

## AEOA Feedback on QQI White Paper on Sector Specific Quality Assurance (QA) Guidelines

The Adult Education Officers Association welcomes the opportunity to give feedback on the long awaited Sector Specific QA Guidelines for ETBs.

We welcome the extension of the focus of the Quality Assurance Procedures to cover all awarding bodies, unaccredited training and related activity. When ETBs have one Quality Assurance policy it will help to embed a culture of quality throughout everything we do.

We have two main concerns regarding the White Paper:

### 1. We are concerned and disappointed with the how general the sector specific guidelines are.

Overall, the guidelines are general and non-specific and give little guidance to ETB in how to develop new Quality Assurance policies. The guidelines are vague and open to interpretation. For example:

“The corporate commitment to quality and the development of a quality culture is essential”.

“Suitable procedures are in place for planning for provision.”

“Quality assurance procedures in place support the management of learner records and the integrity and efficiency of other processes which provides the basis for making and certifying QQI awards and those of other awarding bodies with whom it has arrangements”

One person’s/ETB’s interpretation of what “corporate commitment to quality” or “suitable procedures” or supporting “the integrity and efficiency of other processes” are could be very different to another’s. How do we measure the corporate commitment to quality or the suitability of procedures?

We appreciate that the sector specific guidelines need to be read in conjunction with the Core Statutory QA Guidelines and the sector specific guidelines may benefit from referencing the core guidelines through footnotes etc. to provide greater clarity and detail to the sector specific document.

By generalising the QA requirements for the sector there is a missed opportunity to ensure that there is a common standard of service across the FET Sector nationally going forward. There is a danger that we will lose what consistence we have in how we operate as a sector.

The guidelines refer to “a sectoral approach towards the development of quality assurance guidelines recognising the high level of co-operation, collaboration and cross referencing, on many developments, including quality assurance, that exists within the ETB sector.” This is true. There is a huge body of work being undertaken by a small number of people to ensure that there is a sectoral approach to the development of QA guidelines, in particular Marie Gould in ETBI, the Further Education Support Service, the ETBI/QQI Forum and the QA Strategy Group.

However, this cooperation, collaboration and cross referencing all happens on a voluntary basis, relies on the good will of individuals and is largely dependent on the extent to which individuals within an ETB engage in the process. There is no obligation on an ETB to engage in these processes. Based on the QQI guidelines, it is up to each ETB to develop their own QA Policies and validate their own programmes.

Section 6.1 of the sector specific guidelines does refer to the Education and Training Board Act, which outlines how ETBs can work together, however, getting agreement from 16 ETB and then obtaining Ministerial consent is somewhat of a barrier to working together.

The generality of the guidelines is linked to the planned delegation of authority to ETBs, which will lead to each ETB validating their own programmes and issuing their own certification. While it is welcomed as a sign of maturity for ETBs, it is questionable as to whether it is in the best interest of our learners or of the FET Sector as a whole. If the only thing in common between an award certified by one ETB and another is the Professional Award Type Descriptor then there will be a huge variation in what is offered around the country. How can we then have nationally recognised awards for employment in the childcare and healthcare areas for example?

ETBs need a strategic, national approach to resourcing and structuring of the relevant supports required for devolved responsibility and delegated authority. Detailed, specific guidelines would have helped with this.

Specifically we would like further clarification on the following points:

- A. With regard to provision leading to awards from other awarding bodies in section 4 it is stated: "Arrangements with these other awarding bodies must be formally documented and QQI must be notified before each such arrangement is entered into." Clarification on the level of detail required by QQI in respect of same would be helpful. It would also be helpful to have confirmation that these awarding bodies have been appraised by QQI of what is involved/envisaged.
- B. In respect of contracted provision, specifically contracted provision where the second provider is registered with QQI and has a relationship with QQI in their own right, clarification on the interpretation of the nature of this dual relationship would be helpful.

It would also be helpful to have confirmation that such providers (non-sectoral/private providers) have been appraised of the fact that they will have a dual relationship and are clear as to what obligations they have regarding the quality of their provision (in respect of QQI as opposed to ETB's).

So for example where such a provider has *X validated programme* withdrawn by QQI (following a QQI focused review (as proposed in the other White Paper 'Procedures for Focused Reviews') - what is the nature and extend of ETB's responsibility and the extent of QQI's responsibility regarding this matter (e.g. the dual relationship). Would it be in such a case that quality is linked with 'performance' and 'accountability' as detailed in the QQI

internal review or is it the case that the issue of quality in fact also pertains to the ETB who has the contractual relationship with the provider? The latter is more likely.

- C. It would be helpful to have more detail in section 3 on the nature of the governance and management of education activity. Specifically on the nature of the relationship between ETBs (as the agent fulfilling its expected roles and responsibilities) and QQI (who will be reliant on the agent functioning as it professes to function). The relationship is mutual in nature- as trust in a QQI qualification derives from trust in the ETBs.

So for example how would QQI (as the current agent of the qualification system) articulate its role within the qualification system, and how does it articulate its role in the evolved system (where ETB's make their own awards)? We recognise and appreciate the evolving nature of the system of awards (and the NFQ itself). Nonetheless, at this current juncture QQI holds the most comprehensive understanding of the system itself (being the agent who makes the awards). More detail in respect of its role within (a) the current system and (b) the changed system would be needed if ETB's are to stand a realistic chance of scoping out the governance and management of education activity will have in the NEW QA agreements.

## 2. The guidelines are not clear on what aspects of ETB provision the new QA policies and procedures should cover.

In section 1.2 To Whom Do They Apply? It is stated:

These guidelines are applicable to education and training boards (ETBs) and to any education or training institution established and maintained by an ETB. ETBs are statutory authorities which have responsibility for education and training, youth work and a range of other statutory functions. ETBs manage and operate second-level schools, further education colleges, multi-faith community national schools and a range of adult and further education and training centres delivering education and training programmes.<sup>1</sup>

On reading the section above, which is quoted in its entirety, it would seem reasonable to interpret that all ETB activity is covered by the guidelines. However, this is contradicted on the following page in Section 2 Scope of QA Procedures:

National policy is that the provider-owned, quality assurance procedures of education and training boards will be comprehensive. This means that they will cover all education and training, research and related activities of the ETBs, regardless of whether or not these lead to QQI awards, other awards recognised within the National Framework of Qualifications (NFQ) or awards of other awarding regulatory or statutory bodies, except those education activities that fall under the Education Act (1988).

It is not clear from the sector specific guidelines what the exceptions are i.e. what is meant by "those education activities that fall under the Education Act (1998). The Education Act states that it is "An act to make provision in the interests of the common good for the education of every person in the

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<sup>1</sup> The general functions of an Education and Training Board are stated under the Education and Training Boards Act 2013.

state, including any person with a disability or who has other special educational needs, and to provide generally for primary, post-primary, adult and continuing education and vocational education and training..." This is all of the ETB activity.

It would be much clearer if the sector specific guidelines were to state that QA procedures should cover, for example, all further education and training or all ETB activity apart from mainstream primary and second level education. This would help to avoid any ambiguity around whether self-financing evening classes, prison education, Youthreach Centres, provision for adults with special education etc. needs should be covered by the new QA Procedures.