

**Quality and Quality Assurance Ireland (QQI) Strategy Statement (2014-2016)**

**Draft Preliminary Observations**

**Teachers’ Union of Ireland - TUI (July 2013)**

**Introduction**

The Teachers’ Union of Ireland (TUI) represents close to 15,000 teachers and lecturers working in post-primary schools, in further and adult education contexts and in third level colleges. It has long experience and strong knowledge of qualification issues and current quality assurance practices at each of these levels of education and of how former awarding and quality assurance bodies operated. Most particularly, it has a strong knowledge and understanding of practitioner views (teachers, lecturers, organisers and managers) on a range of relevant issues. These embrace the perspectives of those involved in managing, developing and delivering programmes of study (part-time and full-time), designed to meet a wide range of learners and delivered in a variety of contexts. As the representative body of professional practitioners it has much to contribute to the framing of new policies and procedures by the QQI.

**General Remarks**

* Although the public consultation process that is now underway is welcome TUI re-iterates it’s earlier message to QQI (communicated verbally and in writing) that the consultation process must include specific and regular consultation meetings with key stakeholders, including the union. It understands that the QQI has plans to set up a stakeholder forum in the near future and it welcomes the recent communication suggesting a discrete meeting with TUI in the autumn period. It respectfully recommends that a stakeholder forum should be representative in nature and manageable in size. Such a forum should meet on a regular basis – at least three-four times a year, especially during the phase when new policies and procedures are being explored and agreed. It further recommends that provision should be made for discrete meetings, as necessary, with particular stakeholders, such as TUI, that have a robust and dynamic connection with qualification and quality assurance issues at a number of levels.
* TUI accepts that public consultation events such as those scheduled in May of this year play an important role in accommodating wide engagement in the development of new QQI policies and procedures as these evolve and as QQI functions consolidate. Such events provide an important opportunity for a variety of stakeholder organisations and interested parties to share perspectives and build an understanding of the entire qualifications and quality assurance landscape and associated issues. However, it is important that such consultation events are appropriately notified, well in advance of closing dates for submission to all possible contributors. It is also critical that consultation events are scheduled at times that accommodate maximum and meaningful participation.
* Likewise, written feedback and submissions play an important part in gleaning perspectives from the public, specific groups and organisations. In this regard, notifications and consultation materials must issue well in advance and timelines for the submission of observations must be reasonable and appropriate. In this regard, TUI notes disappointment and frustration at the timing of the recent public consultation events (May) and the timelines for written submissions and on-line feedback (material provided in mid-late May with submission dates in early June and mid-Sept). These dates and times are in direct conflict with time bound responsibilities of relevant personnel, most notably examinations and end of year or commencement of year events. Therefore, they do not allow adequate opportunity for TUI, as a representative organisation, to consult widely and thoroughly with its membership. This approach should be avoided in the future as it will only serve to render the consultation process less meaningful and useful and will frustrate positive relationships with the QQI. Therefore, TUI respectfully requests that the date for submission of feedback on the second phase of the green papers be extended to the end of September.

**QQI Strategy Statement 2014-2016**

Broadly, TUI sees the strategy statement as comprehensive, clear, relevant and accessible and offers the following brief remarks to assist in strengthening the statement and make it more relevant and meaningful.

* ***Mission*** Safeguarding quality is an important mission statement but a question arises as to whether the QQI would, in the first instance, not have to ensure the development of quality.

It is fitting that quality and the recognition of programmes and qualifications are central to the mission of QQI. However, while these ultimately benefit learners they also benefit providers and also support society in general.

* ***Vision*** It is somewhat disappointing that reference to ‘*flexible access to’* high quality education and training opportunities is not integrated into the vision statement. This is a central plank of the National Framework of Qualifications (NFQ) of which the QQI is custodian.
* ***Values*** *Learner centredness* and meeting learner needs are legitimate and expected core values. However, it is providers with which the QQI will work closely with to ensure these values are embraced. Therefore, it is somewhat remiss not to refer in some manner to strong, effective and healthy relationships with providers in this section.

*Collaboration:* Reference to collaboration is valid but weak as currently set out; working with individuals or particular agencies or bodies will not in itself lead to collaborative practices.

*Integrity:* Honesty and reliability could usefully be included in the brief explanation.

* ***Goals*** TUI questions why the NFQ is flagged as the central organising feature for establishing QQI policies and processes as opposed to one of a number of features. The NQF primarily represents the levels of qualifications and the knowledge, skills and competence associated with each level of qualification; not the quality assurance measures and processes attaching to its implementation.

While the needs of learners should be a priority, the needs of and relations with providers should also be a priority. Some re-wording of goals 2 and 3 is advised to capture this.

Goal 5 could be usefully expanded to include providers as well as the public.

* ***Enablers*** Under governance reference to the development of mechanisms and committee structures to engage effectively with stakeholders is welcome and TUI looks forward to further engagement in this regard in the near future. This will be critical in embracing stakeholder expertise, knowledge and ideas into draft policies for deeper consultation. TUI advises that a commitment to effective engagement be further strengthened by including this in the list under the column on People and Structures (page 5).

Effective mechanisms for meaningful communication, stakeholder engagement and consultation will avoid misunderstandings about how future policies were framed and agreed. They will also ensure early notification to key stakeholders about the timing and timelines for submissions in respect of policies and procedures under development.

* ***Challenges and Opportunities***

As set out on page 6 the challenges and opportunities reflect the current and immediate short term context with respect to structural changes, national priorities and constraints in the public service.

* ***Priorities in Relation to Goals***

While the range of priorities set out in pages 8 -11 are extensive and comprehensive TUI believes it would be remiss of QQI if particular attention is not made given to the provision of guidelines for the recognition of prior learning (RPL). At a minimum RPL should be referenced under the priority to provide guidelines for access, transfer and progression under goal 2. RPL could prove an important aspect of supporting access and progression for some learners. However, it a complex concept and implementation can be quite problematic depending on learner needs, provider focus and available resources and support. Clear guidelines will be critical to guide how and which learners can best or appropriately benefit from RPL. In the absence of clear policy and practice guidelines learner expectations may be unrealistic, access to RPL may vary enormously depending on provider approach and capacity and the rigour applied may be inconsistent across providers - which could serve to undermine standards and trust in the process overtime.

A further area of work that may merit being listed under priorities refers to the review of the Leaving Certificate with a view to providing greater clarity as to how achievement in the Leaving Certificate is linked to the NFQ. Currently, there is little capacity under the framework to denote the real difference that exists in student achievement at this level.

Another sensitive area is the ‘shared space’ i.e. Level 6 awards provided under further education and training and third level. Ultimately, an award at Level 6 should have parity of esteem and value, irrespective of which provider delivered the programme or where the learning was undertaken. This is an important area, especially with reference to seamless opportunities for progression to further study. In addition, a number of issues arise as a consequence of all programmes under the apprenticeship scheme being located at the same level. This is problematic and should be addressed.

In conclusion, TUI advises that the above comments should be taken as preliminary observations. They will be further explored as part of a discrete meeting with QQI officials in the near future.

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