

**TUI Response to Issues Raised by the Green Paper on Assessment – Dec 2018**

***17.1 GENERAL ISSUES CONCERNING ASSESSMENT***

***These issues are for all providers.***

***Please comment on the conceptualisation of assessment as set out in this paper and the general issues***

***that have been identified. The following questions may help remind you of some of the issues raised in***

***section 7.***

**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? (Section 7.2)**

TUI members assert that programme validation and revalidation takes too long. Programmes are generally written by practitioners in the field on behalf of the provider without adequate administrative support or encouragement from providers.

*The Initial Access to Validation of Programmes Leading to QQI Awards Application Guide* states: “*Providers seeking access to validation are responsible for the development, maintenance, provision and internal quality assurance (QA) of their own programmes and the procedures for the assessment of learners enrolled on those programmes.”* While the TUI acknowledges that this is not the direct responsibility of QQI, such support might properly reside in expertise at a QA Office at an ETB, for example where such practitioners can be supported, guided and trained in adherence to guidance on the proper validation and revalidation of programmes [FESS and CDETB CDU offer similar services under CPD]. The TUI believes that this should become the established practice at providers if validation and revalidation is to be more efficient.

In many existing modules and programmes, the TUI observes that LOs are sometimes expressions of learning principles in a specific field and others delineate specific elements that require to be assessed. MIPLOS are baseline requirements to pass whereas more specificity and detail in LOs would facilitate assessors in clearly differentiating between a poor, fair, good or excellent response to an assessment brief.

It has been argued that LOs across L4, L5 and L6 are too prescriptive and restrict general learning in 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]

The general statements of principle encapsulated in some LOs allow too much latitude for the elasticity of the standard leading to circumstances where an assignment submitted to achieve that LO might be more suitable for a Level 4 outcome rather than a Level 3 outcome, for example. The case might also be the converse of this example. The NFQ is clear. Level 3 is commensurate with Junior Certificate levels of achievement but examination of a Level 3 portfolio might indicate ability below or above Junior Certificate levels of achievement. The Level 3 Component award in Mathematics, for example does not stipulate multiplying or dividing fractions whereas this mathematical competency is taught in Primary School at NFQ Level 2. The alignment of assessment with LOs greatly depends on the quality of LO writing to better encapsulate knowledge skill and competence. Providers need to resource and train for this work if LOs are to better express what precisely is required in an assessment.

**Do you agree that disciplinary communities have an important role in supporting the consistent interpretation of learning outcomes? How do such communities exert influence on educational and training programmes? Are there opportunities for improvement? (Section 7.3)**

The TUI agrees that disciplinary communities do have an important role in supporting the consistent interpretation of learning outcomes but such communities need to be resourced, legitimized and paid for this work. One cannot expect teachers or lecturers with an already heavy teaching, learning, researching, preparing, correcting and administrative load to additionally volunteer themselves to take on the complex and time-consuming task of devising programmes, writing LOs and taking responsibility for the authoring and validation process without support.

 In recent years, CDETB CDU working with QQI has been active is this area, in particular writing new component specification NFQ Level 5 and 6 minor awards. FESS has published an online resource list for specific module Levels 1-5. Some ETBs have created their own programme module descriptors for minor awards] [In recent years QQI reviewed their minor, supplemental, special purpose awards and major awards.

QQI should remember that there is a whole other piece of work in devising and delivering material to satisfy the LOs in their teaching and learning practice. The TUI believes that teachers and lecturers must be consulted and their expertise is required but government funding in the form of direct and/or ancillary support for providers must be available for this process. QQI is not going to be successful in convincing practitioners to take meaningful responsibility this work on a voluntary basis in addition to their current roles without sufficient ancillary support. Such communities exert influence on educational and training programmes when adequate support and encouragement at provider level is made available. QQI should ensure that efforts by providers to enhance QA supports are mandated and supported.

The document refers to the the use of CPD and quite correctly not over-burdening workload.  There is an opportunity for significant collaboration with the IOT sector as the IOT sector has already travelled this road in relation to delegated authority based on quality assurance, the National Qualifications Framework and QQI. At the forefront of delegated authority is the need for Academic Councils in IOTs to provide oversight on programmatic reviews and to ensure learning outcomes are pitched appropriately for the correct level. The system is not finite and subject to continuous improvement.

IOTs have built a significant body of knowledge in this area and have many qualified lecturers and practicioners that deliver specific modules on pedagogy and differing approaches to assessment. I believe there is an opportunity for ETB/FE practitioners to tap into this body of knowledge and receive accreditation for undertaking these types of modules notwithstanding the earlier comment of not unduly increasing a heavy workload. However if it is accepted that this development is in the best interests of learners then it is not unreasonable to develop a framework to all allow workload alleviation in response to the undertaking of such CPD.

**What more can be done to build expertise in the use of statements of learning outcomes in teaching, learning and assessment? (Section 7.4)**

CPD in writing, reading and interpreting LOs is required but again it has to be resourced and/or funded work and cannot form any significant additionality for practitioners outside of currently onerous teaching and learning commitments. Support is required to ensure that LOs and appropriate teaching, learning and assessment strategies are written and implemented to ensure coverage of the knowledge, skills and competencies at the correct NFQ level.

There are subject associations in second level, so there may be a need to support or create FE communities of practice for FE teachers. Such communities offer teachers a space to share their own area of expertise and seek support from fellow teachers looking for resources for Level 5 and level 6 modules

**Do you agree that all programmes should include a programme-specific assessment strategy as indicated in this Green Paper? What are the obstacles to implementing programme assessment strategies as envisaged here? What else, beyond what we have indicated, should be addressed by a programme assessment strategy? (section 7.5)**

A programme specific assessment strategy is sensible and the written LOs will play an important part in the formulation of any such strategy because as indicated above some LOs are highly prescriptive whereas others are statements of principle that can be achieved by means of a variety of strategies depending on the teacher or lecturer’s particular approach and disposition having regard to QA frameworks in the particular setting. The operation of LOs is often an obstacle, resources both physical and pedagogical/ andragogical are in short supply and learner ability in the context may also be an impediment. Outline marking schemes, sample exam papers and indicative content required to satisfy the LO are available in the Programme Module Descriptor but oversight and guidance on the grading of assignment/project work submitted is scant. There may however be a positive to this as the grades are based on work connected to the chosen vocational area. Teachers should keep their independence without oversight or guidance from third parties. Whether student’s work deserve a pass grade, a merit or a distinction is often nebulous leading to circumstances where EAs may or may not identify discrepancies in the grading at the micro or meso-levels. A silent factor in these matters is the pressure on colleges and centres to enrol and retain students. This issue places upward pressure on the grading of assessment because in PLC Colleges and at IoTs the money follows the student notwithstanding attrition rates. This has the effect of potentially compromising QA and assessment because such a system creates unreasonable expectations as well as poor access, transfer and progression practices and could affect assessment strategies negatively. Some ETB colleges run very effective links programme with colleges in Ireland and the UK and regularly have college presentations on UCAS and CAO]

In creating a direct progression route for PLC students to third level programmes, a co-ordinated and symbiotic agreement with these agencies is important. This approach would encourage school leavers to consider PLC as a valid and alternative access route to college and give them the practical skills needed to succeed on their third level journey.

If programme assessment strategies have to be devised by teachers and lecturers without remuneration or adequate ancillary support this will cause an IR difficulty and will be an impediment to the implementation process.

**Please comment on the accommodation of diversity. (section 7.6)**

Clearly different school systems produce students of diverse ability but the medium of teaching and lecturing in Ireland is generally English and there are language testing systems such as IELTS which help schools and colleges to discern whether international students are capable of engaging with the material in English. In terms of cultural diversity TUI have no comment to make other than to say that international students present with many complexities such as qualifications acquired in other countries and the requirement to conduct RPL in order to accurately discern exemptions that maybe available when considering issues of access, transfer and progression for students of divers ethnic and cultural backgrounds. The TUI might add that any additional workload arising from measures to accommodate diversity would not be welcome in a college that simply did not have sufficient resources to carry out such work.

FE colleges have the most diverse and multicultural group of students than any second level school college/centre in this country. They offer ESOL courses in parallel with the national QQI courses. VTOS and BTEA funding 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.

**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?**

The burden of summative assessment may be difficult to provide for in some organisations but quality and standards that demonstrate the acquisition of knowledge, skill and competence cannot and must not be compromised. 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.

**What are the implications? (section 7.7)**

Depending on the discipline and/or NFQ level, certain assessments are mainly suited to formative assessment, some suit a blended approach i.e. formative and summative and others simply require robust summative assessment. Any approach to responding to this issue must have regard to the above.

**Do you agree that RPL assessment should be reserved to those who can specialise in this kind of assessment? What are the implications? (section 7.8)**

RPL is inchoate in Ireland and the capacity of practitioners to apply this methodology is limited at present. 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. RPL is highly specialised in that interpretation of a framework is required and in that interpretation an assessor has to be familiar and practiced in the field. The implications are that piloting and training in RPL methodologies is vital for practitioners of this mode of assessment.

RPL has been doing the rounds for years and it up to QQI to set out its stall and explain how it may be rolled out with or without proper funding and resources.

**Do you think that all awarding bodies should publish indicators of minimum knowledge, skill and competence required for each of their awards, i.e. threshold as distinct from typical standards? (section 7.9)**

Yes but Component Specifications and Programme Module Descriptors also need to be more specific in what constitutes minimum, reasonable, good, very good, excellent and exceptional work at the point of assessment. It is unreasonable to expect that every student would reach minima or maxima in this regard and a rational bell curve depicting the range of abilities should be implemented and observed by providers at the national level to ensure that indicators of minimum knowledge, skill and competence are achieved and accurately documented. Accreditation in one region must be achieved at the same standard as another region but this can only be done by providing an overarching system of support for the quality of teaching, learning and assessment. However, it could also could become too prescriptive. Part of the role of the EA is to make sure that the grades are related to established marking thresholds. Perhaps the question would not consider maximum knowledge indicators, in whatever form they may take. The question implies an ‘over assessment’ of learning and clarification is needed to respond to this issue].

**Would it be reasonable, for purposes of simplicity and transparency, for all awarding bodies making awards that are recognised within the Framework, to be expected to set and maintain threshold standards for their own awards having regard to the NFQ?**

Yes, because the requisite expertise clearly resides in the field of practice but TUI does not agree that Delegated Authority should become so unregulated or devolved that providers would enjoy a level of independence in the setting of those threshold standards without specifying resources, support or supervision. Awarding bodies should also have regard to benchmarking the relative achievement of standards across the spectrum of awarding bodies making similar awards at the particular NFQ level. Assessment breaches bring accreditation, organisations and learning brands down and there should be no scope for private provider, for example, to have a less regulated environment in which to compete. The TUI believes that all providers both public and private should be stringently held to the same standards without fail.

Private enterprise will often prioritise the cheapest strategy whereas that is not necessarily the imperative at public providers. Indicative effort for learners in Level 5 programmes, for example, is set at 1200 hours but the latitude afforded in the programme directed hours range is 500-1000. This flexibility is ill-defined and allows a situation where some programmes have more class contact than others even though the same accreditation is produced by both programmes. Minimum class contact must be stipulated to ensure that quality and standards are uniform on a national basis. TUI believes that institutions cannot be held to the professed national standard if some institutions deem that the programmes can be delivered with minimal teaching and learning time when the same MIPLOs are being ‘satisfied’ by a variant application of inputs which appear to generate the same outputs.

**Do you agree that it is not sufficient only to assess discrete skills (i.e. follow an atomistic approach) when evaluating competence for occupational practice? Do you agree that generic skills cannot effectively be taught and assessed out of context in vocational programmes? What are the implications? (section 7.10)**

The TUI does agree to an extent that this is the case but Work-Shadowing and WBL in vocational settings is under-utilised in Ireland. TUI believes a blended approach to solving this problem should be utilised as appropriate. The fundamentals of generic skills may require a classroom based approach to teaching and learning and a formative/summative mode of assessment initially but underpinning generic skills in a real working environment is worth considering in many contexts and work placements and WBL carry a high degree of merit in this regard.

FEs offer modules in cultural awareness, sign language, crime awareness, personal and interpersonal awareness, to name a few. Without adequate funding and resources, it is not possible to comprehensively teach such skills in a year.

**Do you agree that well-intentioned but non-strategic arrangements for assessment can hinder the achievement of intended programme learning outcomes? (Section 7.11)**

Every college, centre, organisation, teacher, trainer and lecturer needs a cogent assessment strategy with a framework to ensure that the approach is quality assured in meeting the intended learning outcomes. Well-intentioned is a problematic term as reasonable accommodations might be considered by some to be well-intentioned but lacking in robustness. RPL could be perceived as an attempt to give students enrolled in programmes a free pass in terms of demonstration of learning but a robust framework for RPL can be achieved and implemented to assure the integrity of outcomes. Well-intentioned might also refer to poor application of access, transfer and progression measures which see students enrolled above or below actual competency arising from financial or funding imperatives for the particular organisation. It may be well-intentioned to allow the student to go forward for assessment because they have been enrolled and now have a level of expectation of accreditation. Students must access programmes in FET at the appropriate NFQ level to ensure quality and fit for purpose outcomes, transfer and progression for the provider and the learner.

It appears to be assumed that students are doing the right course for them based on advice from their school or at the interview stage in the college or from career guidance - if it happens that students are on the wrong course, there may be external or personal factors at play here.

SOLAS have put pressure on FE Colleges now whereby funding can be reduced if there is not a maximum number of successful students achieving full awards each year. SOLAS seem to reject the argument that it is a positive result when learners achieve success in gaining minor awards but not a major award in one year. There is pressure on FE colleges to provide outcome based results that mirror the expectations of SOLAS is increasing and this will have an impact on assessment.

**Do you agree that teachers and programme designers can sometimes struggle to address all the dimensions of the NFQ (knowledge, skill and competence) adequately in teaching and particularly assessment? What are the implications? (section 7.12).**

The work of a programme designer is to ensure that programmes designed afford ample opportunity to teach and assess knowledge, skill and competence. The work of a teacher is to ensure that knowledge is acquired, skill is learned and practice and competence is achieved and demonstrated. If programme designers provide the framework to acquire knowledge, skill and competence then qualified and trained teachers will have no particular difficulty in ensuring that all dimensions of the NFQ are addressed in their work. If there is a struggle to address all the dimensions of the NFQ then the quality of the programme, the teaching and learning or the resources available may be at issue. If the LOs, the assessment strategy and the resources which underpin their achievement are not fit for purpose the quality of learning cannot be fully verified or assured and the assessment may potentially be regarded as deficient. The implications are that deficiencies in programme design, inadequacy of resources and unchecked relativism in educational practice (either local or national) make space for issues to arise and undesirable norms may become established in the culture of a given organisation where adherence to the above is not achievable or observable for one reason or another.

Further Education in Ireland was born out of a local need to create job opportunities and new access routes to higher education. These fundamentals have not changed. Teachers are open to developing new modules and courses that satisfy the demands of learners but this work has be to supported with proper funding and adequate resources.

**What applications can you think of for norm referencing in the context of assessment? (section 7.13)**

Norm referencing has got to reference the micro, meso and macro in vocational education and training because the cohort at a particular college/centre may skew acceptable norms in the meso context and may also be out of kilter with the macro norms. Norm referencing also runs the risk of disaggregating the mean norms and thereby undermine the national standards set out in the level indicators of the NFQ. Norms must be properly adjusted and controlled for at all levels of engagement to ensure that norms are not thwarted unduly at either local, regional or national levels.

**What are your views on the purpose and necessity of grading in the context of assessment for/of learning? (section 7.14)**

In the context of grading, the authorship of some LOs can be particularly problematic. Relativism in progressive models of education and training can be perilous in this regard. Where LOs are specific and stipulate elements that must be contained in skills demonstrations, exams or collections of work then grading can be proportionate and accurate. Where LOs are less specific and set out in principle what should be achieved in satisfying a learning outcome then there is room for inconsistent grading practices to emerge. If a student is to demonstrate an understanding of the human digestive system for example is this a simple functional understanding or does a student specifically have to name and describe the function of each organ involved and its relationship to others; does one have to reference a specific number of enzymes, acids etc. In other words, specifically define the task, the elements of the task and the appropriate grading system to ensure certain levels of knowledge, skill and competency are achieved and graded commensurate with the levels required for a particular grade and then ensure that the assessment is commensurate and consistent with assessments carried out at comparable settings. Grading provides learners with meaningful feedback if the grading is meaningful. Grading should properly reflect acquisition of knowledge, development of skills and demonstration of competence. A blend of instructional teaching, modelling, practice, collections of work, skills demonstration and examination all have a role to play and resources, both human and capital, must be available to teaching staff to facilitate good outcomes.

**Do you think award classifications practices are consistent? Do you think, when considered at the national level, they are fair to all concerned? What are the implications? (section 7.15)**

The TUI is not fully satisfied that award classifications practices are consistent or fair at the national level. Award classification processes must cross-reference at the meso and macro levels to ensure a consistency of award classification processes. As matters currently stand, in FET and HET the money follows the student, the student has expectations, the institute/organisation relies on enrolment for its continued and properly funded existence and the current model of funding in FET and HET risks a perversion of the priorities and imperatives of the business of teaching and learning. EAs and Externs are not resourced to and are not in a position to ensure that such aberrations are prevented and the grading system is thereby rendered potentially unreliable. Grading, assessment and expression of LOs needs to be specific to guard against this problem. Local considerations in a largely flexible and self-regulated system are prone to the above considerations which potentially undermines the quality of assessment if allowed to prevail in adjudications of award classification. The system therefore needs to be more robust and better resourced by providers to place the accreditation outcomes above reproach or doubt.

**Is award classification worth the trouble? What should an award classification signify? Is consistent classification practical? Is it desirable? How might it be possible to get a shared understanding of classifications?**

Award classification is paramount. The HI, H2, H3 system employed by the SEC, for example is transparent, simple and fair. It accurately describes and feeds back levels of achievement based on very specific and prescribed marking schemes that weigh the value of elements contained in assessment. Pass, Merit, Distinction is too broad a classification and doesn’t serve the needs of teachers, learners and employers as well as it could. Once the classification grade is attainable it doesn’t incentivise extra effort and neither recognises nuanced ability as incrementally as it could. If LOs are properly designed and outcomes are accurately graded then consistent classification is achievable. Shared understanding of classifications can be achieved by specificity in LOs and suitable assessment frameworks/strategies which are supervised and benchmarked to a local and national standard. Such an initiataive requires increased funding for such collaborative oversight.

**What can be done to support consistency in the actual standards of achievement that must be demonstrated and assessed to qualify for Framework 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.

**How do institutions manage competing interests to ensure that they retain a balance of competences (in assessment in particular) suited to the needs of their enrolled learners? (section 7.17)**

Institutions and organisations face a conundrum in this regard. As mentioned previously the money follows the student in FE and tertiary education so the enrolment of the student is an imperative for the continued existence of the education and training organisation and therefore the continuing survival of jobs and funding in such settings. Access, transfer and progression measures are sometimes perverted by the financial imperative. This may lead to dubious decisions to enrol being made by registrars and admissions offices in colleges and institutes. There should be a memorandum of understanding between providers at such places of learning on a regional basis to ensure that back-referral without financial d[etriment is facilitated. In other words, if a student suitable for an NFQ Level 5 programme is enrolled in a Level 6 programme then there should be a facility to back-refer such a student to a suitable Level 5 programme or indeed Level 4 programme as the case may be if required. An online assessment system on application would discern ability to enrol and participate meaningfully and would therefore allow a place of learning to make an appropriate decision regarding admission without fear of financial loss. If a student were to access education and training at the right level the chances of transfer and progression are ameliorated and it is likely that the place of learning will benefit in due course anyway. FE Colleges have a drop-out rate of approximately 16% and IoTs experience drop-out rates of approximately 30%. This is not the most appropriate use of teaching and learning resources in any event and Government should facilitate adjustment in the system to aspire to the best outcomes for all participants and providers by agreement.

The continuing scarcity and uncertainty of funding lead to staffing decisions, employment practices, resource constraints and class-size and/or contact hours decisions which fundamentally undermine efforts to cater to the needs of enrolled learners.

**What do you think are the main challenges involved in remote assessment? (section 7.18)**

Online and remote assessment is underdeveloped, technologically unreliable and prone to fraud if it is to be reliable, unavailable to many students, and prone to fraud. The element of knowing, meeting, and assessing learners in person is important to gain an accurate picture of ability and capacity in any assessment. However, some online elements of assessment may be valuable in a blended sense. The development of remote assessments requires significant investment.

**Do you think there is a significant risk of some professional bodies or professional regulators imposing requirements on programmes of education and training that conflict with effective assessment practice? (section 7.19)**

Professional bodies and regulators do have an important role to play in education, training and legitimacy of assessment. A professional body or regulator may have a legitimate interest in stipulating requirements that promote effective assessment practice because to do otherwise might lead to damage to the profession. Where there is a proprietary skill being taught which requires acquisition of specific knowledge, skills or competences then it behoves professional bodies or regulators to ensure that the programme and its assessment is fit for purpose and above reproach. In this circumstance, the TUI is not concerned that the risk is significant because the reputation of the profession is at risk if the professional body or regulator does not impose rigour on a given education or training programme. In other areas risks may arise. Professional bodies or regulators may choose to be tacit in facilitating the cutting of costs by ‘ticking a box’ where there is an imposed statutory requirement for CPD, for example. Manual handling or Safe Pass training, for example might be cursory depending on who is providing and paying for the training. Other professional bodies and regulators may seek to profit from the requirement to train by providing minimal training in a field where they have the capacity to do so and where there is a stated curricular need.

**How can/do professional bodies help support the validity and reliability of assessment in the context of professionally oriented programmes?**

Professional bodies can help to support the validity and reliability of assessment by adhering (and being held) to universally held principles and universal norms in a particular sub-set of skills that are to be taught. The process of seeking or maintaining accreditation for a programme by a professional body can be a valuable exercise in keeping Los and course content up-to-date and in benchmarking programmes against national standards. If programmes are provided by public funds, professional bodies should not seek to specialise knowledge to a point where it is only useful in their context. If skills are not intended to be transferable, the programme should not masquerade as anything other than that and mislead applicants. If a company wishes to teach a proprietary skill then the programme should be wholly funded by the professional body or regulator. Most importantly professional bodies must be held to the same standards, quality and accountability as all education and training organisations when assessing learning.

**Do you agree that persons responsible for assessment need to maintain regular contact with the relevant communities of practice (e.g. scientific communities)? (section 7.20)**

Yes, many educators are members of subject associations and the sharing/updating of knowledge is always desirable. This should be incentivised rather than stipulated and practitioners should be encouraged, funded and resourced by providers to engage in CPD to this end.

**What can be done to further engage learners as partners in assessment of, for and as learning? (section 7.21)**

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 in to 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.

**What principles do you think should underpin the quality assurance of assessment in the workplace? (section 7.22)**

Quality of teaching and learning depends on prescribed qualifications of teachers, trainers and lecturers, programme content, course duration, class contact, learning environment and resources, QA frameworks, leadership and appropriate access, transfer and progression pathways. Without these instruments, metrics of quality and standards, assessment is not secure. The quality of assessments depends on the quality of practice and these elements must be given balanced weighting to underpin the quality assurance of assessment. Frameworks for WBL and RPL have an important role to play here also but skills demonstration and independent competence should be rigorously measured, assessed and externally checked to ensure quality in workplace learning and assessment because workplaces are not necessarily equipped to underpin quality assurance of assessment in Ireland.

**What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?** TEL is increasingly a factor and online colleges and courses are becoming more prevalent. TEL compliments and enhances teaching and learning practice if properly implemented and used but supplanting face-to-face learning experiences entirely with automated online learning is fraught and again open to manipulation as transparency cannot be fully assured by the use of algorithms as teachers and assessors. However, in TEL there is a place for guest lecturing, skills demonstrations and seminars through the media of video and audio because human authenticity remains a strong feature of many aspects of TEL making the learning experience varied and stimulating.

***17.2 FURTHER EDUCATION AND TRAINING ISSUES***

**Recognising that providers are responsible for establishing assessment procedures, please comment on how best QQI might help support them.**

QQI might best help support providers to establish assessment procedures by providing for a rational, properly resourced and coherent approach to the implementation of QA and assessment measures having regard to the following:

* That ‘initiative overload’ by QQI and ETBI in FET be halted.
* That unnecessary and excessive bureaucratisation of teaching and learning in FET be resolved.
* That the resources required to provide evidence of quality assured teaching, learning, administration and assessment be nationally standardised and simplified across ETBs and FET providers.
* That an agreed method of QA oversight and implementation be nationally negotiated and agreed with all of the 16 ETBs to ensure that the same governance systems are applied nationally.
* That the application of national standards be uniformly applied in a reasonable and coherent fashion in all settings.
* That each organisation be required to meet the same operational standards of teaching, learning and delivery uniformly and nationally irrespective of whether courses are provided on a part-time, full-time, private or public basis.

**In the context of programmes leading to CAS awards, should the provider be required to assess candidates for the compound award and then inform QQI of the grade for the compound award?**

**The mechanism for calculating that grade would be approved by us (QQI) at validation and might be expected to include a contribution from the components’ results.**

The TUI’s view is that to ask providers to assess candidates for the compound award as well as the component awards would give rise to a workload issue in the current circumstance. The TUI accepts that in the event the mechanism for calculating that grade would be approved by QQI at validation and might be expected to include a contribution from the components’ results but nonetheless would inevitably add to the teaching and learning workload in an already under-resourced sector. The establishment of QA Offices at provider level might assist in resourcing assessment for the compound award. As a result, more resources and funding are needed at local level to further this matter.

**Please respond to the commentaries on the issues raised in section 8.1, viz.:**

**» The unitisation of assessment.**

Too many additional ‘capstone’ units add to the burden for teachers and learners where eight modules might already be required, for example. The best solution to the problematic unitisation of assessment is to provide for proper and meaningful integration of components or units in assessment. The inclusion of RPL in assessment provides an opportunity for learners to reflect on and formalise their lifelong learning and provides an opportunity to contextualise new learning. It may also help to consolidate and reduce the atomisation of learning in assessing the compound award.

**» The sustainability of the burden of assessment on 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.

**» Centralised versus distributed assessment.**

In considering whether there should be an expectation that providers would collaboratively establish arrangements to help calibrate local summative assessment the above comments under “**The sustainability of the burden of assessment on providers.”** also apply. It’s all very well to propose local collaboration in benchmarking assessment to ensure consistency but time and cost obtain in establishing such a system so ‘buy-in’ would be required by providers and their staff. There is already considerable disquiet regarding what is perceived as the excessively bureaucratic paper exercises and the implications that flow for teaching staff in QA and assessment. Education and training professionals in Ireland fully accept and promote that unimpeachable standards are essential in quality accreditation but do not discount the vital importance of quality teaching and learning in underpinning such standards. However, in aspiring to further improve existing systems of assessment facilities and methodologies that are workable and practical it is necessary for ETBs to uniformly establish well-resourced QA Offices to carry out all of the administrative work required in support of such an initiative. Many providers have education and training staff who are paid to teach but not to administrate. If you keep adding to the administrative burden of assessment placed on the shoulders of education and training staff without remuneration then the quality and consistency of assessment will be undermined. The best solution is to have discrete and dedicated services in the form of QA Offices at provider level to provide ancillary support the implementation of assessment procedures.

**» Perceived ambiguities in the QQI regulations.**

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.

**» Micro-management of assessment through regulations.**

Micro-management of assessment can be avoided by providing assessment frameworks setting criteria to be satisfied in order to underpin the rigour of assessment rather than by prescribing directly. Inchoate RPL practices in Ireland, for example, may be indicative of how assessment frameworks and criteria might be satisfactory and fit for purpose in regulating assessment in the future. If providers understand that once criteria are satisfied in a localised, flexible and appropriate manner then TUI members may be more independently amenable to sensible regulation which isn’t unnecessarily prescriptive or arbitrary.

**» Patchiness of current guidelines.**

Again, the observance of frameworks in the satisfaction of assessment criteria rather than prescriptive or unwieldy guidelines (whether patchy or not) is a more appropriate approach in the context. Such frameworks/criteria form part of overall QA systems and must be designed to be consistent with QA.

**» Assessment in the context of the QBS implementation for the Common Awards System.**

If achievement of the components is not necessarily a valid or reliable indication that the compound award’s ELOs have been achieved and if the legislation is clear that it is the provider’s responsibility to carry out this work then providers and their staff must be supported and resourced to establish systems to satisfy the above through the establishment of QA Offices at provider level.

**Please comment on the questions posed in section 14.**

**Would it be useful for QQI to publish general principles and guidelines for assessment?** Yes (a draft version with further consultation). This would establish the requirement for a national standard to be generated at the micro, meso and macro levels.

**» What should the principles and guidelines address?**

The principles and guidelines should clearly reference the knowledge, skills and competence dynamic in the NFQ, be clear, simplified and unambiguous. The principles and guidelines should be non-prescriptive at the micro level i.e. duplicated paper exercises for assessment without rationale should not be implemented by providers. 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 meets the overall requirements of assessment set out in the principles and guidelines as appropriate to the setting. 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.

**» To whom should the general guidelines apply (should they extend, for example, to all providers and awarding bodies quality assured by QQI or only to providers with DA or QQI validated programmes)?**

General guidelines should apply equally to all providers in order to ensure a level playing field. Private providers should not be facilitated in cutting corners and public providers should not be forced to adhere to a higher standard than that imposed on a private provider.

**Please comment on the proposal to establish conventions and protocols as set out in section 15. The idea is that, in the interests of consistency, these would be developed collaboratively with FET providers, recognised by QQI and used by all FET providers. What topics should be addressed by the meso-level?**

TUI supports the development and establishment of conventions and protocols that would be developed collaboratively with FET providers, recognised by QQI and used by all FET providers. This initiative would ensure the avoidance of doubt, exclude the unnecessary and provide certainty to providers in respect of processes and procedures in assessment and the measuring of quality in particular.

**FET sectoral protocols and conventions? In addressing this please be specific.**

*What might usefully be addressed by sectoral conventions?*

The TUI believes that the sectoral conventions set out in *Assessment and Standards Revised 2013* are adequate other than also specifying Pass/Merit Grade 1/Merit Grade 2/Distinction for Level 4 and 5 NFQ Awards would go some way to addressing issues of accuracy of assessment feedback and learning incentives in assessment highlighted by this submission in comments under **7.15.** FET sectoral conventions and protocols are open to latitude in local interpretation when developing QA and Assessment procedures at meso-level. Duplication and excessive application of quality assurance and assessment metrics lead to workload issues for TUI members in FET when providers over interpret or exceed baseline requirements. The business of teaching and learning is paramount here and should not be compromised by excessive paper exercises which seek to affirm quality assured assessment by unnecessarily distracting from the core work of educators which is teaching.

*What might usefully be addressed by reference assessment protocols?*

The TUI believes that the assessment protocols treated of in *Assessment and Standards Revised 2013* are suitable and appropriate *to* institutions with DA.

*What changes are required to the implicit protocols and conventions in Quality Assuring Assessment - Guidelines for Providers?*

The *Guidelines* section of *Assessment and Standards Revised 2013* *states:*

*Progression decisions are informed by assessment designed for that purpose. Assessment of the attainment of intended learning outcomes should inform decisions that concern the learner’s progression through the various stages of programmes.*

Access, transfer and progression are problematic in terms of assessment in FET (and HET), particularly when learners are at the point of accessing a programme of study. As mentioned elsewhere in this submission, the current funding system in both FET and HET inappropriately incentivises institutions to follow the money in applying a policy of student enrolment. This currently means that some tertiary and FET institutions are in danger of compromising standards of access, transfer and progression because not to do so might mean losing the enrolment of a student and therefore the funding that flows from that enrolment. As stated previously in this submission, anecdotal evidence from TUI members reports that learners evidently more suited to a Level 4 programme are being enrolled at NFQ level 5. It also indicated that students are being enrolled at NFQ Level 6 where clearly a programme at Level 5 is more appropriate and commensurate with the ability of a particular learner in the first instance. It is also reported that some tertiary institutions provide “foundation” or “access” programmes at Level 5 to further prepare students for suitability for Level 6 programmes. Conversely it is also reported that incursions into Level 6 programmes are being mat by lesser qualified FET institutions where the work is clearly in the bailiwick of IoTs, for example. Assessment will necessarily be compromised if such practices continue and a system of back-referral without financial detriment is required in order to remove the requirement or desire for such practices.

**Please comment on the guidance on external moderation of assessment in QQI’s Effective Practice Guidelines for External Examining (QQI, 2015) having regard to the questions posed in section 16 (i.e. consider whether the guidance could usefully be generalised to all moderation).**

A national panel of EAs must be established soon if it has not already been done. The practice of recruiting EAs from within existing ETB staff, for example, is less than desirable and probably not sound practice in placing assessment above reproach by ensuring it is fair and consistent with objective national standards gleaned from aggregated practice at the micro, meso and macro-levels. Further to this, EAs should be in possession of the requisite subject specific competencies required to assess and examine a particular subject area. The current system does not always guarantee that EAs are subject experts thereby potentially damaging the quality and integrity of external authentication in practice. A national panel of subject experts as EAs would serve to address this issue by providing a greater variety of choice by ensuring that a sufficient number of EAs were available across all subject areas. Another matter that has to be addressed in respect of EAs is remuneration. Many EAs currently decline external authentication work because the pay does not currently justify the effort and time involved.

**Please raise any other issues that need to be considered.**

There are around 30,000 learners in FET colleges and Centres. About 20,000 of these are PLC students. FET has a role in our education system. It give students another avenue towards Higher Education courses as well as an introductory approach to understanding their chosen vocational area with an intention to seek employment in that field.

FET colleges need QQI validation to offer QQI programmes. FET colleges endeavour to provide sufficient teaching / learning hours over a calendar year. Students receive the time needed to process and evaluate information when they have a full weekly timetable for class contact. Resources are provided for students to learn and experiment. Teachers work with students to help them achieve the best of their ability and gain positive results at the end of the academic year.

Unlike private colleges, FET colleges require teachers to re-register yearly with the Teaching Council. The private colleges can respond quicker than FET centres to marketplace demands for specific skills based courses. They do not have any caps or limits on teacher employment. Subsequently, they can offer different terms and conditions to teaching staff/ trainers depending on the demand for specific skills based courses. Similar to the current campaign for Lower Paid Teachers to get equal pay for their work, private colleges can offer an alternate pay rate at odds with DES rate of pay. At the same time, these teachers/ trainers can experience pressure from management if their learners get poor results or fail to achieve a full award.

QQI awards are being offered in full time state funded courses outside of mainstream PLC centres. These service providers often have limited or minimal support services or resources available to learners. They can be found in commercial office blocks with no canteen. There is no career guidance or student council available.

Plagiarism and cheating is low. ETBs may have their own policies in relation to assessment. Component module descriptors that are available to teachers with market schemes. They are based on QQI’s component specification NFQ module level.

Regardless of the inappropriate and at times flippant tone of sections of the green paper, there is a need to state the obvious -teachers take academic integrity seriously.

FET colleges/ centres have guidelines to respond to instances of cheating or plagiarism. It can be the case where additional classes and learning is given to students to help them avoid common pitfalls in referencing work. This issue can be more prevalent in third level colleges where students have the same difficulties with understanding and demonstrating how to use primary and secondary research skills. Unlike Higher Education, FET does not have the resources to have online software programmes, like ‘Turnitin’, to check for chances of cheating or plagiarism in students work, nor  the resources to built up an online repository to check work submitted over the years.

FET colleges/centres do not exclude students.

The overall tone of the green paper suggests a place for delegated authority in organisations that provide QQI approved courses. This can raise concerns for teachers who hold posts of responsibility in FET colleges and centres. They may be asked to take on additional work that exceeds their post. There is a TUI Directive on Assistant Principals posts in conjunction with proper implementation of Cl 03/2018, more clarity may be needed on suggestions to expand the teacher's role in the planning and preparation stages of assessment.

There are not enough External Authenticators (EA) available.  Adult Education Centres are finding it particularly difficult to get EAs for QQI levels to 3-4. The removal of a centralised service once operated by FETAC has reduced the nationwide movement of EAs. They no longer travel to centres across provinces or county level. There are no regular QQI “in-service" sessions for individuals who are EAs or who wold like to join the list held by the QQI. These opportunities included access to a contact person with long serving expertise in the subject field where the EA was working. Such support services gave confidence to the work of the external examiners at that time.

Is it possible to have a national standard of assessment when EA visits are locally based? Is it possible to have a national standard when FET practitioners are not encouraged to become EAs ? Is it appropriate that EAs visiting colleges/ centres are not FET practitioners? This area requires further investigation and collaboration with QQI and FET colleges/ centres and EAs.

The role of the EA can be to support and validate the work of both student and teacher.

The service providers ownership of EA selection has an impact on programme learner outcomes and national standards.

QQI's 'Effective Practice Guidelines for External Examining' is not readily suitable for the FET sector. Third level examiners meet with learners, are familiar with the programme validation report/ programme assessment strategy and review report. Not so in FET.

QQI awards provide flexibility of learning.