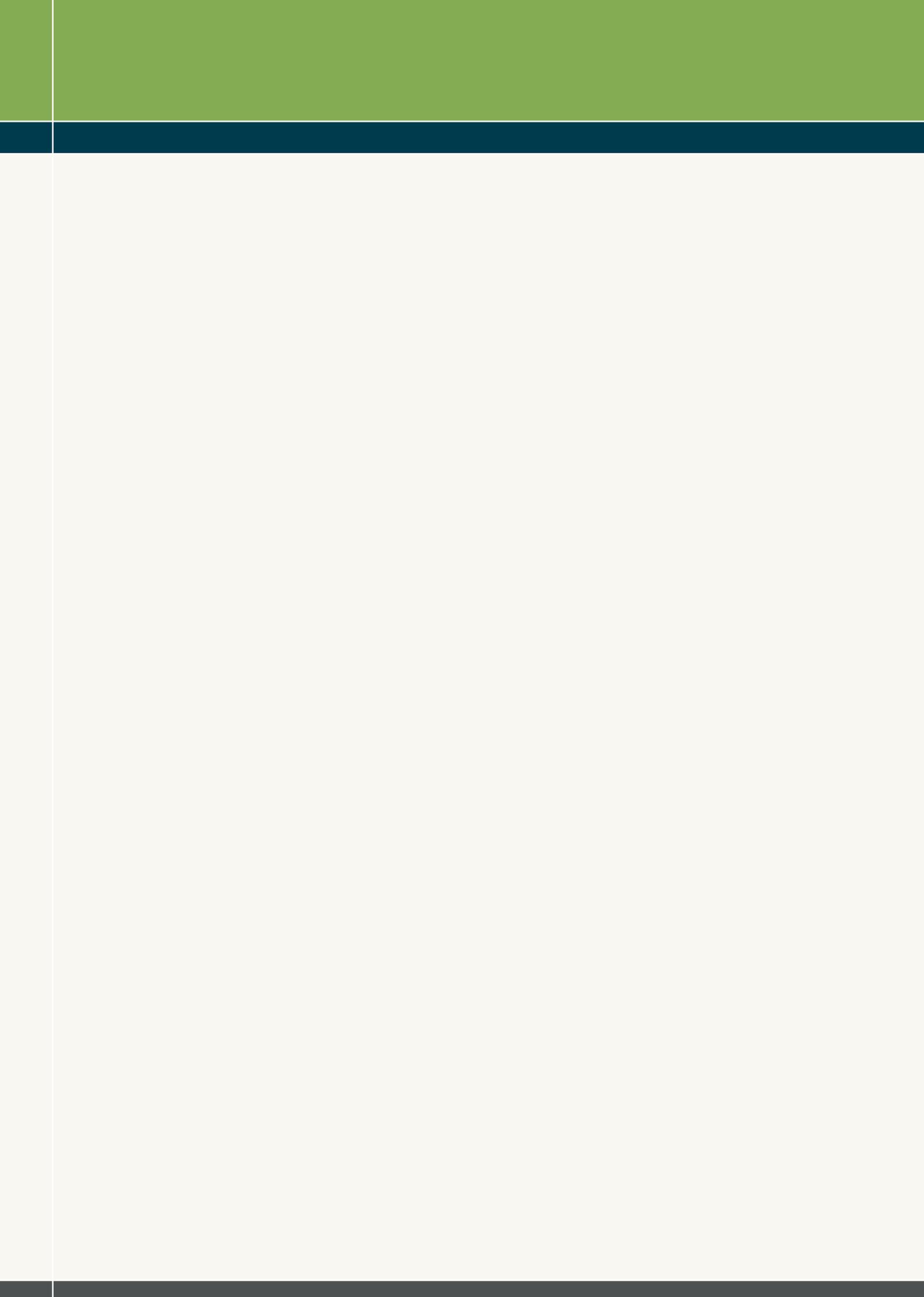




QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

Green Paper on Assessment of Learners and Learning: Stakeholder Feedback



Dr Joanne Banks
School of Education
Trinity College Dublin



Trinity College Dublin
Coláiste na Tríonóide, Baile Átha Cliath
The University of Dublin

CONTENTS

Contents	
Glossary.....	3
CHAPTER 1	5
Stakeholder feedback: a thematic analysis.....	5
Report structure: macro, meso, micro.....	7
Limitations	7
CHAPTER 2	8
2.1 The purpose of assessment (of, for and as learning).....	8
2.2 Principles and guidelines for assessment.....	9
2.3 Summary.....	13
CHAPTER 3	14
3.1 Inclusion and diversity in assessment	14
Reasonable accommodations.....	16
Supporting diverse learners	18
Universal Design for Learning	18
3.2 Engaging learners as partners in assessment	19
Collaborative learning and teamwork.....	21
3.3 Academic integrity and standards of Achievement.....	22
External examination and authentication.....	22
Guidelines: external examination and authentication.....	24
Academic integrity among students	25
Plagiarism	25
Supporting consistency and standards of achievement	27
Academic integrity, grading and awards.....	29
3.4 Recognition of prior learning	29
3.5 Summary	32
CHAPTER 4	33
Over-assessment	33
Avoiding over-assessment	35
4.1 Work-based assessment.....	35
Principles underpinning QA in the workplace.....	36
Industry involved in assessment	38
4.2 Award Classification	38
4.3 Technology in assessment	39
4.4 Learning outcomes	40
Staff training required	41
Learning Outcomes are too prescriptive	42
4.5 Summary.....	43
CHAPTER 5.....	44
Summary of stakeholder feedback	61
References:	46

GLOSSARY

AHEAD	The Association for Higher Education Access and Disability
BTEA	Back to Education Allowance
CPD	Continuous Professional Development
DARE	Disability Access Route to Education
DAWN	Disability Advisors Working Network
EA	External authentication
EE	External examination
ELE	English Language Education
ESOL	English for Speakers of Other Languages
ETB	Education and Training Board
FE	Further Education
FET	Further Education and Training
HE	Higher Education
HEA	Higher Education Authority
HE	Higher Education
HEI	Higher Education Institution
IoT	Institute of Technology
IUA	Irish Universities Association
LO	Learning Outcomes
MIPLO	Minimum Intended Programme Learning Outcome
NFQ	National Framework of Qualifications
QQI	Quality and Qualifications Ireland
RPL	Recognition of Prior Learning
THEA	Technological Higher Education Association
TU	Technological University
UDL	Universal Design for Learning
USI	Union of Students in Ireland
VTOS	Vocational Training Opportunities Scheme

CHAPTER 1

This report provides an analysis of 77 stakeholder responses to the QQI Green Paper on Assessment of Learners and Learning published in 2018.¹ The purpose of the Green Paper was to set out a framework and context to discuss a broad range of assessment issues with a view to provoking debate about what is being done and what can be improved. Following a number of stakeholder consultations in autumn 2018, QQI sought submissions from all providers of programmes of further education and training (FET), higher education (HE) and English language education (ELE). The purpose of this report is to provide a thematic analysis of stakeholder views across the three education sectors. Given the breadth of the topic of assessment, QQI called for submissions to consider issues at all levels of education from the macro to the micro with consideration to what they, as the regulatory body, could 'do better' (QQI, 2018, p. 4).

This report provides a thematic analysis of the 77 submissions by dividing key issues into three distinct but overlapping levels: macro or system level issues, meso or provider level issues and micro level issues dealing with day-to-day assessment for providers and students. Given the detailed nature of responses, the report provides a qualitative analysis of the views of stakeholders on assessment issues raised in the Green Paper. The original submissions will be made available where stakeholder consent has been obtained.

Stakeholder feedback: a thematic analysis

The overall aim of the Green Paper on Assessment of Learners and Learning (2018) was to provide stakeholders with a forum to discuss key issues in the area of assessment. Sections 7 to 17 of the Green Paper describe general assessment issues that affect all education providers in addition to more specific issues that are relevant only to FET, HE and ELE. Stakeholders responded to Section 17 (Summary of Issues Proposed for Discussion) in particular, as it was structured as a series of general and specific questions. Table 1 provides a sample of general questions posed by QQI in the Green Paper. They include aligning learning outcomes (LOs) with assessment at module and programme level; the burden of assessment and over-assessment more generally; consistency in the standards of achievement; engaging learning as partners; and the role of technology in assessment:

¹ 77 submissions were received from a range of stakeholders with 76 giving full permission to quote.

Table 1: Sample of questions posed in the Green Paper

What can be done, and by whom, to help build expertise in expressing learning outcomes and suitably aligning assessment with them at module level and especially at programme level?
Do you agree that the burden of summative assessment for certification might be unsustainable by some organisations that might be otherwise capable of providing programmes of education and training? What are the implications?
What can be done to support consistency in the actual standards of achievement that must be demonstrated and assessed to qualify for Framework awards?
What can be done to further engage learners as partners in assessment of, for and as learning?
What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?
What can be done, and by whom, to help build expertise in expressing learning outcomes and suitably aligning assessment with them at module level and especially at programme level?

Source: Green Paper on Assessment of Learners and Learning, 2018, p. 107-110.

While much of the feedback was in direct response to some, or all, of the questions posed in Section 17 of the Green Paper, other stakeholders based their submissions on what they felt were the most pressing issues in their sector.

In light of the large volume of textual data to be analysed, it was decided to present the responses in the form of a thematic analysis, where significant patterns or themes in qualitative data are identified and used to discuss an issue (Braun and Clarke, 2006). Thematic analysis is particularly suitable for this type of written stakeholder feedback given the varied nature of responses (with some stakeholders responding directly to questions posed in the Green Paper and others giving more general views). Table 2 provides an overview of the key themes raised in the feedback from stakeholders with many of the topics overlapping.

Table 2: Key themes addressed in feedback submissions

Universal Design for Learning	Academic integrity and trust, academic standards of achievement	Resourcing assessment	Principles and guidelines for assessment	Grading and awards and classification
Competence in assessment	Work-based assessment	Recognition of Prior Learning	External examining and authentication	Inclusion and diversity
Technology and assessment	Learner voice, learner involvement, partners in assessment	Burden of assessment and over-assessment	Learning Outcomes	Remote assessment
Unitisation of assessment	Centralised / distributed assessment	Disciplinary communities / communities of practice	Sectoral protocols and conventions	Assessing discrete or vocational competence
Corruption of assessment	Assessment for learning and feedback	Individualised assessment	Norm-referencing	Programme assessment strategies and procedures
Institutional policies and providers	Governing policies or criteria	Programme and module specific regulation	Formative and summative assessment	

QQI received 77 submissions from stakeholders in response to the Green Paper, of which 76 gave full permission to quote in the analysis. Although submissions are anonymised in the report, they have been given an identification number (ID) so that respondents can be identified by using the Appendix². Of the 77 submissions, 23 came from FET providers and a further 24 from HE providers. The remaining 30 submissions came from a range of stakeholders including ELE providers and organisations (two), representative bodies or unions (four), students (seven group submissions), and other institutions, organisations and awarding bodies (17).

Report structure: macro, meso, micro

The following chapters provide a structure for the themes raised in Table 1 by dividing the areas of discussion into how they affect different levels of the education system (macro, meso and micro). Chapter 2 focuses on macro or system level issues and the issues discussed include the purpose of assessment, principles and guidelines for assessment, the role of QQI and regulation more generally; the involvement of disciplinary communities or communities of practice; and the topic of centralised versus distributed assessments. Chapter 3 focuses on meso level issues relevant to many providers and organisations. That chapter focuses on inclusion and diversity in assessment; engaging learners as partners in assessment; academic integrity and standards of achievement; and recognition of prior learning (RPL). Chapter 4 focuses on assessment issues at micro level such as over-assessment, work-based assessments, grading and awards, technology and assessment, the formulation of learning outcomes and assessment. Despite designating issues as macro, meso or micro level issues, the author acknowledges that many of issues apply at either or both of the remaining levels. This structure is simply a way of presenting stakeholder views in a readable and meaningful way.

Limitations

Given the detailed responses of some stakeholders, it was not possible to code and analyse all the material. The report focuses primarily on the key themes raised in the majority of submissions. As a result, some topics highlighted in the Green Paper do not form part of the analysis in the report's chapters (although they are often referred to in analyses of other topics). Based on Table 2 above, the topics not explicitly covered in the report include: resourcing assessment; sectoral protocols/conventions; governing policies/criteria; assessing discrete general skills and norm-referencing. As mentioned above, individual stakeholder submissions will also be made publicly available where consent was provided.

A further consideration must be given to the extent to which the submissions are representative of education stakeholders including formulators of education policy, government agencies, awarding bodies and regulators, representative organisations (where members contributed to their organisations' responses), unions, education providers and learners. Of the 77 submissions, the number of submissions from FET providers (23) was similar to the number from HE providers (24). Given that there are eight universities, 11 IOTs (excluding 3 IOTs that are now TU Dublin), 30 private providers, 355 FET providers and 16 ETB FET providers, the feedback provided is not truly representative of the breadth of provision. Furthermore, the student voice is somewhat under-represented with just seven group submissions written by students.

² See appendix for a list of individuals and organisations that provided submissions.

CHAPTER 2

Macro level issues

As outlined in Chapter 1, this feedback report focuses on a range of assessment topics within education: macro or system level issues, meso or provider level issues and micro issues affecting day-to-day teaching, learning and assessment. Overall, stakeholders welcomed the publication of the Green Paper and the importance of stimulating discussion around assessment in education.

This chapter focuses on the macro system level issues that primarily affect QQI. The Green Paper outlined a number of areas for discussion and invited feedback from stakeholders about the purpose of assessment; principles and guidelines for assessment; the role of QQI and regulation more generally; the involvement of disciplinary communities or communities of practice; and the topic of centralised versus distributed assessments.

2.1 THE PURPOSE OF ASSESSMENT (OF, FOR AND AS LEARNING)

The Green Paper prompted discussion by stakeholders of the different purposes of assessment (of, for and as learning). One submission found this section of the Green Paper to be ‘very light’ and called for a ‘wider discussion’ in any future iteration of the document. They perceived that there is an increasing move away from assessment ‘of learning’ and a ‘lot more emphasis on the wide-ranging learning benefits gained from the ‘as’ and ‘for’ (HE provider).

Some submissions discussed the role of assessment ‘of, for and as learning’ (Green Paper, 2018) in the context of what the purpose of education should be. One submission outlined the variety of educational objectives in further, higher and adult education. These included:

- *Education for foundational knowledge, such as maths, science, languages, culture and society;*
- *Education for professional and occupational training;*
- *Training for the acquisition of skills;*
- *Education for engagement, democracy and citizenship, with reference to Dewey, Newman and Freire;*
- *Education for lifelong learning, including personal development, social development, hobbies, creativity, intergenerational learning, crafts and arts, and so on (HE provider, ID: 47).*

They outlined the need to ‘frame assessment as learning’ and ‘move away from the practice of the assessment of learning, which is, by and large, regurgitation and memory testing’ (HE provider, ID: 47). The submission details how this might encourage students to ‘engage in their own learning in order to develop their own assessments’ where more research and portfolio methods are used:

where students undertake their own projects which develops their own knowledge base in an explicitly personal and social manner. Further, group projects are essential in order to frame learning as social, rather than merely individual endeavour. And groupwork could be part of the assessment as learning (HE provider, ID: 47).

Other providers argued the need for feedback if assessment as a form of learning is to work:

Strategies where learners are taught how to incorporate feedback in final drafts should be carefully considered by colleges developing their teaching, learning and assessment strategies (HE provider, ID: 39).

This provider drew on the model adopted in the Junior Certificate which could be useful to providers at FET and HE levels:

It is reassuring that the skill of assessment for learning is featuring more prominently in the Junior Cert and how students manage feedback will be part of students' assessment in English. They cite the NCCA which states that "Providing focused feedback to students on their learning is a critical component of high-quality assessment and a key factor in building students' capacity to manage their own learning and their motivation to stick with a complex task or problem (HE provider, ID: 39).

2.2 PRINCIPLES AND GUIDELINES FOR ASSESSMENT

The Green Paper also posed a series of questions to stakeholders about the publication by QQI of general principles and guidelines for assessment. The questions prompted feedback about who the general guidelines should apply to and what the principles and guidelines should address, the perceived ambiguities of QQI guidelines and the patchiness of current guidelines. The response to questions around whether QQI should publish general principles and guidelines for assessment, was overwhelming positive across FET and HE sectors. Some contributions reflect the different relationships of FET and HE providers to QQI with some views (predominantly those in the FET sector) reflective of QQI as their awarding body. This distinction is apparent where responses may seem conflicted, with some providers seeking greater guidelines and support and others wishing to maintain autonomy at provider level.

One HE provider discussed the need for 'clear (yet context-sensitive) policies and guidelines and for clarity over where ownership and responsibility lie (Institution, College, School, Programme, module leader)' (HE provider, ID: 50). They maintained that QQI principles and guidelines would become a 'useful reference point for assessment and programme design and review' (HE provider, ID: 50).

One FET submission remarked that the publication of guidelines by QQI was an opportunity to define the 'precise meaning of the terms 'principle' and 'guideline' and to set out a 'clear and unambiguous distillation' and "recommended application of, the concept of assessment' (Representative body/union, ID: 68). The publication could also highlight:

- *QQI's position and role in the assessment process;*
- *The position and role of other parties to the assessment process; particularly for the ETB sector where new validation and governance procedures now exist;*
- *Guidelines on the development of capstone assessments instruments focused on programme objectives would be particularly welcome.*
- *The principles of Universal Design (Representative body/union, ID: 68).*

Another submission argued that any principles and guidelines ‘should clearly reference the knowledge, skills and competence dynamic in the NFQ, be clear, simplified and unambiguous’ (Representative body/union, ID: 69). They suggested that principles and guidelines be adapted to each level of the education system – macro, meso and micro:

- *The principles and guidelines should be demonstrably consistent and fair at the national (macro) level so that, for example, an NFQ Level 5 [or indeed all levels 1-6] award in Mayo is consistent with an NFQ Award in Cork in every type of setting;*
- *The principles and guidelines should be clear, unambiguous and flexible in the manner of their application at the meso-level i.e. a provider should meet the overall requirements of assessment set out in the principles and guidelines as appropriate to the setting;*
- *The principles and guidelines be non-prescriptive at the micro level i.e. duplicated paper exercises for assessment without rationale should not be implemented by providers (Representative body/union, ID: 69).*

Taking a similar approach to guidelines within the various levels of education, one ETB suggested that as the national regulator, QQI should ‘focus on publishing policy (macro) and associated guidelines where issues arise with policy interpretation’ (FET provider, ID: 19). They describe how at meso level ‘umbrella organisations and institutions could work together to develop their own guidelines based on policy and sectoral needs and designed to meet the needs of the specific sector’ (FET provider, ID: 19).

Others agreed with this approach and suggested a ‘set of clear, simple, easy to follow guidelines from QQI to providers, covering the general principles of assessment would be beneficial’ (FET provider, ID: 17) but cautioned against reducing autonomy at provider level:

Such guidelines would assist in maintaining standards, and state clear expectations of providers when it comes to assessment. We would however appreciate the retention of autonomy of control over the creation of assessment for each providers context, once remaining within the parameters for awards (FET provider, ID: 17).

One higher education institution (HEI) acknowledged that general core principles and guidelines could be useful but cautioned that ‘different programs may require specific adaptation of those general principles and provision for such adaptation should be observed’ (HE provider, RIN, 46). A HE organisation echoed this point suggesting that:

the principles/guidelines might be better framed as best practice guidelines rather than the statutory quality guidelines provided for under QQI’s legislation. In addition, if they were to apply to all of ELE, FET and HET, they would need to be at a sufficiently high level, and carefully crafted, to be inclusive and relevant (HE organisation, ID: 33).

Some FET providers remarked that the publication of QQI general principles and guidelines for assessment would ‘provide a common understanding for the sector’ (FET provider, ID: 16). Some providers felt that QQI should provide ‘general principles in the form of guidelines’ and allow providers (and umbrella organisations) to ‘develop appropriate sector-level guidelines’

(FET provider, ID: 19). Other FET submissions were more specific and suggested that the role of the QQI should be made clear and their 'guidelines should include a clear and unambiguous distillation of QQI's understanding, and recommended application of, the concept of assessment in this context' (Representative body/union, ID: 68). The level of prescription of any guidelines would also need to be determined by QQI:

should principles and guidelines be placed at a top-line universal level, or should they be placed at the level of the module? In which case they would need to be customised to each module. My personal experience of prescribed assessment guidelines at module level (e.g. City & Guilds) is that if they are well thought out, they remove a great deal of ambiguity from assessment decision-making, and provide a stronger basis for explaining marking decisions during feedback sessions with students (FET provider, ID: 15).

This, they note, would also facilitate a smoother EA (external authentication) process (FET provider, ID: 15).

One provider felt that guidelines and principles should be based on 'solid academic and practical theory' and that providers should then be able to use these guidelines for the purpose of 'in-house' CPD and training' (FET provider, ID: 19). In one group submission, students generally welcomed the publication of principles and guidelines from QQI but had concerns that they may not accommodate the 'different needs of learners or enable a level of autonomy in each sector of Adult Education (Students from a HE provider, ID: 77).

Other submissions took a broader view and spoke about the importance of principles and guidelines across all sectors:

These principles can provide a solid foundation for assessment design. These principles will be common across all three sectors HE, FE and ELE. These principles will be accessible to students, teachers, institutions and sectors and provide a common vocabulary and a framework (HE provider, ID: 49).

Another submission stressed that principles and guidelines of assessment that do not contribute to learning and development within each of these dimensions should be questioned:

It is vital that assessment be part of a general conversation about the ultimate purpose of education for a critically engaged citizenship (HE provider, ID: 47).

Some providers called for 'clear and concise' guidelines with no ambiguity to ensure QQI regulations are adhered to (FET provider, ID: 17). In response to questions in the Green Paper about patchiness and ambiguity in QQI regulations and guidelines, some stakeholders gave detailed suggestions about how this problem could be resolved:

The solution to resolving perceived ambiguities in the QQI regulations, is to provide a clear and practical methodology as to how such ambiguities might be resolved i.e. provide clear practical guidance as to how mapping is to be done (Representative body/union, ID: 69).

Others agreed with the Green paper's identification of patchiness and ambiguity in some of the current guidelines which may be 'damaging and cause confusion' for providers (FET

organisations group submission, ID: 7). They suggest that QQI provide a framework ‘within which flexibility is fostered’ (FET organisations group submission, ID: 7).

As the statutory body overseeing standards, QQI should give some direction at a national level of what is excellent assessment practice and should facilitate that discussion (FET organisations group submission, ID: 7).

This submission also highlighted a variability in how QQI regulations are interpreted. One submission noted that their ‘interpretation and implementation’ varies from provider to provider:

For instance, there are approaches taken to meeting learning outcomes that are misguided due to lack of training, and sometimes overly-rigid interpretations that can impact the learner negatively. (FET organisations group submission, ID: 7).

One ETB reported that interpretations of current QQI guidelines differ within the FET sector with some ‘confusion around the validation criteria for new Common Award System (CAS) programmes and the programmes already validated under the old system e.g. the relationship between award standards and Minimum Intended Programme Learning Outcomes (MIPLOs)’ (FET provider, ID: 37). They called for better communication between QQI and providers when changes are being made (FET provider). Some providers noted that some of the existing guidelines are now acting as assessment ‘rules’:

While the 2007/2013 document was a ‘guideline’ it has resulted in the development of processes that are, in effect, the ‘rules’ for how assessment is administered and carried out in the FET sector – the two examples of assessment (distributed and centralised- as it applies to the way in which assessment instruments are developed) are an example of how different providers may interpret a single set of guidelines. They also illustrate the potential for the use of diverse approaches within providers, as long as there are clear parameters (FET provider, ID: 19).

Micro-management of assessment through regulations

The Green Paper also invited discussion of micro-management by regulation (Section 8). Stakeholders welcomed the inclusion of this topic as ‘providers sometimes feel that they must adhere rigidly to the current QQI Guidelines on Assessment’ (FET provider, ID: 25). They pointed to a need for greater flexibility for providers:

The aim should be to get a balance between guidance and flexibility for practitioners. The new broad standards will assist with this (FET provider, ID: 25).

Others highlighted that guidelines that are intended to be helpful can ‘run the risk of getting in providers’ way’ and encouraging an excessively rules-based approach to assessment’ (FET provider, ID: 28). While they agree that controls are necessary, they feel that these controls are best established locally rather than centrally:

where they can be situationally optimised, rather than centrally, where they cannot. Quality is, frankly, harmed by excessive control from the centre (FET provider, ID: 28).

The Green Paper notes that 'distributing responsibility for assessment to providers of validated programmes has advantages, but it makes consistency more difficult' (p.71) and encourages stakeholders to discuss their views on same. One group feedback submission cautioned against centralised assessment in FET and expressed concern that if 'QQI assessment were to become centralised' that FET evaluation would begin to resemble the rote-learning experiences of many students in post-primary. (HE provider, ID: 47). Others opposed:

any attempt to unify the assessment process through the central setting of assignments, centralised examination or any other mechanism that would encroach on the freedom of educators to create rich, learning environments that recognise the multiplicity of diversities and contexts (HE provider, ID: 47).

Others were in favour of non-specific approaches to assessment where teachers would have 'agency and ownership of assessment, due to their involvement in the development of assessment instruments' (FET provider, ID: 19).

2.3 SUMMARY

This chapter provides an overview of stakeholder feedback on assessment issues at macro level. Stakeholders discussed the overarching issue of the purpose of assessment with some submissions noting the need for this topic to be expanded in any later iterations of the Green Paper. Others described the need for education stakeholders to think of education in terms of foundational knowledge, the acquisition of skills, promoting civic engagement and lifelong learning. The submissions also discussed the formulation of principles and guidelines which some suggested should be clear and unambiguous and allow for greater consistency in assessment across different providers. Discussing the role of QQI in assessment more generally, some stakeholders emphasised the need for guidelines at national level but autonomy at local level.

CHAPTER 3

Meso level issues

This chapter focuses on issues in assessment at meso level, many of which overlap with themes addressed at macro and micro level. Stakeholders provided detailed submissions on a number of topics including inclusion and diversity in assessment which focuses on inclusion and assessment policies, reasonable accommodations and the support available for diverse learners and Universal Design for Learning. Other topics addressed in this chapter include engaging learners as partners in assessment; academic integrity and standards of achievement (with a focus on external examination and authentication) and recognition of prior learning (RPL).

3.1 INCLUSION AND DIVERSITY IN ASSESSMENT

In the Green Paper, stakeholders were asked specific questions about general issues in assessment, one of which was the accommodation of diversity in assessment. Many of the submissions welcomed the inclusion of this section in the Green Paper but argued that it is not given enough attention despite its importance in providing fair assessment of learners. A number of submissions made reference to the need for the section to be expanded. Similarly, one HE provider felt that the section on learner diversity ‘represents one of the shortest and least developed sections in the document’ (HE provider, ID: 55). A HE organisation felt that inclusion of the section was ‘a core principle for any discussion’ around assessment but believed that ‘this aspect is not clearly articulated’ in the Green Paper (HE organisation, ID: 31). They acknowledged however that the ‘ingredients for inclusion are embedded throughout the document’ but that:

responsibility for the inclusion of learners with disability needs to be more explicitly outlined at macro and meso levels (HE organisation, ID: 31).

One submission noted that there was no mention of people with Intellectual Disabilities (ID) other than the idea of ‘reasonable accommodations’. They pointed to the legislative responsibility (New Directions, Disability Acts) in FET ‘to promote inclusion’ with ‘some examples of good practice’ emerging (HE provider, ID: 47). Another submission sought to broaden the understanding of diversity to include:

individual and group differences in ethnicity, gender, culture, previous educational experiences, optimal modes of learning, and groups of learners with unique kinds of challenges, including the learners with disabilities, socio-economically disadvantaged and English language learners (HE organisation, ID: 32).

The Green Paper states that in any assessment assumptions are made about learners (p. 52), and an assessment designed for one learner profile, such as students who have come through Irish second-level education, may not suit other cohorts such as international or mature students. One HE provider argued for a ‘deep level of critical engagement on the meaning and significance of these ‘assumptions’” (HE provider, ID: 55) and their impact on a range of learners which goes beyond international or mature students to include social class, disability and ethnicity:

Institutionalised whiteness underpins higher education systems internationally (Joseph-Salisbury, 2018), and social class continues to mitigate against full access and participation within HE (HEA 2016). Our students with a disability and students of ethnic minority backgrounds face significant cultural barriers (HE provider, ID: 55).

One HE organisation suggested that a key principle of mainstreaming inclusion is accessibility and outlined four key ingredients for accessible assessment that include:

The LO needs to be designed so that it identifies WHAT Needs to be done rather than specifying HOW is to be done. Badly constructed LOs can place inadvertent barriers in the way of the learner demonstrating their learning.

Designers need to think about the core requirements of the Learning Outcome (LO), what is critical for the learner to demonstrate. There needs to be clear and unambiguous LOs for both the learner and teacher.

- *What is being assessed?*
- *What tasks are mandatory and cannot be compromised?*
- *What skills and knowledge must be demonstrated?*
- *What choices can be available?*

The learner is offered a choice of valid assessment methods that are appropriate to the context and environment and facilitate the achievement of the LO (HE organisation, ID: 31).

One HE provider outlined its own commitment to 'widening participation' and to 'review our student recruitment programmes to ensure emphasis on excellence and widening participation and set annual targets for ensuring diversity in student recruitment' (HE provider, ID: 55). They cite the objectives of The National Plan for Equity of Access to Higher Education 2015 – 2019:

which makes specific reference to targets for progression to higher education by holders of Further Education qualifications. Similarly, one of the key objectives in the Higher Education System Performance Framework is to promote access for disadvantaged groups and to put in place coherent pathways from second level education, from further education, and from other non-traditional entry routes (FET Strategy, 2013, p39 (HE provider, ID: 55).

One FET provider felt that QQI must be responsible for 'changing the mindset' of FET education providers, in particular, who 'tend to take a very literal approach to assessment as contained in the component awards as a safe option' (FET provider, ID: 28).

A further education organisation stated that they 'would like assessment to be considered in terms of how it can be inclusive and equitable to all learners' (FET provider, ID: 10). They point out that the FET sector 'has some of the most diverse learner populations of any Irish educational sector' and argue that priority must be given to designing assessment 'with equal opportunities of all learners in mind' and that 'formative assessment is an essential tool to achieving this aim' (FET provider, ID: 10):

Assessment of learning should provide a chance for all learners to showcase their knowledge, skills, and abilities (KSAs), and thereby have an equal chance of success over the period of their programme (FET provider, ID: 10).

Other submissions emphasised the need for assessment to be varied and to move away from the 'one size fits all' system:

Assessment needs to be flexible and adoptable. The "one-size fits all" approach will disadvantage some students so getting the correct balance is important to be fair to the students (HE provider, ID: 40).

Assessment should be able to gauge the learning of the diverse types of learners within the FET and HE sectors and therefore should not depend solely on traditional systems like end of year exams or essays. (FET provider, ID: 20)

One HE provider suggested a move away from discussing diversity 'in a tokenistic manner' for a minority of students but instead to improve the educational experience of all students by allowing them to 'confront real conflicts of power and interest' in the classroom:

By exposing students to a variety of different languages, discourses, styles and approaches, they are drawn to broaden their linguistic and cognitive abilities, as well as their capacity to reflect critically on complex systems and their interactions (HE provider, ID: 42).

Another submission noted the challenges for the HE sector to:

deliver demanding programmes that meet learners where they are academically, maximise their growth as learners, and accelerate their learning to achievement of the relevant standard and programme award (HE organisation, ID: 32).

Reasonable accommodations

One submission argued that 'insufficient consideration' is given in the Green Paper to the concept of reasonable accommodations. They strongly advocate that:

that the principle of RAs is clearly articulated within any assessment process. It is a complex procedure and can lead to confusion for teachers and learners. (HE organisation, ID: 31)

They also recommend that QQI develop national policies and guidance on reasonable accommodations for institutions at a macro level (HE organisation, ID: 31). Another submission felt that the concept of accommodations needed to be expanded to include not only students with disabilities but also those 'from culturally diverse backgrounds and with language difficulties' (FE organisations group submission, ID: 7). Another higher education provider referred to the 'limited reference to reasonable accommodations in the Green Paper' (HE provider, ID: 38). They acknowledged the guidance provided by organisations such as AHEAD, DAWN and DARE and suggest that:

a consistent approach to the provision of reasonable accommodations in the sector would be welcome to ensure equitable treatment of all students. Any changes to assessment structure should be guided by best practice in the interest of the learner. Many of these decisions are ad hoc, and while well-intentioned, are inconsistent (HE provider, ID: 38).

They note the use of policies, guidelines and toolkits elsewhere which are aimed at supporting staff dealing with mental health issues among students:

With the influx of students presenting with mental health issues entering education on the rise (approximately 50% in the past number of years) there is a constant navigation of new waters in this area specifically. The University of Highlands and Islands developed a Mental Health Toolkit to provide practical guidance to staff to support students with mental health conditions in universities. A similar MOOC style toolkit would be beneficial in raising the profile of mental health conditions and providing implementable guidance across the sector (HE provider, ID: 38).

A submission from a teacher organisation suggested that 'FE colleges have the most diverse and multicultural group of students of any second level school college/centre in this country' (Representative body/union, ID: 69). To accommodate this group of students FET colleges 'offer ESOL courses in parallel with the national QQI courses' and, importantly, provide funding through VTOS and BTEA which allows these students:

get access to an educational opportunity that might have passed them by and generates a momentum of confidence and recognition to enable them to progress to third level or being their journey to employment (Representative body/union, ID: 69).

One group feedback submission perceived the FET sector to be less experienced and equipped than mainstream second-level schools who were in a position to accommodate students with additional needs (FET organisations group submission, ID: 7). They suggest that:

Diversity, and how it is accommodated, needs to be thought about at an institutional level. Without an institutional strategy it is difficult to see how real progress on accommodating diversity can be achieved (FET organisations group submission, ID: 7).

They also highlighted the challenges of individualised assessments and suggested:

there should be an identification on the certificate that special accommodation has been made for a learner – that might increase the flexibility to provide tailored assessments, where appropriate (FET organisations group submission, ID: 7).

On the same topic of individualised or tailored assessments, one HE organisation questioned our need to consider:

how do we maintain a learner-centred approach, and not provide tailored assessments given the diversity of the learners? Can you authentically have one without the other? (HE organisation, ID: 32).

They recommend that QQI 'start work' on 'how this circle can be squared' (HE organisation, ID: 32).

One HE provider outlined the increasingly diverse nature of the student body where there is increasing representation from 'mature, first generation, learners with disabilities and other learners from backgrounds that were traditionally under-represented' (HE provider, ID: 38)

With such a diversity of students from a wide range of previous learning and assessment experiences the challenge for institutions is to devise an assessment strategy that is fair, equitable and transparent. This implies that the objective is that summative assessments should be the same for different categories of students. However, this allows for induction and

formative assessment to be used to equalise among different student categories. For students with disabilities special considerations such as additional time, scribes etc. are also allowed (HE provider, ID: 38).

Supporting diverse learners

Some organisations described the types of methods or interventions that can be used to support diverse learners. One HE organisation suggested the development of learner training where, for example:

An international learner may receive training in the Irish educational system and specific assessment practices that the international learner may not be familiar with (HE organisation, ID: 32).

They suggest ‘maintaining the same assessment strategy’ but having effective interventions to ‘match and support the diverse learner’ (HE organisation, ID: 32):

In relation to mature and international learners, [name of organisation] would encourage the provision of additional support for the diverse learner whilst still enforcing the same assessment and learning outcome standards (HE organisation, ID: 32).

Universal Design for Learning

One of the student submissions referred to the need for assessment to ‘incorporate new concepts like Universal Design Learning (UDL)’ (Students from a HE provider, ID: 77). They suggested that UDL be viewed not as a ‘one-size-fits-all’ process ‘but a framework designed to improve and optimise teaching and learning for all’ (Students from a HE provider, ID: 77).

Referring to UDL, one HE organisation explained how this approach to assessment focuses on the need for learners ‘to experience a diversity of assessment methods’ which will allow ‘the provision of varied and flexible assessments options that provides all learners with inclusive options within the mainstream assessment process’ (HE organisation, ID: 31).

Although many of the submissions supported the introduction of UDL principles to ensure that assessment is appropriate for diverse student cohorts, they believed that caution was necessary to ensure it is ‘purposeful and appropriate’:

It is crucial...that assessment diversity is purposeful and appropriate; that any variety of assessment is strategically placed across the programme and that students have the opportunity to practise any given assessment method. Otherwise diversity in assessment can be counter-productive (HE provider, ID: 52).

Further education providers also referred to the importance of UDL in all teaching, learning and assessment. One provider stated that UDL ‘should be an underpinning principle of the resultant QQI Policy on Assessment’ as:

This approach is vital to the inclusion of the greatest number of citizens possible, to the greatest extent possible...(FET provider, ID: 12).

The same provider noted the legal obligation of providers ‘to provide all of our services in a universally designed manner’ (FET provider, ID: 12) under the UN Convention on the Rights of Persons with Disabilities, recently ratified by the Irish government.

Referring to diversity and assessment, another provider called for ‘detail [from QQI], especially in relation to more than just ‘international students’ and ‘mature learners’. Maybe a section on Universal Design for Learning (UDL) would fit in here and how it considers assessment strategies’ (HE provider, ID: 41).

The principles of Universal Design should be incorporated into the guidelines and advocated as good practice. For example, a visually impaired student completing the sound production level 5 component has to record using a sound deck. Braille sound decks are extremely expensive and not practical for colleges to purchase. Alternative assessment instruments should be devised to meet this need (FET provider, ID: 41).

3.2 ENGAGING LEARNERS AS PARTNERS IN ASSESSMENT

Another topic discussed in the Green Paper is how learners can be engaged as partners in assessment. Students from a HE provider described how assessment should be ‘seen as a partnership between educator and the learner, by engaging learners in the planning and development of assessment by offering different methods of continuous assessment to include visual, audio, practical, self, peer and collaborative evaluation’ (Students from a HE provider, ID: 77). They describe how, as students, they ‘should be encouraged to view assessment as a positive aid to learning, and recognise how learning, assessment and the learning outcomes are connected’ (Students from a HE provider, ID: 77).

Some submissions raised concerns about the amount of attention given in the Green Paper to learners as partners in assessment. They described the section as being ‘underdeveloped’ and suggested that:

Further guidance would assist here especially around the area of involving students in designing assessment practices during new programme development and programmatic reviews (HE provider, ID: 44).

[We are] delighted to see specific focus on the issues of student partnership within the Green Paper, however, given that the QQI’s Core Guidelines on Quality Assurance offer very little concrete requirement on student engagement generally, the question stands out not for its inclusion, but for its lack of development (Representative body/union, ID: 70).

Others felt that a diverse group of FET learners should be consulted as part of the Green Paper to reflect their views on assessment and being partners in that process:

The opinions and recommendations from a representative group of learners in a variety of further education settings needs to be sought as part of this green paper on assessment of learners and learning (FET provider, ID: 23).

One submission from a teacher representative organisation stressed the importance of meaningful engagement with students:

Student councils are part of QA agreements but in many settings they are arbitrary and cursory in nature. Meaningful engagement is harder to achieve. Feedback on assessment procedures is useful but patchy and unreliable so perhaps such reflection should be built into the assessment procedures to account for learners as meaningful partners in assessment.

Reflections on learning which can be assessed may be useful in this regard as ‘capstone’ units (Representative body/union, ID: 69).

Similarly, a student representative organisation also argued that there is still no attempt by education providers to engage meaningfully with students on the issue of assessment:

It is of significant concern that many institutions have not set out any basic policies, for example on the timetabling of exams, and worse still, that they continue to refuse to engage in meaningful conversations with their students on matters of assessment. This is indicative of the current state of the conversation on assessment, and until such questions are answered, quality assurance of assessment remains below par, and quality enhancement remains elusive (Representative body/union, ID: 70).

One HE provider suggested that changes in how we view assessment in HEIs may be due to the ‘changing student cohort (massification)’. They argue that they have already begun to think:

about assessment as a formative teaching and learning experience. An approach to assessment which not only sees students/learners as partners ... but takes into account their entire learning experience would be welcome (HE provider, ID: 46).

Stakeholders raised important issues around the practical aspects of learner input and active participation in assessment. Some suggested specific methods such as peer review, use of blogs or diaries and working in groups to shape assessment:

Student, blind peer review can be very useful in this regard. Together with this it facilitates the development of students’ analytical skills and engagement. Encouraging students to reflect on their learning through blogs, diaries, podcasts enables them to take a more active role in their own assessment. Involving students in research processes could also be beneficial. Through this process students would become creators rather than mere consumers of knowledge. This could be combined with participation in working groups mentioned above. Enabling students to offer input into curriculum and assessment design (HE provider, ID: 39).

Others spoke in favour of peer assessment but voiced concerns about the resources required to implement it meaningfully:

Initiatives such as introduction of peer-assessment could be useful to increase engagement, however, meaningful implementation of these practices can be resource intensive (HE provider, ID: 46).

Some stakeholders discussed the need for greater collaboration between learners and their own assessment where education providers ‘engage with learners about the achievement of learning outcomes within their individual contexts’ (FET organisations group submission, ID: 7). One group feedback submission outlined the need for more flexibility, so that staff ‘can include learners in assessment’:

If you can explore success criteria with learners then you can show them the connection between outcomes, curriculum and assessment. Otherwise they are passive and don’t make those connections. (FET organisations group submission, ID: 7).

A community education organisation suggested that in order to overcome assumptions about learners in summative assessments, learner input in the assessment design process is needed.

Learner involvement would 'ensure assessment works against these assumptions and is responsive to the changing profile of learners in Ireland' (FET provider, ID: 10). They suggest that:

this process could take many different approaches but the important point is that there is a space for learners to actively participate in assessment design. An assessment development process that is inclusive of learner views would help encourage learners to take greater ownership of their learning (FET provider, ID: 10).

They also suggested that other examples such as the Student Engagement Framework be considered in the development of this approach 'with the goal to modify and adjust to the unique landscape of FET, as models currently in place have been put in place and operate in the higher education sector' (FET provider, ID: 10). One HE organisation argued that there is a need to engage the National Forum for the Enhancement of Teaching and Learning, in collaboration with QQI, IUA, THEA, USI and HEA in order to:

explore how best to frame a strategic approach to engaging learners as partners in assessment. This might involve evaluating the current state of play, the identification of good, existing practice, and the establishment of funding supports for pilot projects. It might also involve establishing a formal community of practice under the National Forum, perhaps supported by QQI and HEA (HE organisation, ID: 33).

They also highlighted the importance of 'securing, appropriate resources to achieve tangible progress within specified timelines' (HE organisation, ID: 33).

Collaborative learning and teamwork

One HE organisation maintained that collaborating in a partnership manner with their learners on the assessment criteria and determination of grading had resulted in numerous positive impacts on the learner experience where 'learners feel empowered, increasing their sense of ownership and accountability'. They described the importance of collaborative learning in HE for promoting:

social interaction, developing generic skills (negotiation, delegation, leadership etc.) and developing the student's knowledge and competence in the subject and their capability in research and inquiry (HE provider, ID: 39).

They also note, however, that teamwork can be a source of anxiety for some students 'as a fear arises that grades are compromised and work can be unevenly distributed' or 'inefficiencies [occur] in the formation and coordination of the groups, unequal participation by certain members ("free-loader" or dominant individual)' (HE provider, ID: 39). They believe that 'any assessment must be considered in the context of the agreed programme assessment strategy as articulated and approved at programme validation stage' (HE provider, ID: 39).

Another HEI outlined their existing policies to ensure students are active participants in their learning. They also pointed to the need for assessment literacy among students:

In attempting to engage students as partners in assessment, a key focus has to be on building their assessment literacy and ensuring their assessment experiences are appropriately scaffolded. The National Forum Insight here provides useful advice on engaging learners in assessment (HE provider, ID: 52).

Similarly, another HEI stated that it ‘wishes to support the development of positive student learning behaviours and to acknowledge the individualised learning pathway of students’ (HE provider, ID: 53). Their academic strategy recognises that:

“diversity begets stability” and that diverse learning experiences are vital to students’ holistic development and to their ability to tackle the world’s greatest challenges (HE provider, ID: 53).

3.3 ACADEMIC INTEGRITY AND STANDARDS OF ACHIEVEMENT

The Green Paper sought general comments on academic integrity from stakeholders. Section 13 outlines how assessment relies on trust which, according to some submissions, is closely linked to academic integrity:

This applies to all actors involved in the learning experience; the provider, the educator and the learners (Students from a HE provider, ID: 77)

Qualifications and assessment depend on trust relationships with multiple stakeholders – from the individual student to professional communities and our wider society (HE provider, ID: 53).

For HE providers, the issue of academic integrity is an obligation of Universities in line with the 2012 Qualifications and Quality Assurance (Education and Training) Act 2012. One HE provider explained how:

the University engages widely with external support structures and benchmarking in relation to its assessment practices. This includes the support of “professions, scientific and academic communities and other communities of practice”³ – including industry, employers and community-based stakeholders (HE provider, ID: 53).

Some submissions called for guidelines for providers to ensure academic integrity among both students and staff. Submissions also provided valuable information on what can be done to counter behaviours and practices which threaten academic integrity. Some discussed the importance of activities such as ‘peer reviewing, monitoring/oversight, cross moderation, anti-plagiarism software and training’ (FET provider, ID: 23), and felt that it would benefit the sector if QQI were to provide ‘a charter or code of conduct around academic integrity and provide training around same’ (FET provider, ID: 23).

External examination and authentication

The Green Paper received various responses to the question ‘What purposes does external authentication serve? How can it better serve those purposes?’ One group of stakeholders described how the External Examination (EE) system:

should be helping to ensure that a qualification awarded at a level is of a comparable standard regardless of the location in which it is delivered. The role of the EA is to ensure that the standard has been met, regardless of the type of assessment selected’ (FET organisations group submission, ID: 7).

³ Green Paper on Assessment of Learners and Learning, (2018), p.21

Other submissions summarised the role of external authentication (EA) as:

External authentication and external moderation are a very positive part of the assessment undertaking, which confirm the validity, reliability, fairness, transparency and consistency of the assessment. (FET provider, ID: 19).

Both EE and EA are crucial in maintaining standards of academic practice and general confidence in those standards (Representative body/union, ID: 68).

Difficulties with EAs were also discussed. Some found 'a difficulty in sourcing EAs with appropriate experience' and as a result EA reports can be 'quite general' (FET organisations group submission, ID: 7). Others felt that 'the role and responsibilities of the EA might be more widely publicised, especially to learners' (Representative body/union, ID: 68). Other submissions questioned whether the role of the EA 'should change in any way'. They had concerns about differing rates of pay for EAs working in FET with many EAs working in both:

there are different rates of pay for External Authenticators in FE and Training – some of the EAs carry out work in both, and this lack of consistency is inappropriate (FET provider, ID: 19).

Other stakeholders called on QQI to enable a dynamic system of exchange amongst EAs so that EAs would not be operating in isolation. They suggested a mentor system which they think would be valuable for EAs who need advice, and highlighted the limited opportunities for continuous development and improvement for EAs. On a practical level, this group of stakeholders felt that the system relies too heavily on EA reports rather than discussion or feedback from EAs:

External Authenticators should be given an opportunity, under QQI, to form their own community of practice and QQI should provide further guidance on the role and its importance (FET organisations group submission, ID: 7).

This submission also highlighted issues 'around low levels and differing levels of financial compensation for the role of the EA (FET organisations group submission, ID: 7).

Others reported that the majority of EAs are 'excellent' but they felt that 'many take on a policing role, rather than identifying and suggesting new or alternative assessment techniques' (Individual submission, ID: 58).

National training for EAs which includes authenticating both FE and apprenticeship programmes. One system for all FET programmes leading to QQI awards (FET provider, ID: 16).

In response to the Green Paper's questions about whether EEs and EAs can 'reliably ensure that NFQ awards of the same type awarded to learners in the same discipline in different institutions are of a similar standard to one another?' much of the feedback was positive albeit accompanied by suggestions for improvement.

One group submission felt that there was no 'absolute standard across the country' although some larger providers 'send EAs to multiple centres to look at the same programme – that establishes a sense of a local standard'. They expressed some caution that the EA is 'often made to sign off on modules that do not match their primary areas of knowledge' (FET organisations group submission, ID: 7).

One HE organisation felt that standards were maintained but raised the issue that external examiners 'tend to work with only one institution at a time which may not lead to useful comparisons across the institutions' (HE organisation, ID: 32).

One submission noted that by addressing the issue of consistency of standards of achievement (as outlined in the Green Paper), a shared understanding of the issues could be developed:

[The Green Paper] would facilitate the development of a shared understanding of the issues relating to the development of assessment instruments at an appropriate standard, consistency in marking, and, in combination with a revised and more structured role for EAs, would have the effect of enhancing academic integrity throughout all elements and levels of the assessment process (FET organisation, ID: 68).

Others felt that in any future guidelines on the role of the external examination system, QQI should consider the development of a cohort of external examiners made up of trained staff who would enhance quality:

When considering meaningful external scrutiny, a view should be taken of the current external examining system. The performance of external examiners is seen as varied and a potential improvement to the Guidelines could consider the development of a body of credible, trained external examiners that could enhance quality and direct/enable a more holistic learner experience and assessment (HE organisation, ID: 32).

These guidelines could seek to address the level of variation between external examiners, and describe minimum requirements at programme and sometimes subject level:

There should be minimum requirements that the external examiner assures are followed at a programme level and some consideration could be given to a subject specialist approach for external examiners. Theoretically, these guidelines could be generalised to cover all kinds of external moderation in all educational sectors but there is a dependence on the rigour of the external examiner and as has already said, there is variation between external examiners (HE organisation, ID: 32).

Guidelines: external examination and authentication

A group submission highlighted some issues with general guidelines, particularly for HEIs who have 'a wide degree of autonomy for policy-making, including for exams' (FET organisations group submission, ID: 7) and wouldn't necessarily come within the remit of the QQI guidelines. The submission highlights the use of the external examiner in HEIs who seem 'to speak to the lecturers and the learners and the reporting is more comprehensive' (FET organisations group submission, ID: 7). They suggest that if:

these elements were brought into the EA system, it could be positive, but the role would then change and supports would be required to manage that change' (FET organisations group submission, ID: 7).

Another HE provider noted that while external moderation was important, having general guidelines might reduce flexibility for certain programmes among some providers:

External moderation at an advisory level is very important to maintain standards; however, if as mentioned above, general guidelines are to be implemented, there is a risk that these do not allow for flexibility necessary for specific programs, so too general guidelines may not be fit for purpose (HE provider, ID: 46).

Academic integrity among students

One submission from a HEI described the mutual trust necessary between students and education providers around issues of assessment. They suggest introducing ‘Honour Codes’ which students can ‘pledge themselves to follow’. They also note that many of the initiatives to ensure academic integrity for students should also be aimed at institutions:

While there are many processes in place to ensure academic integrity for students, it is harder to verify if an institution conducts itself with integrity with regard to the assessment process. An institution can also commit itself to an Honour Code, by using fair and consistent grading, and defining Academic Integrity so all actors understand what is acceptable, and maintain academic standards (Students from a HE provider, ID: 77).

Plagiarism

Some submissions raised the issue of plagiarism in the context of digital technologies. One HE provider sought to explain the technological tools they are using to address issues of ‘academic impropriety and support academic integrity’ (HE provider, ID: 38). The software used is referred to as “text matching” not “plagiarism detection” and emphasises the role of the educator in using their ‘academic judgement’ to decide whether plagiarism has taken place (HE provider) thus the software acts as a ‘formative tool first and foremost, not a punitive tool’ where the student themselves can decide prior to submission whether they have done ‘something improper or not’ (HE provider, ID: 38).

Another provider highlighted the need to train staff in the use of plagiarism detection software:

The use of plagiarism detection software within a Provider should be accompanied with the provision of adequate training on using the software. Clarifying the components that make up the similarity index within the reports is a very important component (HE provider, ID: 44).

Students from one HEI provider suggested the use of specific software such as Turnitin to counter poor referencing among students:

If plagiarism occurs as a result of poor referencing skills, training around citation and referencing, and encouraging drafts to be submitted to Turnitin, can reduce this (Students from a HE provider, ID: 77).

Others felt that plagiarism detection software no longer has the same value it once had and highlighted the Green Paper’s position on promoting academic integrity among students:

Recognising the challenges of advances in technology, the use of essay mills, and the different cultural understandings of matters such as plagiarism, the College feels that implementing plagiarism detection software no longer has the same value it previously had in identifying

academic impropriety. The value of such software is further reduced depending on the subject being assessed and the mode of assessment. In this regard, the College welcomes the position of promoting academic integrity, as opposed to penalising academic impropriety (HE provider, ID: 57).

Another submission from a HEI echoed these suggestions of educating students on issues of academic integrity as an alternative to taking punitive measures:

We feel that the focus should be on integrity, rather than on 'essay mills' and 'contract cheating', and specifically around the development of a holistic range of approaches to support academic integrity, including effective policies, good practice in assessment design, and open conversations with all stakeholders. Legal approaches to contract cheating will not solve the problem, but open conversations with students are effective (HE provider, ID: 50).

This submission cited research from Australia in the area of academic integrity and calls on empirical work to be carried out in Ireland for a greater understanding of the issues (HE provider, ID: 50).

Others suggested that student awareness was a key factor in reducing plagiarism and that many students simply do not understand how to reference material in their work:

There needs to be a better way of conveying the seriousness of plagiarism and how to avoid it. Most of the time plagiarism is due to the poor understanding of the student, rather than a genuine intent to cheat (FET organisations group submission, ID: 7).

A submission from a student representative body also maintained that greater student awareness and sense of self within academia could avoid academic offences such as plagiarism:

academic offence, [name of organisation] believes, are best prevented through effective integration into the educational process itself. Students are often unaware of what constitutes an offence; even the most recognisable offences such as plagiarism. Developing a sense of self within academia and self-regulated learning must include a well-rounded and application-based tutelage on academic integrity and how to avoid committing an academic offence (Representative body/union, ID: 70).

Some noted the role of exams as a 'means of addressing plagiarism' (Individual submission).

Exams are necessary as a means of addressing plagiarism. Sharing assessment across modules is a good idea (Individual submission, ID: 58).

Others suggested the use of more individualised formative assessment or flipped classroom approaches where students have to show how they reached the 'final product':

Useful ideas here are individualised assignments and asking the students to show much more of the scaffolding that leads to the final product. This may be another reason for switching to a flipped classroom model, where students do the assignment in the presence of the teacher and acquire the knowledge to complete them in a less controlled environment (Individual submission, ID: 60).

In FET, one stakeholder highlighted the need for professional development for teachers and assessors 'on the assessment process and plagiarism' (FET provider, ID: 16). They suggested that software be installed to 'detect plagiarised assessment evidence' in addition to training for learners about plagiarism and referencing (FET provider, ID: 16).

One of the IoTs felt that section 13.3 in the Green Paper on Misconduct and Negligence among providers and teachers was an area ‘well worth exploring’ and suggested that a ‘national workshop/seminar’ be held on this topic:

we don't usually consider negligence in relation to staff and the issue of assessment. This is well supported with examples of the reasons why it might occur, which would give rise to interesting dialogues (HE provider, ID: 41).

Another IoT argued that in-service training should be provided in the area of assessment and academic integrity to establish standards of achievement at both FET and HE level:

In-service training by the provider in the general area of assessment & academic integrity. This should be promoted [in] a suitable QQI campaign where standards are established that can support both FET and HE assessment and the perceived differences between both sectors as they relate to assessment be removed (FET provider, ID: 15).

One teacher representative body suggested that increased collaboration and training of staff in different sectors was essential to ensure oversight and consistency in national standards of awards:

The availability of collaborative examination boards which have to account to a national standard process would be helpful in this regard. Training and CPD for teachers, trainers, and lecturers would also assist in ensuring such consistency but a system of national oversight and regulation of awards as a response to standards is vital from two perspectives. It ensures the overall integrity of the grading and assessment systems and can ensure that the integrity of awards and standards can be monitored, supervised and adjusted in the same way that the SEC oversees the consistency of grades on a national basis for the state exams (Representative body/union, ID: 69).

One HE organisation emphasised the need for providers to minimise ‘opportunities to engage in academic dishonesty as well as being alert to new forms of academic misconduct’ (HE organisation, ID: 32). They highlighted the recent increased risks due to the widespread use of digital technologies:

The ever-increasing availability of internet and digital technologies (including smartphones), and of electronic academic content, increases the potential for new forms of academic misconduct. Providers need to be aware of the capabilities and potential of emerging technologies, and of the issues these may cause for the protection of academic integrity (HE organisation, ID: 32).

Supporting consistency and standards of achievement

Section 7.15 of the Green Paper asks for feedback in the area of consistency in award classification practices across different institutions. There was consensus among many of the submissions that this area needed to be examined by QQI. Some submissions emphasised the role of QQI in ensuring national standards. One focus group of stakeholders argued that with such a small population, Ireland should be able to ease providers’ concerns and publish consistent standards to influence the quality of programmes:

QQI have legislative responsibility for establishing the standards of Knowledge, skill and competence to be acquired by learners. Practitioners in [name of provider] consistently demonstrate concern about national standards. In a country the size of Ireland (5m people), it should be possible to publish consistent standards that influence the quality of programmes/awards that are developed by providers /providers with delegated authority (FET provider, ID: 19).

One IoT described this as a 'significant issue' where grade inflation is often the outcome:

There is pressure on learning providers to inflate grades and if one programme succumbs to this there is a knock-on effect (HE provider, ID: 42).

They caution that if the 'holistic approach to assessment' is adopted then achieving consistency in award classification will 'become even more complex' (HE provider, ID: 42). The level of communication between providers and external examiners will become more important:

It seems likely that there will need to be greater communication between course providers and external examiners regarding how a grade was arrived at, perhaps the provision of a descriptive overview of the students' progress and development. Although this could present challenges, including an increased workload for teacher and examiner (HE provider, ID: 42).

They argue that as the numbers entering FET grow the pressure to implement and promote measures to ensure academic quality also grows:

As the further education landscape becomes more crowded and grade inflation becomes a more significant issue, learners, employers and other stakeholders will be looking for a reliable indication of quality. However, more rigorous implementation and greater promotion may be necessary if it is to be truly meaningful (HE provider, ID: 42).

Writing in their individual capacity, one staff member working in an IoT said they felt that 'lip-service' was being paid to academic integrity and objective standard setting in the sector but in reality 'this is just an elaborate facade' (Individual submission, ID: 61). The submission argues that the main priority of their institution is increasing and maintaining student numbers, a 'drive to maximise the number of students entering and progressing through the system each year and to retain them for as long as possible' (Individual submission). This stakeholder feels that this has led to an erosion of standards across the entire IoT sector:

More challenging material is eliminated from courses. Assessments and examinations are manipulated in every imaginable way to maximise marks and the appearance of learning. If all this fails, and throughput is still inadequate, inconveniently low marks are discarded and replaced by fictitious marks which allow for the level of throughput demanded (Individual submission, ID: 61).

This stakeholder believes that priority must be given to ensuring that examination and assessment processes cannot be compromised:

The priority must be on ensuring that the examination and assessment processes on foot of which qualifications are awarded cannot be 'gamed' and that those who are supposed to be objective assessors of student performance have no motivation to do so. This is no small objective but if QQI has any serious intent to act as a guardian of qualification standards, it

must devote all its energies to that endeavour and that endeavour above all others (Individual submission, ID: 61).

Academic integrity, grading and awards

In response to the Green Papers comments on ‘academic integrity’ in relation to institutions awarding ‘unduly high grades relative to the norm’ one HE organisations noted that:

unwarranted grade inflation and deflation to adhere to a bell curve must also be considered as a breach of academic integrity (HE organisation, ID: 32).

One of the IoTs called for a review of the ‘NFQ standards and how they work in practice’:

Students can be confused by the differences between Further Education level 6 and Higher Education level 6, and this extends to employers (HE provider, ID: 40).

One submission simply highlighted the issues around ‘establishing what a merit is nationally considering the diversity of disciplines and students’ and noted that it is the responsibility of the FET sector to match learner ability with the programmes available:

There is a responsibility on the sector to ensure that learners are not being put forward to pursue programmes that are beyond their capability. There is an assumption sometimes that when one level has been completed the learner should pursue the next one, and this can put pressure on the learner, the provider and potentially on the validity of the assessment system (FET organisations group submission, ID: 7).

Another IoT felt reassured that the Green Paper ‘acknowledges the presence of extraneous variables when it comes to assessment and outcomes’ and the fact that ‘grades/results standards may vary within an institution’ (HE provider, ID: 41). They suggested that the challenges of implementing effective assessment strategies could be further explored ‘both within departments and across institutions’ (HE provider, ID: 41). In response to section 5.9 of the Green Paper discussion on Standards for Awards Classifications, this submission argues that ‘further discussion is necessary here on how to align a learning-outcomes approach with a marking scheme/classification approach’ (HE provider, ID: 41).

3.4 RECOGNITION OF PRIOR LEARNING

The Green Paper highlights the growing national and international trend to use RPL as a means of accessing programmes, achieving within programmes, gaining qualifications and accessing employment. One submission noted ‘that a learner’s previous experience of learning, both in education and in work, has a stronger influence on their skill formation than actual skills training’ (Representative body/union, ID: 68).

As part of the broad range of issues proposed for discussion in the Green Paper, QQI asks stakeholders for their views of RPL:

Do you agree that RPL assessment should be reserved to those who can specialise in this kind of assessment? What are the implications?

One IoT welcomed the place of RPL within the Green Paper, describing it as a ‘significant opportunity to diversify the learning environment, introducing a range of backgrounds and learning experience’ (HE provider, ID: 42). This submission argued that RPL is a student-centred approach and is ‘something that potential students are demanding more of – for real cognisance to be taken of experiential learning and experience’ (HE provider, ID: 42).

Many of the submissions described RPL as a difficult topic without any clear ‘generic solutions’. One HE institution acknowledged its place in the Green Paper but suggested that QQI needs to state that RPL is not always possible:

the document should grasp the nettle and state that RPL is not possible in many circumstances, for all the good reasons we know (lack of documentation of prior experience, mapping of RPL into NFQ ill-defined, non-academic prior learning is not necessarily comparable with HE academic learning) (HE provider, ID: 40).

Other submissions expressed frustration at the pace of development in the area of RPL where policy commitments have been made but not necessarily implemented:

QQI and its stakeholders need to commit to establishing a clear policy that leads to learner access and progression through RPL. The Further Education and Training Strategy 2014-2019⁴ laid down the priority of developing clear RPL policies by 2018 in order to meet EU Recommendation number (2012/C 398/01) of 20 December 2012 on the validation of non-formal and informal learning. Unfortunately these clear policies have not yet come to fruition (FET provider, ID: 20).

While other submissions agreed with the principles of RPL, they argued that there may not be capacity to ‘apply this methodology’ (Representative body/union, ID: 69):

There may be a time in years to come when all practitioners will be well-versed in this methodology but without training and practice it is too complex and prone to error if practiced or applied without expertise (Representative body/union, ID: 69).

Others described issues around the number of candidates ‘being presented for RPL processes’ in addition to the ‘time it takes to process an individual for entry to a HE taught programmes (levels 7, 8 and 9) based on their prior learning’ (HE provider, ID: 40).

Some stakeholders suggested that training and funding is required in order for it to be made fully available:

The implications are that piloting and training in RPL methodologies is vital for practitioners of this mode of assessment out (Representative body/union, ID: 69).

Providers struggle with RPL, even with a specialist person assigned to the task. It’s a specialist and niche area. If it’s decided that it should be undertaken more generally, training and CPD would be required (Educational organisation, ID: 2).

Other HEIs called for ‘better guidelines from QQI on what is acceptable and not acceptable to help HE institutions streamline the process and to allow candidates be better informed’ (HE provider, ID: 40).

⁴ SOLAS, National Further Education and Training Strategy. p.93.

One HEI emphasised the need for specialist knowledge and expertise in RPL. They suggested that national and international protocols could be used at sectoral or disciplinary level:

RPL requires a structured framework which will enable consistency across institutions and transnationally. Just as sectoral conventions exist for assessment, so too could nationally or internationally accepted protocols be drawn up and agreed at sectoral or disciplinary level (HE provider, ID: 53).

One IoT described how a National Centre for the Recognition of Prior Learning ‘could leverage the subject matter expertise of academics and industry experts across Ireland in conjunction with a single administration unit’. They describe how the ‘centre would not have to have a single physical location but would have an online portal. This would provide a more economical business model and build a community of practice in RPL’ (HE provider, ID: 42).

Another submission gave examples of areas such as childcare where it was suggested that ‘half of those working in the sector didn’t survive the change in regulations around qualifications because they wouldn’t go back to college’ (Educational organisation, ID: 2). This was used as an example of where it is necessary to consider what is being assessed. If someone is extremely good at their job but can’t pass an assessment, are the right things being assessed? Or should the qualification level required be reconsidered? (Educational organisation, ID: 2).

One student representative body however argued that too often RPL processes are considered too ‘bureaucratic, incomprehensible, and expensive’ (Representative body/union, ID: 70). They believe that RPL should be viewed as a way to engage with students in programme development and learning outcomes:

seeking to understand their skills through a lens of understanding their personal learning aims. This can inform programme development that is tailored to the needs of the student, and indeed, can create a partnered environment for development of LOs and assessment that is responsive to those LOs (Representative body/union, ID: 70).

Others noted that any current module awarded by QQI is ‘very precise and prescriptive’:

there would seem to be a huge challenge to map the outcomes identified via RPL (FET organisations group submission, ID: 7).

They suggest that the ‘task might be made easier if a more holistic approach to assessment was introduced’ (FET organisations group submission, ID: 7).

One FET college argued the need to consider not only learner skills achieved through formal learning ‘but also the skills they bring with them’. They note that the issue of RPL is not given much space within the Green Paper (only three-quarters of a page) but believe that ‘issues and questions around assessment procedures for RPL have a significant impact on learner access and progression’ (FET provider, ID: 10):

In essence, assessment must give significant consideration to Recognition of Prior Learning (RPL) and where it rests in relation to broader assessment culture in Irish FET (FET provider, ID: 10).

They reported that ‘through the National FET Learner Forum learners have aired frustration’ at the RPL approach as they ‘would like to see RPL processes expanded and promoted on a national level, and they would like to see this process standardised and made transparent across all levels of the National Framework of Qualifications (NFQ)’. This FET college would support and actively participate in a re-evaluation of current RPL processes with the aim of drafting and implementing a national RPL policy (FET provider, ID: 10). They argue that the current ‘ad-hoc system of provider-driven RPL’ is not meeting the needs of education providers or learners and say ‘the implementation of a national RPL policy would be a significant step toward demonstrating the Government’s commitment of widening and diversifying participation in lifelong learning of traditionally underserved and disadvantaged communities’ (FET provider, ID: 10).

3.5 SUMMARY

This chapter covers a broad range of issues at meso level that sometimes overlap with other issues at macro and micro level. The submissions highlight the importance to many providers and educational organisations of inclusion and diversity in assessment. Much of the feedback called for clearer guidance about assessment from QQI in order to provide students with reasonable accommodations and to introduce UDL principles. Stakeholders at FET in particular noted the increasingly diverse nature of their student cohort and emphasised the need for assessment to adjust accordingly. Others highlighted the need for assessment to be an equitable process which challenges inequalities by demonstrating flexibility and adaptability. This chapter also provides an analysis of stakeholder views on engaging learners as partners in the assessment process. Some feedback called for greater attention to this topic in the Green Paper while others called for ‘meaningful’ engagement with learners, obtaining learner input in the assignment process and considering assessment as part of the learning process. The issue of academic integrity and standards of achievement was also covered in this chapter. Again, many stakeholders called for clear guidelines to ensure academic integrity, not just for students, but for staff also. The stakeholder submissions provided detailed feedback on the role of external examiners and authenticators in the assessment process, highlighting their importance but also raising questions about professional development for EAs, enhancing quality and ensuring consistency in standards of achievement across different providers. This section also included academic integrity within the student body and highlighted ways in which issues such as plagiarism could be resolved. The final section of this chapter examined stakeholder responses to the Green Paper questions on the use of RPL. While many welcomed the place of RPL in the Green Paper, some were cautious given the lack of capacity and expertise in this area. Stakeholders suggested that both training and funding is required in addition to clear and concise guidelines on the use of RPL.

CHAPTER 4

Micro level issues

This chapter draws on submissions from a broad range of HE, FET and ELE institutions, community organisations and professional bodies based on micro or provider-level issues raised in the Green Paper. The views of both students and staff working in each of these sectors are included and the results reflect their views on a range of topics including the burden of assessment, focussing specifically on over-assessment, work-based assessments, grading and awards, technology and assessment, the development of learning outcomes and assessment.

Sections 8 and 9 of the Green Paper highlights the burden of assessment on FET providers. It raises questions about the possible impact of modularisation of curricula on assessment load and how programme designers might strike the balance between student learning and institutional resources when modularising programmes. This is echoed in a number of submissions as a key issue in relation to the overloading of staff and students, the paperwork involved in assessment, and the implications for learning, given that over-assessment can lead to a narrowing of the curriculum.

Over-assessment

Some submissions argued that too much assessment had implications for learning and learners, staff workload and 'large amounts of paperwork' (FET provider, ID: 19). One HE organisation described the risk of over-assessment and the 'unnecessary duplication of work' (HE organisation, ID: 32). This, they felt, can 'can dampen motivation for learning and learners' (HE organisation, ID: 32).

Some submissions claimed that the unitisation of assessment was resulting in an overloading of learner assessment:

For example, on a programme leading to a Level 5 Major Award students can be expected to engage in excess of 30 assessment events. Over the academic year, the February to April period is increasingly characterised by the assessment activity displacing teaching and learning (Representative body/union, ID: 68).

This submission used a quotation from Mulder and Winterton (2017) to describe 'the experience of many FET programmes' where the focus is on the assessment of each module rather than the programme as a whole:

A main problem of many educational programmes is that they are containerships stacked with course units or modules which are inserted by departments or faculty members under the umbrella of a programme name, but which are really incoherent sets of overloaded and overspecialised introductions into disciplinary knowledge domains (Mulder and Winterton (2017), p.5 cited in submission from a representative body/union, ID: 68).

One IoT described how much of what was done in the area of assessment was carried out on an ad hoc basis by staff with little training in the area:

There is generally too much assessment with much of it being done on an ad-hoc basis by people with little or no actual training or understanding of good practice or how assessment should be integrated with project design and module delivery. On certain modules students are definitely over-assessed, with what seems to be a scatter gun effect of using every type of assessment under the sun, instead of a more measured approach (HE provider, ID: 35).

Student representative bodies also acknowledged an increase in assessment in recent years and suggested that students should be at the heart of programmatic design and review where assessment can 'be made more manageable and more relevant to the overall learning aims of the programme itself' (Representative body/union, ID: 70). They argue that over-assessment stems from a lack of communication within education providers where assessment deadlines and exam times were not aligned:

Enhancement-aimed reform around continuous assessment has also been blamed for the over-assessment of students, but it is [name of organisation] view that this stems from other issues, such as a lack of communication within programmes and institutions, and from a lack of minimum standards around the spacing between deadlines and exam times. (Representative body/union, ID: 70).

This submission references the NStEP Project which they believe will help 'inform a student partnership approach to resolving issues of over-assessment' (Representative body/union, ID: 70). Other submissions also raised the issue of over-assessment from the learner perspective with some concern:

for learners suffering from, for example, anxiety or mental health issues, the pressure of the assessment burden can be overwhelming and in many cases result in the learner not completing the course (FET provider, ID: 11).

The key issue for the learners today is assessment overload. In particular, for students presenting with such difficulties as anxiety and mental health difficulties, the volume of assessment events can lead to feelings of being overwhelmed. This would increase the likelihood of such learners not completing the course (Representative body/union, ID: 68).

One submission acknowledged the burden of assessment but emphasised the need to maintain summative assessment in order to maintain standards of achievement in particular fields:

There is a fashion now among relativists to find creative ways of providing assessment but certain subjects require robust summative assessment i.e. one knows it or one doesn't in order to maintain the integrity of assessment in the particular field. Partnership in providing summative assessment frameworks for organisations not in a position to provide such facilities might form part of a solution to this problem (Representative body/union, ID: 69).

This submission also raised the issue of the burden of assessment on smaller providers.

The burden of assessment on providers is already onerous particularly in smaller centres. A system of collaboration coordinated by provider-based QA Offices. This might well be the solution at internal verification stage but dedicated staff coordinating the collaboration would

need to be resourced and trained in the proper implementation of a collaborative summative assessment model (Representative body/union, ID: 69).

Avoiding over-assessment

Some submissions, where the issue of over-assessment at FE level was discussed, pointed to the ‘continued reluctance by practitioners to integrate assessment across modules’ (Students from a HE provider, ID: 77). They suggest that improved external moderation might solve some of this issue:

We wonder if this relates to fears at programme level about external verification and support the need for a more robust and confident internal moderation/verification to give practitioners confidence that student work is at an appropriate standard (Students from a HE provider, ID: 77).

Some feedback sought to emphasise ‘the assessment of the overall programme objectives, or core competencies, rather than the individual component objectives’ (Representative body/ union, ID: 68). Others suggested ‘modular learning outcomes that feed into the same programme learning outcomes [that] could also be assessed summatively once in the programme (instead of in every module)’ (HE organisation, ID: 32) in order to avoid duplication of assessment and over-assessment. An IoT submission suggested that over-assessment and assessment issues more generally could be avoided if programme board teams were obliged to engage in Curriculum Design CPD activities prior to programme and module design (HE provider, ID: 37):

they undertake ‘A Curriculum Design Structured Activity in a workshop setting’ that explores six clear learning activity types (i.e. Investigation, Acquisition, Collaboration, Practice, Discussion and Production) and the formative and summative assessment options open to choose from (HE provider, ID: 37).

Some providers called for guidelines on how to manage the burden of assessment in higher education at present:

The issue of over-assessment and manageability of assessment is a contemporary issue in the current higher education landscape, particularly in the context of semesterisation. It would be helpful to include insights or guidelines on how to address this important issue (HE provider, ID: 44).

Other providers reported that the ‘amount of paperwork associated with assessment is enormous’; they highlighted the use of various assessment methods and queried whether they are ‘appropriate and effective’ (FE organisations group submission, ID: 7). They suggested an online approach to assessment which could significantly reduce the amount of associated paperwork (FE organisations group submission, ID: 7).

4.1 WORK-BASED ASSESSMENT

Some submissions acknowledged the importance of work-based assessment for apprenticeships and other professional programmes within both FET and HE. A number of submissions noted that the education landscape is beginning to change from solely classroom-based to based ‘in the classroom, the workplace and online’:

The blend of these three will depend on a variety of factors, but their accommodation in assessment, with all of the governance implications, must be seen as an increasing part of our provision (Representative body/union, ID: 68).

This submission suggested that requiring attendance in a classroom ‘will not be sustainable’ and feels there is an increasing acceptance of ‘the value of work-based learning, with its implications for assessment’ (Representative body/union, ID: 68). Other submissions highlighted the ‘intersection between apprenticeship learning and traditional work-based learning where both are forms of employer-led learning’ (HE provider, ID: 38).

Some issues around work-based learning and assessments were raised in the feedback from stakeholders. One submission raised concern about the level of variation in ‘quality assuring assessment in the workplace’:

Not all are equally effective. In some occupations there are concerns about the consistency of assessments undertaken in different workplaces. Mechanisms that work well for one occupation may not be practical in another (FET provider, ID: 28).

Others simply stated that ‘on-the-job assessment [practices] are not sufficiently developed, supported, or consistent’ (Representative body/union, ID: 70). They called for greater engagement between providers and industry to achieve greater levels of support for apprentices, for example:

more systematic interaction of practitioners and industry assessors or mentors with professional development around assessment practices and standards, including apprentice or trainee personal support (Representative body/union, ID: 70).

One higher education organisation also noted difficulties with the role of work-based assessors who often do not ‘view themselves as ‘assessors’’ (HE organisation, ID: 32).

Principles underpinning QA in the workplace

Stakeholders outlined a number of initiatives that could underpin quality assurance in workplace assessments, and some set out what they felt was required to ‘increase the reliability and validity of competence assessment in the workplace’.

- *Work placement needs to be authentic and employer-led rather than academic;*
- *More cooperation is needed between teachers and trainers and the workplace mentor. There needs to be exchanges to show how outcomes should be measured and how practice and theory come together;*
- *A rubric is required to assist employers to assess learners (FE organisations group submission, ID: 7).*

One submission emphasised the need to involve students in this process:

Student reflection is central to the quality of assessment in the workplace. Students should be able to provide evidence of achievements in the work environment, as well as describe how they relate to their learning development, and demonstrate proficiency in the relevant subject area. (HE provider, ID: 42).

Others suggested the need for 'clear delineation of roles and expectations of stakeholders (including students, supervisors, assessors) involved in workplace learning' in order to reduce the variation among students availing of workplace learning opportunities:

Mutual understanding can be supported by learning contracts which clarify expectations. These can be structured around MIPLOs and MIMLOs which have been coherently linked to occupational needs (HE organisation, ID: 32).

The grading of work-based learning was a problem raised by stakeholders, some of whom felt that the Green Paper could have devoted more space to it. They believe competence among assessors was important to ensure consistency:

Section 7.16 covering grading workplace learning requires more depth on the capacity and competency of assessors on work placement. This is an integral element of ensuring consistency of grading of students and this section should be expanded further to incorporate these elements (Regulatory body, ID: 65).

The issue of grading work-based assessments was also raised by a HE organisation which called for a 'common approach to the grading of work-based learning' (HE provider, ID: 49). They maintain that an apprenticeship is normally made up of '50% on-the-job learning' but note that 'there are Irish apprenticeships in operation where the on-the-job learning is not graded and consequently does not contribute to the determination of the final award classification' (HE provider, ID: 49).

Others emphasised the need for guidelines in this area:

Specific Guidelines on Work-Based Learning and Placements should be developed by the QQI in order to tackle these issues (Representative organisation/union, ID: 70).

Stakeholders also raised the issue of professional development for work-based assessors in order to maintain standards of achievement across settings:

Professional development in assessment and integrated assessment for mentors is essential as mentors are workplace assessors for apprenticeship programmes (HE provider, ID: 47).

Training is required for work-place supervisors to clearly outline expectations and requirements. Standards for non-academic work-place assessors could help inform training... (HE organisation, ID: 32).

This ETB provider gave an example of its Apprentice Support Service which supports apprentices with their learning and assessment. They describe phases in apprenticeships which include time spent 'on the job' or 'in the training centre' where support is offered:

the apprentices are assessed in Maths and reading Comprehension at induction and following this, anyone who needs support is offered classes in the Adult Education Centre nearest them (this is the ABE service). Classes are held for Maths, IT and literacy support. Maths materials have been developed and shared for these classes. A Maths for Trades class is run twice per year here in the Training Centre and includes sections for general maths and separate classes for Electricians, Motor Mechanics etc. (FET provider, ID: 16).

The supports also include additional tuition (where required) in addition to learning guides and one-to-one support:

all apprentices are assessed for maths in the first week of the course and support classes are arranged for those needing help or for those simply needing to brush up on their maths. A Study and Learning guide is given to all apprentices and three sessions of 40 minutes are used to complete this workbook. Drawing classes are arranged for those apprentices with no previous drawing experience in both Metal Fabrication and Carpentry and Joinery. One to one support is offered as needed, and all of this takes place with the collaboration of the Instructors and the staff from the Apprentice Support service (FET provider, ID: 16).

Industry involved in assessment

A key issue raised by stakeholders was the relationship between providers and industry and how this was linked to quality assurance. The Green Paper specifically posed the question:

What can be done (and by whom) to help support professionals in industry who are responsible for mentoring and assessing apprentices? What can be done to ensure that assessment is suitably consistent while allowing for necessary workplace diversity? One response highlighted three areas which they felt would address these issues:

- *Professionals in industry who are responsible for mentoring and assessing apprentices need to be engaged in the design of assessment also;*
- *The assessment materials themselves need to be innovative and engaging;*
- *There is currently a gap between educators and industry that needs to be bridged (FE organisations group submission, ID: 7).*

One provider suggested that the current arrangements tend to encourage ‘silo-based’ approaches but noted that this issue may be more common in traditional craft apprenticeships. They questioned ‘the extent to which such professionals actually have any interaction with education providers that have experience of assessment practice’ and suggested that ‘employers tend to have relationships with the regulator rather than with institutions experienced in assessment’ (HE organisation, ID: 33). Others called for a ‘distinct forum for industry’ which could take an active part in discussions on assessment. This, however, would involve putting supports in place for employers ‘in the event that they have an issue and there needs to be communication around these supports’ (FET provider, ID: 23).

A number of submissions discussed the importance of engaging industry ‘as early as possible’ in the ‘development of programmes, the validation of programmes and the re-validation of programmes (HE organisation, ID: 32).

4.2 AWARD CLASSIFICATION

Some submissions discussed the current grading method used by many providers, particularly for professional qualifications, where the grade may signify competence in an area, but may not reflect the students’ actual level of competency:

Is a student on an approved programme who has achieved just the pass mark deemed to be a competent professional? In these instances, can education providers be sure that they have seen enough data and evidence to ensure the competency of the students? All of these issues

should be considered more thoroughly in the paper. Consideration must be given to the value of attesting to competency (Regulatory body, ID: 65)

Another organisation complained that the Green Paper appeared to focus solely on Major awards. They argue that for many learners, and particularly learners from socio-economically disadvantaged backgrounds, ‘the purpose of education is to achieve a specific Minor Award and move on to their next personal goal, whether that goal is professional, educational, or otherwise’ (FET provider, ID: 10). They maintained that ‘from the perspective of learners seeking opportunities for flexible lifelong learning, and professional development, assessment must allow for an evaluation of short-term learning achievements as well as longer term achievements’ (FET provider, ID: 10). The role of minor awards for those from more disadvantaged backgrounds was highlighted in another group submission:

Those who are most socio-economically disadvantaged and underserved are more likely to participate in education that allows flexibility, and which promotes employment mobility and educational progression. Therefore, while policies for assessment are being reviewed, we ask that policy makers remember that important role that Minor Awards have in widening and diversifying participation in lifelong learning (FET provider, ID: 10).

4.3 TECHNOLOGY IN ASSESSMENT

Prompted by the Green Paper, a number of submissions discussed the role of digital technologies in assessment. Technology is already playing a key role in many education providers through ‘supports for grading, plagiarism detection and provision of feedback’ (HE organisation, ID: 32). Some providers outlined efforts being made to use technology in assessment to engage learners:

Our unique approach is underpinned by technology and this allows us to deliver personalised synchronous support, engage learners in multiple modes of learning and assessment and deliver a range of interest led content to support student engagement with topics (FE provider, ID: 17).

Our unique position as a blended and online course provider ensures we have a unique perspective on the use of technology in assessment. Our practices in using technology in assessment have always been guided first and foremost by pedagogy, thus ensuring any technology used is appropriate, relevant and fit for purpose. [Name of provider] staff have expertise in embedding technology in teaching, learning and assessment and this expertise also guides our use of technology in assessment (HE provider, ID: 38).

Some submissions from the HE sector argued, however, the need to re-evaluate ‘pedagogical approaches’ and to re-examine how assessments are viewed in the light of changing technologies:

[We] needs to look at how they will assess their learners and learning and develop increasingly sophisticated understandings and skills for designing and producing fit-for-purpose, quality, digital assessments (HE organisation, ID, 32).

To a certain extent responding to these challenges will require a complete re-evaluation of pedagogical approaches... Central to this shift will be recognition and trust in the professional

integrity of lecturers and learning providers, best placed to assess and respond to the needs of students as they interact with the learning material (HE provider, ID: 42)

It was argued in other submissions that ensuring digital assessments and processes ‘achieve the same level of rigour as written exams and construct new responses to the current emphasis on high-stakes summative assessment’ (HE organisation, ID: 32) is a major challenge.

In response to the Green Paper’s question about the main challenges involved in remote assessment, one submission maintained that the area of online or remote assessment is underdeveloped:

Online and remote assessment is underdeveloped, technologically unreliable and prone to fraud...(Representative body/union, ID: 69).

They suggest that ‘knowing, meeting, and assessing learners in person’ is an important element in any assessment process. They acknowledge, however, that ‘some online elements of assessment may be valuable in a blended sense’ (Representative body/union, ID: 69).

Other submissions discussed the issue of validity and the authentication of remote assessment:

Replicating the academic integrity of a classroom is one of the main challenges involved in remote assessment. The assessor needs to ensure validity and authenticity of the classroom while considering that requiring online students to travel to a physical testing facility presents significant challenges and defeats the purpose of an online education. The use of webcams and screen-sharing technology ensures the academic integrity of distance online assessments (HE organisation, ID: 32).

For others, investment at both government and sectoral level is essential for any real change to occur:

The development of remote assessments requires significant investment (Representative body/union, ID: 69).

I would genuinely use technology to assess and provide feedback but, due to very restricted computer lab access, my larger class groups cannot be assessed electronically (HE provider, ID: 35).

There is a problem with the availability of ICT in the sector, the investment isn’t there. An ICT strategy at government level is required to roll this out across the FET sector. It’s important that QQI is aware of the diversity of ICT abilities and resources in the FET sector (FE organisations group submission, ID: 7).

4.4 LEARNING OUTCOMES

Section 7 of the Green Paper posed a series of questions about Learning Outcomes and how they are aligned to assessment. To prompt feedback in this area the Green Paper asks:

What can be done, and by whom, to help build expertise in expressing learning outcomes and suitably aligning assessment with them at module level and especially at programme level?

This section highlights some of the main comments received in submissions. Some reported problems with LOs across different sectors; the need for staff training in the area of LOs

and assessment; the extent to which stakeholders consider the current system to be overly prescriptive; and the need for guidelines and support in the formulation of LOs.

The discussions around LOs is closely aligned to Chapter 2 on the purpose of assessment more generally. One submission highlighted what they felt was a 'major issue' in assessment today and questioned the current use of LOs in Further Education where 'there are 'numerous assessments' undertaken in each module:

Are individuals being given the chance to learn and grow through their respective courses, or are they getting "over the line" with their assessment (ultimately forgetting about the topics covered and moving quickly on to the next) (Students from a HE provider, ID: 76).

One HE provider submission described how 'considerable progress has been made nationally, over the past decade, in implementing a Learning Outcomes based approach in Higher Education' (HE provider, ID: 53). They argued, however, that there is 'still a way to go' to gain a real understanding of LOs within the HE sector. Others stressed the need for QQI to shift its thinking towards assessing key competencies rather than specific LOs:

It's important to impress upon QQI the notion of assessing key competencies rather than specific learning outcomes. QQI needs to focus on that more in the context of supporting diversity. European key competencies are not discussed at all in the Green Paper (FE organisations group submission, ID: 7).

Respondents recognised the role of LOs 'in setting standards, increasing transparency and in focusing assessment design and learning activities' (HE provider, ID: 57). Other submissions were critical of the Green Paper and QQI for failing to 'critique a learning outcomes approaches to education' (HE provider, ID: 47). They consider this method of assessment to 'be reductionist' and 'can never capture the entirety of the learning experience':

Education is not about a measurable end product but is a much more complex, expansive and experiential process (HE provider, ID: 47).

Staff training required

Much of the feedback around LOs acknowledged the 'degree of sophistication' required to align LOs, curriculum and assessment but stressed that the onus was on providers to ensure that LOs and assessment at both module and programme levels are 'appropriately and effectively aligned' (HE provider, ID: 53). Some stakeholders felt that 'all lecturing staff should be familiar with and knowledgeable about writing learning outcomes and how these are expressed for both module and programme learning outcomes' (HE provider, ID: 42). Others argued that 'the majority of academics involved in programme design are not appropriately trained – even the terminology can be challenging' (HE provider, ID: 46). Some submissions raised the issue of staff training and upskilling in the area of LOs. Some noted the comment in the Green Paper that writing LOs is 'an art' (p. 50) but felt that this needed to be 'viewed in line with staff professional development and the need for pedagogical upskilling/development' (HE provider, ID: 41). One submission from a teacher representative body raised the issue of staff expertise on the validation and revalidation of programmes and suggested that support for staff was required (Representative body/union, ID: 69). Similar comments were made about the need for staff training and upskilling in HE:

Training in aligning modular assessments to programme level, as well as developing a clearer understanding of the validation processes, are essential in building expertise (HE organisation, ID: 32).

The need for further training and guidance for academics, external examiners and panel members in constructing and assessing learning outcomes (HE provider, ID: 57).

Supports suggested by stakeholders for the purpose of informing and supporting providers included 'distance workshops or blended learning short courses run by QQI' (FET provider, ID: 28) or that QQI simply offer a 'consultancy role in the development of academic programmes' (HE provider, ID: 40):

A member of QQI should work together with an institution's programme development team in drafting the Learning Outcomes of the new programmes and the assessments of the L.O. in the modules. This would bring expertise into the institutions on the interpretation of the NFQ guidelines and help develop better programmes (HE provider, ID: 40).

Learning Outcomes are too prescriptive

It was maintained in a number of submissions that some LOs exhibit an 'overly prescriptive approach to assessment' particularly at 'module and individual assessment level' (HE provider, ID: 57). This approach, some suggest, restricts learning and facilitates a 'teaching to the test' approach, similar to the Leaving Certificate:

the class where students are taught or prepared the exams process, in a manner similar to the Leaving Certificate, with little time for concepts like critical learning, team building, social communications - skills that should help them on their next course or job as they build a career in their chosen discipline (Representative body/union, ID: 69).

Assessment exercises that are poorly designed or assessment for the sake of assessment does not demonstrate acquisition of LOs; for example, some of the practices in secondary education and leaving certificate examinations, which are based on rote-learning, could possibly hinder achievement of LOs (HE provider, ID: 46).

Some suggested that many of the problems outlined in the Green Paper result from the obligation that LOs comply with QA policies, rather than programmes being designed from LOs:

A lot of the problems discussed in this green paper arise from the fact that programs have identified LOs to comply with QA policies (top-down approach), rather than programs being revised or designed from LOs (bottom -up approach). Part of the difficulty in identifying and articulating LOs and defining strategies for assessment can be due to the fact that the majority of academics involved in program design are not appropriately trained-even the terminology can be challenging. Appropriate training would require a substantial investment of resources and implementation would demand significant time commitment. Overall, this process would involve training and extensive revision of programs. Academics are already facing heavy workloads and not sure how they would like to engage in these exercises (HE provider, ID: 46).

One submission highlighted a concern around a narrowing of the curriculum in order to cover what is required in the assessment:

In practice there is a tendency, across the sector, towards an assessment-driven curriculum with potential for a teaching to the test approach. Learners are predominantly motivated by

assessment and what grades they need, and faculty focus on the curriculum content they must “deliver” to facilitate learners completing assessments. This can narrow the focus on broader learning’ (HE provider, ID: 57).

They discussed staff concerns about ‘teaching to the test’ and the need to prevent this becoming practice (HE provider, ID: 57).

While acknowledging the variety of approaches used by providers to formulate LOs, some submissions discussed the need for ‘clarity’ and a ‘common vocabulary and understanding of assessment’ for those involved in developing modules, validation panels and regulatory bodies:

We recommend further emphasis on the core underpinning principles of assessment to develop expertise and competencies in clear and rationale mapping of assessments from module learning outcomes to programme learning outcomes (HE organisation, ID: 32).

Some welcomed the Green Paper’s acknowledgement of the confusion ‘around the assessing of expected learning outcomes’ and called for assessment guidelines to bring some clarity to this area (FET provider, ID: 25).

4.5 SUMMARY

This chapter focussed on issues affecting providers in the assessment of students. Prompted by questions in the Green Paper, stakeholders first discussed the burden of assessment and, in particular, over-assessment as a result of the increased unitisation of assessment in recent years. This, some felt, had led to a focus on modules rather than on the programme as a whole. Others highlighted lack of staff expertise in the area of assessment and how this may lead to over-assessment. Over-assessment from the learner perspective was also discussed in the light of mental health issues and worries about assessment among students. Importantly, some stakeholders outlined a range of ideas intended to avoid over-assessment.

Another key topic discussed in this chapter was work-based assessments for apprenticeships and other professional programmes at FE and HE levels. Some suggested the need for educators to re-examine our view of work-based assessments but argued that these types of assessments continue to be underdeveloped and under supported. Again, stakeholders offered a range of ideas to promote quality assurance in work-based assessments and called for clear and concise guidelines to ensure consistency of standards. Developing better relations between providers and industry was viewed, by many, as essential to the success of work-based assessments.

The increasing use of digital technologies in assessment was raised by a number of stakeholders, some of whom described ways in which it currently benefits assessment of learners. Other submissions raised concerns about the lack of investment and development in the area of technology and highlighted the challenge of ensuring the validity and authentication of remote assessment.

This chapter also examined feedback on the topic of learning outcomes across different sectors. Submissions highlighted a number of difficulties in this area such as the need for staff training on assessment and the extent to which stakeholders consider the current system of assessment to be overly prescriptive. Stakeholders argued that clear guidelines would help support the formulation of learning outcomes.

CHAPTER 5

Summary of stakeholder feedback

This report has provided a detailed analysis of feedback on the QQI Green Paper on Assessment of Learners and Learning published in 2018. In developing the Green Paper, QQI sought to offer a forum for a detailed discussion of assessment. In the Green Paper, a series of questions were posed, to focus on key issues in present-day assessment in Ireland and to seek suggestions on how assessment practices and policy could be improved. The 77 stakeholders who submitted response documents included organisations and providers from higher education and training, further education and training and English language education. In the interests of clarity, the key issues raised by stakeholders have been designated macro or system level issues, meso or provider level issues or micro level issues dealing with day-to-day assessment. The author acknowledges an overlap in many cases between the levels assigned to topics. Furthermore, some of the issues or questions posed in the Green Paper were not addressed in the responses (such as resourcing assessment or governing policies/criteria) in sufficient detail and therefore do not feature in the analysis.

The findings at macro or system level highlight the extent to which stakeholders welcomed the publication of the Green Paper. The submissions suggested an eagerness, on the part of many stakeholders, for an open debate about the role of assessment in education today with many suggesting that the section on the purpose of assessment in education was not given enough attention in the Green Paper. Stakeholders described the need to view education in terms of foundational knowledge, the acquisition of professional skills, promoting civic engagement and lifelong learning. The submissions emphasised the need for QQI to provide clear and unambiguous guidelines for providers in order to ensure consistency of standards of assessment across different educational settings. A number of submissions were somewhat conflicted, calling for guidelines to aid their assessment processes while arguing to preserve autonomy and control at local level.

At meso level the issues focussed on topics such as inclusion and diversity in education in light of the increasingly diverse nature of the student body and the need for assessment to reflect these changes. Some submissions felt this section on inclusion and diversity (and further sections on reasonable accommodations and Universal Design for Learning) were underdeveloped in the Green Paper. A number of submissions highlighted the need to broaden the current understanding of diversity in the student population (such as international and mature learners) to include students who are socio-economically disadvantaged and those with disabilities and additional learning needs. Providers highlighted the need for debate and clear guidelines on how inclusion can truly be achieved in assessment within the context of providing reasonable accommodations for students and introducing UDL principles. Much of this discussion focussed on the need for assessment to be fair and equitable by introducing greater flexibility in policies at macro and micro level.

At meso level, stakeholders provided detailed contributions on the potential role of learners as partners in assessment with mixed views on the feasibility of this approach. Some suggested

that this process would need to be truly meaningful in order to be effective and invite students to be part of the assessment process which would also form part of their learning.

Other meso level issues included the issue of academic integrity and standards of achievement in assessment where stakeholders again emphasised the need for clear guidelines to ensure academic integrity, not just for students, but for staff also. This analysis included a detailed discussion on the role of external examination and external authentication, highlighting the importance of these roles in the assessment process and also raising issues of professional development and how to enhance quality and consistency of standards from provider to provider. Academic integrity among both staff and students was also highlighted with a particular focus on how plagiarism (intended and unintended) can be avoided.

At micro level the issues around assessment focussed on over-assessment, work-based assessment, the use of digital technology in assessment and learning outcomes and assessment. The discussion of over-assessment centred on the increasing unitisation of assessment where some argued focus has shifted to the module rather than the overall aims of the programme. Stakeholders provided detailed comments on how to avoid over-assessment to the benefit of both staff and students. In relation to work-based assessments, some submissions argued for a re-examination of the role such assessments within the broader meaning of education. Others stressed the need for clear guidelines on work-based assessments for assessors and the need to strengthen relations between providers and industry. The present and future role of digital technologies in assessment also formed part of the micro level discussions. Some submissions noted a lack of investment in this area and the resulting variation in such methods across different providers in HE and FET sectors. Others highlighted the challenge of ensuring the validity and authentication of remote assessment. Many of the submissions responded to questions in the Green Paper on the topic of LOs and how they are aligned to modules and assessment. There was a notable emphasis on the need for staff training in the area of assessment and LOs. Stakeholders called for clear guidelines in order to counter some of the issues involved in formulating LOs.

REFERENCES:

Braun, V. and Clarke, V. (2006) Using thematic analysis in psychology, *Qualitative Research in Psychology*, Vol. 3, pp. 77-101.

Mulder, M. (Ed.) (2017) *Competence-Based Vocational and Professional Education. Bridging the Worlds of Work and Education*, Cham, Switzerland: Springer, pp. 1-43.

QQI (2018) *Green Paper on Assessment of Learners and Learning*, Dublin: Quality and Qualifications Ireland.

SOLAS (2014) *Further Education and Training Strategy 2014 – 2019*, Dublin: Department of Education and Skills and SOLAS Further Education and Training Authority.

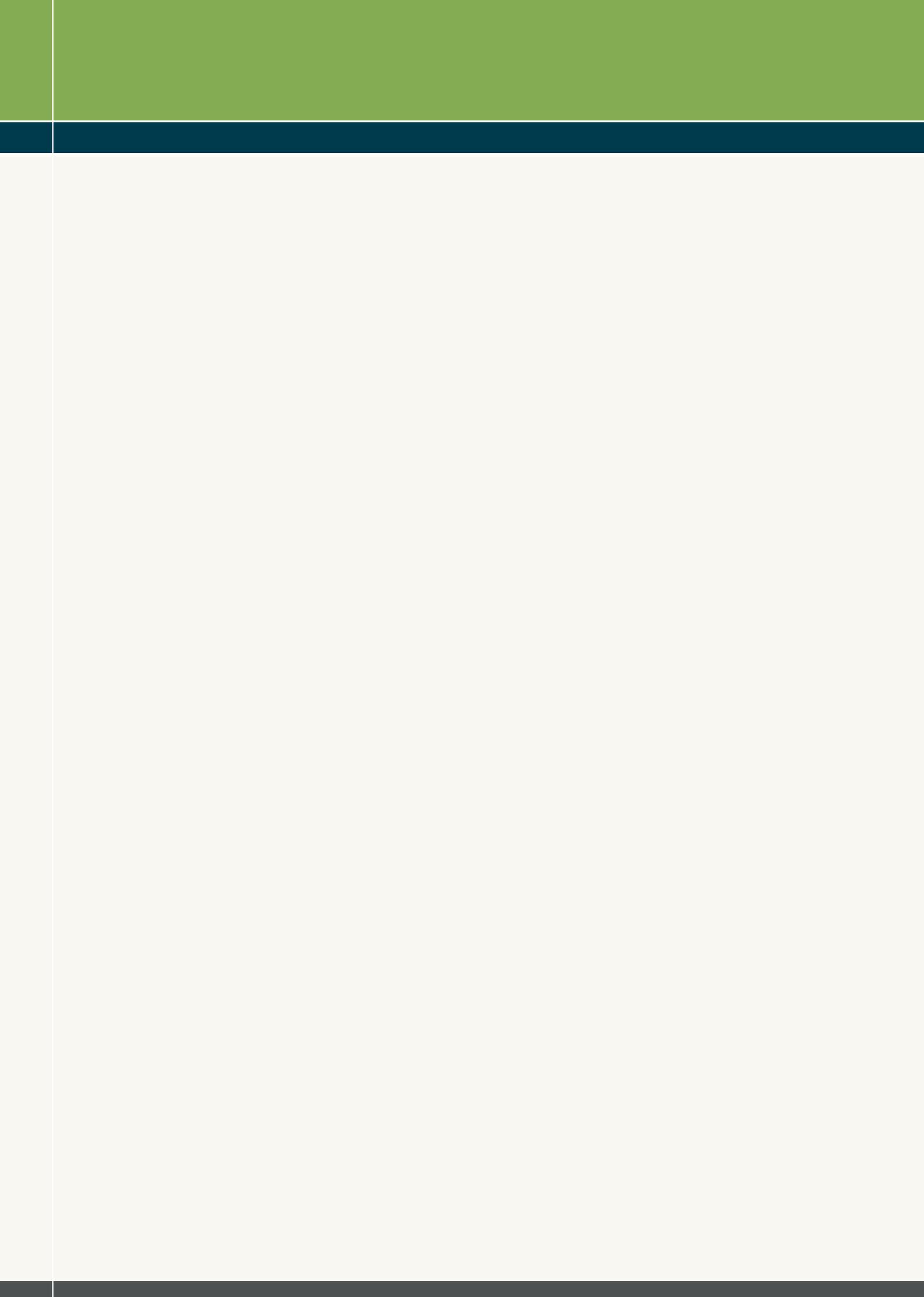
Appendix: List of Organisations/Individuals who Made Submissions

ID	Respondent/organisation	Role	Category
1	Chartered Accountants Ireland	Director of Education and Training	Awarding body
2	Éirim: The National Assessment Agency Ltd.	Director	Educational organisation
3	State Examinations Commission	Head of Examinations & Assessment	Educational organisation
4	Irish Association for Applied Linguistics (IRAAL)	President	ELE organisation
5	Ulearn	Individual on behalf of Ulearn	ELE provider
6	Education and Training Boards Ireland	ETBI in consultation with 16 ETBs	FET organisation
7	EPALE and ECVET Ireland and the Further Education Network	EPALE and ECVET Ireland [Erasmus+ programmes managed in Ireland by Léargas] and the Further Education Network	FET organisation group submission
8	Access Community Education project	Management and Staff of ACCESS 2000 (Wexford) CLG	FET provider
9	Age and Opportunity	Manager, Engage Programme	FET provider
10	Aontas	Advocacy Lead and Learning Advocacy Officer	FET provider
11	City of Dublin Education and Training Board_a	Director of Further Education and Training	FET provider
12	City of Dublin Education and Training Board_b	Chief Executive	FET provider
13	Dorset College	Registrar	FET provider
14	Dublin Adult Learning Centre (DALC)	Individual on behalf of DALC	FET provider
15	Dun Laoghaire Further Education Institute	Individual on behalf of DFEI	FET provider

16	Galway and Roscommon Education and Training Board	Director of FET	FET provider
17	Iscoil	Head of Learning	FET provider
18	Kerry Education and Training Board	QA Unit	FET provider
19	Kildare and Wicklow Education and Training Board	Focus groups (members of the FET Management Team, Centre Coordinators, Teachers, Tutors, Training Staff, Assessors, QA personnel, and External Authenticators)	FET provider
20	Larkin Unemployed Centre	Individual on behalf of Larkin Unemployed Centre	FET provider
21	Limerick Community Education Network - Aontas	Development Worker on behalf of LCEN	FET provider
22	Longford Women's Link	Education and Training Manager on behalf of LWL	FET provider
23	Mayo, Sligo and Leitrim Education and Training Board	Assistant Manager and QA Officer	FET provider
24	Meitheal Mara	General Manager	FET provider
25	National Adult Literacy Agency	Chief Executive Officer	FET provider
26	North Presentation Secondary School/Centre for Further Education	Adult Education Coordinator	FET provider
27	Northside Family Resource Centre - Aontas	Education Development Worker	FET provider
28	Teagasc	Curriculum Development and Standards	FET provider
29	TMTS training	Individual of behalf of TMTS training	FET provider
30	Warrenmount Community Education Centre	Centre Manager	FET provider
31	AHEAD	Executive Director	HE organisation
32	Higher Education Colleges Association (HECA)	Executive Director	HE organisation
33	Technological Higher Education Association (THEA)	Director of Academic Affairs and Deputy CEO	HE organisation
34	Centre of Nursing and Midwifery Education Galway	Colleagues at CNME Galway	HE provider

35	Cork Institute of Technology	Survey of staff, Teaching and Learning Unit	HE provider
36	Dublin Institute of Technology (DIT)	Head, Conservatory of Music & Drama	HE provider
37	Galway Mayo Institute of Technology Teaching and Learning	Teaching and Learning Officer	HE provider
38	Hibernia College	Quality Assurance Officer	HE provider
39	IBAT College Dublin	Staff of IBAT college	HE provider
40	Institute of Technology Blanchardstown (ITB)	Individual views of staff	HE provider
41	Institute of Technology Carlow	Head of Teaching and Learning Centre	HE provider
42	Institute of Technology Sligo	Chair: Learning, Teaching and Assessment Committee	HE provider
43	Institute of Technology Tralee	Assistant Registrar/Head of Student Engagement	HE provider
44	Limerick Institute of Technology	Team from the Registrar's Office, LIT	HE provider
45	Mater Misericordiae University Hospital, Dublin Centre of Nurse Education	Nurse Tutor	HE provider
46	Maynooth University_a	Institutional response	HE provider
47	Maynooth University_b	Former students and current staff in the Department of Adult and Community Education	HE provider
48	Maynooth University_c	Lecturer, Department of Adult and Community Education	HE provider
49	National College of Ireland (NCI)	Director of Quality Assurance and Statistical Services	HE provider
50	National University of Ireland Galway	Staff at the Centre for Excellence in Learning & Teaching	HE provider
51	Royal College of Surgeons in Ireland (RCSI)	Director of Quality Enhancement	HE provider
52	Trinity College Dublin, the University of Dublin	Senior Academic Developer	HE provider
53	University College Cork_a	Institutional response	HE provider
54	University College Cork_b	Lecturer, Acting Director of 5 Year Medical Programme, School of Medicine	HE provider
55	University College Dublin	Lecturer/Assistant Professor, School of Social Policy, Social Work and Social Justice	HE provider
56	University of Limerick	Quality Support Unit	HE provider

57	College of Computing Technology (CCT) Dublin	Academic Council and Senior Management Team	HE provider
58	Catherine Browne PhD MA RGN RM HDip Ed.	Individual opinion	Individual submission
59	Coss, Sarah	DDLETB tutor and BTEI Coordinator, Maynooth University (associate staff)	Individual submission
60	Cuffe, L.	Teacher in the further education system	Individual submission
61	O'Grady, M.	Lecturer in the IT sector	Individual submission
62	O'Regan, M	Individual submission, doctoral student - School of Education, Trinity College Dublin	Individual submission
63	Irish Institute of Sport Surfaces	Managing Director	Other
64	Royal Irish Academy of Music	Director	Other
65	CORU - Regulating Health & Social Care Professionals	Education Policy and Standards Manager	Regulatory body
66	Royal Institute of Architects of Ireland (RIAI)	Accreditation Process Advisor	Regulatory body
67	Institute of Professional Auctioneers and Valuers (IPAV)	Education Director	Representative body/union
68	National Association of Principals and Deputy Principals (NAPD)	Chair of the NAPD-FET Committee	Representative body/union
69	Teachers Union of Ireland	Education and Research Officer	Representative body/union
70	Union of Students in Ireland	Deputy President/Vice President for Academic Affairs	Representative body/union
71	Students Maynooth University_1	Students studying the Higher Diploma in Further Education in Maynooth University	Students from a HE provider
72	Students Maynooth University_2	Students studying the Higher Diploma in Further Education in Maynooth University	Students from a HE provider
73	Students Maynooth University_3	Students studying the Higher Diploma in Further Education in Maynooth University	Students from a HE provider
74	Students Maynooth University_4	Students studying the Higher Diploma in Further Education in Maynooth University	Students from a HE provider
75	Students Maynooth University_5	Students studying the Higher Diploma in Further Education in Maynooth University	Students from a HE provider
76	Students Maynooth University_6	Students studying the Higher Diploma in Further Education in Maynooth University	Students from a HE provider
77	Students Maynooth University_7	Students studying the Higher Diploma in Further Education in Maynooth University	Students from a HE provider





QQI

Quality and Qualifications Ireland
Dearbhú Cáilíochta agus Cáilíochtaí Éireann

www.QQI.ie