



## **JMB/ACCS Submission to QQI on the White Paper on Core Statutory Qualification (QA) Guidelines**

**5<sup>th</sup> February 2016**

The Joint Further Education Representative Body, a representative body for Further Education providers in the Community and Comprehensive and Secondary Voluntary schools sectors appreciate the opportunity to provide comment on the Core Statutory Quality Assurance (QA) Guidelines White Paper prepared by QQI.

Initial comment is that it is a welcome, comprehensive and informative document outlining the QA obligations of all providers of further education programmes in the post second level setting. It is understood that the guidelines aim to capture all providers and as such it is surprising that in this high level document there is so much specific detail that would be expected in specific guidance documents to be developed for different types of providers.

### **Introduction**

It is welcomed that the guidelines recognise that “a provider’s scale and scope of activity will determine the level of complexity of their QA procedures, which should always be fit-for-purpose and context”. This appears to indicate a sense of realism relating to the process of QA.

With reference to ‘To Whom Do These Guidelines Apply?’ it is noted that there is reference to “all types of providers”. Later specific reference is made to ETBs, SOLAS and Teagasc. There is no reference to second level schools within the Community and Comprehensive or Voluntary Secondary sectors. Perhaps you view them as captured under ‘independent providers’ however we believe there should be specific reference to all relevant second level sector providers.

## **Section 2**

The following are observations on different aspects of the main areas to be considered under QA.

### **Governance and Management of Quality**

As is the case in all sections of core quality assurance guidelines this section is very detailed. The level of detail would appear more appropriate to the sector specific guidelines which are to follow.

There is little in this section that second level schools do not currently engage in. The clear identification of roles and responsibilities for the implementation of QA is stressed which is important. All teachers are encouraged to be reflective practitioners and the process of SSE is currently being embedded in schools. The difficulty that schools will on occasion encounter is the time required for all the internal and external monitoring required. It is important that the process does not become an excessive administrative burden where the focus is distracted from the key purpose of learning and teaching.

### **Documented Approach to Quality Assurance**

This section appears to promote best practice and as stated previously in the White Paper it must be viewed in terms of the scope and context of provision.

### **Programme Delivery**

In the context of each provider again the scope and context must be considered. In 2.3.3 there is specific reference to positions of 'academic managers' to monitor programme delivery. If providers are to take ownership of the process of quality assurance it must be benchmarked against the scope and context of the provision. The language being used here is not consistent with the language of certain providers.

It is assumed that staff recruitment mentioned under 2.4.1 and the provider's policy will be cognisant of the employment regulations in specific sectors as determined by other regulatory bodies.

Without doubt all providers will wish to support staff professional development. "Planning and resources are committed to identifying and addressing staff training needs" is indeed something we would strive for but is dependent on the availability of resources.

The monitoring of the quality of the learning experience is commendable but must take place within the agreed procedures within any given sector.

### **Assessment of Learner Achievement**

Aligning the assessment to the identified desired outcomes, the use of assessment methods to reflect the different ways in which learners learn and the emphasis on formative learning strategies are to be supported. "The criteria for, and method, of assessment as well as criteria for grading are published in advance" is a clear statement of best practice.

The use of “anonymous grading of summative assessment” would appear inconsistent with current practice being promoted by the Department of Education and Skills particularly regarding reforms of assessment in the new Junior Cycle which emphasises the importance of the teacher in all aspects of assessment. The provision of external moderation and authentication would appear to provide the safe guards required to ensure fairness.

### **Support for Learners**

This entire section is commendable but also somewhat aspirational and may place a significant resourcing issue on agencies such as the Department of Education and Skills to ensure providers meet their QA requirements.

### **Managing Information and Data**

When considering the data required from second level schools it is important to note that duplication of reporting should be minimised. Second level schools are now required to provide similar information on learners to the DES, SOLAS and QQI. Each agency has tended to develop systems to meet their own requirements and it can appear there is little inter agency communication resulting in similar information being potentially entered in three different systems.

### **Publishing Quality Assurance Evaluation Reports**

With regard to second level providers engaged with further education provision it is assumed that the sector specific guidelines will clearly identify the role of QQI and the Inspectorate regarding inspections and reporting.

### **Annex 1**

The table provided setting out the legal basis and requirements in the 2012 Act is very useful and well presented.

### **Annex 2**

The Glossary of Terminology is again useful and brings clarity to some of the terminology used in the document.