



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

5th February 2016

Core Statutory Quality Assurance (QA) Guidelines

Contact: Niamh O'Reilly
CEO, AONTAS
2nd Floor, 83-87 Main Street,
Ranelagh,
Dublin 6
Phone: 01 4068220
Email: noreilly@aontas.com

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 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.

Comments on the Core Statutory Quality Assurance (QA) Guidelines

AONTAS acknowledges that QQI do not intend these guidelines to be a 'how to' manual for providers (page 6). However, a set of parameters would be beneficial in order to ensure that providers meet QQI requirements. Community education providers are capable of establishing internal quality systems and review systems. Therefore we would urge QQI to consider providing a clear outline of what is required to satisfy QQI standards.

In developing statutory core guidelines that are applicable across all types of providers and programmes, AONTAS would question the suitability of such an approach that treats an ETB, an Institute of Technology and a community education provider in the same manner. We propose that the guidelines take into account the size and scope of the organisation. The same processes for higher education may not be the most applicable or appropriate for further or community education.

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.

2.1.1 Governance

In terms of applying the same standard of governance across all education providers, the size and appropriateness for a “group or unit responsible for the oversight of a providers’ education and training, research and related activities are identified in the provider’s documented procedures” (page 14) would differ between providers. Such structures may be applicable for higher education institutions/ETBs with large numbers of learners but not for a small provider. Although the section does note that “where a provider’s scale is such that it cannot support internal committees, alternative arrangements are put in place to ensure objective oversight”, it must be stressed that for smaller organisations internal committees are appropriate and should be considered as rigorous as a “unit” for oversight.

2.1.2 Management of Quality Assurance

It states that a “resource base which is sufficient to ensure sustainability is required” (page 15), 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 total SOLAS FET budget (not including PLCs) and is only 0.11% of total education budget. It is important to recognize that community education is a poorly resourced part of the education system, but 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 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.

2.2.1 Documented Policies and Procedures

Regarding the point “cover any elements of a provider’s activities that are sub-contracted to, or carried out by, other parties both at home and abroad” (page 18), we would question the scope of this point. Taking into account that a large number of community education organisations are funded by ETBs, we would question whether the funding ETB would be responsible for the QA of the funded community education organisation/programme (whether it owns its QA system or not). If the ETB is responsible for the QA of the community education organisation who has its own QA system due to funding arrangements (via BTEI funding/ETB tutor hours etc.), this would add a great burden to the ETB and could potentially result in community education organisations losing ETB funding due to the extra work/responsibility that the ETB would face. If ETBs withdrew funding for accredited community education programmes carried out in small organisations this would have a devastating impact on community education resulting in a complete loss of accessible, locally provided community education programmes that reach the most educationally disadvantaged learners.

2.3.1 Programme Development and Approval

On page 20, a list of policies and procedures for programme design and approval are outlined. In addition, the sharing of programmes for community education organisations with approved ETB programmes must be permitted, as per the previous arrangements with FETAC. The sharing of programmes supports cost effective approaches to provision and avoids unnecessary duplication.

2.4 Staff Recruitment, Management and Development

Many community and voluntary further education and training providers engage with independent contractors (tutors) to deliver their programmes. Tutor panels from our member organisations have been established over a considerable period of time and there is a documented process by which expert tutors are recruited. Therefore we suggest that an additional comment is inserted into section 2.4 to reflect this. This will be an integral element of evaluations and reviews and therefore is required within the guidelines.

Furthermore, it is important to recognize that this issue of occasional/adjunct staff is prevalent across the education sector and due regard is necessary when making such assessments. It is not confined to the voluntary sector, for example, in higher education institutions it is estimated that a significant proportion of courses are provided by precarious workers (Courtois & O’Keefe, 2015).

2.5.4 Learning Environment

The learning environment is central to community education provision. In addition to the physical environment, an open, warm, engaging social environment is key to making the learner feel welcomed, their contribution acknowledged, and a democratic pedagogical approach that harnesses the learner voice is central to good practice. Adult learners have reiterated to AONTAS that process is key, and we would welcome its inclusion in the guidelines giving it equal weighting to the importance of an appropriate physical learning space.

2.6 Assessment of Learner Achievement

External authenticators have different views and expectations. Therefore we would recommend that a standard set of criteria, along with training for external authenticators would be of benefit to providers, authenticators and QQI.

2.7.1 Supports for Learners

AONTAS supports the centrality of the learner within the learning process. In relation to 1. “An integrated approach from the perspective of the learner”, and “iv learner representation” (page 33) informal and formal feedback mechanisms from learners to practitioners (and vice versa) have proved effective in raising the learner voice. An outline of such examples is available online³.

2.8 Management Information and Data

Whilst there are a number of initiatives in further education and training that will document learner information (e.g. SOLAS PLSS system), it is important to note that such facilities may not be available to all community education providers (or programmes) and therefore a full outline of the information required by QQI is required so that organisations can set up appropriate systems.

³ http://www.aontas.com/download/pdf/learner_engagment_seminar_report_final.pdf

2.10 External Partnership and Second Providers

The statement “the quality assurance procedures extend to involvement with external partnerships and second providers” (page 38). We would question the scope of this point. Clarification is needed on what is deemed a ‘partnership’, is it a funding relationship or is it in relation to QA. Taking into account that a large number of community education organisations are funded by ETBs, it would appear that the funding ETB would be responsible for the QA of the funded community education organisations/programmes (whether it owns its QA system or not). If the ETB is responsible for the QA of the community education organisation (who has its own QA system) due to funding arrangements (via BTEI funding/ETB tutor hours etc.), this would add a great burden to the ETB and could potentially result in community education organisations losing ETB funded due to the extra work/responsibility that the ETB would face. If ETBs withdrew funding for accredited community education programmes carried out in small organisations this would have a devastating impact on community education resulting a complete loss of accessible, locally provided community education programmes that reach the most educationally disadvantaged learners.

2.11 Self-Evaluation, Monitoring and Review

In the interests of ensuring that self-evaluations and reviews are conducted to the requirements of QQI, in-depth guidelines are required for this element of the process. This is to minimise the amount of time spent by providers contacting QQI to ensure that they are following the correct path and also to ensure that there is a uniform approach to self-evaluation, monitoring and review within the sector.

Annex 1 - Legal Basis for QQI Core Quality Assurance Guidelines for Providers

The legal basis for the following section is unclear: “The quality assurance procedures extend to involvement with external partnerships and second providers” (page 38). Section 28 (2) states each relevant provider and linked provider shall have regard to the guidelines issued by the Authority under section 27 (1) (a) in establishing procedures under subsection (1). From our understanding this would not cover a funded party and therefore funded organisations of an ETB should not be under the remit of the ETB QA if the funded organisation has their independent QA relationship with QQI.

Fees

The issue of fees for reengagement is a recurring theme that arises for members of the CEN. The reason fees are such a stumbling block for reengagement 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 reengagement 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 reengagement fee could cover the complete cost of a QQI level 5 Minor award for 20 hard-to-reach students who would not otherwise engage in further education and training.

Sharing of Programmes

The ability of community education legacy providers to continue to share programmes is essential. It avoids duplication and maximises resources and local expertise. In order for community education legacy providers to make an informed decision on reengagement, additional guidelines on both *collaborative sharing* and *collaborative development* would be welcomed in this document.

Templates

Members of the CEN have called for the publication of templates for specific areas of QA, in order to support a mainstreamed approach and as a tool to share expertise. In the absence of which, if each organisation has to create their own systems it is a waste of valuable resources. Rather than seeing a template as a check list, it would be useful to publish specific tools that support effective QA e.g. self-assessment report.

Information and Communication

The increasing number of consultative spaces provided by QQI (January/February 2016) is a very positive step to opening up the flow of communication between QQI and community education legacy providers. It is important that this open communication is maintained and supported. We would welcome further QQI events that support information sharing, the sharing of expertise and support for QQI reengagement. This would be particularly beneficial in terms of maximizing resources and supporting the development of local networking around QQI QA requirements. A clear Frequently Asked Questions section to the website would assist this further.

Conclusion

AONTAS CEN has made over 20 submissions to the QQI in recent years, AONTAS draws on the experience and expertise of its members and views it as a valuable resource. Therefore, we recommend that the QQI strongly consider the points raised in this submission in order to collectively develop strong QA within the community education sector.

The AONTAS Community Education Network is committed to continued engagement with the QQI in order to ensure that community education legacy providers are afforded the best possible opportunity to reengage with the QQI and thus deliver accredited programmes to adult learners.