

Submission to the Joint Committee on Education and Skills Qualification and Quality Assurance (Education and Training) (Amendment) Bill 2018

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Introduction to AONTAS, the National Adult Learning Organisation

AONTAS, The National Adult Learning Organisation exists to promote the development of a lifelong learning society through the provision of a quality and comprehensive system of adult learning and education that is accessible and inclusive.

AONTAS is a highly respected non-governmental membership organisation established in 1969. Currently it represents approximately 400 members from across the lifelong learning spectrum. The work of AONTAS centres on: Advocating and lobbying for the development of a quality service for adult learners; promoting the value and benefits of adult learning; and building organisational capacity. With particular emphasis on those who did not benefit from education initially or who are under-represented in learning. AONTAS' seeks to:

- widen participation in lifelong learning;
- ensure community education supports quality learning opportunities for the most educationally disadvantaged;
- ensure adult learners are central to local, regional, national, European and International adult learning policy; and
- promote quality adult learning

Drawing on the strength of our members, including through the 100+ strong membership of the AONTAS Community Education Network (CEN) and meaningful relationships with adult learners, we advocate for the rights of all adults to quality learning through their lives based on a grassroots, authentic understanding of lifelong learning that benefits the social, personal and skills development of adults, their family and community. In addition, we promote the value and benefits of lifelong learning. We have a specific focus on the most educationally disadvantaged and our work seeks to ensure that all adults have the right to participate in adult learning that exhibits the following elements: inclusion, learner supports, progression, positive learning outcomes, is learner focussed, offers learner choice, a positive learning experience and is transformative.

Introduction to the submission on the *Qualification and Quality Assurance (Education and Training) (Amendment) Bill 2018*

AONTAS would like to start by thanking the Joint Committee on Education and Skills for taking the time to engage with wider civic society about the proposed amendments in the *Qualification and Quality Assurance (Education and Training) (Amendment) Bill 2018*.

Unique space of Community Education

As background information for members of the Joint Committee who may be unfamiliar with community education, community education is adult learning which takes place in local community settings across Ireland. It is learner-centred and responds to the needs of the local community. The holistic, non-threatening and supportive environment in which community education takes place has the effect of increasing the engagement of socially excluded adult learners and those who have had previous negative experiences of education. Adult learners who participate in community education include but are not limited to people living in areas with high levels of social deprivation, Travellers, migrants and people affected by drug addiction, mental health issues, homelessness and high and/or persistent unemployment. People who identify or are identified with these groups may not have the confidence, or social and financial supports needed to access formal adult education opportunities in local institutions and so community education acts for them as a first step back to education.

The variety of community education courses, from non-accredited to accredited, up to QQI Level 6, meets diverse needs within local communities. Many community education providers are quality assured by QQI, and so, are in a position to provide the opportunity for adults, from the most disadvantaged communities in Ireland, to access accredited courses recognised on the National Framework of Qualifications (NFQ). Community education therefore is a particularly effective way of reaching those who are most distant from education and the labour market, and can act as a stepping stone for many towards further learning, qualifications and labour market engagement.

It is because of the important role that community education plays in supporting the most hard to reach members of our country to engage with education that AONTAS makes this submission on behalf of our membership.

Community Education in national policy

At the time of this submission community education is being recognised for, and being promoted by the Department of Education and Skills for its important role in national adult education policy.

In 2016 the European Commission reported that close to 70 million Europeans struggle with basic reading and writing; calculation; and using digital tools in everyday life. Without these skills they are at higher risk of unemployment, poverty and social exclusion. In June 2016, the Commission proposed the setting up of a "Skills Guarantee" to address this challenge. The resulting initiative, now called "Upskilling Pathways" was adopted by the European Council on 19 December 2016.

At the national level each of the member states was to develop an action plan for implementing Upskilling Pathways in their jurisdiction. As part of the Irish response, the Department of Education and Skills is including the community education sector as an important component of the Irish Upskilling Pathways action plan. The Department of Education and Skills recognises the unique position that community education providers have in reaching the most vulnerable and hard to reach members of our society. With this important role of community education as a support to the implementation of national policy in mind, it is difficult for AONTAS and our membership to accept the ongoing funding and resource challenges that community education is placed under, without any corresponding assistance or relief from governmental institutions.

AONTAS Community Education Network (CEN)

The Community Education Network (CEN) was established in 2007 by AONTAS. It is a network of over 100 independently managed community education providers who work collaboratively, sharing information and resources, engaging in professional development and working to ensure that community education is valued and resourced. Approximately 1/3 of community education providers within the CEN have recognition by QQI as legacy FETAC providers and offer courses leading to awards on the National Framework of Qualifications (NFQ). Such providers work collaboratively through the CEN, to support one another in the maintenance of robust quality assurance requirements necessary for the delivery of a high standard in accredited programmes. The network has developed a collaborative working relationship with QQI staff over the past several years through ongoing engagement on numerous policy issues, and through QQIs regular inputs and question and answer sessions during CEN meetings.

The community education sector has in recent years been affected by significant and disproportionate funding cuts. In spite of this, the sector has continued to prioritise the provision of high quality, accredited learning opportunities within their local communities. For adult learners the opportunity to participate in an accredited programme leading to a nationally recognised award on the NFQ, within a holistic, non-threatening, community environment, creates an accessibility and provides the motivation for people furthest removed from the education system to take the first step back to lifelong learning. Therefore the importance of community providers continuing to offer accredited learning opportunities cannot be overestimated.

Quality assurance at the expense of learner access to education

Since the creation of QQI in 2012 and its ongoing efforts to sustain and highlight quality education provision, AONTAS and CEN members, have continuously engaged with QQI. Engagement occurs so that AONTAS and our members can ensure that community education providers continue to provide a quality offering to learners across Ireland. Based on feedback that CEN members have received as part of the pilot reengagement process CEN members have shown time and again that their offering meets and in many cases surpasses the quality sought by QQI. Where there are challenges to the provision of quality as defined by QQI in the reengagement pilot it is because community education groups remain severely under-resourced by government and depend on a small number of staff for management and provision.

It is because community education shows time and again its capacity to meet the quality requirements laid down by QQI, while at the same time being financially penalised by existing QQI fees because they are small, independent, and efficiently run organisations, that CEN members are concerned about their future ability to provide accredited education. Even as they continue to do everything right in terms of providing quality education offerings efficiently and effectively, they continue to be squeezed financially by fees and increased resource needs.

This submission highlights additional new fees and resource requirements for providers of community education that will further squeeze community education providers. We therefore ask the Joint Committee members to engage with AONTAS and our membership to understand that approval of these new QQI fees and resource requirements for community education providers will impact the access learners have to education across the country.

One-size policy does not fit all

Since the establishment of QQI following passage of the original *Qualifications and Quality Assurance (Education and Training) Act 2012* (Act) there has been an administrative culture to treat all providers of accredited learning in the same way despite major structural differences; including whether an organisation is an independent not-for-profit community education provider, or for-profit private provider.

Though the current Act allows for policy flexibility in several areas such as fees (Section 80); QQI has opted for a one-size fits all policy approach. This approach which AONTAS has been lobbying against for more than 5 years has led to community education groups that are further and further stretched, and in some cases unable to continue provision of accredited programming. While for-profit providers are able to charge large learner fees that cover the costs of QQI reengagement and program validation costs, independent not-for-profit community education providers are left to struggle on.

Since the discussions about fees began, AONTAS has made several submissions and developed policy analyses concerning the impact of fees on the community education sector. AONTAS made several submissions to QQI (2013, 2014, 2015) clearly highlighting the QQI reengagement fee issue. AONTAS produced two detailed policy papers on the issue of fees (2014) and the scenarios of reengagement (2015) in advance of meeting DES officials and QQI (2015). AONTAS and CEN members participated in all 7 Joint QQI / Community and Voluntary Sector Working Group meetings in 2015. Additionally, the issue was raised in our submission to the National Skills Strategy (2015), Pre-Budget Submission in 2016 and 2017, and letters to former Minister Jan O’Sullivan (2015/6) and Minister Bruton and Minister of State Halligan (2017), and Ministers Bruton, and Donohoe (2018).¹

Concerns with specific amendment proposals

The remainder of this submission speaks to the specific concerns that AONTAS has regarding the draft *Qualifications and Quality Assurance (Education and Training) (Amendment) Bill 2018* (Bill).

The areas of primary concern for our members exist around the creation of ‘listed awarding bodies’; the creation of regulations specifying capacity and capability of providers; and the imposition of even further fees in addition to the existing reengagement and program validation fees for which AONTAS has already been lobbying against for more than 5 years.

¹ Links to AONTAS public submissions on the implementation of existing QQI fees are available at the end of this submission.

Listed Awarding Bodies and Associated Providers (s. 27; 55)

Reading the draft Bill AONTAS would like to note that a significant concern at this time arises from a lack of clarity about the implementation of new guidelines for ‘listed awarding bodies’ and ‘associated providers’. As this new policy framework develops, community education providers require clarity about the options that will be available to them as they develop accredited learning with recognition on the National Framework of Qualifications (NFQ). At present several of our members are pursuing reengagement with QQI. However, if new listed awarding bodies are created, new options will become available to them, and it is important they have an understanding of their options before significant monies and time are invested in the status quo system.

While the proposed new section 55E of the draft Bill will require ‘as soon as practicable after the operative date of the Act’, for QQI as the Authority to establish policies and criteria regarding the criteria for application to join the list of awarding bodies, AONTAS is arguing that for the sake of transparency these policies and criteria should be drafted and discussed during the consultation period before the operative date of new legislation.

Recommendation: Community education providers who may consider becoming an associated provider of a new listed awarding body need to understand their options in full now, and not several years from now as might be the case if these policies and criteria are implemented after passage of the Bill. This is important as there are many community education providers seeking QQI reengagement. However, if new listed awarding bodies are created, new options will become available to them, and it is important they have an understanding of their options.

Regulations specifying criteria concerning capacity and capability of providers and related criteria (s. 29B)

Another concern of AONTAS is the creation of regulations after the operative date of new legislation that will specify whether or not a provider of accredited programming has the capacity and capability to provide learning.

As members of the Joint Committee are aware community education providers across Ireland are professionally run organisations governed according to relevant laws and receiving funding from various funders (which may include programme or project specific funding, direct grants from public and private institutions, learner fees, and philanthropic funding to name a few).²

² Research conducted by AONTAS in 2017 as part of an EU funded project FinALE, examined the various funding models of community education providers in Ireland. <https://eaea.org/wp-content/uploads/2018/01/FinALE-Where-to-invest-Final.pdf> (accessed 4 October 2018)

Part of the reality of these efficiently and effectively run organisations is that they work to support one another, and in turn gain supports from national organisations like AONTAS. As new governance and quality assurance requirements have been implemented over the past several years communities of practice like the AONTAS Community Education Network (CEN) provide supports to providers of independent not-for-profit community education organisations so that they can learn from one another and also access support structures that would otherwise not be available. A contemporary example of this is that as of mid-2018 AONTAS employs a Quality Assurance Officer who is working to help CEN members who are reengaging with QQI to understand and meet the obligations of a provider of accredited learning.

Therefore AONTAS is requesting that when the Regulations are drafted in order to specify the criteria used to evaluate the capacity and capability of providers; the Regulations clearly state that the evaluation must include an evaluation of all internal, and as importantly, external supports available to a provider.

Recommendation: AONTAS recommends that in the Regulations specifying the criteria used to evaluate the capacity and capability of providers, which will be produced after passage of the Bill, that the Authority be required to look at the broader external support structures available to individual providers including an evaluation of all internal, and as importantly, external supports available to a provider.

Fees (s. 65)

The primary concern of AONTAS is the imposition of even more fees for the not-for profit community education sector as proposed in the draft Bill. In particular we cite fees for the new proposed Learner Protection Fund as concerning.

As stated throughout this submission community education provides opportunities for access to education to the disadvantaged, underserved, and most hard to reach learners. We therefore do not believe that it should be made even more difficult to access education for learners already far from the formal education system.

Recommendation: AONTAS recommends that the draft Bill include 'not-for-profit community education providers' as part of the list of providers to which the exemption for payment to the new Learner Protection Fund extends (s.65(6)).



Conclusion

AONTAS and our membership want to thank you for your time in considering this submission to the Joint Committee on Education and Skills. While AONTAS appreciates the work of QQI to ensure the strength of the National Framework of Qualifications, the policy actions taken by QQI over the past several years have been damaging to the provision of accredited education provided by independent not-for-profit community education providers. The new fees and additional resources necessary for reengagement, without corresponding increases to budgets provided by public funders such as ETBs and SOLAS has created a difficult situation for community education providers. Even as the Government acknowledges the important role community education providers have in reaching national Upskilling Pathway targets, more than a decade of funding cuts and additional requirements placed on reduced resources means the sector isn't able to provide the accredited learning that is demanded by the communities in which they exist across Ireland.

An important point to remember when considering this submission is that community education providers across Ireland exist because there is an unmet demand for holistic learner-centred education that responds to the needs of your local communities. While ETBs around the country are noting an undersubscription in their courses, community education providers are often unable to meet the demands for learning that exist in their communities.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Niamh O'Reilly'.

Niamh O'Reilly
CEO
AONTAS

A handwritten signature in blue ink, appearing to read 'Benjamin Hendriksen'.

Benjamin Hendriksen
Advocacy Lead
AONTAS



AONTAS public submissions which include concerns regarding QQI Fees

- [Submission to Quality and Qualifications Ireland Policy Consultation Process on Green Papers \[2013\]](#)
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- [AONTAS Community Education Network Submission to the Quality and Qualifications Ireland \(QQI\) \[2014\]](#)
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- [AONTAS Community Education Network Submission to Quality And Qualifications Ireland \(QQI\) \[2017\]](#)
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- [Pre-Budget Submission 2017](#)
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- [Pre-Budget Submission 2018](#)
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- [Pre-Budget Submission 2019](#)