



Submission to Quality and Qualifications Ireland (QQI) Green Paper on Assessment of Learners and Learning

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 for Quality and Qualifications Ireland (QQI) and other stakeholders, areas of particular interest and importance to AONTAS. Comments that arise from the *Green Paper on Assessment of Learners and Learning* (hereon referred to as the *Green Paper*) focus on the issues of learner voice, the resourcing of quality assurance which is necessary for creating and maintaining quality assessment, and assessment for the purpose of recognising prior learning. While there are many other issues discussed in the *Green Paper* such as data protection, academic integrity, and general assessment issues to name a few, AONTAS believes that other individuals and organisations are better placed to comment on these topics.

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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 throughout their lives based on a grassroots, authentic understanding of lifelong learning that benefits the social, personal and skills development of adults, their families and communities. 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 *Green Paper*

AONTAS would like to start by thanking Quality and Qualifications Ireland for taking the time to develop this *Green Paper on Assessment of Learners and Learning* (hereon referred to as the '*Green Paper*') and create the space for engaging a discussion about assessment processes and supports as it regards further education and training (FET) and higher education (HE). While QQI has provided 10 pages of potential questions for consideration, AONTAS is providing comments on areas within the scope of our expertise and experience. Therefore, the remainder of this submission focusses on the following areas:

- assessment from a learner perspective;
- resources available for creating quality assessment must be equal to the costs of providing quality assessment;
- assessment as a policy instrument through recognition of prior learning (RPL) to create equity of access to education and employment;
- Recommendations for improving assessment policies in Ireland.

Reflection on assessment practice and the impact to learners

As the National Adult Learning Organisation, AONTAS believes learners should be at the heart of all educational theory and practice. Many of the issues raised in this section of the response are aimed at bringing learner needs to the centre of questions on assessment, to gauge how assessment impacts or measures the diverse needs of learner populations. A number of key themes raised in the *Green Paper* are of critical importance to the enhancement of teaching and learning in adult education in Ireland. The questions posed in the *Green Paper*, are aimed at deepening the conversation about the issues raised. Rather than approach these questions individually, we would like to focus on themes we believe address issues raised by learners in FET. The themes we develop in more detail are assessment practices within the FET sector, inclusion and equality within assessment practices, and the promotion of lifelong learning through assessment.

Assessment in FET

As a broad framework underpinning the approach to assessment, AONTAS agrees with the *Green Paper's* endorsement of Astin's IEO (Inputs, Environment, and Outputs) model of assessment over alternatives like the CEDEFOP model. As the *Green Paper* suggests, the ASTIN model "gives greater recognition to the roles of dynamically interacting autonomous individuals" by considering how a learner's environment shapes their experience and learning outcomes.¹ This approach allows for greater consideration for the diverse experiences learners have within FET and therefore better meets their needs as learners, while giving consideration to an individual's learning journey.

Current assessment practices within FET are a topic explored at different points throughout the *Green Paper*. As part of this reflection, the *Green Paper* leads to the position that FET suffers from the absence of a holistic approach to assessment. The paper suggests that Education and Training Boards (ETBs) instead currently take a bottom-up approach to assessment, attempting to fit module learning objectives into QQI established minimum intended programme learning outcomes (MIPLOs). The result from this practice is that assessments in FET are designed to fit learning objectives at the module level, as opposed to the programme level for which QQI certifications are given. The *Green Paper* suggests that this process leads to a "lack of sufficient reflection about the overall programme as distinct from its constituent subjects."² It should be noted however that this process also poses a challenge to learners as it contributes to barriers learners may face when progressing through levels of the National Framework of Qualifications (NFQ).

Through the SOLAS funded, and AONTAS managed National Further Education and Training Learner Forum, learners have raised concerns about the abrupt changes in programme requirements, particularly when progressing from Level 3 to Level 4.³ This quick transition may suggest either that MIPLOs do not accurately reflect the gradual skills development required to progress from level to level or that module level learning objectives at Level 3 are not adequately preparing learners for those at learning objectives at Level 4. In both cases, a holistic reflection upon the MIPLO's at each level and their relationship to assessment would help alleviate this issue. For this reason AONTAS believes, as the *Green Paper* suggests, that a holistic approach to assessment would better support a learner's development while also ensuring that assessments accurately measure the MIPLOs used to

¹ Quality and Qualifications Ireland, *The Green Paper on Assessment of Learners and Learning* (2018), pp 4-5.

² Ibid, 49.

³ AONTAS, *The National FET Learner Forum Advisory Report 2017* (April 2018), p.9.

validate QQI certifications. This approach would require cooperation at both the macro and meso levels from both QQI and ETBIs. This would also need to be monitored in the future through ongoing learner engagement to ensure assessment continues to meet learner needs.

Inclusion and Equality in Assessment

A holistic approach to assessment should occur in tandem with a significant reflection on the relationship between summative and formative assessment, with the aim of inclusion and equality in mind. FET has some of the most diverse learner populations of any Irish educational sector; therefore, ensuring assessment is designed with equal opportunities of all learners in mind, must be of the highest priority. Formative assessment is an essential tool to achieving this aim.

The OECD/CERI's 2008 paper on *Assessment for Learning* proves the importance of formative assessment to ensuring learners receive supports necessary to achieve their learning objectives. The *Green Paper* argues that formative assessment not only raises overall learner performance, but it also promotes higher-level equity in teaching practices. While formative assessment is delivered at the micro-level (by tutors), the role of building capacity among tutors to develop effective formative assessment practices must occur at the meso and macros levels. This process is to ensure that formative assessments are linked to the MIPLOs and summative assessment tools developed at these levels.

There are a number of frameworks developed on how to design effective formative assessment tools to measure a learner's progress. One example is found in Elise Trumball and Andrea Lash's work on formative assessment.⁴ In this work they provide a framework to approach formative assessment and its relationship to broader MIPLOs. They do this by questioning knowledge, skills, and abilities as the starting point to developing all formative assessment practices. They raise questions such as:

- What knowledge, skills, and abilities (KSAs) do I wish to assess toward a specific competency?
- What is the cognitive and developmental path (i.e. learning trajectory) I would expect to see with regard to these KSAs?
- What evidence (i.e. observable features of students' performance and responses) would I need in order to determine the student's level of KSAs?
- What are the characteristics of tasks that will elicit this evidence?
- What KSAs that are not wanted (e.g. unnecessarily complex language, need for speed of response) might this type of formative assessment process introduce?
- How can I modify my formative assessment process to make it inclusive for all students, to minimise the impact of non-target KSAs?⁵

Frameworks and tools such as these can be adapted to the MIPLOs to ensure there is alignment between MIPLOs and course instruction.

In an effort to approach diverse learner populations' experiences with assessment, AONTAS would like assessment to be considered in terms of how it can be inclusive and equitable to all learners. Assessment of learning should provide a chance for all learners to showcase their KSAs, and thereby

⁴ Elise Trumball and Andrea Lash, *Understanding Formative Assessment Insights from Learning Theory and Measurement Theory* (April 2013) available at https://www.wested.org/online_pubs/resource1307.pdf

⁵ *Ibid*, p.9.

have an equal chance of success over the period of their programme. As the *Green Paper* accurately points out, summative assessments can themselves be shaped by an assumption about learners.⁶ The danger is that these assumptions do not reflect the diverse experiences and backgrounds of learners whose performance is being measured by an assessment tool. To ensure assessment works against these assumptions and is responsive to the changing profile of learners in Ireland, AONTAS would like to see an approach to assessment that encourages learners to become partners in designing assessment processes. This process could take many different approaches but the important point is that there is a space for learners to actively participate in assessment design. An assessment development process that is inclusive of learner views would help encourage learners to take greater ownership of their learning. As the *Green Paper* points out, there is advice on what this process would look like.⁷ AONTAS would encourage further examples such as the Student Engagement Framework to be considered in the development of this approach. These examples, however, should be approached with the goal to modify and adjust to the unique landscape of FET, as models currently in place have been put in place and operate in the higher education sector.

Developing inclusive assessment practices means considering how learners can showcase not only the skills they achieve through their formal learning, but also the skills they bring with them. In essence, assessment must give significant consideration to Recognition of Prior Learning (RPL) and where it rests in relation to broader assessment culture in Irish FET.⁸ As studies have shown, RPL processes promote social and economic inclusion.⁹ Ireland has made significant strides in RPL in recent years, particularly in HE.¹⁰ These developments have been focused on the meso-level, with individual HE institutions implementing RPL processes that are distinct from each other. This approach has also been followed in the FET sector. Through the National FET Learner Forum learners have aired frustration at this approach. Learners would like to see RPL processes expanded and promoted on a national level, and they would like to see this process standardised and made transparent across all levels of the National Framework of Qualifications (NFQ).¹¹ To meet this aim, AONTAS would support and actively participate in a re-evaluation of current RPL processes with the aim of drafting and implementing a national RPL policy

Lifelong Learning and Assessment

AONTAS believes that healthy assessment practices and a strong culture of assessment can do more than support learning; assessment if done well can help to promote learning. With Ireland's National Skills Strategy 2025 calling for substantial increases from current lifelong learning levels, the importance of approaching assessment as a tool for promoting learning cannot be understated.¹²

⁶ QQI, p.52.

⁷ Examples provided are Mick Healy, Kathy Flint, and Kathy Harrington, *Engagement through partnership: students as partners in learning and teaching in higher education* (July 2014), available at https://www.heacademy.ac.uk/system/files/resources/engagement_through_partnership.pdf and The National Forum for Teaching and Learning in Higher Education, available at <https://www.teachingandlearning.ie/>. QQI, p.62.

⁸ QQI, p.19.

⁹ Werquin, P. *Recognition of Non-Formal and Informal Learning; Outcomes, Policies and Practices* (February, 2010) available at <http://www.oecd.org/education/skills-beyond-school/44600408.pdf>, pp 11-14.

¹⁰ For a history of these developments, please see Deridre Goggin, Phil O'Leary, and Prof. Irene Sheridan of Cork Institute of Technology, *Recognition of Prior Learning in Irish Further Education and Training*.

¹¹ AONTAS, *The National FET Learner Forum Advisory Report 2017* (April 2018), p.8.

¹² Ireland's National Skills Strategy 2025 available at https://www.education.ie/en/Publications/Policy-Reports/pub_national_skills_strategy_2025.pdf, p. 72.

AONTAS believes that the key to this approach is to include learners as partners in assessment processes at every level of engagement.

Studies have shown that by providing a space for learners to actively engage with learning objectives, processes, and assessment, learning itself is improved. Active learner engagement in assessment processes promotes collaboration and teamwork; critical thinking and reflection; communication skills; and facilitates learning to learn.¹³ These skills are linked to an increased likelihood of learners to engage in further lifelong learning opportunities, as well as gives them the chance to reap the rewards that come from the wider benefits of education such as improved health and civic engagement.

Focus on major awards at the expense of minor awards and lifelong learning

Following from the subsection above on the importance of assessment as a tool for promoting lifelong learning, AONTAS would like to briefly discuss the challenge that exists for lifelong learning when the primary focus of the *Green Paper* is on assessments for Major Awards. While this focus on Major Award assessment may not have been purposeful it is important to note that when policy makers focus on Major Awards at the expense of Minor Awards they are (whether inadvertently or not) building policies that work to exclude many adult learners from educational opportunities.

All adults seeking to return to education, but particularly those who are most socio-economically disadvantaged and underserved are more likely to participate in education that allows flexibility, and which promotes employment mobility and educational progression. Therefore while policies for assessment are being reviewed which focus on the achievement of Major Awards, for many learners, particularly in the FET sector, the purpose of education is to achieve a specific Minor Award and move on to their next personal goal, whether that goal is professional, educational, or otherwise.

From the perspective of learners seeking opportunities for flexible lifelong learning, and professional development, assessment must allow for an evaluation of short term learning achievements as well as longer term achievements. This need for flexible assessment is why AONTAS promotes the position that learners be part of the assessment development process. Without learner engagement in assessment development, institutions will not know what the right mix of assessment tools that are necessary for evaluating learner outcomes.

Resources available for creating quality assessment must be equal to the costs of providing quality assessment

While only briefly discussed in the *Green Paper* on pages 53 and 54 AONTAS believes it is very important to discuss the human and financial resource commitments required to create trusted and effective assessment systems. In short, the resources available for creating quality assessment must be equal to the costs of providing quality assessment. As has been noted by AONTAS and our membership in numerous submissions to QQI and various Ministers and Ministers of State over the past several years, the resource requirements for maintaining a robust quality assurance framework, and therefore strong assessment framework, are very high. AONTAS has frequently discussed these

¹³ David Boud, Ruth Cohen and Jane Sampson, 'Peer learning and Assessment' in *Assessment and Evaluation in Higher Education*, p. 41.

resources requirements and costs in past submissions to QQI as it concerns the changing funding requirements of the community education sector¹⁴¹⁵.

The *Green Paper* notes the importance of organisations having the resources to maintain quality procedures for fair and consistent assessment. It goes on to say that it can envisage how well-resourced providers of mainstream courses can provide the necessary quality structures, while under resourced organisations providing bespoke courses relevant to their smaller groups of learners may have challenges paying for the maintenance of quality procedures and assessment. While these statements are objectively correct, what is missed in these statements is the larger policy issues surrounding limited funding that is available to smaller community education providers.

In order to support community education providers seeking to provide accredited learning AONTAS has been working with the Community Education Network (CEN) to ensure that groups have the support they need. This includes working with QQI to provide clear information for community education providers seeking to continue provision of quality accredited programmes. For the past several months of 2018 AONTAS has employed a Quality Assurance Coordinator to consult with CEN members seeking to reengage with QQI and undergo programme validation, so that they can have a clear picture of the financial and human resource time commitments they face.

Recognition of Prior Learning (RPL)

Recognition of prior learning through assessment is an issue that has been discussed for several years but for which little action has been taken at a national policy level. While there are individual processes for RPL existing across the country in HEIs and in progressive/forward looking FET providers who have the resources to implement RPL, the lack of a cohesive national policy that defines the purpose, goals, and responsibility for RPL puts Ireland at a competitive educational and economic disadvantage.

While the issue of RPL is only given three-quarters of a page on page 55 of the *Green Paper* the issues and questions around assessment procedures for RPL have a significant impact on learner access and progression. As noted in AONTAS' submission to the Department of Education and Skills' on the 28th May 2018¹⁶ there is currently a missed opportunity to reach the Upskilling Pathways target groups of women engaged in home duties; Men, and older men, in employment, farmers/construction/drivers and unemployed/inactive; Travellers; lone parents; and the homeless, by using RPL to recognise their existing skills and help them to enter and progress through the more formal education system.

¹⁴ AONTAS has made several submissions to QQI (2013, 2014, 2015) clearly highlighting the issue of QQI fee. 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 Submissions in 2016, 2017 and 2018, 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).

¹⁵ While the resource requirements of community education providers has increased over the past several years as new regulatory requirements have come online, SOLAS funding for community education based FET has remained stagnant, as evidenced in the 2015 (€10,581,826), 2016 (€10,727,731), 2017 (€10,836,192), and 2018 (€10,869,060) FET Service Plans.

¹⁶ AONTAS, Upskilling Pathways Recommendation reaching Target Groups through Community Education 28th May 2018, <https://www.aontas.com/AONTAS%20-%20Upskilling%20Pathways%20.pdf>

The implementation of a national RPL policy would be a significant step toward demonstrating the Government's commitment of widening and diversifying participation in lifelong learning of traditionally underserved and disadvantaged communities. As AONTAS has argued before and will continue to argue, a well-resourced and clearly defined RPL policy framework is required. The current ad-hoc system of provider driven RPL is not meeting the needs of education providers or learners. Providers are unsure about their responsibilities the best practices of RPL across the country, and the resources required, and learners exist in a system of unequal access to RPL depending on where in the country they live and depending on what institution they attend.

As stated earlier in this submission, the importance of RPL from the perspective of learners has been highlighted through the National Further Education and Training (FET) Learner Forum. Learners have said that they would like to see a national RPL policy that provides a clear and transparent pathway to accessing all levels of the National Framework of Qualifications (NFQ).¹⁷ To meet this aim, AONTAS again states our support and willingness to actively participate in a re-evaluation of current RPL processes with the aim of drafting and implementing a national RPL policy.

The *Green Paper* finishes discussion about RPL by detailing the challenges for implementing a national RPL policy framework. These challenges include the human and financial cost of having experts in various fields available to create bespoke assessments and evaluate individual learner expertise. It is our argument at AONTAS that RPL is critical to widening and diversifying participation in education and that it is necessary for Government to make these investments and not only detail the difficulty of making such investments..

Recommendations

Based on this submission the following recommendations are made as a way of promoting further discussions on issues introduced in the *Green Paper*.

- 1) Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners. Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. Learners are at the centre of the education system in both FET and HE and assessment should be varied and inclusive of all learners. Assessment should be able to gauge the learning of the diverse types of learners within the FET and HE sectors and therefore should not depend solely on traditional systems like end of year exams or essays.
- 2) Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards. Those who are most socio-economically disadvantaged and underserved are more likely to participate in education that allows flexibility, and which promotes employment mobility and educational progression. Therefore while policies for assessment are being reviewed we ask that policy makers remember that important role that Minor Awards have in widening and diversifying participation in lifelong learning.

¹⁷ AONTAS, *The National FET Learner Forum Advisory Report 2017* (April 2018), p.8.

- 3) The resources available for creating quality assessment must be equal to the costs of providing quality assessment. To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality, while also keeping their capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) Establish a national RPL policy. For assessment to be learner focused and have the result of widening participation to lifelong learning QQI and its stakeholders need to commit to establishing a clear policy that leads to learner access and progression through RPL. The Further Education and Training Strategy 2014-2019¹⁸ laid down the priority of developing clear RPL policies by 2018 in order to meet EU Recommendation number (2012/C 398/01) of 20 December 2012 on the validation of non-formal and informal learning. Unfortunately these clear policies have not yet come to fruition.

Conclusion

AONTAS wants to again thank QQI for developing this *Green Paper* and engaging discussions on how assessments can be improved to ensure improved learning outcomes for all learners. While there are many interesting options for the future of assessment that are introduced in the *Green Paper* it is important that QQI and wider stakeholders in Government recognize that none of these options will ever come to fruition or otherwise be successful if we do not ensure that learner needs are heard and understood.

Thank you for taking the time to review our submission.

¹⁸ SOLAS, *National Further Education and Training Strategy*. p.93.