AONTAS Community Education Network Submission to the Quality and Qualifications Ireland (QQI)

9th May 2014

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

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Introduction

The AONTAS Community Education Network[1] welcomes the opportunity to engage in the QQI consultation process and this submission represents its commitment to the process. The paper outlines the main issues for community education organisations in order to shape QQI policies and procedures for the benefit of community education learners.

This submission outlines the concerns of the AONTAS Community Education Network with regard to:

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

The key areas of concern for the AONTAS Community Education Network with regard to both White Papers are:

1. Proposed fees for re-engagement of legacy providers
2. The proposed idea of consortia for Quality Assurance purposes
3. The process for the evaluation of provider capacity for approval of QA.

White Paper: Re-Engagement with Legacy Providers: Overarching Policy

The main issue with this White Paper for members of the Community Education Network is the proposed fees for QA approval.

2.5 Fees for Approval of QA (page 7)
A fee will apply for the approval of a provider's QA procedures.

The exact fee for the re-engagement process for legacy providers is unclear in the Fees Schedule October 2013, however it could be estimated as €5000, in line with section *1.1 Fees for the submission of quality assurance procedures for approval in respect of new providers (Section 80, a)*. As voluntary providers (page 5: 1.2.2) encompass a diverse range of providers including for-profit providers, we strongly urge that no fees for re-engagement be applied to not-for-profit community/voluntary organization.

Not-for-profit education providers should not be required to pay QQI fees for re-engagement because:

- They attract the most hard to reach learners who would not generally engage in formal adult education
- Community groups are already underfunded and engage in education provision that is unprofitable for private providers as they offer extra supports e.g. outreach and learner supports

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[1] The AONTAS Community Education Network comprises over 100 independently managed community education organisations which work collectively to gain recognition for community education, raise its profile and lobby to ensure it is adequately resourced.

- It will further disadvantage learners who are least likely to engage in accredited learning which is counterproductive to achieving national policy agendas regarding upskilling, particularly for the unemployed and those at the lower levels of the NFQ
- Funding for community education groups generally covers contact hours only; therefore, there are no extra funds available for fees. Furthermore, much of the funding for community education is contingent on the ability to deliver accredited training. Diminishing such capacity will be a threat to the basic sustainability of community education. In addition, much of the quality assurance or validation work is carried out through voluntary hours by organisations.

SOLAS has committed itself to developing a Further Education and Training system which is learner centred. The aspiration to create a seamless system in which access, transfer and progression onto the National Framework of Qualifications a reality is laudable. However it is important to recognize the need for a diversity of FET provision which ensures that those individuals who are most distanced from the education system are supported to engage. With this backdrop the role of community education comes to the fore, it has a history of effectively engaging the most hard to reach through its approach: outreach work, the non-threatening, welcoming environment; the learner supports; the specific learning methodology; and its location in, and knowledge of, the community. Learners who do not participate in courses delivered by statutory providers, or who may require the kind of provision that is unprofitable to private providers, can take the step into learning through community education. The number of learners that a community education organization engages cannot be compared to formal adult education, as most learners are from hard to reach groups and require a range of supports to build up their capacity to participate and complete an accredited course.

One of the most important developments in recent times has been the ability of community education providers to offer accredited courses which allow learners to take that step towards achieving a full award, to progressing to further accredited learning and ultimately secure employment. For example: Disadvantaged learners with the lowest level of qualifications are the main cohort of community education learners. The attraction of community education is its strength for engaging learners, however it is one of the most underfunded the FET system. Community Education providers are already struggling to provide a service to their community and learners. To propose a fee for the re-engagement of legacy community education providers, who are an underfunded part of FET and attracts the most hard to reach learners, is discriminatory.

From a learners' perspective, in order to support their ability to participate in accredited learning, their first step back is the most crucial. Community education, and minor (component) awards from level 1-5, allows learners to make the transition to accredited learning and act as the building block for further accreditation attainment. However, community education organisations will not be able to access accredited programmes through the QQI if a fee is applied for re-engagement.

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

The main issue with this White Paper for members of the Community Education Network is:
1. The proposed idea of consortia for Quality Assurance purposes (page 6)
2. The process for the evaluation of *provider capacity* for approval of QA (page 9).

The proposed idea of consortia for Quality Assurance purposes (page 6)

As the new QQI QA may include extra requirements in order to achieve QA, there is a possibility that this will impact on the ability of legacy providers in meeting alternative processes requirements. For example on page 6: *Existing providers may also choose to consider satisfying the requirements for meeting QQI QA criteria through consortia or networks. QQI is currently considering and analysing how such arrangements might be accommodated.*

The consortia idea has been explored to some extent by the CEN (based on how some organisations came together as a consortium to share programmes). However the development of consortia for community education groups is challenging as they do not have the infrastructure to readily engage in/create this process. Furthermore, this work needs resources which in the case of community education groups they do not have, in terms of time or personnel to engage in a collaborative process that is time intensive/need to find suitable partners etc. Also, it is important for community education organisations to have the opportunity to maintain their own QA in terms of autonomy of provision, both through its tutors and as it is oftentimes a requirement of their funding schemes.

The process for the evaluation of provider capacity for approval of QA (page 9)

Legacy providers in the AONTAS Community Education Network are committed to providing high quality programmes for their learners and are in agreement that quality assurance policies must enable learners to achieve intended learning outcomes in a well-supported learning experience. Legacy providers have previously adhered to the QA criteria for FETAC and welcome the opportunity to ensure their practice meets the new standards of the QQI. However, it is unclear from the White Paper how the evaluation of FET legacy voluntary providers will be carried out.

On page 9, it states that:
> *'All FET legacy voluntary providers had a QA agreement with the FET Awards Council. In conducting the evaluation of providers' QA procedures, QQI will take into account the FET legacy voluntary providers' prior QA agreement with the FET Awards Council. The QA agreement with the FET Awards Council was based on the establishment of provider QA procedures. Accordingly, the emphasis of the evaluation will be on the implementation of fit-for-purpose QA procedures and provider capacity rather than the existence of the procedures per se. In carrying out the evaluation, QQI may use evidence generated through prior engagements with the FET Awards Council, gleaned through programme validation, monitoring and certification.'*

In terms of provider capacity, due consideration must be taken for community providers who have previously met the standards of FETAC QA, have engaged in the monitoring process with FETAC, and who

provide quality assured accredited programmes. The process for evaluating the capacity of groups should be fair and consistent with the main focus being on the learner's experience, rather than a comparison between providers. Community education groups may engage fewer learners than formal education providers however this does not imply that the QA standards are of a different standard.

The proposed requirements for assessing providers included in the Green Paper were:
1. **Sole purpose/core business of the applicant is the delivery of education and training.**
2. The applicant is an established education and training provider for a specific period
3. of time e.g. two years.
4. **A minimum number of learners will achieve awards annually.**
5. Providers that are located in areas with limited current available provision of NFQ
6. awards. (Green Paper, p.8)

Community education organisations provide a variety of other services and therefore meeting the requirements of the first point would be difficult. Furthermore, in point 4, a proposed minimum number of learners would be problematic for community education groups as their work cannot be viewed in terms of the number of learners but the progression of learners who are most hard to reach.

Conclusion
The AONTAS Community Education Network is committed to continued engagement with the QQI and welcomes the opportunity to shape their future policies.