

**Quality and Qualifications Ireland – Green Papers on Policy Development**

**Teachers’ Union of Ireland (TUI) Comments - September 2013**

**General overarching comments:**

In developing new policy positions TUI advise that:

* There are many good things about current policies and practices and current good practice must be acknowledged
* The learning gleaned from the development of current policies at national and local level in the third level colleges and further and adult education sector must be drawn on to shape new directions
* Change may be necessary as QQI has cross-sectoral responsibilities. While principles and broad parameters may be possible to apply across sectors and providers differences are significant enough to merit different approaches especially at implementation stage.
* The varying needs of and expertise within each sector must be recognised and relevant capacity building supports put in place (e.g. the further education sector requires a different level and type of support that the third level sector).
* Other legislation which already affords a level of autonomy and delegated authority to third level colleges (e.g. DIT) must be explicitly acknowledged and respected. In any move to affords delegated authority to other providers appropriate regard must be given to capacity to undertake the range of associated responsibilities.
* High level regulation and robust policies and monitoring will be crucial to guarantee quality and to ensure reasonably and appropriate consistency. In particular, private providers must undergo regular, adequate and thorough monitoring to avoid some of the worst practices in the past and, consequently poor outcomes for learners; a light touch approach to private providers must be avoided.
* There should be strong consideration given to the regulation of employers involved in delivering or overseeing elements of programmes or leaners e.g. apprentices.
* Appropriate systems for appeals and investigations should be agreed as early as possible.
* Resources, or the lack of them, must not become a reason why effective policies are not be agreed or become problematic at implementation stage. Adequate resources must be made available to ensure service delivery is of high quality.

**General Comments on Quality Assurance**

**Issue 1:** The list set out under 4.10.4 will be useful in informing more discussion on how best to shape QA guidelines and what their specific purpose might be. There could usefully be reference to legislative obligations and the fact that QA guidelines will underpin other policy areas.

While there should be a common understanding of the general purpose of QA guidelines, TUI considers there will need to flexibility in how guidelines are expressed for and by different sectors and different providers. This is critical to recognise the diversity that exists in the provision of further, adult and third level education and the range of providers and contexts involved. Therefore while, generic QQI templates will be important to guide practice an ‘over prescriptive and over directive approach’ or a requirement for too much detail will be unhelpful. In practice, such an approach could fail to reflect the different capacities and emphases that exist depending on context and could draw too heavily on restricted resources (staff and time). Over prescription and over direction could also lead to a time lag in responding to learner needs/demands e.g. very specific and detailed QA policies could restrict the design and organisation of a new course within a short timeframe.

**Issue 2:** With reference to the nature and scope of guidelines to be issued by the QQI TUI sees the need for a set of high level principles to underpin all providers and practice. It also understands why a single set of guidelines would be advocated by some. However, given the differences that exists across sectors and provider types this could be difficult to achieve in a manner that would lead to positive effect for all concerned. In this regard a modular suite of guidelines may have advantages. However, each module should be underpinned by shared principles, understandings and broad commitments after which different module could address different needs and capacities within sectors, provider types etc. Whatever model is adopted must ensure high overall quality and sufficient general consistency within sectors and across providers.

**Issue 3:** TUI believes that any new development in this area should draw on past experience and the best of current systems (Issue 3). For example while the task of preparing QA guidelines in the further education sector supported a development approach in some instances the process was also reported to be cumbersome and too time-consuming. The requirement for significant detail in terms of approaches and procedures to be employed and evidence of action taken led to unhelpful demands. In turn, this led to a significant increase in administrative tasks and bureaucracy which, in some cases, distracted teachers for their core responsibility of teaching and learning. A further issue that arose is that in many instances providers made commitments that they could not meet within resources, necessitating review which could have been avoided. An issue of some concern was the variation that emerged in practice even within services organised by a single provider. These issues need to be borne in mind in developing new approaches.

Importantly, different providers depending on their context and experience will need more or less support for the QQI or some other support agency in developing and reviewing their QA policies, procedures and practice. Much more detailed discussion is clearly required.

TUI has consistently emphasised the need for consultative and representative structures to support the development of new systems and polices in advance of final decision by QQI. It considers that these should include general interactive consultative fora where a wide range of stakeholders have an opportunity to discuss and share ideas. They should also make provision for more discrete forums where the education partners meet the QQI official team. Finally, as a representative organisation of teachers and lecturers working in post-primary, further education and third level education it respectfully requests that it be provided an opportunity to meet the QQI on a regular basis to address specific and general developments. This approach would serves as a useful anchor for continuous or periodic updating.

TUI notes, in particular, that quality assurance guidelines and requirements must be fit for purpose and ensure high quality practice right across providers irrespective of size, context and target learner groups. In this regard it emphasises the need for private providers to be subjected to the same level of rigour as public providers with respect to their QA systems, capacity to deliver programmes and outcomes for learners.

**Issue 4:** TUI accepts the principles of, and necessity for Quality Assurance (QA) guidelines. A comprehensive but relevant and manageable approach will serve as a tool for planning, review and development at local and national level. It will also support the QQI in meetings it regulatory functions (Issue 4).

**General Comment of Awards and Standards**

TUI welcomes the emphasis on the QQI role to ensure public trust and confidence in awards recognised under the framework and their associated programmes. It sees this as a central function of the QQI into the future.

TUI notes the reference to the expectation of providers that polices on awards and standards may not differ from the legacy but that it sees significant reform ahead. It welcomes the acknowledgement that the questions and ideas presented on awards and standards at this point are largely exploratory in nature in advance of comprehensive consideration of wide-ranging and significant issues in consultation with multiple stakeholders.

**4.1.4** In reviewing policies it emphasises that care must be taken that within the third level sector universities do not enjoy privilege or favour above and beyond the Institutes of Technology except where a different approach is appropriate under legislation.

Reference to involvement of professional recognition bodies in the approval of programmes is favoured as it may reduce duplication of effort but only within agreed processes and mechanisms that will not undermine the autonomy of public providers.

**4.1.8.2** TUI recognises the review and development of awards and standards must take cognisance of resources available. In this regard TUI accepts that collaboration with providers and interested experts, especially practicing teachers and lectures, is an important mechanism in the development and review process. However, the issue of resources, or the lack of them, must not short change the necessary processes and work involved in developing and maintaining awards and standards of the highest quality. These processes and work demand significant engagement and time commitment by numerous organisations and individuals.

**4.1.8.3/ 4.1.8.4** TUI emphasises the need for existing expertise, capacity and models of development within the public education system to be acknowledged and drawn on as appropriate. It accepts that the development of awards and standards may require a different approach and model depending, for example, on the sector involved and/or the level of award under development or the purpose of award. In addition the breadth and the detail expressed in a ‘standard’ may vary according to purpose. Varying levels of support, efforts to build capacity and different approaches will be appropriate depending on circumstances and context. What must be common though is that the quality of the standard and award is uncontested.

**4.1.8.8** Emphasis appears to be on major awards which are a concern especially within further and adult education. A move towards broader standards could mean that much of the learning that occurs in FE will not be captured as many minor awards are provided. An emphasis on major awards within the new systems must not be at the expense of groups who achieve certification in minors as stand-alone, in bundles or for the purpose of progression over time to a major award.

At present, while there are some issues, there is consistency of standard across the FET sector at each award level. There is a level of confidence in a system where the awarding body determines the standard which helps to ensure the necessary consistency of standard across multiple provider types and learning contexts. New polices must protect this especially at further education as it is at levels 1-5 that learners obtain the basic and foundational skills necessary to move on to further learning and employment.

**4.1.8.9** There are undoubtedly sensitive education and practical issues associated with credit accumulation. These are not always or easily understood by those who may be seeking progression, transfer or the acquisition of a ‘qualification’ through units of study taken if different context and for different purposes. Equally they are sometimes misunderstood by those supporting progression, transfer or the recognition of prior learning.

CAS provides a uniformity of standard which is seen as a positive across the FE sector. This uniformity is valued within the sector and should be retained in order to ensure quality, duration of delivery (with appropriate flexibility) and progression options. The existing credit values should also remain.

While the idea of non-framework certification has some potential it would need considerable discussion. On the one hand it can be argued that Ireland has become too wedded to formal certification for learning. On the other hand it helps learners, employers and the education system to understand what a unit of learning involved and represents in terms of knowledge and competence. Non-certification should not be seen as an easy solution to the proliferation of minor awards. Minor awards are extremely important for part-time learners and to support progression towards a full award. There are up on 100,000 part-time learners in adult and further education alone and well over half legitimately seek formal certification which must continue to be an option. Another point of note is that funding for part-time courses is often linked to the capacity to offer certification with a view to learner progression. However, there is considerable scope for a more coherent approach to how minor awards are organised, especially in the further education sector. E.g. at present similar purposes can be identified across major / minor awards.

TUI supports the review of existing document and policy statements with a view to providing clearer guidance on the matter and ensuring a greater understanding of how this can be managed more effectively and appropriately from an institution and learner perspective. As new standards emerge consideration should be given to including appropriate summary clarification in the relevant specification.

**4.1.8.10** With respect to the level of detail in standards TUI subscribes to the idea that standards should, in general, be broad based. However, that may represent something different at different award levels. In particular, the union considers more specificity may be necessary at levels 1-5 of the NQF as these represent the levels where learners must have appropriate to the very specific foundational skills required to progress to the higher levels where more independent and self-directed learning come more to the fore. Therefore, a greater level of consistency in how a provider interprets a standard and the programmes learning outcomes is advisable. The issue of how providers offering awards at levels 1-5 will be supported in designing programmes and how validation will be supported arises again. In this regard TUI notes significant variation among providers and the need for a strong emphasis on capacity building.

**4.1.8.11/ 4.1.8.14** TUI respects the need to involve a range of stakeholders including employers, regulators and those involved in guiding occupational standards in advising on standards for education and training awards. It also acknowledges that some practical skills may not always be best demonstrated in an examination setting. However, in advancing new models where workplace activity may play a more significant role agreed protocols will be necessary.

TUI notes that education and training programmes, especially those funded by the exchequer, should have a strong focus on social, cultural and personal development, general educational as well as responding to specific needs of employers, the economy and specific occupations employment. This is in keeping with ensuring that learners develop specific and transferrable knowledge and skills and learning-to-learn competences so essential to living and working in a modern day society. It considers that these dimensions to learning and qualifications are, in fact, intrinsically linked but such linkage is underdeveloped in many courses and programmes. It concurs that a more coherent approach is necessary and a fuller more informed discussion is required before explicit decision are taken. Likewise the concept of licensing to practice and the valuable role further study can play requires further exploration. Crucial in this regard will be robust, standards that respond to new developments and practices and ensure appropriate consistency and flexibility.

**4.1.8.15** **/4.1.8.16/4.1.8.17** TUI appreciates the challenges set out in this section and again points out that the issue of what organisation makes awards will play out differently in different sectors. As stated earlier the third level sector has infinitely more experience in this area which must be acknowledged and respected. A greater level of consistency would be merited in this sector and anomalies in current practice and systems could usefully be addressed e.g. some colleges enjoy different status with respect to DA and making awards.

However, very careful consideration will be necessary in terms of what changes are necessary and appropriate for further education awards. Capacity issues will be to the fore and not least issues to be considered for small FE providers will be significant. The risks of delegating authority to too many inexperienced providers must not be ignored, and current perceptions around the poor practice must be fully considered. A move towards big changes in the short term would be ill-advised. Cautionary exploration is advised.

As suggested in the paper, TUI considers, a discussion on branding is not appropriate until other decisions are taken.

**4.1.8.18** Protocols and practices within the VECs (ETBs) have served to strengthen the QA processes and should be considered review of CAS. There are some legitimate reasons to review CAS to bring greater coherence and in some cases to reduce rigidity and provide greater flexibility. Some rationalization of the CAS is clearly possible. However, given the level of engagement that was involved and to avoid destabilisation an incremental approach to review could be developed over the next five years, and would serve to increase confidence in the existing awards. This would also inform a process and schedule for programme review across the sector. A cautionary approach in the short term is also advised because there is considerable structural change underway in the FE sector but which should enhance capacity over time.

**4.1.8.21:** The issue and importance of minor awards and small units of learning with respect to part-time learning was addressed under earlier points. While some change may be helpful the needs of part-time learners from many different contexts (work, adult returners, employment) must be fully considered. Formal recognition of a small volume of learning is a significant achievement at all NFQ levels, particularly at the lower levels. Its role in promoting lifelong learning, a national policy objective, must also be considered carefully.

Finally, TUI welcomes the commitment by QQI to engage with stakeholders such as TUI on a regular basis to support discussion on policy direction and changes. This will provide an invaluable opportunity for the experience of the practicing lecturer and teacher to inform new policies and guidelines.

***Bernie Judge, TUI Education/Research Officer.***