THE AONTAS COMMUNITY EDUCATION NETWORK

QQI Re-engagement for Community Education Legacy Providers

- **A roadmap of scenarios for effective accredited community education provision
Version 2 (2015)**

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Summary

Issue: Quality and Qualifications Ireland (QQI) proposes to charge a fee for existing registered FETAC community education providers who want to continue to provide accredited programmes under the National Framework of Qualifications (NFQ). AONTAS Community Education Network (CEN) members have expressed great concern about this proposed 're-engagement' fee, which may amount to €5000. This means that if community education organisations want to maintain their own Quality Assurance QA in order to provide accredited programmes to learners they will have to pay a fee of €5000. This is in addition to other new fees e.g. for validating programmes. Community education groups do not have the funding to cover this fee.

Why this is an important: Community education provision is dependent on the ability to independently offer accredited programmes on the NFQ because it is a requirement for learners, who want accredited community education programmes, and funders who generally require groups to provide accredited learning. The proposed QQI fee for re-engagement will result in many groups not being able to provide accredited programmes to the detriment of community education learners and their communities. Community education groups are poorly funded and are fundamentally different in their ethos, approach, capacity and objectives to private providers.

Community education has been named in the SOLAS Further Education and Training Strategy as a key education provider within their social inclusion goal. Community education groups offer quality, education provision that is learner-centred and responds to the local community, it allows people to engage in education in a non-threatening, welcoming environment. It provides the learner supports and participatory learning processes that have a history of successful learner engagement and progression. Community education is a particularly effective way of reaching those distant from education and the labour market.

AONTAS and the Community Education Network (a network which comprises over 100 independently managed community education providers) proposes that a waiver should apply to independently managed community education providers and no re-engagement fee should apply. This is a provision in the QQI Act (2012)[1]

A roadmap for offering accredited programmes: We are cognisant of the need for community education providers to independently engage with QQI, however, we are aware that groups may want to engage differently. In order to ensure provision of accredited programmes for community education providers this paper outlines the practical aspects of alternative modes of accreditation highlighting the importance, the challenges and the best case scenarios.

Background

AONTAS and the AONTAS Community Education Network has a long history of engagement with QQI and the predecessor FETAC. Since the amalgamation AONTAS has engaged on a number of levels e.g. invited QQI staff to our Community Education Network meetings, we participated in joint meetings and made numerous submissions in response to their relevant Green and White Papers. These submissions highlighted the issues for community groups including proposed fees. However, despite extensive, detailed submissions to QQI, the issue of re-engagement fees for community education legacy providers remained. The AONTAS Community Education Network comprises over 100 community education organisations, almost half of whom are legacy providers and following the AONTAS CEN Focus Group meeting on 28th May, a position paper on the proposed QQI fees for re-engagement was developed in line with the views of CEN members and members decided to engage in advocacy work in order to raise the pressing issue of fees.

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[1] Qualifications and Quality Assurance Education and Training Act (2012) "exemptions and waivers may be provided for in specified circumstances" (Section 80, 3.13).

In light of the new policy documents on re-engagement the following issues for community education providers remain:

1. Uncertainty regarding fees for re-engagement is still the main concern for our members
2. The concept of capacity within the QQI re-engagement process is unclear
3. The level of support for groups who wish to enter the reengagement process is yet to be determined
4. Real, effective alternatives for groups who cannot re-engage are not clear, this is essential for groups' continual ability to provide accredited programmes for their learners.

The AONTAS CEN members have existing issues that require the QQI and the Department of Education and Skills to address:

1. Re-engagement Fees are still an issue and an unnecessary barrier for groups. Organisations are already considering their options and how they want to proceed, the fee shouldn't be used as a filter for determining which groups who are most serious about QA.
2. Community education legacy providers have made great strides to prepare for re-engagement and to look at their options. However, they need detailed information from QQI regarding what is involved in order to make an informed choice. In order to do so they need answers to questions:
    a. How will you assess capacity in the re-engagement application?
    b. Detailed guidelines are needed on what is required for re-engagement?
3. There needs to be far greater communication with groups regarding what is involved in re-engagement more generally. AONTAS is providing information to groups, answering queries, QQI needs to address this issue as they have the correct information.
4. Quality costs, the Department of Education and Skills need to look at how they are going to support the providers offering accredited programmes. There is a resource cost to groups in providing accredited programmes: either in terms of meeting the requirements of the ETB, as the integrity of the ETBs own QA is linked to the groups who go under it. If there are more stringent QA requirements for groups broadly, the Department of Education and Skills needs to provide the necessary resources to support this. Or if groups are going to directly reengage. In order to ensure effective QA resources for QA need to put into legacy community education providers.
5. It is not beneficial to learners, community education providers or ETBs to implement a one size fits all approach to QA for community education legacy providers. There must be flexibility, and a fair, reasonable approach taken by QQI to provide re-engagement options for legacy community education providers. Furthermore, not all ETBs have the capacity to bring all local legacy providers under their QA, many don't want to, and it doesn't suit all legacy providers. A centralised approach doesn't equal better QA, or a more appropriate QA. Therefore, the QQI must be open to, and provider appropriate support for alternatives.

The CEN will: Support legacy community education providers to collectively network at a national and regional level in order to strengthen their capacity to: engage directly with QQI; negotiate with their ETB regarding the most effective processes for going under their QA; and will offer continuous long-term collective support for monitoring changes and supporting/influencing policy development in this area. Already emerging in areas across Ireland e.g. Limerick, Longford, Wexford, Tipperary.

The following 4 scenarios outline how community education groups can still provide accredited programmes within the new QQI system

- Scenario 1: Community education legacy provider engage directly with QQI
- Scenario 2: Community education legacy provider goes under the ETB QA
- Scenario 3: Consortium approach with other legacy providers (not including the ETB)
- Scenario 4: Community education legacy provider does not re-engage with QQI and finds alternative methods for accreditation (e.g. City and Guilds)

Beneficial aspects

1. *If a community education group has their own QA this means they have a degree of autonomy over their accredited programmes.*
   Community groups are well placed to engage the most hard to reach learners who wouldn't participate in programmes in other institutions e.g. the ETB. Community education groups have organically grown in response to their community and have developed a proven approach, ethos and values that allow learners to engage in learning in a way that suits their needs. Having one's own QA means you have a degree of autonomy over your accredited programmes: e.g. you can develop accredited programmes for validation in response to the needs of your learners.

2. *Having your own QA means: you can choose your own tutors.*
   This is an essential part of ensuring a community education approach is offered to learners. Community education groups source tutors who understand their learner cohort, who bring a community education ethos and effective methodologies to engage hard to reach learners. This knowledge has been built up in the sector over years. This is essential for reaching and maintaining hard to reach learners. For example, a community education tutor who is not on the ETB panel, can be used, e.g. a specific tutor who, in addition to a qualification, has expertise in effectively engaging hard to reach learners in that community can be hired.

3. *Having your own QA means that you are more attractive to a range of funders.*
   - Groups are not restricted from providing accredited programmes from a range of funding sources. For example, if the community education group went under another organisation's QA, they may not be able to obtain accreditation for courses funded by other sources (e.g. outside the ETB). For example, funding from DSP or Pobal.
   - Funding applications are strengthened by having your own QA. There has been a move towards funding accredited programmes over non-accredited. Group who have their own QA can demonstrate good quality assurance practices are in place. We have received examples of why this is important by both an ETB staff member and also a Partnership staff member.

Challenges with re-engagement

1. Fees: if groups have to pay €5000 they are not in a position to re-engage. Due to the nature of the funding system for community education it is not possible. This cuts out community education legacy providers from the re-engagement process immediately.
2. Lack of clarity within the proposed re-engagement process
   a. There is a need for clear criteria regarding the concept of *capacity* in the re-engagement process
   b. There is a need for the publication of clear guidelines for re-engagement
   c. There is a lack of clarity regarding the 'fit for purpose' requirements within the re-engagement process
   d. Concern around the scope of access for groups also exists (e.g. will community education groups be confined to the lower levels of the NFQ?)
3. The QQI policy papers on re-engagement emphasise that capacity is a key indicator for successful re-engagement. The concept of capacity is also mentioned in Minister Jan O'Sullivan's letter. There are a number of points of note in this regard:

   I. Community providers went through rigorous testing before being granted FETAC QA, inspection occurred during monitoring visits, and QA has become an essential standard for centres
   II. FETAC invested significant time and resources into building the capacity of the community sector to create, and implement, good quality assurance procedures

III. The Further Education Support Service (FESS) has developed over the years an extensive range of supports to enable the community sector to implement good quality assurance procedures

IV. Community groups have developed their capacity and expertise in maintaining quality assurance. Some groups had monitoring visits and such groups had to demonstrate their QA processes, others were on standby for a visit. It was imperative that QA procedures were in place

V. Groups also had a number of good practices, for example quality is assured through the accreditation process:

   a. Tutors mark the students portfolio

   b. The internal monitoring system authenticates the work of the learner and also that of the tutor

   c. The external authenticator evaluates the learners' portfolios and provides feedback to the organisation. The external authenticators are independent and not from an associated/linked organisation, which can be the practice in larger organisations.

VI. Finally, and significantly, community education is different: as a group of providers, it is supportive, it fosters collective expertise and shares knowledge. For groups engaging directly with QQI they will have the added support, and strengthened capacity to capitalise on the knowledge built up in the sector already by way of supporting each other with the changes via the CEN.

Best case scenario

Given the diversity in the community and voluntary sector a one size fits all approach is not equitable or sufficient in order to meet the accreditation needs for learners. Community education groups have developed, and demonstrated the capacity to provide quality accredited programmes and there is a need for groups to engage independently with QQI. The fee should not be used as a means to filter the number of groups re-engaging as significant time and resources are required to fulfil the re-engagement application process even in the absence of a fee.

AONTAS, through the CEN, will offer CEN legacy community education providers the following:
A Network to provide support, expertise and continuous professional development for quality assurance processes.
To strengthen the community education sector and ensure it has the capacity to maintain its autonomy should the legacy provider decide to re-engage with QQI directly.

What community education legacy providers need for re-engagement:

1. **No re-engagement fees**: groups cannot initiate the re-engagement process if there is a fee
2. **Clarity** with regard to what is required for the re-engagement process so that groups can decide whether they can invest their time and resources into applying for re-engagement with QQI. In addition to guidelines a case study example would also be useful, and a questions and answers document outlining the implications of re-engaging directly.
3. **Clarity** regarding what is expected in relation to their 'capacity'
4. **Information** and **support** regarding QA requirements with QQI (previously provided by FETAC). A clear indication of the difference between the support that FETAC provided around QA and that which will be provided by QQI. Is there is a difference who will make up this up?
5. **Maintain ability to share programmes** with other QQI registered providers e.g. ETB

Scenario 2: Community Education legacy provider goes under the ETB QA

Beneficial aspects

- This process can be useful for:
    - Small groups (very limited number of staff) who have decided that they cannot engage directly with the QQI
    - Groups whose main focus is diverse and education is only one very small element
    - Enabling groups to have access to validated programmes which the ETB developed.

What works in this scenario

- This approach appears to be effective for groups who have worked well with their local ETB (previously VEC), where there is an effective partnership regarding using the QA of the ETB
- Tutors are central to engaging and retaining learners. Good examples have shown a degree of flexibility around assigning tutors to courses, effective processes include consultation between the ETB and the community group regarding the most suitable tutor for that cohort: either from the ETB tutor panel or one of the community education group's own list of tutors.
- It works well when the values and ethos of the ETB and the community organisation are similar

What are the challenges of this?

- This approach is highly dependent on the relationship between the community education provider and the ETB
- Our CEN members would say that community education tutors know their learners. Community groups feel they are best placed to provide a suitable tutor and effective learning environment. Within this QA arrangement the ETB may not permit the community organisation to choose the tutor and they may have to come from the ETB tutor panel. This is a real issue. Tutors need to have experience and skills in engaging the most vulnerable and external tutors may not have understanding of that. For example, one Travellers' Education Group had previously engaged an Art tutor, however although qualified in art she was not eligible for the ETB tutor panel. That tutor had previously demonstrated an effective approach for engaging and retaining the learner cohort and in this instance the ETB agreed she was the most suitable tutor for the group.
- Groups cannot develop their own programmes to meet the needs of their learners
- In all probability, groups may not be able to provide accredited programmes which are outside ETB funding
- The ETB will require significant resources to be able to provide QA to community groups, in terms of time, resources, information and support; the ETB may not have the capacity to engage in this process.

Best case scenario

- **Effective partnership approach**
    - Local Service Level Agreements between the ETB and the community group would need to clarify the roles and responsibilities for each partner in this arrangement
    - Need to look at policies of the legacy groups and that of the ETB to see how this approach can work. Groups are already taking steps to look at how they can negotiate to work with their ETB in using their QA, some are reviewing their own QA policies and that of the ETBs (there is an example from Dublin). There needs to be a marrying of the two QAs.
    - Agree a fair level of balance between autonomy and accountability between the group and ETB
    - Work towards establishing good a relationship between the ETB and the community group and a clear understanding of the roles and responsibilities
    - Specific issues for the Service Level Agreement:
        - Groups need to control their our own programme:

- o They need to exert autonomy over the recruitment and selection of Tutors and to hold the money to pay tutor
- o There needs to be flexibility in ETB policies so to accommodate and include Community Education needs
- o Community Education centres need to be able to **target** the learners themselves.
  - There needs to be access to Level and standards that are required by their learners. Community education providers need to offer QQI level 5 not just Levels 3 and 4. Progression also means continued progression in the community.
- This is essential so that legacy community education providers are not subsumed into the ETB.

- **Be part of the QA amalgamation process across the ETB**
  - ETBs are restructuring their own QA in line with their amalgamations and changes for QQI. If legacy community education providers are to go under the ETB they need to be part of that discussion from the start.
  - Legacy community education providers want an active role in shaping the QA of the ETBs for groups who will be going under their QA.
  - Again, this is essential so that legacy community education providers are not subsumed into the ETB.

- **Support**
  - Clear support system for this work, for example, sharing templates needed to fulfil QA requirements, checklists etc. would be helpful.
  - A specific person in the ETB that is responsible for this work would be necessary for a seamless process (ETB needs to be resourced for this purpose).

- **A degree of autonomy for the community education group**
  - Community groups and the ETB could work together to decide on the most appropriate tutor (which includes considering those outside the ETB panel as potential tutors)
  - Can ETBs offer QA for programmes outside their funding streams? For example if an organisation was receiving SICAP funding and is offering accredited programmes, how can they offer this if they are going through the ETB's QA? There needs to be a degree of flexibility regarding the source of programme funding and the ability to access ETB's QA.

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- A Network to provide support, expertise and continuous professional development for quality assurance processes. To strengthen the community education sector and ensure it has the capacity to maintain its autonomy should the legacy provider decide to re-engage with QQI directly.
- AONTAS will develop a template National Service Level Agreement to support the development of Local Service Level Agreements by CEN members.

Scenario 3: Consortium approach with other legacy providers (not including the ETB)

The concept of developing a consortium for QA has been noted in numerous QQI policy documents, however, it is unclear how this process will work and how it would be supported. One possible approach would be a network of similar legacy providers in a local area who would create a consortium, led by a main link to QQI, who would share QA across the network members. This would involve agreement on the QA processes, accountability to each member and specifically to the lead link member.

Beneficial aspects

- As an alternative to going under the local ETB (who may not have the capacity to undertake this)
- For community education groups who are obtaining funding from other sources e.g. in SICAP funding
- For community education groups who don't have the capacity to reengage, who want autonomy regarding their tutors and who want to work with other community education organisation in a consortium
- Supports local capacity building, sharing of resources and knowledge.

What are the challenges of this?
- There is little or no infrastructure at local level to support this type of consortium
- There is no funding to support the development of a sustainable consortium and it would require significant resources and expertise for establishing and maintaining such a structure
- Diversity within groups and the sector could make a single, consortium approach difficult to manage
- A consortium is not the best way to support diversity and to meet the needs for a variety of learner, it is one step away from the frontline organisation
- One provider (the lead link provider) would assume full responsibility for the QA for all members of the consortium.

Best case scenario
- Consortia are supported by QQI in terms of offering information on the requirements of partners: clear understanding how the consortia would communicate with QQI, and the role and responsibilities of QQI and the consortia in relation to the provision of accredited programmes
- Ring-fenced, sustained funding for the development and maintenance of consortia.
- There is still a need to provide detailed information about this process e.g. can there be a new lead provider from a consortium who is not a legacy provider, e.g. in Limerick the Limerick Community Education Network are looking at taking on this option but as a structure it is not a legacy provider, however they have the infrastructure to support a consortium. How would it work in this arrangement?

AONTAS, through the CEN, will offer CEN legacy community education providers the following:
A Network to provide support, expertise and continuous professional development for quality assurance processes.
To strengthen the community education sector and ensure it has the capacity to maintain its autonomy should the legacy provider decide to re-engage with QQI directly/be part of a consortium.

Scenario 4: Legacy provider decides against re-engagement with QQI/ETBs/Consortia and finds an alternative method for providing accredited programmes

Community education groups do not want to seek alternatives to QQI as they have built up the capacity to engage in effective QA work, they want to provide programmes on the NFQ, and they want to ensure the currency of qualification that community education learners receive is equal to that of formal adult education providers.

How this could work

- Another accrediting body such as City and Guilds could provide accreditation
    - The benefits of this is that the engagement and validation of programmes is cheaper than QQI
    - The accrediting body appear open to actively supporting effective arrangements for community groups wishing to provide accredited programmes (individual/consortia)
- Higher education institutions could offer accreditation options for community education legacy providers, as they have a history for such an arrangement.

Negatives

- Legacy community education groups have developed a body of knowledge regarding QA around FETAC and they want to continue to offer programmes within the NFQ
- FETAC and the NFQ has been promoted extensively and is recognised by learners and employers as having currency
- It is uncertain how having a qualification outside the NFQ would impact on the ability for access, transfer and progression to the NFQ. This is a key area for community education providers, ensuring learners progress to an appropriate programme or employment; this could be hampered by having a qualification outside the NFQ
- It could impact on funders who may require a QQI awards, we believe that some ETBs would not fund City and Guilds Awards.

Another alternative process

Community groups hire in private providers to deliver course:
- This is a step away from the community
- There is a loss of community expertise in the delivery of programmes
- Most marginalised learners are a different cohort to the traditional student of private providers and require more support: there are concerns about the private provider's ability to effectively meet the needs of such learners
- Community education differs from schooling in that learners are taught by drawing on their lived experience and are supported e.g. one-to-ones, by skilled tutors who understand the needs of their community. This process may not be possible to achieve by hiring in a private provider whose skills/ethos differs significantly.

Conclusion
The AONTAS Community Education Network remains gravely concerned about the proposed QQI fees for re-engagement. The fees should not be used as a filtering system to deter underfunded groups from re-engaging. The re-engagement process should be fair and recognise the quality assurances processes which have been built up in the sector and the need for groups to independently engage with the QQI. The concept of 'capacity' within the QQI re-engagement process is unclear, needs to be defined and should not be associated with the ability to pay fees due to the complexity with which community groups are funded. Furthermore, for community education legacy providers who decide to opt out of re-engagement real, effective alternatives must be available so that groups can provide accredited programmes for their learners.

However, the CEN is most concerned with legacy community education groups re-engaging directly with QQI. They believe that there must be an option to pursue this arrangement as it cannot be a one size fits all approach. The CEN believes that learners need community education organisations with their own QA so that their needs, and that of the community, are responded to. It is also important to ensure quality is maintained and to enable learner choice in terms of diversity of educational opportunities.

- ✓ Learners: providers can respond to their needs
- ✓ Quality: quality learning provision for learners is ensured
- ✓ Community: being able to respond to the needs of the local community
- ✓ Further Education and Training Sector: diversity in FET by offering learners an effective, quality, alternative to for obtaining qualifications

The community education sector is different in that it has an ethos and, through the CEN, an infrastructure to offer continuous support around QQI arrangements. Therefore, the CEN will: support legacy community education providers to collectively network at a national and regional level in order to strengthen their capacity to: engage directly with QQI; negotiate with their ETB regarding going under their QA; and will offer continuous long term collective support for adapting to changes and supporting/influencing policy development in this area. These networks are emerging at present across the country.

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