



THE AONTAS COMMUNITY EDUCATION NETWORK

The QQI Re-engagement Fee And the case for a waiver for independently managed community education providers



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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. A proposal to share the cost through organisations coming together in a consortium to apply for a collective's QA is not a realistic solution based on a number of concerns raised in this paper.

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 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

This paper outlines in more detail the reasons why community education organisations should be exempt from this fee and why it is important that they maintain their ability to independently provide accredited programmes.

Background

Quality and Qualifications Ireland (QQI) was established in November 2012 by the amalgamation of the functions of four bodies that had both awarding and quality assurance responsibilities: the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the Irish Universities Quality Board (IUQB) and the National Qualifications Authority of Ireland (NQAI). QQI is responsible for the external quality assurance of further and higher education and training and validates programmes and makes awards for certain providers in these sectors. QQI is also responsible for the maintenance, development and review of the National Framework of Qualifications (NFQ).

The QQI has initiated an extensive policy development programme. These new policies will impact on existing FETAC registered providers who want to maintain their ability to provide accredited programmes under the National Framework of Qualifications. Central to the 're-engagement' process between QQI and existing registered providers is the approval of the provider's Quality Assurance (QA) procedures. Of particular significance is the introduction of fees for providers who wish to use the services of QQI as set out in the legislation (Qualifications and Quality Assurance Education and Training Act, 2012)².

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

² In October 2013 the QQI published a proposal for a fees schedule which will apply to providers who want to provide accredited further education and training.

What does re-engagement mean?

Education providers who previously had a relationship with the former awarding Councils³ are referred to as 'Legacy Providers'. Community education providers mainly engaged with the FET Award Council (FETAC) and were registered FETAC providers. Following the amalgamation of the preceding Awarding Councils into QQI, legacy providers must re-engage with the QQI in order to provide QQI awards. The re-engagement process involves legacy providers having their Quality Assurance (QA) procedures approved by the QQI. QA approval means that the provider can provide a QQI validated programme leading to a QQI award. QQI have proposed that there will be a **fee** for the process of re-engagement⁴. The re-engagement process has not commenced yet. The QQI consulted with stakeholders and its White Papers on Re-engagement⁵ were the final documents for consultation on re-engagement. The current transition period for legacy providers will end when the QQI Board adopts the finalised policies and procedures. Although the process of re-engagement for legacy providers is imminent the exact fee for the re-engagement process for legacy providers has not yet been determined.

Section 80 of the Act (2012)⁶ states that the QQI is required to determine the fees which apply to the providers with which it engages, and to seek the consent of both the Minister of Education and Skills and the Minister for Public Expenditure and Reform in this regard.⁷ The fee for re-engagement could be in the region of €5000 according to the QQI Fees Schedule October 2013 and it does not distinguish between not-for-profit and private providers.

Why is this an issue for community education legacy providers?

There are 210 community/voluntary organisations who are legacy providers (according to QQI data). AONTAS Community Education Network (CEN) members represent over 30% of these providers. On 28th May, a focus group meeting of 24 CEN members shared their views on the impact of this proposed re-engagement fee, their views form the basis of this paper. AONTAS and the CEN are particularly concerned about the impact of the proposed fees on the community education sector. Community education providers are already under resourced and overstretched. The introduction of this fee would have a detrimental effect on the community education sector as many providers would have to withdraw from engaging with QQI and thus not be able to provide accredited community education courses to learners. AONTAS and the Community Education Network calls for a fee waiver for independently managed community education providers.

In a recent QQI document⁸, a proposal was made that existing providers may choose to become part of a consortium/network in order to meet the requirement of QQI Quality Assurance criteria. This is not the answer to the fees issue and members of the AONTAS CEN have outlined later in this paper, why they need to engage with the QQI independently in order to provide accredited programmes.

Why should community education legacy providers to be exempt from the re-engagement fee?

The Qualifications and Quality Assurance Education and Training Act (2012) states that "exemptions and waivers may be provided for in specified circumstances" (Section 80, 3.13). Both AONTAS and the CEN recognise that the ability to offer accredited programmes is crucial for quality, learner centred programmes to learners in their communities and value for money to funders.

³ FETAC, HETAC, the National Qualifications Authority of Ireland (NQAI) or the Irish Universities Quality Board (IUQB)

⁴ The QQI White Paper on Re-Engagement with Legacy Providers: Overarching Policy (Section 2.5 Fees for Approval of QA (page 7) states: A fee will apply for the approval of a provider's QA procedures.

⁵ QQI White Paper: Re-Engagement with Legacy Providers: Overarching Policy and QQI White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

⁶ Qualifications and Quality Assurance Education and Training Act 2012

⁷ Parliamentary Question,⁷ Tuesday, 10th June, 2014) [weblink](#)

⁸ White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards

Furthermore The Act (2012) also states that:

3.9 *Fees will be set at a level that is sustainable both for QQI and for the education and training sector.*

- ✘ AONTAS and the CEN propose that the fees are unsustainable for community education organisations in the current funding climate and will pose a serious challenge to the survival of community education providers, who operate independently on a non-profit basis and who depend on a variety of funding streams to support their activities.

3.11 *The determination of fees will have regard to the nature, type and mission of providers and the programmes they offer.*

- ✘ Community education providers differ from other providers in terms of their nature, programmes and the learning environment they provide. The mission of community education organisations is to attract hard-to-reach learners and support their progression in learning with resource intensive interventions and supports. The cohort of learners is more resource intensive.

Who will be affected by this QQI re-engagement fee?

In order to determine the impact of the potential loss of independent community education groups' ability to provide accredited programmes, the CEN carried out a small snapshot study of 15 community education organisations who are legacy providers. The following interesting points arose from 15 community education organisations⁹:

- 1,545 learners are on accredited programmes
- Accredited provision ranged from 10 learners in small isolated organisations to over 300 in urban community education organisations
- 1,819 FETAC awards were made within this cohort with a retention rate for Minor FETAC Awards level 3, 4, 5 and 6 were 84%, 95%, 77% and 82% respectively.

Why is it important for community education organisations to have their own Quality Assurance?

Community education providers must re-engage with the QQI to maintain their own QA and their ability to provide accredited programmes for learners. Having access to their own QA means that:

✓ Providers can respond directly to the needs of their learners

- Not all learners are the same. Small organisations can respond to the specific needs of their learners in terms of type and content of their programme. Having the ability to accredit programmes allows community education organisations to develop tailor made programmes that are learner-centred. For example in response to their learners' needs one group in the CEN includes personal development and interpersonal skills in all of their accredited programmes.
- Learners want to engage in accredited programmes but at a location, timing and pace that suits them. Community education organisations take an holistic approach to provision, offer a range of supports and learning methodology which enables learners to successfully complete courses.

✓ Providers can ensure quality of their programmes

- By having their own QA community education organisations must commit to quality learning provision.
- It sets a standard because the provider must adhere to the policies and procedures of their quality assurance agreement (previously with FETAC). Quality is assured through learner evaluations, programme evaluations, tutor feedback, regular reviews and external monitoring.
- Having one's own QA confers a status that strengthens the organisation and encourages all staff to engage in QA processes: a designated staff member monitors QA, identifies areas for improvement and collectively implements changes as a result. It is an organisation-wide approach to quality.

⁹ Across Ireland from Donegal, Dublin, Wexford, Longford, Limerick, from small organisation (10 learners) to larger organisations (over 300 learners).

- Funders of community education groups require strict adherence to QA process and therefore this external monitoring and reporting strengthens the quality of provision offered to learners.
- ✓ **Providers can respond to the needs of their own community**
 - Organisations need their own QA so they can validate and create programmes that are community-led. Community education organisations know their community and offer programmes that are locally determined and can directly respond to the needs of the community and local employment opportunities. Courses can be developed in conjunction with the community offering flexible, responsive provision that can rapidly respond to changing needs.
- ✓ **Providers can contribute to a diverse, vibrant further education and training sector**
 - By having the ability to provide accredited programmes community education groups can offer diversity of provision, and provide a real alternative for engaging hard to reach learners. It adds to and complements existing provision.
 - Different methodology and approach that supports learners to make choices about their education progression. It also offers a transformative education experience for learners in addition to getting a qualification.

In a recent QQI document¹⁰, a proposal was made that existing providers may choose to become part of a consortia/network in order to meet the requirement of QQI Quality Assurance criteria. This is not a realistic proposal for all community education organisations for the following reasons:

- There are significant resource implications to establishing and maintaining a consortium
- Diversity within groups and the sector would make a single, consortium approach difficult to manage
- It could reduce diversity of provision and result in unnecessary duplication of work and less choice for learners
- A consortium is not the best way to support diversity and to meet the needs for a variety of learners
- ETBs may not be in a position to offer QA to courses that they do not directly fund themselves.
- Community education organisations need autonomy over their provision so that it is learner-responsive: allowing community education groups to design, operate and evaluate the programmes so they can better suit learners

Conclusion

The AONTAS Community Education Network is gravely concerned about the proposed QQI fees for re-engagement in order for providers to offer accredited programmes under the NFQ. Community education has a history of effectively engaging the most hard to reach through its approach, however in order to maintain this provision groups must be able to maintain their ability to have their own QA and thus ability to provide accredited programmes. The imposition of fees will most certainly have a serious impact on the activities they currently deliver. 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 mainstream education*

For further information on the paper please contact Niamh O'Reilly, 01 4068220 or noreilly@aontas.com

¹⁰ White Paper: Policy and Criteria for Further Education and Training Legacy Voluntary Providers Continuing Access to Validation of Programmes Leading to QQI Awards