



AONTAS

■ RESPONSE TO:

*“TOWARDS A NATIONAL
FRAMEWORK OF QUALIFICATIONS
:A DISCUSSION DOCUMENT”*

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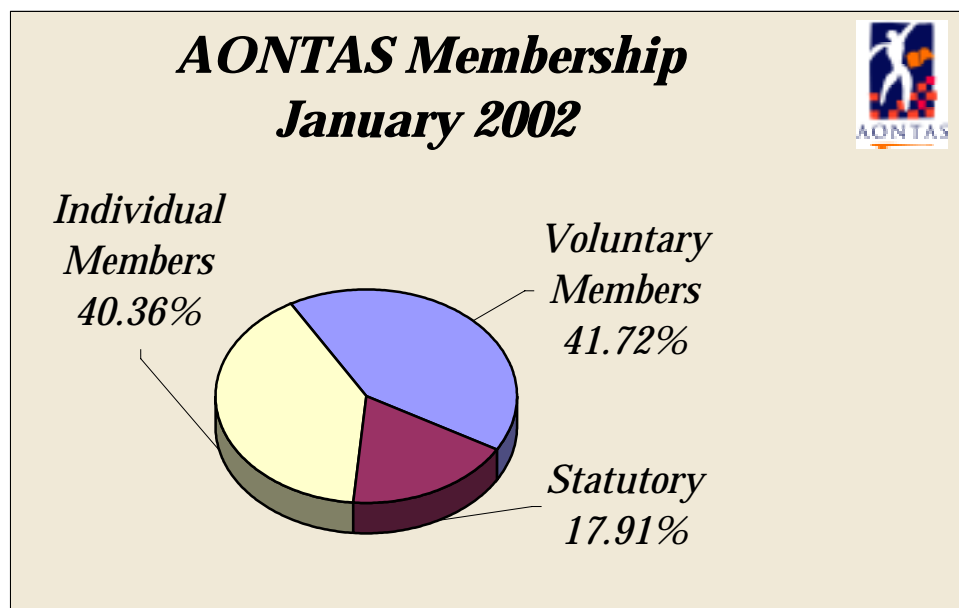
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INTRODUCTION

AONTAS is the Irish National Association of Adult Education, a voluntary membership organisation. It exists to promote the development of a learning society through the provision of a quality and comprehensive system of adult learning and education which is accessible to and inclusive of all. It is a voluntary organisation and a registered charity.

Established in 1969 it is an umbrella organisation whose members include providers of courses, organisers, tutors, learners and anyone interested or involved in adult education. Its membership currently is as follows:



Corporate (Statutory)	79
Corporate (Voluntary)	184
Individual Members	178
Total Membership	441

As can be seen from the chart AONTAS membership represents a wide and varied range of adults across a number of sectors, both statutory and voluntary. Adults availing of education and training opportunities across these sectors are not a homogeneous group. They include adults with a wide range of educational levels from primary, Junior or Leaving Certificate through to adults with further and higher level qualifications. They include people who are in paid work, unemployed, working in the home or as volunteers in communities. All adults have acquired a range of experiences and skills in the courses of their lives. The complexity and range of experiences and qualifications of the adult population, as well as the fact that they have many starting points and do not always advance in one direction, make the task of developing a framework of qualifications which is inclusive of their needs an extremely challenging one. Lifelong Learning is about more than just obtaining qualifications for economic reasons. Adult learners engage in learning, whether formal or informal for a variety of reasons. They will have different aspirations and

expect different outcomes at different times in their lives. AONTAS would like at the outset to emphasise that in terms of lifelong learning:-

- There is more than one kind of knowledge
- There is more than one kind of outcome
- There is more than one kind of measurement

The challenge for the NQAI is to develop a framework which is sufficiently flexible to allow for these realities. It must seek to develop a system which allows flexibility and coherence with regard to access, progression and transfer, yet which is transparent and easy to negotiate. The framework should be such that anyone regardless of age or qualification can enter, leave and re-enter education and training opportunities at any stage of their lives. While the principles laid down in the document appear to acknowledge these issues, the challenge will be to ensure that a variety of routes towards different levels of qualification will be included in the framework, and that third level education will be seen as one of these, but not the only goal.

In responding to the discussion document, AONTAS will examine it from the point of view of the learner since all of the issues logically centre on the learner as the key beneficiary of the framework. It will look at the development of the framework from the point of view of individual learners seeking to extend their current qualifications for their own personal, social and economic benefit, in particular those who have benefited least from the system first time round, and learners who need qualifications for work in the adult and community education sector itself. It will particularly focus on the needs of learners in the non-formal sector since this is the sector least understood by, or visible to policy makers, and is the one which will present the greatest challenge to the NQAI in developing an inclusive and flexible framework.

The work of AONTAS in relation to accreditation takes as its starting points:

- A belief in the importance of Lifelong Learning and the creation of a Learning Society aimed at maximising individual and collective potential and fulfilment.
- A commitment to access, progression and formal recognition/value for the learning achieved by all adults, in particular those most disadvantaged in relation to formal education and training opportunities

SETTING THE CONTEXT

Since the eighties the entire environment in which adult and community education operates has changed out of all recognition. There has been a major expansion in investment in the sector most recently in the wake of the White Paper on Adult Education, *Learning for Life*. The Adult Literacy Initiative, the Back to Education Initiative (BTEI) and the development of Community Education are three of the main areas of expansion identified within the Paper, and are the frameworks within which the most marginalized adults will gain access to education and training. Other policy documents such as the *Report of the Action Group on Access to Third Level Education (2001)* and the yet to be published report of the *Taskforce on Lifelong Learning* also contain important recommendations which, if implemented, will

impact on the accessibility and availability of education and training opportunities and qualifications for adult learners in general.

One of the most significant changes in the adult and community education sector since the early nineties is the increasing number of community-based and voluntary groups engaged in education and training activities at a local level. Many have joined AONTAS bringing with them new life, energy, approaches and issues. For a variety of reasons, the accreditation of learning achieved within these groups has become one of the most pressing issues of concern to AONTAS and for its lobbying in recent years. This work has been spearheaded by women's groups and networks, and more recently provision is being developed by and for marginalized men.

Through the AONTAS/NOW projects 1992-1994 and 1996-1997, AONTAS has been centrally involved in the diverse and complex issues related to the accreditation of community based and non-formal learning. In 1994, together with the Combat Poverty Agency, AONTAS published, *Can You Credit It*, the results of a baseline study into these issues. Since then the organisation has been working consistently to progress them both within the community sector and with the mainstream statutory agencies most centrally involved in delivering accreditation and policy development in the area.

In 1996 the Community and Voluntary Accreditation Forum (CVAF) was established as an ad-hoc group of National Educational/Training Organisations after the call by TEASTAS for submissions in March of that year. The Forum included AONTAS, Banulacht, Community Action Network (CAN), Creative Activity for Everyone (CAFÉ), Disability Equality Network, Irish Traveller Movement, Meitheal, National Adult Literacy Agency (NALA) and the National Youth Federation. The vision of the forum was to effect change at a systemic level through the development of a framework for accreditation and certification genuinely inclusive of organisations in the community and voluntary sector. The safeguarding of a shared ethos - a commitment to inclusion and empowerment - would be paramount to both the process and the outcome of developing the necessary framework.

In 1998 the CVAF with funding from the Combat Poverty Agency commissioned a research project which aimed to gather the information necessary for the development and sustainability of non-university routes to vocational qualifications for those wishing to work or already working in the community and voluntary sector. The idea was that the research would enable CVAF to progress its work of contributing actively to the development by TEASTAS of a National Framework of accreditation which would be flexible and responsive to the needs of those most usually marginalised by society. It would, it was hoped, also be capable of offering formal recognition with real value for the learning achieved through means such as community-based education, training and voluntary work.

This research, *Towards and Integrated Accreditation Framework*, undertaken by Nuala Lennon on behalf of CVAF was published in 1999 and made a number of recommendations which will be referred to later in this paper in the discussion of professionalisation within the adult education service. It is worth noting, however, that one of the main recommendations was as follows:-

“The Community and Voluntary sector, it appears, is a major provider of non-formal education and should be specifically represented on the proposed National Qualifications Authority and the National Certification Councils, both of which will be linked to the proposed National Qualifications Framework”.

AONTAS lobbied strongly for the implementation of this recommendation during the enactment of the Qualifications Act and was successful in achieving the aim of a seat for the Community and Voluntary sector on the NQAI. The aim was to ensure that there would be specific representation of the issues of adult learners, in particular those engaged in learning in the non-formal sector. NALA currently represents the broader Community and Voluntary sector and is charged with the responsibility of bringing the issues affecting adults in this sector to the Authority. This will involve a thorough identification of the key stakeholders in the sector, and a major consultation and representation role to ensure that the broad and varied interests of adult learners across the sector are included in the framework. Since neither FETAC nor HETAC include specific representation from the adult and community education sector, the role of the NQAI and its Community and Voluntary Sector representative will be vital in ensuring that the interests of these stakeholders are on their agenda.

MEETING THE NEEDS OF THE LEARNER

The most important and key question within the document is how the proposed framework will address the diverse needs of learners and in particular learners who have not had the opportunity to benefit from formal education first time round. Such learners tend to return to education via adult literacy provision, basic and second chance provision within the VEC sector and through locally based provision in the community. Since the remit of NALA is to deal with issues relating to adult literacy, the AONTAS submission will focus primarily on second chance and community education and progression from these to further, continuing and higher education options.

The White Paper on Adult Education developed a number of key proposals for adult education in key learning sites namely:-

- School-based or out of school further education provision
- Community
- Workplace
- Higher education

The Back to Education Initiative which is particularly aimed at those adults who have less than upper second level education has specified a number of entry points which are as follows:-

- Access to NCVA (now FETAC) Foundation Level or Junior Certificate or *equivalent* (writer's italics) levels of basic education for those who have no prior educational qualifications. A key priority is to provide an effective bridge to certified learning for those progressing from the literacy service

- Access to NCVA Level 1 or Leaving Certificate or *equivalent* (writer's italics) options for those who enter having completed lower second-level education
- Access to NCVA Level 2 or 3 programmes for those who have successfully completed upper second level education or who are in a position to successfully complete a programme at this level. Within this area, key priorities will be the provision of ICT, electronic, engineering and e-commerce training, the development of foreign language proficiency and the provision of childcare training.

The proposals for the BTEI are very specific and are particularly geared for qualifications relevant to the workplace. In particular the grouping of courses at Levels 2 and 3 are primarily vocational and represent a rather narrow range of options for adult learners. However the nature of adult learning is such that it involves a wide range of options across the economic, social, cultural and spiritual spheres. In developing a framework of qualifications which will live up to the principles and policies outlined in the discussion document, the NQAI must take a much broader view of education and educational qualifications than is presented in this section of the White Paper.

The development of awards which hold the equivalent value to those identified by the guidelines laid down in the White Paper presents a particular challenge for the NQAI. At the level of basic education this implies the exploration and development of different methods of assessment, the building of learning units as identified within the discussion document, and the linking of these units one with the other so as to ensure the learner can build a coherent path to his or her chosen goal. The learning units should not be strictly linear as learners may need to pursue a core learning module and build laterally depending on their requirements. Of key importance is the credibility of equivalent awards, in particular the recognition by employers as well as education and training institutions of their value. This will entail not only consultation with the employer stakeholders but also the development of working partnerships and pilot programmes aimed at developing best practice and promotion of the awards.

The White Paper further states in relation to BTEI that improvements in teacher/pupil ratios to 1-10 will be contingent on certain conditions. One of these is providing for access to national certification. This will, it states, be a pre-requisite for providers though not compulsory for participants. This raises important questions in relation to the flexibility of a qualifications framework. For many new learners, especially those who have been out of the educational system for many years, time is an important factor in building confidence, self-esteem and basic skills. It will be important to ensure that the requirement to provide certification should not be used as a compulsory condition for the learner. However at the pre-certification stage it should be possible to document progress and achievement in a non-threatening manner and to use this to the learner's advantage when he/she is ready to progress to accredited courses.

COMMUNITY-BASED LEARNING

The White Paper on Adult Education, “Learning for Life 2000”, particularly acknowledges the contribution of Community Education in the following areas:

- in reaching large numbers of participants, frequently in disadvantaged settings.
- in pioneering new approaches to teaching and learning in non-hierarchical community based settings.
- in taking the lived experiences of the participants as a starting point.

WHAT IS THE VOLUNTARY AN COMMUNITY SECTOR

For the purposes of this submission the Voluntary and Community sector refers to all organisations and groups established as a result of a voluntary coming together of people committed to developing a response to the needs of a particular community or interest group. The voluntary sector is extremely diverse. It includes organisations and groups which differ substantially in size, target groups, activity and orientation. Nevertheless voluntary and community groups share a number of characteristics e.g.

- most groups begin and may continue to depend on the active involvement of unpaid and voluntary workers in management and staffing.
- most groups are organised in such a way as to allow some level of active involvement and participation by consumers, clients and/or constituent groups.
- most groups have little stable, ongoing or guaranteed sources of funding and may rely to a large extent on voluntary fund-raising activities.

The community sector within the voluntary sector emerged as a significant social force during the 1980s and since then it has continued to grow in size, visibility and influence. Within the community sector there are many other subsectors, some of which include women’s groups, unemployment centres, community groups, men’s groups, youth groups and locally based education groups.

All of these groups and subsectors are involved in some form of education and training at all levels from basic to advanced. The courses delivered through these sectors range from literacy and basic education through second chance education, leisure, hobby and liberal arts courses to skills training programmes aimed at equipping people to work more effectively as resource people and professionals within the sector. The diversity and richness of the sector serves to enhance its responsiveness to the needs of its target groups, the accessibility of courses to groups usually excluded from educational opportunities and its effectiveness in terms of motivating and fulfilling the expectations of disadvantaged learners.

Nevertheless it does raise problems from the perspective of seeking to win formal recognition for the learning achieved. Diversity of provision from this perspective can appear as incoherent provision. The flexibility of the community sector in designing courses based on the differing needs of particular target groups does mean that there is a marked lack of consistency in relation to the subject matter, content, structure, materials, methodology, quality of tutors, level and standards of the courses

provided within the sector. Some groups already have links with statutory providers, in particular the VECs while others operate more or less independently. Many groups have developed links with community development training agencies for recognition of their training. One of the challenges for the inclusion of community-based learning in the overall qualifications framework is to find a way to retain the elements which make it effective for disadvantaged and excluded groups, while developing frameworks within which the learning achieved can be appropriately evaluated, credited and related to outcomes in more formal contexts.

As far back as 1994, *Can You Credit It*, found that 79% of learners and 74% of organisers felt that options for accreditation should be available to all participants engaging in community based education and training activities. The research identified a number of issues behind this significant and constantly growing demand for accreditation from the community sector:

- The right of adults, especially those whom the formal education system has failed, to gain credit for competency and achievement wherever it is won.
- The desire to increase the chances of accessing paid work, including paid work within the sector and the necessity of gaining formal qualifications to do this.
- The desire to progress to further and higher education and more formal training courses and the need to ensure access for those with no/low levels of qualifications for these courses.
- The need to meet the requirements of funders, particularly those of EU funding programmes.

The three most important issues relating to accreditation identified by stakeholders in the adult and community education sector are as follows:

- Access, progression and transfer for learners in non-formal settings to formal accredited provision.
- Accreditation for prior and experiential learning.
- Development of accredited courses designed to establish professional qualifications for work in the adult and community education sector.

ACCESS, PROGRESSION AND TRANSFER

Research by AONTAS and others has shown that there are a range of issues facing any adult student wishing to access formal education and training opportunities particularly at higher and professional training levels. These include cost of course fees, location of courses, structure/timing of courses, lack of advice and guidance services, lack of transparent information on entry requirements, lack of childcare, the lack of places for mature students in higher education institutions and lack of supports for adult students therein.

For demographic reasons, i.e. the numbers of young students seeking entry, Irish third level institutions are only beginning to acknowledge the demand for education which exists amongst mature students. There is also a marked lack of the support structures which adults, and particularly adults who have experienced educational disadvantage require in order to maximise their chances of success within a formal environment. This issue is identified in the definition of access in Ch. 12 of the discussion document (p.50). AONTAS welcomes the document's broader definition of access and supports the view that there is a need for provision of in-process supports and an examination of structure and delivery of programmes especially within the third level system. The *Report of the Action Group on Access to Third level Education* has made a number of recommendations in this regard. (*Chapter 4, Mature Students*). AONTAS supports these recommendations and urges the NQAI to examine how it can best play a role in progressing their implementation.

The different ethos, methodologies and approaches to learning which are characteristic of community and mainstream contexts can often act as a barrier for community learners and can mean that Foundation/Access type courses are necessary to bridge the gap between the two sectors. While there are a number of excellent Foundation/Access courses now available prioritising places for mature students who have experienced educational disadvantage, the accreditation for these courses is not necessarily recognised by the third level institutions into which students might wish to progress. This issue is addressed by *Recommendation 49* of the *Report of the Action Group on Access to Third Level* which states that:-

...the National Office should initiate urgent discussions among the NQAI, the Conference of Heads of Irish Universities, the Council of Directors of Institutes of Technology and providers of adult and continuing education and training, and of community education and training in order to achieve:

- *The development and recognition of systemised national entry routes to third level colleges other than through the Leaving Certificate*
- *The recognition of access courses within such a system*
- *The exploration of partnership models between the further and third level sectors and/or community education providers for provision of different modes of outreach access courses, including short term intensive courses, embedded within a national system of entry routes. Such routes must take account of the needs of adults in specific locations and in diverse local contexts*
- *The co-ordination of a nationally recognised and transparent procedure for assessment of mature student applications ,providing for flexible entry routes taking into consideration the needs of non-traditional higher education applicants, including APEL, portfolio presentation interviews etc.....*

AONTAS fully supports the establishment of the proposed mechanisms contained in this recommendation as a way of developing access and progression for adult students It would also add that mechanisms be developed to assess credits and awards by

HETAC (formerly NCEA), as well as other awarding bodies, for equivalency and transference to courses provided by NUI institutions and vice versa.

AONTAS is in agreement with the approach taken by the Authority in Chapter 12. Facilitating and Promoting, Access, Transfer and Progression. In particular its broader definition of access to incorporate completion of courses is extremely important and has implications for how institutions plan to support non-traditional learners. The capacity of such learners to succeed is reliant on supports described in a range of research reports and endorsed by the Action Group on Access to Third Level Education. The issue of under representation of particular groups of learners is also inextricably linked to the issue of cultural change at an institutional level. It centres round the notion that the opening up of access to non-traditional students will lead to an erosion of standards. This will be a key challenge for the Authority and has been identified as such within the document. While AONTAS agrees that it will need to be approached in a facilitative and advisory way at the outset, educational institutions may well need more direct approaches if they are to be persuaded to engage in the organisational and cultural change required to become more inclusive of a broad range of learners.

With regard to portal awards, while the value and credibility of the so called blue chip awards should be maintained there will be a need to develop new portal awards which will open up progression for community based learners. It will, however, be essential that such awards are credible and portable. This will require a willingness to be open to new approaches by both employers and education and training providers.

ACCREDITATION OF PRIOR AND EXPERIENTIAL LEARNING

Despite the pioneering work of the NCEA, NCEA and FAS, and a number of recent innovations within the university sector, there are generally poorly developed mechanisms for the accreditation and certification of prior and experiential learning. This is particularly the case for the accreditation of learning achieved within the non-formal adult education sector. This would involve a systematic method for documenting and assessing the learning outcomes and levels achieved through courses previously attended, or through the experience of paid or unpaid work in the community sector, and for relating it to the learning outcomes specified for courses in formal settings.

The dominance of assessment through written examinations, the focus on a narrow range of intelligences and a reluctance to recognise new areas of learning and new modes of assessment pose barriers to access and progression. The development of such a framework is no easy task. Chapter 12 identifies some of the difficulties involved and indeed anecdotal evidence suggests that current models of APEL could well create new barriers for the learner. The development of a workable model would require a significant investment of time, resources and expertise together with a degree of coordination probably unprecedented within the adult and community education sector. Yet it is a crucial step in setting up the infrastructure required to begin to establish equivalency between learning outcomes in formal and non-formal contexts. Pilot programmes developed on a partnership basis between statutory

institutions and the community-based sector could explore the advantages and disadvantages of an APEL system.

The White Paper on Adult Education, Learning For Life, discusses the Accreditation of Prior Learning and Work-Based Learning in the context of learning in the workplace. APEL should not only be considered in this context but should also take account of the wide variety of competencies people gain from different life experiences including involvement in the home and in the community in a voluntary capacity.

The recommendation of the White Paper that the NQAI in collaboration with the National Adult Learning Council, whose establishment was recently announced should explore the feasibility of a national training programme to develop a pool of highly skilled learning assessors is a possible way forward. The White Paper suggests that the programme be targeted at education and training providers and those in supervisory and management positions in industry. It is of crucial importance that education and training providers should include those involved in the community as well as mainstream providers. The learning assessor would, according to the White Paper, have the role of both guiding and assessing individual learners through the assessment process. The White Paper further proposes that following training and a quality assurance process successful learning assessors would be recognised by FETAC and HETAC and could form a panel which could be accessed through designated learning and assessment centres.

This proposal, if implemented across the formal and non-formal sectors could be a breakthrough in the development of progression routes across the sectors. Such a mechanism might address many of the difficulties identified by the discussion document in Chapter 12. It is essential that the development of mechanisms of Accreditation of Prior and Experiential Learning are not so complicated as to create a new barrier for adult learners. As mentioned earlier anecdotal information indicates that the current processes can be so time consuming and labour intensive that many adult students become resigned to traditional methods of assessment which can put them at a disadvantage. There is a danger that just because adult students come through non-traditional routes, they will be regarded as less able than traditional students and consistently over assessed. The development of mechanisms of assessment for APEL will need to be done in close collaboration with providers and learners in the non-formal sector.

At the outset a mapping exercise needs to be undertaken to establish the number and variety of community education and training providers. The new Community Education Facilitators could have a key role in this regard. However as new workers in the sector they will need time to establish themselves. They will also need the full support of the Community Education Technical Unit of the NALC, one of whose functions is;

“to promote in association with the NQAI the development of appropriate mechanisms for assessment and accreditation of community learning”.

Similarly the two other technical units of the NALC, Adult Education and the Formal Sector and Workplace Learning, have functions with regard to the development of accreditation in collaboration with NQAI. The recent announcement of the establishment of the Council is a major step forward. Establishment of the Technical Units is now a priority and will aid the work of the NQAI.

As well as establishing the number and variety of community education providers and the courses they provide, the mapping of existing links between the community/voluntary and statutory mainstream providers would be a useful exercise. It would provide information on models of best practice for the development of new links and would also identify where there are gaps and blocks in developing partnerships. Any links or partnerships made between the mainstream providers and the community education sector should recognise the independence and creativity of the sector. Mainstreaming community education practices should not result in these practices becoming institutionalised and outcome based at the cost of learner's needs and expectations. As mentioned earlier in the context of the BTEI, it is important that learners have a choice in relation to accreditation especially with starter courses which are geared toward developing confidence and skills needed for returning to education.

The strengths of the community education sector in reaching the most marginalised should be respected. The key will be to develop the building blocks or learning units which will carry credits and link into the mainstream system. Another important aspect will be the recognition of awards already received by learners from non-Irish accrediting bodies, particularly those taken before the establishment of the NCVA.

PROFESSIONALISATION OF THE ADULT AND COMMUNITY EDUCATION SECTOR

One of the major issues emerging in response to the Green Paper on Adult Education, *Adult Education in an Era of Lifelong Learning*, was the professionalisation of the adult education sector. The subsequent White Paper opened its section on Support Services with the Training of Adult Educators by stating:

“If the Adult Education Sector is to make the quantum leap envisaged for it in this White Paper it can only do so on the basis of a highly trained corps of adult educators and trainers who are dynamic and equipped to lead change, to play a key role in the policy debate and to reflect the distinctive identity of the sector in the field of professional practice and research”.

In its response to the Green Paper, *Making an Impact*, AONTAS on the basis of consultation with its member groups stated that professional qualifications should be placed firmly within the remit of the NQAI, its awarding bodies and the proposed Inter Agency Working Group on professional qualifications for practitioners of adult education.

The growth of the adult and community education sector has recently seen, and will continue to see, a growing number of employment opportunities related to a range of activities in the sector. These can include teaching, facilitation, management,

administration, information delivery, guidance and counselling among others. The development of the Adult Educational Guidance Initiative (AEGI) is an example of such a development and the experience at the pilot stage identified problems in relation to the absence of specific professional qualifications for those involved in the delivery of the service. The increase in funding invested in the sector brings with it the need for accountability and quality assurance. The organisation and delivery of provision implies a growing need for professionalism.

Currently people working within the adult and community education sector have a broad range of skills, experience and qualifications, but as yet there is no coherent career structure or quality assurance framework in place. Community education in particular has found itself increasingly pressured into providing accredited vocational training courses in order to access the funding they need to continue to meet the needs of their target groups.

As a result there is a proliferation throughout the sector of training courses at different levels, each developing its own content, structure, methodology, standards and forms of accreditation with no attempt to establish any coherence or consistency. Neither are there agreed currency values for the accreditation being offered nor are there valid and appropriate progression routes for the people being trained.

DEVELOPING PARTNERSHIPS

On the basis of a number of experiences of community groups seeking to design accredited courses with mainstream providers through the nineties a number of crucial issues were identified. There is the issue of the extent to which the mainstream provider can respect the community sector as an equal partner with a different but nonetheless valid and valuable body of expertise and experience without which a proposed course cannot be effectively designed. Community providers can bring to the task of course design a number of resources different to those of the mainstream institution but invaluable to the task:

- knowledge of the target group, its needs, issues and priorities.
- expertise in relation to the principles, philosophy and process of community development.
- a range of creative, experiential and participative learning methodologies.
- a range of methods for assessing competence and evaluating performances.
- a commitment to collective goals and processes.

It is a common experience that these resources are not always recognised or valued by mainstream institutions and that at some stage in the process of negotiation this will emerge. From a community perspective this appears to signal a lack of respect for what the community sector has to offer and a lack of trust on the part of mainstream

bodies in the quality and value of the expertise developed within the community sector. A typical bone of contention that can arise relates to methods of assessment. From a community perspective academic emphasis on writing as an assessment method is restricting and not always strictly necessary. Just as there are different ways of learning and different ways of knowing there are also different ways of demonstrating learning and knowing. To insist on one way only can be unnecessary, unhelpful and very restricting.

The most contentious issue that can emerge in attempts by the two sectors to develop accredited courses in partnership with each other have to do with the core political issues of ownership and control. For example, a community organisation can find itself asked by the delivering institution to contribute its expertise at design stage without being offered appropriate payment and without any guarantee of continued involvement in course delivery or even any guarantee that its contribution will be credited in course literature.

For a community group this amounts to an expectation that it hands over its “product” for nothing, or next to nothing, that it relinquishes any control over course methodology, ethos or assessment and that it has no say in relation to the ongoing accessibility of the course to the very people for whom it was designed. This can be experienced as exploitative and meaningless and does not create a good basis for equal partnership.

The fear is that the institution is using its expertise in order to develop a product for profitable sale to an expanding market without crediting the contribution of the community sector. At the end of the day a small number of community learners may benefit but there is no guarantee that there will be in existence an accessible and appropriate progression route for others. Mainstream institutions have a real, economic and political interest in holding onto their exclusive right to define competency and to award credit. It is of the utmost importance that the Authority in developing a comprehensive and inclusive framework find ways to encourage the development of real partnerships between the sectors and stakeholders. The Appeals roles of the Authority might be expanded to take account of these issues.

The research commissioned by CVAF and funded by the Combat Poverty Agency was a first attempt to examine the practices and standards of five selected practitioner learning programmes and to relate these practices and standards to those of similar selected programmes delivered in the formal education sector. The programmes examined included six non-formal Practitioner Learning Programmes (PLPs) ranging through information-giving skills, facilitation skills, capacity building and training of trainers. The three Formal Learning Programmes included; The Learning Wheel (CAFÉ); National Certificate in Training and Development in Adult Basic Education/Management (NALA/WIT); National Certificate in Training and Development, Community Education and Development (Access 2000/WIT).

The research found the following in relation to the partnerships for formal accreditation:-

Some partnership learning programmes (e.g. NALA/WIT; ACCESS 2000/WIT; CAFÉ/NCVA), have been very busy in reaching mutually agreed practices and

standards regarding several aspects of the learning programmes. These partnership learning programmes have been developed largely on the following principles;

- *trust and confidence in the expertise and ability of each partner*
- *acknowledgment, acceptance and valuing differences between partner's approaches*
- *mutual respect for the differing contexts within which each partner works*

It is not evident, however, that these principles form the basis of the majority of partnership approaches. The EU Employment funded programmes as well as other individual initiatives have highlighted a number of issues in relation to this partnership approach. The issues involve flexibility, ownership and control and costs.

With regard to non formal accreditation the report states:-

The second option appears to be the more favoured approach by deliverers within the sector. Generally, it provides an accreditation mechanism which is flexible enough to allow for routes to accreditation without damaging the creativity and flexibility associated with the work of many of the learning programmes offered within the sector (e.g. OCN accreditation structure).

However, the gaps in this type of non-formal accreditation are of serious concern to both the deliverers and the participants. These gaps focus on the progression routes, the linkages to other courses, the time factor involved in pursuing the accreditation and the currency of the accreditation. Underlying the currency of accreditation is the question of who promotes quality assurance aspects in relation to practices and standards of these learning programmes. Currently, there is no co-ordinated quality assurance system in place to monitor learning programmes. This results in poor transparency and consequently low levels of confidence in the programmes both within, and to a greater extent, outside of, the sector.

If education and training within the sector is to avoid further marginalisation and the implications this marginalisation has for participants, it is important that learning programmes within the sector are structured and accredited in such a way as to allow participants:

- *to avail of progression routes into further education and training within mainstream education*
- *to make transfers within and to other sectoral programmes and to mainstream programmes*
- *to obtain currency which is valid in the labour market*

To facilitate these aims, changes are required within the Community and Voluntary sector regarding transparency of practices in relation to the provision of education and training services within the sector, as well as, in relation to standards of knowledge and skills being transmitted by learning programmes. In addition, structures need to be put in place to allow for the development of credited learning modules which can be accumulated into substantial blocks. These learning blocks need to be structured so that they facilitate transfer to other programmes within the

sector. Furthermore, these learning blocks should (contingent on the co-operation of mainstream providers) eventually act as bridging programmes between sectors.

The report went on to recommend:

- *the establishment of mechanisms for dialogue between mainstream providers, other stakeholders and the community and voluntary sector.*
- *support structures to be established for a defined period of time to work on issues of accreditation concerning the community and voluntary sector.*

The issues identified in this research are of fundamental importance to the development of a coherent framework of accreditation for this sector and should be studied by the NQAI. Furthermore much more research needs to be done to build on the findings of this report and to inform the development of best practice. The other structures recommended by the White Paper relating to professionalisation of the sector, the Inter Agency Working Group and the Forum for Practitioners, should be set in place as a matter of urgency to examine the development of a quality service staffed by qualified personnel. The issues of access transfer and progression and in particular APEL apply to the professionalisation of the sector just as much as they do to individual learners progressing to further and higher educational opportunities.

With regard to the definitions of further and higher education this could be viewed as a matter of level in a hierarchical approach to progression. However many adult learners especially those in paid work may wish to develop new skills in relation to workplace needs. This is usually referred to as continuing education. Continuing education, however may incorporate courses which could currently be identified as both further and higher education. Either way there will be overlaps but the important issue will be the currency value of the course of study regardless of the level at which it is achieved.

GENERAL COMMENTS

- With regard to the overall thrust of the document AONTAS is broadly in agreement with the principles and proposed policies and processes.
- The principle of flexibility is particularly important when dealing with the learning needs of adults.
- There is a strong need for clear and simple progression routes for all learners wishing to achieve an award
- Recognised outcomes for learners should not only include academic knowledge
- Whatever awards that may be achieved under the new framework it is of the utmost importance that they carry national currency and credibility especially if new awards are being developed.

- In the proposed grouping of awards it is difficult to see where the needs of adult and community education fit. Given the current and future developments within the sector it may well merit a grouping of its own e.g. Adult, Community Education and Development
- All providers involved in the delivery of education and training services to adults whether in the formal or non-formal sector should be regarded as having equal importance in the context of the development of the framework
- There is a strong need for the development of meaningful and equal partnerships between mainstream education and training providers, community and voluntary sector providers and employers

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