

Submission to Quality and Qualifications Ireland (QQI)  
**Public Consultation:**  
**White Paper**  
**Inaugural Review of Quality Assurance in Education  
and Training Boards**

**Brief outline of submission:** This submission is being made on behalf of AONTAS, the National Adult Learning Organisation, and our membership. The submission is being made in order to highlight the importance of learner voice, community education, and a holistic review of a learner's learning experience during the inaugural review of quality assurance in Education and Training Boards.

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**Publication of submission:** AONTAS welcomes the publication of our submission by QQI.

## Introduction to AONTAS, the National Adult Learning Organisation

AONTAS is a highly respected non-governmental membership organisation established in 1969. We represent over 400 members from across the lifelong learning spectrum. The vision of AONTAS is for all adults to achieve their educational aspirations through an equitable lifelong learning system. Our mission is to advocate for the right of all adults in Ireland to quality learning throughout their lives, and to promote the value and benefits of lifelong learning.

The work of AONTAS centres on advocating for all adults to achieve their educational aspirations through an equitable lifelong learning system. We place a particular emphasis on those who did not benefit from education when they were young or who are under-represented in learning. Through our work AONTAS seeks to:

- widen participation in lifelong learning beyond the educated segment of the population who already participate;
- ensure that community education provides access to and pathways within education, and supports quality learning opportunities for the most educationally disadvantaged people in Ireland;
- ensure that the voice of adult learners is central to local, regional, national, European and international adult learning policy; and
- promote quality adult learning opportunities for everyone in Ireland.

Drawing on the strength of our members, including through the 100+ strong membership of the AONTAS Community Education Network (CEN) and relationships with adult learners across Ireland, we advocate for the rights of all adults to achieve their educational aspirations through an equitable lifelong learning system of quality learning. We advocate that this system should be based on a grassroots, authentic understanding of lifelong learning that benefits the social, personal, and skills development of individual adults, their family and community.

## Introduction to the Submission

AONTAS is making this submission in order to highlight areas for development during the inaugural review of quality assurance in Education and Training Boards. The issues we would like to discuss are as follows: **1)** learner voice; **2)** community education and how community education providers who provide accredited learning via relationships with ETBs are reflected in the inaugural quality assurance process; and **3)** the employer's role and the role of contracted training providers.

## Learner Voice and Learner Representation

The *White Paper* makes two specific references to the importance of ensuring that learners are included in the quality assurance review process. This is a welcome inclusion in the proposed review processes as AONTAS believes learners need to be engaged as equal partners in all educational planning and policy development. The *White Paper* suggests that learners can serve as representatives on the quality assurance review team and that learner voice and the learner experience must be a part of the objectives of the proposed Terms of Reference for evaluating ETB quality assurance standards. Within this submission AONTAS provides comments and points of thought that we hope will be considered by QQI and ETBs and therefore create a genuine engagement with learners.

### Learner Representatives on Quality Assurance Review Teams

It is a very positive development to see the inclusion of learner representatives in the proposed Review Teams for the Inaugural Review of ETBs. However, as these proposed learner representative roles are not clearly defined, AONTAS would like to take the opportunity to note some important considerations that must occur if these representative roles are to be successful.

- 1) **Diversity** QQI must clearly state how learner representatives on these Review Teams will be identified and chosen. It is important that diversity within the sector is being considered in relation to the Review Teams. However, a clear definition is needed to clarify what is meant by diversity. On page 10 of the *White Paper* the term 'diverse learners' is used, but the example provided is diversity of programmes and providers (ie Youthreach and FET Colleges). AONTAS would encourage a broader conceptualisation of diversity to include individuals from marginalised communities (ie Traveller voices, refugee voices, voices from older learners), or groups identified as a high risk of having lower participation rates in education.

On page 13 the *White Paper* refers to review panels as having an 'appropriate gender mix'. AONTAS would like to pose a clarifying question to ask what diversity means in this instance. We would also highlight that gender should not be the only aspect of diversity that is considered when assessing the range of voices in this process.

**Access and Diversity** A large body of International research states that the authentic involvement of learners, particularly those whose voices are least heard, is essential for supporting access, retention and engagement.

- 2) **Representatives** QQI should articulate a clear outline of what 'learner representative' means in a FET context, eg if they will be individuals actively enrolled

in ETB programmes or previous learners. Given the often short-term nature of FET programmes, the need for learner capacity development in order for them to engage meaningfully in the process must be considered. Overall, for effective learner representation a sustainable model of learner representatives should be developed. It would be of benefit for QQI to clarify the criteria for who will qualify as a learner representative.

**Capacity Building** QQI must commit to supporting learner representatives on these Review Teams so that they can meaningfully participate in the review process. This process must involve all members who are participating on the review board, especially if learners who are actively engaging on ETB courses are selected. It is important that each panellist is equipped with the methods to deconstruct some of the power dynamics that could occur. Without appropriate capacity building measures, there is a danger that this type of learner engagement could be tokenistic. To ensure this does not occur, QQI must take a proactive and thorough approach to these capacity building processes.

### Evaluating Learner Experience and Learner Voice

Similar to the inclusion of learner voices in the review process, AONTAS is pleased to see that the evaluation of learner voice will be a component of quality assurance evaluation as per the draft Terms of Reference included in the *White Paper*. However significant expansion in detail is required to understand how quality in this area will be assessed and what mechanisms will be used to make these assessments. We believe clarity is needed before the quality assurance process begins.

### Community Education in the Review Process

Community education providers across Ireland have for decades been collaborating with Vocational Education Committees (VECs) and now ETBs in the provision of quality accredited education. The relationship between community education providers and ETBs has in many cases become closer as a result of changes to policies for the provision of accredited learning in Ireland since the creation of QQI. As a result of changes many community education providers now provide all of their accredited education in collaboration with their local ETB.

Arising from these changes AONTAS proposes that when the Review Teams are being created, QQI and ETBs work to include community education providers on the Review Teams. Including community education providers on these Teams will help to broaden the expertise of these Teams, particularly as it regards the unique areas of community education provision and inclusion of learner voice and experience in the learning and programme development process. Inclusion of community education providers on Review Teams should be possible as QQI has worked with AONTAS and the AONTAS Community

Education Network over the past several years during the QQI reengagement process to build relationships among this group of education providers.

### Quality of Contracted Training Providers and Employers

AONTAS would like to flag as an issue of potential concern: the inclusion of contracted training providers and employers in the assessment of ETB quality assurance processes, without a similar assessment of employer and contracted training provision and educational provision taking place.

It is stated in the last line on page 10 in the *White Paper* that training providers and employers will not be subject to quality assurance reviews as individual entities. This means that contracted providers and employers will be part of the Review Teams of ETBs, but these groups will not themselves be reviewed.

The National Further Education and Training Learner Forum (NFLF), which AONTAS has led out on since 2016 with funding from SOLAS, under authority of the Further Education and Training Strategy 2014-2019, has shown that learners, while largely satisfied with their learning experiences within ETBs across Ireland, have found their work placements and learning taking place by contracted providers more mixed. This finding is important because if learners and their learning experience are to be at the heart of this inaugural review, then this process should take into account the entirety of a learner's ETB learning experience. If this cannot be done at this time due to time and resources then the review should outline how it will occur in the future.

Employers and contracted providers are playing an increasingly large role in the lives of learners accessing education through ETBs. Therefore provision of learning through these contracted providers and employers needs to be reviewed in the same way as learning provided directly through ETBs.

### Conclusion

AONTAS thanks QQI for engaging with stakeholders as it concerns the *White Paper on the Inaugural Review of Quality Assurance in Education and Training Boards*. We hope that this brief submission provides useful insights about: how learner voice can be meaningfully incorporated into the review process; how community education providers can supplement the expertise of Review Teams; and the necessity for contracted providers and employers to be included in the inaugural review of quality assurance in ETBs.

AONTAS looks forward to seeing the results and actions of this *White Paper* consultation.