

NAPD response to recent QQI Consultation Documents.

Statutory Quality Assurance Guidelines for Flexible and Distributed Learning

NAPD PLC Colleges and Schools are not resourced to create programmes of this nature. The current teaching contract will hamper development in this area. However PLC Colleges and Schools could outsource this aspect of full-time courses to organisation such as eCollege to enhance course provision and prepare learners for industry standard qualifications.

Requirements, as specified in these guidelines, could be very restrictive in relation to back office support and high quality IT hardware and software resources. The PLC sector is massively under resourced in this area.

Currently PLC Colleges and Schools offer a virtual learning environment through Moodle and this delivery is currently governed by providers QA, which is already in place. Is the scope of this policy to generate additional QA guidelines for the use of VLE's?

Core Statutory Quality Assurance (QA) Guidelines

- Developed in line with EU Policies which is good practice.
- Reference to all providers being responsible for QQI reputation is good practice, however current QQI policy development documents are becoming onerous for PLC Colleges and Schools to deliver and will drive Colleges and Schools to use certification other than QQI.
- **Governance page 14 in relation to risk register:** There are many risks associated with PLC provision, however many of these are governed by the teaching contract and teachers union agreements. Identification of risks can happen, however unless the teaching contract is reviewed in relation to performance then these types of risks cannot be addressed (teacher underperformance, delivery outside of the academic year and refusal to engage in retraining or upskilling).
- **Programme Delivery:** (To include well-structured placement opportunities). The issue of work experience and its relevance is a recurring theme. PLC Colleges and Schools are not resourced at a local level to find well-structured placements and to monitor learner progress and develop an employer relationship.
- **Staff Recruitment, Management and Development:** The ETB is the employer under license from the DES. The recruitment processes are governed by Circular Letters and employer legalisation. However within PLC Colleges and Schools the performance and benchmarking of teachers is governed by the Inspectorate and not ETB's. In addition peer review and benchmarking is not agreed to by the Teachers Union of Ireland. Contractual employment issues will need to be agreed between the DES and the TUI. It is the remit of QQI to engage currently in the performance of staff.
- **Teaching and Learning:** The responsibility for the quality of teaching and learning is the responsibility of the DES and the Inspectorate. While PLC Colleges and Schools can engage with staff on a college or school basis there needs to be a co-ordinated national approach.

- **Learning Environment: Learning off-campus.** PLC Colleges and Schools engage in many Learning Off-Campus activities. As providers we are under resourced to investigate each off-campus learning environment.
- **Information Provision:** Currently information systems are being developed by SOLAS such as FARR and PLSS. These systems are designed to meet the expectations mentioned in this section. However PLC Colleges and Schools would like to survey learners achievement 1 year after completing their course of study to make the outcomes more realistic. QQI should note that many learners do not respond to surveys of any kind and if learners could be tracked by their PPSN number through the Revenue system this would clearly give the results needed.

Towards a White Paper on Sector Specific Quality Assurance (QA) Guidelines by QQI for Education and Training Boards.

- **Scope of QA Procedures to cover all ETB activities:** This is a good policy move and can only help to standardise the sector and enhance its reputation and that of QQI. However there is a concern that this will stifle the flexibility of the sector, especially when dealing with hard to reach minorities and those who struggle with learning. The concern is that the learning process will become too onerous for those groups and they will refuse to engage.
- **Governance and Management:** Recognition that there is a multi-layered governance and management systems within ETB's are good practice. Are ETB's resourced to embrace the fundamental changes as outlined in this document? This will cause a lot of difficulty on the ground and will erode the confidence in QQI awards. However QA across all ETB activities cannot be benchmarked the same and the same QA cannot be supplied overall. For example: A QQI award delivered through a day-time PLC course has to be delivered by a teacher approved by the Teaching Council. The same award being delivered through Adult-Education or a Training Centre does not have to be delivered by a teaching council approved teacher. How is this situation going to be addressed?
- **Programme of Education and Training:** Staff performance within PLC Colleges and Schools is a matter for the DES and the TUI as the teacher contract is established through the DES and negotiated by the TUI and not QQI. This needs to be recognised.
- **Support for ETB staff** is seriously lacking and within the remit of the current teaching contract. It is impossible for teachers to engage in employer liaison or development as the teaching contract does not allow it.
- **Validation:** Clarification is needed on the difference between Programmes with a shared curriculum and Programmes based on a shared curriculum. This is confusing.
- **Developing capacity of the ETB:** There are some issues here that relate to the teaching contract which are not part of the ETB remit. This will have to be negotiated with the DES and the TUI. Performance monitoring is not currently in place for PLC teachers, this needs to be addressed within the confines of the teaching contract and in conjunction with the TUI.
- **ETB's collaborating on a national basis:** Issue with Peer review and benchmarking. There are contractual and union issues related to this which need to be negotiated.

- **Shared Curriculum development and review:** The shared ETB process worked well and a shared curriculum development similar to that process would benefit the sector.

Evaluation of the quality assurance procedures of other providers: PLC Colleges and Schools are involved in the provision of additional training to learners such as: First Aid, Manual Handling etc. Does this section mean that PLC Colleges and Centres will have to approve the QA of these providers prior to delivery? In this instance will a common ETB list of such providers suffice?

Quality Reviews for Staff Performance: Teachers in PLC Colleges and Schools are governed by DES contracts and review in this instance is the remit of the inspectorate. How and when does QQI propose this is to happen? Comparing staff performance of a teacher with much experience in a subject area, with that of a new teacher is not comparable. In addition comparing the performance of a teacher with that of an adult-education tutor or training centre instructor is equally not comparable. In addition resources will have to be fit for purpose and upgraded to ensure that delivery is supported.