, with a specific application form and stated deadlines. For learner appeals an external subject expert is selected. The Panel did recommend that an appeal is an extreme measure and that there should be options below an appeal which are made available to learners such as inspection by the learner or rechecks with the tutor or another assessor within the provider before putting a learner to the expense and delays involved with processing an appeal.

The provider has a Results Approval Panel (RAP). This Panel examines EA reports and affirms that learners have met the required standards through assessment to be put forward for the relevant award. It was not clear whether the findings from EA reports then go for examination by the Quality Committee. The learning specialist interviewed advised the Panel that at the last RAP Panel meeting it was identified that there was an increase in grades in the cohort of learners being examined over the previous cohort and this was gone through in detail and that where anomalies are identified the RAP do review and make recommendations for implementation to ensure grading is fair and consistent.



The learning specialist was keen to point out that learner attendance has improved as part of online delivery and there was a knock-on effect for improvements in the quality of assessment work and grade distribution as a result. Learner surveys showed that learners found it beneficial that travel time was removed as part of doing the programme.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification. This proved valuable in providing clarification in relation to the membership and duties of the RAP.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.

**Panel Findings:**

It was very clear from the meeting the management team and trainers that the ethos for programme delivery is learner centred. The Panel explored the area of supports for learners with management and teaching and learning staff.

It had been identified in the previous section (3) on programmes of education and training, where Access, Transfer and Progression were dealt with, that more formalised and documented processes were needed in this area to include the assessment of learners with additional needs as part of access procedures. There also needed to be more information on such processes and supports available before commencing the programmes and during the programme.

The learning specialist interviewed set out a range of supports offered which included:

- Clear contact people for learner support provided to learners (programme administrator and learning specialist) and an overview of the programme is provided
- An induction into the programme which involves a 'Tech Check' and includes an induction into TEL tools which will be used and what they will need to participate effectively
- Peer learning and support is facilitated through the use of break out rooms during live sessions and a WhatsApp Group
- Mentoring and follow up calls take place with learners to ensure they are managing their course work and any disclosures in relation to additional needs can occur as part of this also, and where necessary additional supports are put in place.

Due to the nature of the programme - one Level 6 module and the profile of the learners (employees in a senior management role in a nursing home) - there is less scope for additional learning needs arising. However, the provider did express a desire to develop more programmes for QQI validation and where the scope of provision is increased, formalised procedures that address the area of assessing learners for additional support requirements, ensuring resources to provide necessary supports are available, and the quality assurance processes to ensure interventions and supports are effective need to be present and reflected in the QA documentation.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines couldn't be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document cross referencing appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices. The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



## 8 INFORMATION AND DATA MANAGEMENT

### Panel Findings

The provider has a dedicated section in its QA manual on information and data management. There is a dedicated member of the team responsible for data protection. The provider also has a policy and mechanism for dealing with version control of its QA documentation to ensure staff are accessing the most up to date information. However, the specificity and format of the section was lacking and real specificity needed to be strengthened to ensure it contained procedures that inform the work of the provider in this regard and would be connected to quality improvement cycles. For example, it was not clear how the Learner Management System operated and how this enhanced access by learners to relevant information and data, or how the outputs of such a system were used as part of quality assurance processes. This relates to the issues that had already identified with the documented approach. Were the scope of provision to increase, the need for clear and formalised procedures that address this area sufficiently becomes all the more crucial.

In relation to data management and third parties, the provider confirmed there were data processing agreements in place. However, the provider could not confirm that learners were clearly made aware how their data was being used and transferred between the relevant parties and if their permission to do so was secured in advance. Concerns were also raised in relation to the use of a WhatsApp group and whether a more appropriate facility could be used as part of the VLE to encourage peer engagement and engagement with relevant learning specialists and support staff.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document cross referencing appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.

***Panel Findings:***

The provider operates a website which the Panel explored in advance of the meeting. There were concerns expressed about the lack of detailed programme-related information on the website e.g. details of entry criteria for the programme. The issue was also raised in relation to the programme being offered by LHP through its website. In advance of the virtual site visit both sites were looked at by the Panel and it was concluded that the structure and information to learners would give rise to confusion as to who was the actual provider of the programme, and therefore who the learner was contracted with and had ultimate responsibility for their experience on the programme.

It should be clear from the public facing information that a learner will be in a position to know with whom they have contracted, who is clearly responsible for the programme, what the programme will involve, the possible outcomes in terms of certification, and the associated fees and progression routes from the programme. It is this information that enables them to make an informed decision about the programme.

Again, were the scope of provision to increase, the need for clear and formalised procedures that address this area sufficiently becomes even more crucial. It was noted by the Panel in it was prescribed in the provider's QA documentation that upon the provider successfully re-engaging with QQI there would be a dedicated section of their website for their quality assurance documentation.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



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

Harvest Resources Limited has a collaborative arrangement with LHP (Leading Healthcare Providers Skillnet), where the latter advertises Harvest's QQI validated programme, which has one module on leadership and is directed towards those holding the senior management role of 'person in charge' within a nursing home setting. It would seem that LHP does the recruitment and selection and charges the course fees, and then Harvest is paid a fee to deliver the programme to the learners. Harvest then delivers the programme under its QA processes in the usual way.

Private/independent providers are required to have effective quality assurance procedures which must *'include provision for engagement with external partnerships and second providers...including sub-contracting of provision'*. In the interests of transparency and accountability providers are required to publish the details of all such arrangements including the nature of the collaborative relationship.

A private/independent provider is required to exercise due diligence prior to entering into collaborative arrangement. The relevant guidelines provide a non-exhaustive list of indicative areas that private/voluntary providers should consider before determining whether to enter into a collaborative arrangement with another provider. These include legal, reputational and compliance requirements, resource, governance and structural requirements and programme development and provision requirements.

As part of monitoring procedures a private/independent provider is required to review and evaluate quality. A fundamental requirement of a provider's quality assurance system involves the monitoring and review of its programmes of education and training including the quality assurance system and procedures which underpin these. In doing so, existing effective practice is identified and maintained, while areas needing improvement are addressed. Implicit in this is the requirement that Harvest has the ability to conduct this type of monitoring in all aspects of programme delivery including access procedures and be in a position to adequately remedy deficiencies regardless of who is in given charge of any particular aspect of the programme.

Pursuant to the Qualifications and Quality Assurance Act 2012, the provider that applies for validation in its own right to QQI and who is successful in securing validation is the body responsible for every aspect of delivery of that programme. Where collaborative provision involves a contractual arrangement that permits another provider to deliver one of the provider's QQI validated programme(s), it requires detailed formal and legal agreements. Such agreements should set out clearly the expectations, the key performance indicators (KPIs), the processes that are to be followed (including quality assurance processes), how monitoring and review will be managed (including the recording of same), and how non-compliance will be dealt with (including investigations and sanctions). This will often take the form of a detailed 'contract for services' which is supported by a document which sets out operationally how the contracted training will be managed to guide both parties. This aspect often takes the form of a dedicated quality assurance manual. The quality assuring of contracted training requires dedicated and experienced personnel to ensure adherence through monitoring and managing the process which should include formal records of site visits, monitoring reports etc. This is required to protect the learners, ensuring they receive the same service as they would if the programme was delivered by the primary provider, and to address the potential reputational risk posed to the primary provider, the sector, QQI and the National Framework of Qualifications.





In the case of this provider, the nature of the commercial arrangement with LHP is governed by a very brief service level agreement/contract and the nature of the arrangement is limited to the recruitment and selection of learners but also involves the taking of course fees by LHP directly from the learners. This creates a contractual relationship between LHP and the learner directly, despite LHP not being the provider to which the programme was validated for delivery. It then seems that Harvest is then contracted to deliver its own programme. Whilst the quality assurance implications for learners is mitigated by the fact that Harvest is the main delivery agent for the programme, the aspect that LHP manage directly (i.e. programme access, including the assessment of the suitability of learners), there does not appear to be any clear procedures on how this is sufficiently quality assured.

It was not clear that Harvest had a direct contractual relationship with all learners recruited and enrolled on the programme by LHP and this raised legitimate concerns. For example, were a learner to be enrolled and not assessed sufficiently and it was subsequently found by Harvest that the programme does not meet the learner needs and therefore the suitability of the learner for the programme comes into question, the learner at that point has contracted with LHP for the programme and not Harvest. It was also noted by the Panel that the arrangement did bring a benefit to the learner, in that by registering with LHP they qualify for state subsidies and therefore pay a reduced course fee. However, the arrangement as it stood did not seem to be consistent with QQI programme validation and in essence it would seem to represent a contractual arrangement whereby LHP are permitted to advertise, recruit, select and receive course fees and then Harvest become a second provider by contract for their own validated programme. The programme would also then be subject to an evaluation by Skillnet as the provider of state funding to LHP, which accounts for the reduced fees paid for by learners. If the learner is not satisfied with the delivery of the programme by Harvest, they could as part of the evaluation advise Skillnet of their dissatisfaction.

While collaborative arrangements in relation to QQI validated programmes are currently limited to the arrangement with LHP, it would be necessary to address the area of collaborative provision in general and, in particular, how it would relate to the contracting out of education and training services to second providers. It was recognised that contracting out the delivery of a provider's validated programmes presents a significant level of challenge in terms of regulation and compliance and risk to reputation of not just to the provider but also to the regulatory and qualifications system.

Notwithstanding this, the challenges were not insurmountable and collaborative arrangements could bring many benefits, which include access to another provider's resources and expertise. To sufficiently address the associated risks, however, the provider needed to review this aspect of their quality assurance as a matter of urgency, including but not limited to, publishing the details of the nature of the commercial arrangements, providing for detailed contractual agreements, as well as dedicated and appropriately detailed documents on the management of second providers. This could be prepared in the form of a manual to quality assure all aspects of the relevant collaborative provision of programmes, thereby ensuring learners experience the same standards in all aspects of the programme. At the time of the initial evaluation, there was insufficient quality assurance procedures to approve this provider for collaborative provision with second providers.

In terms of Harvest Resources Limited using a second provider to deliver its programmes, detailed quality assurance procedures to underpin such arrangements have not been presented to the Panel. The area of collaborative provision and using second providers currently consists of a series of very short aspirational statements in the QA manual on pages 229-230 and could not be considered as the type of detailed procedures that could be considered for approval in this area. Notwithstanding this, as the only collaborative arrangement that was put forward by the provider as part of reengagement is one more akin to a strategic partnership with LHP rather than a second provider relationship, this was evaluated under



this area. Even though the partnership does seem to be of limited scope and does not consist of sub-contracting the delivery of the programme to a second provider, the issue of the compatibility of such an arrangement with QQI validation agreements may still arise. Compliance would need to be ascertained by the provider and this is the type of issue which should be picked up on as part of programme governance which should include monitoring programme validation compliance and ensuring adherence. Subject to the outcome of the aforementioned compliance check, should the arrangement be permissible the quality assurance of the recruitment and selection processes operated by LHP and the issue of who has ultimate responsibility to the learner would need to be addressed.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently in so far as it applies to the current strategic partnership with LHP and subject to compliance with QQI validation requirements as part of implementing the relevant mandatory changes.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate. Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.

## **11 SELF-EVALUATION, MONITORING AND REVIEW**

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

The provider has engaged in significant self-evaluation as part of the re-engagement process. There is ample evidence that the provider has updated their documentation and has established governance systems which at their core are aimed at establishing a cycle of self-evaluation, monitoring, review, improvement planning and implementation. The documentation and governance system established by the provider were reviewed by the Panel and vulnerabilities were identified which have been outlined in Section 5.1., Section 5.2 and other relevant sections.

The Panel exploring the area of 'measuring success' with the provider. The provider indicated the following as measures of success within Harvest Resources:

- Level of certification
- Grade distribution
- How are learners getting on in their employment – for example, their ability to use new skills to improve their work

The following were identified as sources of data:

- Programme Report – Tutor/Admin which is generated within a management information system
- Learner Survey – Survey Monkey – this is the end of year survey results
- External Authenticators (EA) Reports and Feedback



The provider emphasised that this information is considered at their Review Approval Panel which was at times also referred to as their Result Approval Panel meetings, and then it feeds from there up to the Quality Committee. It was not completely clear which governance unit was actually responsible for formulating appropriate responses to issues and trends identified through the use of this data, nor which governance unit was responsible for ensuring the recommended responses were followed up on. This linked back to the need to strengthen the governance structures to ensure a quality improvement cycle is clearly embedded.

The Panel did query how employer feedback was collected and the provider response was that information was obtained from Nursing Homes Ireland, and that the Health Information and Quality Authority (HIQA) also recommended the qualification. The provider emphasised that a lot of the information collected and used as part of quality assurance was collected through informal means of staff interacting with learners and liaising with staff in the nursing homes as part of the work based learning and assessment elements. The Panel was of the opinion, that more formalised processes are required in terms of data collection and it would be useful to identify data and information sources that inform the work of the governance units within their TORs, and that governance would be strengthened in terms of clear responsibilities as part of quality improvement cycles to include planning, implementation, monitoring and review. While it was clear, that there is good practice in terms of responding to the needs of learners, it seemed more informal in nature. It was recommended that there would be more formal processes established and documented for the collection of learner feedback from current cohorts that would be used in a timely manner to improve the current cohorts' experience instead of just at the end of a programme cycle. The governance units should also be clear about the metrics which they would be using to assess performance and using the relevant data sources as part of this assessment.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate. Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

## **12 TOPIC-SPECIFIC QA PROCEDURES: BLENDED LEARNING**

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

The Panel noted that the current remote teaching provisions in place in response to the Covid-19 pandemic, which include wholly online delivery, are not part of the evaluation as they are separate and distinct and subject to a bi-lateral agreement between the provider and QQI. Instead, the evaluation focused on current practice and how it will inform the plan for the future after the conclusion of the aforementioned agreement.

Currently, the QQI validated programme in delivery is not validated for delivery via blended learning and the provider confirmed that it is its intention to have this programme revalidated for a blended mode of delivery post the end of the Covid-19 agreements with QQI, in addition to other new programmes also. The



provider confirmed that it would leverage the expertise of Flex Labs in this regard, and also the learning gained from remote delivery which has been achieved across teaching, administrative and management staff. The provider does have blended learning procedures devised which do have regard to the QQI Statutory QA Guidelines. As stated previously in relation to the documented approach, the QA manual would need to be revised to ensure it is a procedural document which will meaningfully inform the work of staff within the provider and it does include its section on blended learning.

The area of information to learners was discussed in particular in relation to bullying and harassment policies and online etiquette. The provider confirmed that this policy area needs to be updated in light of the online delivery and it was recommended by the Panel that learners would be educated in relation to online etiquette and clear expectations would be documented and communicated to them in this regard.

The Panel raised concern in relation the use of a WhatsApp group and this was discussed with the provider as it is encouraging learners to engage; however, what controls are in place in relation to this area? Staff did advise that it is monitored, however, it was agreed that it would be more appropriate to move this chat/discussion facility to the VLE and use an appropriate mechanism to achieve the same aim within that learning environment such as discussion boards.

From the information the provider had furnished, the Panel was satisfied that this area under QQI's Quality Assurance Guidelines could be addressed sufficiently as part of implementing the relevant mandatory changes. Should the provider be successful it would permit it to apply for validation for programmes using a blended mode. It would not permit a continuation of remote delivery post the expiry of current Covid-19 agreements with QQI without securing validation.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



## Evaluation of draft QA Procedures - Overall Panel findings

The Panel acknowledges the track record and established good standing of Harvest Resources Limited and equally the positive, professional and open attitude of the provider to the reengagement process, taking the view that it presented a valuable learning opportunity to improve the manner in which it delivers training services to learners. The positive disposition of the provider's team aided the examination of quality assurance processes conducted by the Panel in conjunction with the provider, in particular, as part of the full-day online meeting. The commitment, passion and experience of the management and support team was clearly evident.

The reengagement process has involved a comprehensive review by the Panel of Harvest Resources Limited's quality assurance (QA) manual, related documentation and a lengthy and robust review meeting. During the latter, the Panel engaged directly with key members of staff working at both executive and operational areas, achieving triangulation of information/documentation provided as part of the review. A learner-centred approach was evident across the organisation as a whole, with a clear commitment to supporting learners.

At the conclusion of the initial meeting with the provider, a number of areas of vulnerability were identified with the provider which related to:

1. **Governance Structures.** The Panel was of the view that the structures needed more development to achieve higher levels of clarity, connectivity, accountability and to ensure academic decision making was protected within the structures from undue influence of commercial considerations. Equally, separation between those that develop, and report into structures and those that approve as part of decision making within the governance structures needs clear separation and clarity.
2. **The Documented Approach to QA.** The content of the QA manual needed to be updated to have sufficient policy and procedural specificity to inform day to day work in a meaningful manner. It also needed to be strengthened in terms of its layout, consistency of language, role focus and lend itself to updates and version control. The specificity of Quality Improvement Plans and the Risk Register also needed improvement to be more meaningful and measurable to ensure performance could be accurately assessed.
3. **Collaborative Provision/Information to the Learner and Management of Learner Data.** The contractual arrangement with LHP needed to be strengthened, with greater levels of detail in terms of roles, process and responsibilities and, in particular, who is ultimately responsible for quality of the learner's experience and how the quality of this experience would be ensured. How such collaborative agreements would be communicated to the learner needs to be clearly provided for, so that the learner is clear with whom they are contracting and their entitlements under such agreements.
4. **Assessment.** Work-based assessment needed to be strengthened.
5. **Publication and Communication.** All of the above need to be reflected in the QA documentation, subject to publication and communicated clearly to all staff at all levels, learners and relevant stakeholders.



**QQI**

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Dearbhú Cáilíochta agus Cáilíochtaí Éireann

The Panel was of the view that the issues identified could not be addressed by the provider in a short timeframe and are therefore recommended that QQI refuse approval pending mandatory changes prescribed, in order to allow Harvest Resources Ltd sufficient time to submit evidence to the Panel that the mandatory changes identified had been satisfactorily addressed.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval and specific advices.



## Part 6 Conditions of QA Approval

### 6.1 Conditions of QA Approval

1. Harvest Resources Limited, is limited in their scope of provision insofar as the subcontracting of programmes for delivery by third parties was not part of their application for re-engagement and in line with their organisational strategy, as confirmed by the provider. Should this position change, Harvest Resources Limited is required to submit quality assurance procedures for contracting the delivery of their programmes to third parties.

## Part 7 Mandatory Changes to QA Procedures and Specific Advice

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes.

The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate. Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

### 7.1 Mandatory Changes

#### 1. Governance

The clarity and precision of the governance structures and their terms of reference need to be strengthened in relation to:

- the roles of the different governance units and their relationship to another
- the communication, reporting lines and accountability mechanisms
- the roles of the members and any restrictions on role combinations
- how members are recruited, selected and appointed
- how the structures underpin a clear separation between commercial and academic decision making
- the sources of information and data that are used to measure success within the governance units
- the monitoring and review activities assigned to governance units
- the frequency of meetings

#### 2. Documented approach to QA

The content of the QA manual must have sufficient policy and procedural specificity to inform day to day work in a meaningful manner. It also needs to be strengthened in terms of being more:

- accurate
- user-friendly
- role-driven





The presentation of the QA manual needs to:

- be laid out in a user-friendly manner
- lend itself to future updates
- be consistent in its use of terminology
- be suitably indexed (including appendices)

The Quality Improvement Plan needs to be strengthened in terms of:

- clarity on what needs to be achieved
- metrics used
- time frames
- priorities

The Risk Register needs to be strengthened to be:

- role-driven
- prioritised
- clearer on the maintenance of the register in terms of inputs and outputs e.g. a clear process for determining how risks are included and how risks are addressed and removed, and the implementation of same.

### **3. Collaborative Provision/Information to the Learner and Management of Learner Data**

The contractual arrangement with LHP needs to be strengthened in the following areas:

- clarity in terms of contractual obligations to learners
- clarity in terms of roles, process and responsibilities and in particular who is ultimately responsible for quality of the learner's experience and how the quality of this experience is ensured including oversight of how entry criteria to the programme will be consistently applied by partner providers
- clarity in relation to documentation supporting the arrangement
- clarity in relation to data protection obligations
- information to the learners in relation to all the above
- publication of the contractual agreement

### **4. Assessment**

Work-based Assessment needs to be strengthened to ensure:

- assessors are appropriately qualified and trained
- the roles and obligations of a work-based assessors are clear
- there are clear processes for internally verifying work based assessment and any follow up required with employers
- the integrity of the assessment process and national standards are protected

All of the above needs to be reflected in the QA documentation and communicated clearly to all staff at all levels. As outlined at the conclusion of the site visit, the Panel has also identified some "Specific Advices", which are set out below.





## 7.2 Specific Advices:

1. Programme validation should be sought for programmes that will be continued using a blended mode of programme delivery and be in place post the termination of emergency response agreements with QQI.
2. The use of WhatsApp needs to be reviewed and consideration given to moving these types of communications to a more appropriate environment
3. The Panel of the EAs would benefit from being widened and time limitations set on the tenure of EAs
4. Ensure pedagogy is leading practice in blended learning
5. Reflect good practice as far practicable in their QA documentation and disseminate as appropriate to staff.

The Panel reconvened on 23 September 2021 with Panel members having conducted a desk review of the evidence submitted by Harvest Resources Limited. It was noted that the evidence submitted by Harvest Resources Limited included a comprehensive quality assurance manual, a learner handbook and a document that cross referenced appropriate changes. The Panel also met with members from the provider again to discuss the resubmission and receive clarification as appropriate.

Following this engagement, it is the Panel's view that Harvest Resources Limited has addressed the proposed mandatory changes and has responded appropriately to the Panel's mandatory changes and specific advices.

The Panel consequently recommends that QQI approve Harvest Resources Limited QA procedures subject to recommended conditions of QA approval set out above and the following specific advices:

1. The operation of the governance units is reviewed within 2 years in line with the relevant statutory quality assurance guidelines.
2. A small number of inconsistencies and inaccuracies which were noted with the provider within the quality assurance manual, including in relation to roles of personnel in governance units and data protection legislation and these should be addressed.

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

NFQ Level(s) – min and max	Award Class(es)	Discipline areas
Level 6 only	Minor	Business and administration
Delivered via face-to-face and blended modes.		

**Part 9 Approval by Chair of the Panel**

This report of the Panel is approved and submitted to QQI for its decision on the approval of the draft Quality Assurance Procedures of Harvest Resources Limited

Name: PROFESSOR MARTIN MCKINNEY

Date: 29 SEPTEMBER 2021



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

Document	Related to
Application form for Re-Engagement	Corporate information; QA systems
Harvest Quality Assurance Manual (30.09.2020)	QA systems
Associate Learning Specialist – Role Description	Teaching & Learning
QQI Clarification Requirements Pre-Panel Meeting (11.12.2020)	Corporate and financial information; academic and corporate governance/reporting channels; QA systems; Teaching & Learning; e-learning competencies and LMS
Quality Committee overview document	QA system
QA framework flowchart	QA system
Accountants letter and financial statements (11.12.2020)	Corporate and financial information
QQI provider profile, awards per year, validated programmes	Corporate information; scope of provision
Venue checklist and guidelines	QA systems; Teaching & Learning
Harvest Consultancy Associate Agreement (specimen)	QA systems; Teaching & Learning
Record Maintenance/Retention Schedule (template)	QA systems
Meeting Agenda – Governance & Quality (template)	QA systems

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

Name	Role/Position
Nicola O'Neill (*)	Managing Director
Milla Clynes	Managing Director, Equality Officer
John Kilroy	Managing Director
Aoife Coonagh (*)	(Observer)
Brenda Sheridan (*)	Quality Assurance
Grainne Smyth	Training Administrator, Internal Verifier
Barry Kavanagh	Learning Specialist

**The Panel met with the Provider staff asterisked (\*) at the reconvened meeting on 23 September 2021.**

*Appendix: Provider response to the Reengagement Panel Report*

4<sup>th</sup> December 2021

Dear Marie,

Thank you for your email of 30<sup>th</sup> September 2021.

We are delighted that the panel is recommending that QQI approve our QA procedures subject to recommended conditions of QA approval and specific advice set out in the report.

We have completed a full accuracy check of the attached report 'Final Pre Factual Accuracy Reengagement Report Harvest Updated 24.09.21' and accept that it reflects the feedback discussed at the Panel meeting on the 23<sup>rd</sup> of September 2021. We have no factual inaccuracies to report.

We accept the recommendation of the panel and accept and agree the recommended conditions and specific advice in the report.

Regards,



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Nicola O'Neill, Managing Director, Harvest