

## **AEOA Feedback on QQI's White Paper on Core Statutory Quality Assurance Guidelines.**

The Adult Education Officers Association welcomes the opportunity to give feedback on QQI's White Paper on Core Statutory Quality Assurance guidelines and welcomes the progress that has been made in the publication of the White Paper.

Overall, the document seems to be closely aligned to the Higher Education model of single site, large centres. This system does not reflect the nature and breadth of provision within FET, and adult education in particular, wherein there is : (i) a diversity of provision from levels 1 to 6 on the NFQ, (ii) a considerable number of small, dispersed centres, located along the highways and byways of rural and urban Ireland and (iii) part time tutors typically only paid for tuition hours.

The practicalities of preparing a document for validation and achieving a successful and timely outcome appear challenging – to say the least. The guidelines are very general and non-specific and while it is understood that the core guidelines need to be general to cover a huge variety of providers, we feel that more detail and more specifics are needed in order to ensure there is clarity around the standards expected.

### **1. What is the extent of the QA Guidelines?**

#### **a. Governance**

We believe that the more clarity is needed on the extent of “governance”. On page 13 of the White Paper it states that “In the context of these quality assurance guidelines, governance refers to a system in place to oversee the education and training, research and related activity of a provider. This system, or governance structure, enforces separation of responsibilities between those who produce/develop materials and those who approve it.”

This falls short of saying “An ETB should have a system overseeing the work of the entire organisation to ensure its validity” as governance was explained in the Consultative Working Draft of QA Guidelines for ETBs.

The new explanation of what is covered by governance refers to a system in place to oversee three things

- (1) education and training,
- (2) research
- (3) related activities of a provider.

The example given for related activity is programme development. The other examples given are programme approval, learner results and self-evaluation. This explanation of governance is very similar to what Quality Assurance policies for VECs covered in the past.

If governance refers to the whole organisation, and not just managing FET, then this needs to be made more explicit. Does governance cover procurement policies in head office, performance reviews for administrative staff, the quality of food provided for Youthreach students, communication with the general public, planning capital projects etc? While our dual provision schools provide some QQI courses, they also provide programmes certified by the State Examinations Commission and other providers. ETB schools, especially small rural schools, may not have the resources to meet all that is required from the different providers.

If the provider is a community or disability organisation where education and training is a small part of their operations, are they required to include all their operations e.g. counselling services, crèche, mother and toddler groups, under Governance and Management of Quality or does the policy only relate to their education and training? This needs to be made explicit in the core guidelines.

More specific queries / concerns include:

1. The plethora of information that needs to be provided at the time of validation application, including:
  - Need for provider to specify all centres at which the programme will be provided and ensure each centre meets validation criteria. Again, in adult education, centres can vary from PLC Colleges to Church Halls and change regularly to meet learner need and availability – pg 25 7.5 & pg 61 19.7b
2. Samples of material to be provided to learners and samples of assessment tasks, model answers, marking schemes for each award stage, etc. These details are typically not readily available and would need to be provided by a tutor, the preparation of which would likely incur additional costs
3. The reference to the need to review and manage staff ( i.e. tutors) performance and ensure staff development opportunities. Not sure exactly what is required here, is it a PMDS system? These are IR issues which may require financial resources that SOLAS may not put at our disposal.

#### **b. Staff Recruitment, Management and Development**

Similarly in Section 2-4 Staff Recruitment, Management and Development, the general term “staff” is used but the implication is that it refers only to teachers/tutors. “Field or discipline knowledge is necessary for staff, but it is not sufficient. A capacity to teach the discipline to others is also required” and “The providers’ policy in this area expresses its commitment to appoint suitably qualified staff to the role of teacher/instructor/trainer/tutor/other and to provide opportunities for further development”. There appears to be little cognisance of the requirements on PLC Colleges under section 30 of the Teaching Council Act in this section.

Does QA not cover the recruitment, management and development of administrative staff, cleaners, caretakers, coordinators and managers? Support and administrative staff are mentioned under learner supports but it needs to be more explicitly stated.

CVs of staff to be involved in programme delivery – apart from data protection concerns here, adult education would typically not know which tutors would be delivering a programme at the time of applying for validation pg 28 -8.3 How do we cater for the inevitable maternity leave situations, sudden illness, even deaths among staff

### c. Self-evaluation and Monitoring

The same applies in section 2.11 Self-evaluation, Monitoring and Review where “the purpose of self-evaluation is to review, evaluate and report on the education, training, research and related services by the provider and the quality assurance system and procedures which underpin these”. If self-evaluation applies to the whole organisation or to the sections of the ETB delivering QQI programmes. This needs to be made more explicit.

The only mention of maintaining buildings and maintenance services is under 2.7 Supports to Learners. In section 2.7.iii it states that “the adequacy and effectiveness of all academic and other support services *related to the programmes of education and training* are regularly reviewed”. Does this mean that buildings that are not related to education and training do not fall under QA or are all buildings including administrative offices related to education and training? The facts are that Further Education programmes have not traditionally attracted capitol funding in the former VEC sector. Unless there is a major mood swing then some of the requirements will be very difficult for us to deliver.

In section 2.7.1 it states that “Learner resources and supports are benchmarked against standards”. What are the standards for learner resources and supports?

## 2. Pastoral Care

Under 2.7.ii Pastoral Care, does this mean that the Code of Practice for the Provision of Education and Training to International Learner now applies to all learners?

“The sentence The Code of Practice for Provision of Education and Training to International Learners ... is complied with where applicable” gives the impression that it only applies to international learners.

The sentence “This includes both pastoral and educational care, such as tutors, mentors, counsellors and other advisors.” is not clear.

Clear definitions of what is meant by “pastoral care” and clear guidelines, (more substantial than those in the code of practice for international learners) are needed before we can develop a policy. Some of our learners would have personal, social, health and financial problems that it would be beyond the remit/expertise etc of ETB staff working under the management of the Adult Education Officers..

### 3. Self-Evaluation

The AEOA believes that the self-evaluation by providers needs to be more detailed and take a broader approach to the one outlined in the white paper. Self-evaluation and improvement and enhancement is very specifically relating to the impact on learners and other stakeholders on page 41. This is very different and much narrower than the previous approach where the Self-Evaluation Checklist focused the following areas and the provider was obliged to show evidence for these:

- Communication,
- Equality,
- Staff Recruitment and Development,
- Access Transfer and Progression,
- Programme Development,
- Delivery and Review,
- Fair and Consistent Assessment of Learning,
- Protection for learners and
- Sub-contracting / Procuring Programme Delivery

While the AEOA welcomes the document, it has significant reservations on the legal framework within which it fits. We accept that a lot of what is in it, mirrors other awarding bodies from another jurisdiction, but some of what is proposed may not comply with the law of this land as it stands. It lacks the flexibility to deliver over six levels in full and part time modes, in particular to disadvantaged learners and early school leavers. The ETBs in which we work, are legal statutory entities in their own right and this document appears to dilute some of the core functions laid out in the Education and Training Board Act and the Teaching Council Act. Maybe we are sensitive beings, but we feel that the tone was perceived as unnecessarily derogatory and negative towards legacy, agreed validation policy and processes within existing ETB FET structures. AEOs are and have always been, committed to providing a world class FET service to Ireland. In reading the document one felt that there was incorrect information outlined therein, for example with regards to evaluators for FET programmes; it was noted that ETB programme evaluations are always subject matter experts within the discipline area; this is part of the criteria for selection. AEOs built up the adult Education service since their first appointment in 1979 and feel that this document does not reflect the breadth and depth of provision particularly in rural Ireland and may not accommodate all the existing provision in small isolated centres and communities.