



AONTAS Community Education Network Submission to the Quality and Qualifications Ireland (QQI)

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**Core Policy and Criteria for the Validation of Education and Training
Programmes by QQI**

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Introduction

AONTAS is the National Adult Learning Organisation, a membership organisation which includes over 500 members nationwide. AONTAS believes that lifelong learning is the key, not just to economic success but also to personal, social and cultural development and as such has a range of outcomes and benefits for the learner. AONTAS promotes adult and lifelong learning, provides an information referral service for adults who wish to return to education, and advocates on behalf of all adult learners. Our organisation receives funding from the Department of Education and Skills through SOLAS (the Further Education and Training Authority).

AONTAS has engaged with the QQI on the Joint QQI Community and Voluntary Sector Working Group¹ over the course of 2015, having participated in all 7 meetings and with representation from AONTAS Staff, AONTAS Executive Committee and the AONTAS Community Education Network (CEN). Having been fully committed to engaging with QQI, we have taken steps to ensure continued communication in 2016 between the community education sector, in particular the CEN, and QQI.

The AONTAS Community Education Network² welcomes the opportunity to engage in the QQI consultation process and this submission represents its commitment to the process. The paper outlines the main issues for community education organisations in order to shape QQI policies and procedures for the benefit of community education learners.

Fees

The main issue for community education providers is the inequitable proposal of fees for community education groups for re-engagement. Community education groups has faced severe cuts in recent years and quite frankly do not have any additional resources to pay fees. Any extra funding is used for provision of programmes for learners, the majority of which are the most educationally disadvantaged in the Further Education and Training system.

It has been broadly documented (Harvey, 2012), (AONTAS, 2011), (Cork City-Wide Community Education Network, 2015) that community education has faced harsh cuts since the recession. Furthermore, funding for Community Education from SOLAS distributed funds - at €10.58 million - represents 1.64% of the total SOLAS FET budget (not including PLCs) and is only 0.11% of the total education budget. It is important to recognise that community education is a poorly resourced part of the education system, but despite this, has built its capacity to deliver effective programmes (AONTAS, 2009, LCEN, 2011 and Cork City-Wide Community Education Network, 2015). The concept of sufficient resources must be considered broadly rather than just on monetary income e.g. volunteers play a significant role in community education provision thus bolstering its ability to deliver programmes within a context of financial constraints.

¹ <http://www.qqi.ie/Pages/Joint-QQI-Community-and-Voluntary-Sector-Working-Group.aspx>.

² The AONTAS Community Education Network comprises of over 100 independently managed community education organisations which work collectively to gain recognition for community education, raise its profile and lobby to ensure it is adequately resourced.

The issue of fees for re-engagement is a recurring theme that arises for members of the CEN. The reasons such as a stumbling block for re-engagement are as follows:

1. Under FETAC, community education legacy providers have demonstrated their ability to maintain their QA. The helpful *QA guideline comparison document* details the additional QA requirements, however the ability to meet the new guidelines is not the issue, rather it is the fees.
2. It is difficult for community education legacy providers to plan the best method of re-engagement without clear information on fees.
3. The prospective cost of fees takes away valuable resources which would otherwise be put into education provision. For example, it has been estimated that the €5000 re-engagement fee could cover the complete cost of a QQI level 5 Minor award for 20 hard-to-reach learners who would not otherwise engage in further education and training.

1. Sharing of Programmes (incl. Collaborative Programmes/Shared Curriculum)

It is vital that sharing of programmes for community education providers continue as per the previous FETAC arrangements. Our CEN members have a long and valuable history of sharing programmes with local ETBs. Many community education groups are supported by ETBs in a variety of ways including: via funding arrangements, staff support and importantly the sharing of programmes. The sharing of knowledge, expertise and resources at local level between ETBs and community education groups has supported quality provision and avoided duplication, thus ensuring the best use of scarce resources. Therefore, under the new arrangements for the validation of programmes, ETBs must remain in a position to share programmes with community education organisations. Not just in terms of curriculum, but to *validated programmes*. The proposal that all organisations who re-engage with QQI must have the ability to develop programmes, should not infer that all programmes must be developed by that group, there must be provision for the sharing of programmes. In addition, this would address the fee issue in relation to the validation of programmes - which is costly.

Our CEN members also require further clarification on the issue of shared programmes/curriculum (Section 5.7). The change of terminology with the use of 'shared curriculum' requires clarification in addition to 'differential validation', 'collaborative provision' and 'joint/parallel validation', including an outline of any proposed associated fees and application process for same. Section 5 does not provide a straightforward overview of the proposed processes.

2. Contracted Staff

Clarification is required with regard to the use of the term 'staff' throughout the document. This fails to acknowledge that many community education providers engage independent contractors (tutors) to deliver their programmes. This is the case across the education system, including higher education, where adjunct tutors/lecturers are increasing becoming the norm for programmes provision.

Community education organisations develop their own tutor panels which have been established over time and there is a documented process by which expert tutors are recruited. It is essential that

community education providers retain their autonomy in relation to programme delivery, based on their expertise and knowledge of both the sector and the learner needs. Recognition that staff, also includes contracted tutors needs to be reflected in the final policy paper.

3. Self-Evaluation

AONTAS welcomes QQI's statement at the recent briefing that guidelines for the self-evaluation process will be provided (without being prescriptive). In order to increase transparency, we would recommend that such guidelines are distributed to providers for comment.

Regarding the proposal to 'commission' an external evaluator for the purposes of self-evaluation (Section 8.4) - this would infer the need to use scarce resources on this process, clarification as to whether this is the case is required.

4. Protection for Enrolled Learners (PEL)

AONTAS welcomes policies that protect the learner as we believe this is paramount to quality provision, however QQI stated at recent briefings that they are discussing the difficulties posed by Section 65 in respect to the arrangement for the protection of enrolled learners. Clarification and the outcome of these discussions should be communicated as early as possible to providers.

5. Discipline-Area Based Approach

AONTAS welcomes appropriate initiatives which result in a more efficient process for the provider. We are seeking further clarification on the discussions around 'devolved responsibility'. While it was acknowledged by QQI at the recent briefing that this area needs further consultation with the sector, as there is no 'one size fits all' approach, additional guidelines are required.

6. Re-validation

AONTAS understands the requirement for programmes to remain current and in line with learner needs. However, the re-validation of programmes must be linked to need, for example, rather than a blanket date and time for re-validation, it should be as per the need of that programme (e.g. in line with new requirements - as is the case in childcare programmes at present).

A further concern is that in theory, providers could be engaged in the processes of re-validation and re-engagement at the same time. While it was stated at the briefing that this is unlikely, in theory it could still occur and we would welcome clarification on this.

7. Core Validation Criteria - Minor Awards

Minor awards are essential building blocks for learners as they promote accessibility and enable the learner to move up the NFQ in a manner that best suits their needs. For example, many educationally disadvantaged learners will start with a minor award e.g. QQI level 3, then move to a full award at QQI level 5. Rather than just focusing on completing full awards, minor awards act as a stepping stone to major awards. This flexible modular approach needs to be maintained, it is in keeping with national and European lifelong learning policy that seeks to enable learners to learn in a flexible manner and one which supports appropriate movement up the NFQ. In order to continue this flexible, modular approach, QQI must ensure that the validation of minor awards remains a possibility. To lose such an arrangement and

only focus on Major awards, does not serve all beneficiaries of QQI. A 'one-size-fits all' approach is not the most effective or efficient use of resources.

8. Timelines

Detailed timelines are required for providers at this point regarding re-engagement and re-validation timelines.

Conclusion

AONTAS and the CEN has made over 20 submissions to QQI regarding a variety of policies, has been an active and committed member of the QQI/Community Voluntary Joint Working Group and has recently met with QQI staff in order to ensure continued communication and collaboration. However, we have concerns that previous issues highlighted, particularly regarding fees, have been overlooked. We would urge QQI to acknowledge the time and commitment that AONTAS and the CEN has made to consultation processes and to act on the proposals put forward.