

7<sup>th</sup> December 2018

## Response to the Green Paper on Assessment of Learners and Learning

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of Age & Opportunity as I want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

Age & Opportunity delivers training and personal development courses to older people and to people providing care to older people in residential and day-care settings. We have a number of accredited courses leading to QQI level 6 Minor Awards. We know that the provision of Minor Awards facilitates the participation of many of our learners whose primary qualification is a QQI level 5 award in Care of the Older Person. These learners have the potential for contributing significantly to the quality of life of older people receiving care services, which is why we developed our Minor Awards in the first place.

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

- 1) **Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education provider learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.
- 2) **Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.
- 3) **The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative

and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.

- 4) **Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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.

As a provider of community education in Ireland I want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

Yours sincerely



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Promoting lifelong learning and active citizenship

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<sup>1</sup> SOLAS, *National Further Education and Training Strategy*. p.93.

# AHEAD Response to the QQI green paper on assessment

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AHEAD welcomes this report and the opportunity it presents to respond to the green paper and we to advocate on behalf of learners with disability engaged with assessment. In the past people with disabilities have been discriminated against in accessing all aspects of education (ERSI 2011), in particular state examinations. Today, inclusion is a basic human rights issue and is articulated clearly in the UNCRPD, Article 24. In addition according to the report on the commission on the status of people with disability, the right to inclusion in mainstream education can be regarded as a gateway to exercising other human rights. In fact it is the key that opens the doors to qualifications, employment and to true equality in society for people with disability. Creating a barrier free learning environment that includes assessment is a critical step to building an inclusive education environment and an inclusive society.

This response brings up a number of concerns arising from the experiences of learners with disability and staff with responsibility for those students and focuses on the assessment systems currently in place in post leaving cert education.

## **INTRODUCTION**

The rate of participation of learners with disabilities is rising exponentially and there are now over 12,000 learners across all higher education programs see table 1 below.

This data tells us that students with disabilities amount to 6% of the student population in higher education and we know anecdotally the rate is 11% in FET programmes. The HEA anticipate from the numbers in second level that this increase will continue for the foreseeable future.

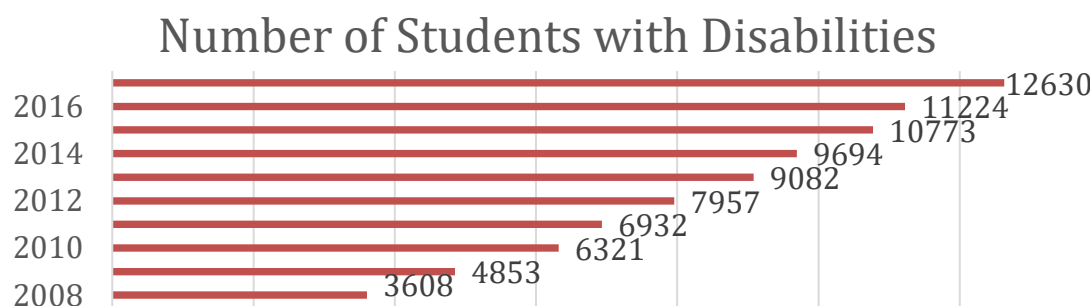


Table 1

The model of support in place to date for students with disability in post LC has been a medical one that takes a deficit view of the learner with a disability and locates any problems with them and not with the system. So it sees the disability that the person cannot do. The system has been to ADD ON supports to help the learner to compensate for the impact of the condition. But, the traditional system of teaching, learning and assessment has remained the same.

However this situation is rapidly changing and inclusion is happening. As a result of policy changes at an EU and a national level, it is now recognised that the text based system of education itself is the source of many barriers to access and inclusion of learners with disability. These policies include the Maastricht and Bologna Treaties, the report on the Commission on the Status of People with disability, 1998, Equality Legislation 2004 and more recently the UNCRPD ratified by Ireland in 2018.

The UNCRPD Article 24 gives students with disability the right to an INCLUSIVE education, this does not give them additional rights but simply endorses the

rights that other people have. This includes the right to a fair and equal assessment and places the responsibility with the institutions at all levels to ensure that these students can access a barrier free assessment and that does not discriminate against them either directly or indirectly.

A key pillar promoting the move to mainstream inclusive education is the strategic goals of both higher and further education and training (FET). The HEA have a clearly articulated mainstreaming as a leading priority for higher education. The National Access Plan strategic objective is to:

*“To mainstream the delivery of equity of access in HEIs: to embed the whole of HEI approaches to institutional access strategies so that access for underrepresented groups is prioritised across all faculties”*

This means that access and inclusion is not a niche activity of access services, but is everyone’s job. It also means that all aspects of education, especially assessment, should be disability proofed to identify and remove potentially discriminatory practices. Furthermore the assessment system should be accessible and contain sufficient choice of assessment methods to enable most learners with disabilities to demonstrate that they have reached robust academic and technical standards.

In what is primarily a written examination system many learners with disability need additional time, different exam locations, to use computers, readers, scribes, all of which is a waste of time and resources. Increasing numbers of learners with disability means that to continue to teach and assess through mainly one medium, written text risks being at best unfair to many students and at worst discriminatory.

## **A mainstream approach to inclusion in assessment**

The HEA strategic objective to mainstream all aspects of high education necessarily includes the ASSESSMENT process.

Inclusion is therefore a core principle for any discussion moving forward. Yet this aspect is not clearly articulated within this Green Paper on Assessment. In spite of the fact that most of the ingredients for inclusion are embedded throughout the document, for example the principles articulated by the Teaching and Learning Forum (pg32), responsibility for the inclusion of learners with disability needs to be more explicitly outlined at macro and mesa levels. Otherwise there is a risk of excluding learners with disabilities from further discussion and policy decisions.

Ensuring an inclusive assessment process means that designers have a deep understanding of the ingredients of accessible curricula including accessible Learning Outcomes, the need to provide choice of a valid assessment methods and a system for identifying what is a reasonable accommodation.

AHEAD promotes Universal Design for Learning (UDL) is a mechanism for facilitating mainstreaming inclusive assessment. This approach of UNIVERSAL DESIGN is also advocated by the UNCRPD as a framework for delivering inclusive practice for a diversity of learners. UDL operates on the assumption that there is of a variety of learners who all have different needs and consequently require a variety of teaching, learning and assessment process.

## **UNIVERSAL DESIGN FOR LEARNING**

A UDL model of inclusive practice will create a climate within institutions that facilitates the implementation of the HEA National Access Plan, and the achievement of institutional performance compacts in relation to Equality and Access. Inclusive practice is based on principles of universal design as follows:

1. The active and variable engagement of students from pre-entry to graduation
2. Providing multiple means of representation of learning and pedagogy
3. Providing multiple means of action and assessment.

A UDL approach to assessment also aligns very well with the eight principles for assessment outlined within the T&L Forum pg. 32 in particular the need for learners to experience a diversity of assessment methods. Indeed these principles allow the provision of varied and flexible assessments options that provides all learners with inclusive options within the mainstream assessment process. Nevertheless, choice is imperative for learners with disabilities as many apparently flexible assessments such as power point presentations, in reality embed many inherent barriers for some learners.

### UDL PYRAMID

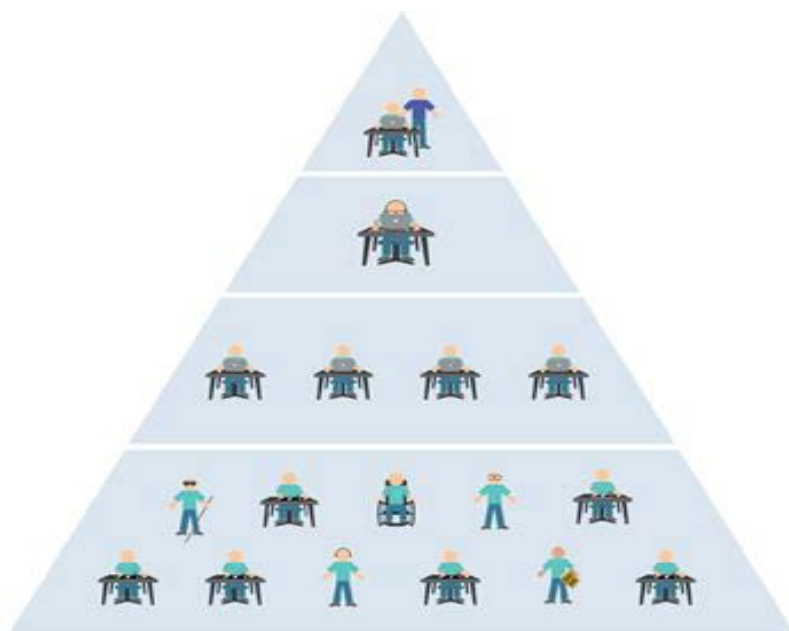


Table 2

**Level 1** - Ordinary solutions found in the in the mainstream lecture hall, laboratory, assessment etc.

**Level 2** - for individual accommodations arranged through the disability support services within the institution

**Levels 3 and 4** - reasonable accommodations are identified by the disability support services and implemented by the relevant part of the College where necessary to ensure they have equal access to learning and to a successful college experience.

## ACCESSIBILITY OF ASSESSMENT

A key principle of mainstreaming inclusion is accessibility and there are a number of key ingredients for accessible assessment such as:

1. Designers need to think about the core requirements of the Learning Outcome (LO), what is critical for the learner to demonstrate.
2. Ensure that the LO is based on what the activity is, and not be prescriptive about how this is to be done.
3. 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.
4. Where the learner requires the allocation of additional supports, there should be a clear policy /procedure for the identification of appropriate Reasonable Accommodations within the assessment process that also uphold the robustness of academic and technical/occupational standards are maintained.

### The Learning Outcome (LO)

AHEAD recommends that the design of LOs is a critical issue for mainstreaming all aspects of assessment at all levels and should be addressed specifically in the guidelines. The section on learning outcomes is critical to a conversation on Inclusive Assessment and to the provision of appropriate reasonable accommodations.

A common barrier met by learners with disabilities is where the LO specifies how a task is to be carried out which leaves no room for allowing the learner to do the task and meet standards differently.

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. For example on a nursing course an LO could specify that the learner:



*“Safety lift the patient from chair to the bed” SHOULD READ*

*“The patient is moved safely and with dignity from one place to another”.*

The first LO has barriers for the nurse learner if they have a physical disability bad back etc. But if the LO is written in terms of the is to be done rather than the how, then it is more accessible.

Similarly if the LO requires the student to WRITE a report then the authenticator will expect to observe just that, a written report, However if the LO is really intended to demonstrate a learner’s theoretical understanding, then perhaps this should be drafted using different language such as

*“Report on the cultural dynamics of”*

Allowing the learner to choose a number of different assessment options with their tutor such as a video, an academic poster, a video blog, a poem etc.

A LO statement determines the assessment methods and what options of assessment methods are valid and appropriate to the context. There needs to be clear and unambiguous LOs for both the learner and teacher.

1. What is being assessed?
2. What tasks are mandatory and cannot be compromised?
3. What skills and knowledge must be demonstrated?
4. What choices can be available?

LOs need to articulate clearly to the learner which assessment choices are available to them and what assessment methods are both valid and reliable. This understanding is important to the accessibility the assessment process for all learners but particularly so for learners with disabilities.

Furthermore the design of LOs on clear statements of what is mandatory is essential to the identification of reasonable accommodations.

### **Recommendation:**

That LO is designed so that it identifies WHAT needs to be done rather than specifying HOW is to be done

## **REASONABLE ACCOMMODATIONS**

No matter how inclusive a mainstream system is, there is no getting away from the responsibility of the institution to provide reasonable accommodations. Many learners will not be accommodated within the mainstream assessment, (for example a Deaf learner using an ISL interpreter) and will require an additional accommodation to be made.

AHEAD strongly advocates 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. We would also recommend that QQI develop national policies and guidance for institutions at a macro level.

We believe that there is insufficient consideration given to this important issue within the green paper and the concept of Reasonable Accommodation is only mentioned once. Yet, this is a legal requirement and at the very core of building equity into the system. While not new in higher education, providing RAs is relatively new in FET and poorly understood in both sectors. In a perfect world it would not be necessary to highlight the fact that one size does not fit all and that many students will do things differently. Unfortunately as pointed out by the WHO and NDA surveys on attitudes to disability there are significant attitudinal and structural barriers that discriminate against learners with a disability. Inclusion is a national strategic objective at all levels of education and a key principle to inform assessment and future planning. This is the time to get this right.

**Recommendation: Add in a key principle on RAs to be implemented in assessment practice.**

*“That students are provided with reasonable accommodations where they are not available within the mainstream” pg. 32*

## **In Summary**

The mainstreaming of Inclusion into Assessment at a macro and Meso level needs to be given specific consideration within a national discourse on Assessment. There are elements unique to learners with disability, such as the right to reasonable accommodations which do not affect other learners, but which have the potential to discriminate against learners with disability at all stages of the assessment process. So unlike the typical IKEA instructional manual, which includes no instructions, QQI should provide detailed guidance AND instructions to tutors, assessors and authenticators on policy and practice in relation to Inclusive Assessment practice.

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## **QQI Green Paper on Assessment of Learners and Learning**

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Date: December 2018

### **Submission**

I welcome the opportunity to respond to the QQI Green Paper on Assessment of Learners and Learning. I make this submission as Chair of the Widening Participation (WP) Committee within the College of Social Sciences and Law (CoSSL) UCD, and as Director of the Gender Studies Community/University Outreach programme at the School of Social Policy, Social Work and Social Justice, UCD. Given that the University Sector (including UCD) is a designated awarding body guided by the QQI's quality assurance guidelines, which addresses assessment in outline only, I will limit my comments in this brief submission to two areas of particular relevance to widening participation namely learner diversity and learner progression as they relate to the learner assessment process and adult and community education.

### **Learner Diversity**

We welcome the QQI Green Paper's acknowledgement that assessment supports both quality and equality specifically, 'access, transfer and progression procedures' (p18-19). We also welcome the Green Paper Section 7 (pp47-64) which sets out explicitly to consider issues affecting all educational providers including, though not limited to, holistic assessment in the context of programmes with specific learning outcomes and diversity of learners. Whilst there is a recognised need for our higher education system to become much more flexible in provision and to facilitate transfer and progression through all levels of the system, there remain significant challenges to achieving this (Hunt, 2011, p.11). UCD remains firmly committed to widening participation with clear statements and ambitions in the UCD Strategic Plan 2015 – 2020 such as the commitment to 'review our student recruitment programmes to ensure emphasis on excellence and widening participation and set annual targets for ensuring diversity in student recruitment' (UCD Strategic Objective No 5). Equally,

UCD has committed to support 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).

Reflecting these ambitions, the CoSSL WP Committee spent considerable time, commitment and energy working on the development and implementation of new QQI-FET progression pathways for progressing students from FE Colleges to UCD's CoSSL degree programmes. We have evidenced significant success in this regard in 2017-18 including the removal of systemic barriers which had negatively affected progression opportunities to date. These included the expansion of the range of qualifying Level 5 and level 6 awards for progression to UCD Social Sciences programmes, the removal of specific prerequisite modules within an approved award, a significant increase in the QQI-FET quota places and a communication and information strategy aimed at highlighting the importance of QQI-FET pathways into UCD. The continued success of these progression pathways requires a shared understanding across the entire education sector of the importance of learner diversity for teaching, learning and assessment.

Therefore, while we strongly welcome the explicit reference to diversity and assessment contained in the Green Paper we note that the section on diversity (section 7.6, p52) represents one of the shortest and least developed sections in the document. Given that the learner profile across all educational provision sectors are increasing in diversity this could be interpreted as a missed opportunity to explore both the potentialities and challenges associated with designing and implementing assessment strategies that reflect, and dynamically engage with, our diverse student cohorts.

The QQI Green Paper states that 'assessment invariably involves making some assumptions about learners' (p52). We strongly encourage a deep level of critical engagement on the meaning and significance of these 'assumptions' and their impact on a range of learner cohorts. There is an abundance of scholarship on diversity and learning which highlights the complexity of this arena as evidenced by the literature nomenclature which traverses intercultural, multicultural and cross-cultural contexts in addition to culturally blind contexts of absences and invisibilities (Palfreyman & McBride, 2007). Indeed, 'persistent under-representation of some social groups in HE can be seen through the cultures of exclusion which operate within universities' (Puwar, 2004, p.51). 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.

There is an imbricated relationship between these cultural absences/presences and the ways in which they impact on what is being taught, to whom and by whom (Baker, 2004) and therefore how curriculum material is being assessed.

Recommendation: We see the publishing of this Green Paper as an opportunity to further understanding vis-à-vis social and cultural diversity within our classrooms across the educational spectrum and the opportunities to reflect this diversity within our assessment of learners and learning.

### **Adult and Community Education**

The CoSSL WP Committee also engaged with the adult and community education sector and specifically women's community education (NCCWN)<sup>1</sup> in our work given its success in attracting hard to reach cohorts and previously underrepresented cohorts in formal, lifelong learning programmes. Indeed, UCD has built a range of community/university outreach partnerships aimed at supporting its work to make the university less exclusive by widening and deepening participation among underrepresented cohorts. The National Strategy for Higher Education to 2030 (Hunt, 2011: p77) argues the need for more community-based approaches where the emphasis is on principles of partnership, empowerment, participation and capacity building so as to challenge systemic inequity through widening participation. Over a decade previously The White Paper on Adult Education (2000) acknowledged the pivotal role feminist, women's education had in both pioneering and driving community education in Ireland. Indeed, this legacy has evolved to embrace community education programmes and initiatives across the spectrum of levels on the national qualifications framework (NQF) including QQI-FET awards and higher education awards (See Quilty et al 2016; WERRC 2003; 2001). Community education has from the outset been underpinned by principles of engaged pedagogy and of learner involvement and participation through the acknowledgement of existing knowledges and experiences within their learning and assessment processes (hooks, 2000; Freire, 1972; Kumashiro, 2000).

It is evident that these broad principles underpinning community education reflect the following position within the Green Paper:

Effective teaching...does not just deliver, or direct learners to, information or drill them in the execution of procedures and manoeuvres but provides purposeful goal-orientated interactive formation and guidance to learners, helping bring out their potential, while adopting to their receptivity and progress (p17).

Clearly this approach to teaching has implications for assessment of learners and learning. The Green paper recognises that 'all education providers from the smallest to the largest can and should be involved in assessment of learning including

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<sup>1</sup> National Collective of Community Based Women's Networks (NCCWN). <http://nccwn.org/>

summative assessment’ (p71). However, it further acknowledges the burden this carries for smaller organisations. In particular, it suggests that the imperative to ensure valid, consistent and fair procedures may be ‘beyond the unaided capabilities if many providers’ (p71). The challenges associated with scale can have real impact for providers on the ground. However, it is critically important to emphasise the level of expertise held within many small organisations, especially those within the community education sector. This expertise reflects years of dedicated practice engaging with diverse cohorts and responding collaboratively to issues of social and economic marginalisation. This expertise is potentially compromised by the sustained limited resource investment, both human and material, within this sector over the past decade.

Recommendation: smaller providers should not be materially disadvantaged, or indeed their expertise undervalued, in any consideration of assessment of learners and learning.

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# Submission to Quality and Qualifications Ireland (QQI) Green Paper on Assessment of Learners and Learning

**Brief outline of submission:** This submission is being made on behalf of AONTAS, the National Adult Learning Organisation, and our membership. The submission is being made in order to highlight for Quality and Qualifications Ireland (QQI) and other stakeholders, areas of particular interest and importance to AONTAS. Comments that arise from the *Green Paper on Assessment of Learners and Learning* (hereon referred to as the *Green Paper*) focus on the issues of learner voice, the resourcing of quality assurance which is necessary for creating and maintaining quality assessment, and assessment for the purpose of recognising prior learning. While there are many other issues discussed in the *Green Paper* such as data protection, academic integrity, and general assessment issues to name a few, AONTAS believes that other individuals and organisations are better placed to comment on these topics.

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## Introduction to AONTAS, the National Adult Learning Organisation

AONTAS, The National Adult Learning Organisation exists to promote the development of a lifelong learning society through the provision of a quality and comprehensive system of adult learning and education that is accessible and inclusive.

AONTAS is a highly respected non-governmental membership organisation established in 1969. Currently it represents approximately 400 members from across the lifelong learning spectrum. The work of AONTAS centres on: Advocating and lobbying for the development of a quality service for adult learners; promoting the value and benefits of adult learning; and building organisational capacity. With particular emphasis on those who did not benefit from education initially or who are under-represented in learning, AONTAS' seeks to:

- widen participation in lifelong learning;
- ensure community education supports quality learning opportunities for the most educationally disadvantaged;
- ensure adult learners are central to local, regional, national, European and International adult learning policy; and
- promote quality adult learning

Drawing on the strength of our members, including through the 100+ strong membership of the AONTAS Community Education Network (CEN) and meaningful relationships with adult learners, we advocate for the rights of all adults to quality learning throughout their lives based on a grassroots, authentic understanding of lifelong learning that benefits the social, personal and skills development of adults, their families and communities. In addition, we promote the value and benefits of lifelong learning. We have a specific focus on the most educationally disadvantaged and our work seeks to ensure that all adults have the right to participate in adult learning that exhibits the following elements: inclusion, learner supports, progression, positive learning outcomes, is learner focussed, offers learner choice, a positive learning experience and is transformative.

## Introduction to the submission on the *Green Paper*

AONTAS would like to start by thanking Quality and Qualifications Ireland for taking the time to develop this *Green Paper on Assessment of Learners and Learning* (hereon referred to as the '*Green Paper*') and create the space for engaging a discussion about assessment processes and supports as it regards further education and training (FET) and higher education (HE). While QQI has provided 10 pages of potential questions for consideration, AONTAS is providing comments on areas within the scope of our expertise and experience. Therefore, the remainder of this submission focusses on the following areas:

- assessment from a learner perspective;
- resources available for creating quality assessment must be equal to the costs of providing quality assessment;
- assessment as a policy instrument through recognition of prior learning (RPL) to create equity of access to education and employment;
- Recommendations for improving assessment policies in Ireland.

## Reflection on assessment practice and the impact to learners

As the National Adult Learning Organisation, AONTAS believes learners should be at the heart of all educational theory and practice. Many of the issues raised in this section of the response are aimed at bringing learner needs to the centre of questions on assessment, to gauge how assessment impacts or measures the diverse needs of learner populations. A number of key themes raised in the *Green Paper* are of critical importance to the enhancement of teaching and learning in adult education in Ireland. The questions posed in the *Green Paper*, are aimed at deepening the conversation about the issues raised. Rather than approach these questions individually, we would like to focus on themes we believe address issues raised by learners in FET. The themes we develop in more detail are assessment practices within the FET sector, inclusion and equality within assessment practices, and the promotion of lifelong learning through assessment.

### *Assessment in FET*

As a broad framework underpinning the approach to assessment, AONTAS agrees with the *Green Paper's* endorsement of Astin's IEO (Inputs, Environment, and Outputs) model of assessment over alternatives like the CEDEFOP model. As the *Green Paper* suggests, the ASTIN model "gives greater recognition to the roles of dynamically interacting autonomous individuals" by considering how a learner's environment shapes their experience and learning outcomes.<sup>1</sup> This approach allows for greater consideration for the diverse experiences learners have within FET and therefore better meets their needs as learners, while giving consideration to an individual's learning journey.

Current assessment practices within FET are a topic explored at different points throughout the *Green Paper*. As part of this reflection, the *Green Paper* leads to the position that FET suffers from the absence of a holistic approach to assessment. The paper suggests that Education and Training Boards (ETBs) instead currently take a bottom-up approach to assessment, attempting to fit module learning objectives into QQI established minimum intended programme learning outcomes (MIPLOs). The result from this practice is that assessments in FET are designed to fit learning objectives at the module level, as opposed to the programme level for which QQI certifications are given. The *Green Paper* suggests that this process leads to a "lack of sufficient reflection about the overall programme as distinct from its constituent subjects."<sup>2</sup> It should be noted however that this process also poses a challenge to learners as it contributes to barriers learners may face when progressing through levels of the National Framework of Qualifications (NFQ).

Through the SOLAS funded, and AONTAS managed National Further Education and Training Learner Forum, learners have raised concerns about the abrupt changes in programme requirements, particularly when progressing from Level 3 to Level 4.<sup>3</sup> This quick transition may suggest either that MIPLOs do not accurately reflect the gradual skills development required to progress from level to level or that module level learning objectives at Level 3 are not adequately preparing learners for those at learning objectives at Level 4. In both cases, a holistic reflection upon the MIPLO's at each level and their relationship to assessment would help alleviate this issue. For this reason AONTAS believes, as the *Green Paper* suggests, that a holistic approach to assessment would better support a learner's development while also ensuring that assessments accurately measure the MIPLOs used to

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<sup>1</sup> Quality and Qualifications Ireland, *The Green Paper on Assessment of Learners and Learning* (2018), pp 4-5.

<sup>2</sup> Ibid, 49.

<sup>3</sup> AONTAS, *The National FET Learner Forum Advisory Report 2017* (April 2018), p.9.

validate QQI certifications. This approach would require cooperation at both the macro and meso levels from both QQI and ETBIs. This would also need to be monitored in the future through ongoing learner engagement to ensure assessment continues to meet learner needs.

### *Inclusion and Equality in Assessment*

A holistic approach to assessment should occur in tandem with a significant reflection on the relationship between summative and formative assessment, with the aim of inclusion and equality in mind. FET has some of the most diverse learner populations of any Irish educational sector; therefore, ensuring assessment is designed with equal opportunities of all learners in mind, must be of the highest priority. Formative assessment is an essential tool to achieving this aim.

The OECD/CERI's 2008 paper on *Assessment for Learning* proves the importance of formative assessment to ensuring learners receive supports necessary to achieve their learning objectives. The *Green Paper* argues that formative assessment not only raises overall learner performance, but it also promotes higher-level equity in teaching practices. While formative assessment is delivered at the micro-level (by tutors), the role of building capacity among tutors to develop effective formative assessment practices must occur at the meso and macros levels. This process is to ensure that formative assessments are linked to the MIPLOs and summative assessment tools developed at these levels.

There are a number of frameworks developed on how to design effective formative assessment tools to measure a learner's progress. One example is found in Elise Trumball and Andrea Lash's work on formative assessment.<sup>4</sup> In this work they provide a framework to approach formative assessment and its relationship to broader MIPLOs. They do this by questioning knowledge, skills, and abilities as the starting point to developing all formative assessment practices. They raise questions such as:

- What knowledge, skills, and abilities (KSAs) do I wish to assess toward a specific competency?
- What is the cognitive and developmental path (i.e. learning trajectory) I would expect to see with regard to these KSAs?
- What evidence (i.e. observable features of students' performance and responses) would I need in order to determine the student's level of KSAs?
- What are the characteristics of tasks that will elicit this evidence?
- What KSAs that are not wanted (e.g. unnecessarily complex language, need for speed of response) might this type of formative assessment process introduce?
- How can I modify my formative assessment process to make it inclusive for all students, to minimise the impact of non-target KSAs?<sup>5</sup>

Frameworks and tools such as these can be adapted to the MIPLOs to ensure there is alignment between MIPLOs and course instruction.

In an effort to approach diverse learner populations' experiences with assessment, AONTAS would like assessment to be considered in terms of how it can be inclusive and equitable to all learners. Assessment of learning should provide a chance for all learners to showcase their KSAs, and thereby

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<sup>4</sup> Elise Trumball and Andrea Lash, *Understanding Formative Assessment Insights from Learning Theory and Measurement Theory* (April 2013) available at [https://www.wested.org/online\\_pubs/resource1307.pdf](https://www.wested.org/online_pubs/resource1307.pdf)

<sup>5</sup> *Ibid*, p.9.

have an equal chance of success over the period of their programme. As the *Green Paper* accurately points out, summative assessments can themselves be shaped by an assumption about learners.<sup>6</sup> The danger is that these assumptions do not reflect the diverse experiences and backgrounds of learners whose performance is being measured by an assessment tool. To ensure assessment works against these assumptions and is responsive to the changing profile of learners in Ireland, AONTAS would like to see an approach to assessment that encourages learners to become partners in designing assessment processes. 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. As the *Green Paper* points out, there is advice on what this process would look like.<sup>7</sup> AONTAS would encourage further examples such as the Student Engagement Framework to be considered in the development of this approach. These examples, however, should be approached 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.

Developing inclusive assessment practices means considering how learners can showcase not only the skills they achieve through their formal learning, but also the skills they bring with them. 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.<sup>8</sup> As studies have shown, RPL processes promote social and economic inclusion.<sup>9</sup> Ireland has made significant strides in RPL in recent years, particularly in HE.<sup>10</sup> These developments have been focused on the meso-level, with individual HE institutions implementing RPL processes that are distinct from each other. This approach has also been followed in the FET sector. Through the National FET Learner Forum learners have aired frustration at this approach. Learners 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).<sup>11</sup> To meet this aim, AONTAS would support and actively participate in a re-evaluation of current RPL processes with the aim of drafting and implementing a national RPL policy

### *Lifelong Learning and Assessment*

AONTAS believes that healthy assessment practices and a strong culture of assessment can do more than support learning; assessment if done well can help to promote learning. With Ireland's National Skills Strategy 2025 calling for substantial increases from current lifelong learning levels, the importance of approaching assessment as a tool for promoting learning cannot be understated.<sup>12</sup>

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<sup>6</sup> QQI, p.52.

<sup>7</sup> Examples provided are Mick Healy, Kathy Flint, and Kathy Harrington, *Engagement through partnership: students as partners in learning and teaching in higher education* (July 2014), available at [https://www.heacademy.ac.uk/system/files/resources/engagement\\_through\\_partnership.pdf](https://www.heacademy.ac.uk/system/files/resources/engagement_through_partnership.pdf) and The National Forum for Teaching and Learning in Higher Education, available at <https://www.teachingandlearning.ie/>. QQI, p.62.

<sup>8</sup> QQI, p.19.

<sup>9</sup> Werquin, P. *Recognition of Non-Formal and Informal Learning; Outcomes, Policies and Practices* (February, 2010) available at <http://www.oecd.org/education/skills-beyond-school/44600408.pdf>, pp 11-14.

<sup>10</sup> For a history of these developments, please see Deridre Goggin, Phil O'Leary, and Prof. Irene Sheridan of Cork Institute of Technology, *Recognition of Prior Learning in Irish Further Education and Training*.

<sup>11</sup> AONTAS, *The National FET Learner Forum Advisory Report 2017* (April 2018), p.8.

<sup>12</sup> Ireland's National Skills Strategy 2025 available at [https://www.education.ie/en/Publications/Policy-Reports/pub\\_national\\_skills\\_strategy\\_2025.pdf](https://www.education.ie/en/Publications/Policy-Reports/pub_national_skills_strategy_2025.pdf), p. 72.

AONTAS believes that the key to this approach is to include learners as partners in assessment processes at every level of engagement.

Studies have shown that by providing a space for learners to actively engage with learning objectives, processes, and assessment, learning itself is improved. Active learner engagement in assessment processes promotes collaboration and teamwork; critical thinking and reflection; communication skills; and facilitates learning to learn.<sup>13</sup> These skills are linked to an increased likelihood of learners to engage in further lifelong learning opportunities, as well as gives them the chance to reap the rewards that come from the wider benefits of education such as improved health and civic engagement.

### *Focus on major awards at the expense of minor awards and lifelong learning*

Following from the subsection above on the importance of assessment as a tool for promoting lifelong learning, AONTAS would like to briefly discuss the challenge that exists for lifelong learning when the primary focus of the *Green Paper* is on assessments for Major Awards. While this focus on Major Award assessment may not have been purposeful it is important to note that when policy makers focus on Major Awards at the expense of Minor Awards they are (whether inadvertently or not) building policies that work to exclude many adult learners from educational opportunities.

All adults seeking to return to education, but particularly 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 which focus on the achievement of Major Awards, for many learners, particularly in the FET sector, 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.

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. This need for flexible assessment is why AONTAS promotes the position that learners be part of the assessment development process. Without learner engagement in assessment development, institutions will not know what the right mix of assessment tools that are necessary for evaluating learner outcomes.

### **Resources available for creating quality assessment must be equal to the costs of providing quality assessment**

While only briefly discussed in the *Green Paper* on pages 53 and 54 AONTAS believes it is very important to discuss the human and financial resource commitments required to create trusted and effective assessment systems. In short, the resources available for creating quality assessment must be equal to the costs of providing quality assessment. As has been noted by AONTAS and our membership in numerous submissions to QQI and various Ministers and Ministers of State over the past several years, the resource requirements for maintaining a robust quality assurance framework, and therefore strong assessment framework, are very high. AONTAS has frequently discussed these

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<sup>13</sup> David Boud, Ruth Cohen and Jane Sampson, 'Peer learning and Assessment' in *Assessment and Evaluation in Higher Education*, p. 41.

resources requirements and costs in past submissions to QQI as it concerns the changing funding requirements of the community education sector<sup>1415</sup>.

The *Green Paper* notes the importance of organisations having the resources to maintain quality procedures for fair and consistent assessment. It goes on to say that it can envisage how well-resourced providers of mainstream courses can provide the necessary quality structures, while under resourced organisations providing bespoke courses relevant to their smaller groups of learners may have challenges paying for the maintenance of quality procedures and assessment. While these statements are objectively correct, what is missed in these statements is the larger policy issues surrounding limited funding that is available to smaller community education providers.

In order to support community education providers seeking to provide accredited learning AONTAS has been working with the Community Education Network (CEN) to ensure that groups have the support they need. This includes working with QQI to provide clear information for community education providers seeking to continue provision of quality accredited programmes. For the past several months of 2018 AONTAS has employed a Quality Assurance Coordinator to consult with CEN members seeking to reengage with QQI and undergo programme validation, so that they can have a clear picture of the financial and human resource time commitments they face.

## Recognition of Prior Learning (RPL)

Recognition of prior learning through assessment is an issue that has been discussed for several years but for which little action has been taken at a national policy level. While there are individual processes for RPL existing across the country in HEIs and in progressive/forward looking FET providers who have the resources to implement RPL, the lack of a cohesive national policy that defines the purpose, goals, and responsibility for RPL puts Ireland at a competitive educational and economic disadvantage.

While the issue of RPL is only given three-quarters of a page on page 55 of the *Green Paper* the issues and questions around assessment procedures for RPL have a significant impact on learner access and progression. As noted in AONTAS' submission to the Department of Education and Skills' on the 28th May 2018<sup>16</sup> there is currently a missed opportunity to reach the Upskilling Pathways target groups of women engaged in home duties; Men, and older men, in employment, farmers/construction/drivers and unemployed/inactive; Travellers; lone parents; and the homeless, by using RPL to recognise their existing skills and help them to enter and progress through the more formal education system.

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<sup>14</sup> AONTAS has made several submissions to QQI (2013, 2014, 2015) clearly highlighting the issue of QQI fee. AONTAS produced two detailed policy papers on the issue of fees (2014) and the scenarios of reengagement (2015) in advance of meeting DES officials and QQI (2015). AONTAS and CEN members participated in all 7 Joint QQI / Community and Voluntary Sector Working Group meetings in 2015. Additionally, the issue was raised in our submission to the National Skills Strategy (2015), Pre-Budget Submissions in 2016, 2017 and 2018, and letters to former Minister Jan O'Sullivan (2015/6) and Minister Bruton and Minister of State Halligan (2017), and Ministers Bruton, and Donohoe (2018).

<sup>15</sup> While the resource requirements of community education providers has increased over the past several years as new regulatory requirements have come online, SOLAS funding for community education based FET has remained stagnant, as evidenced in the 2015 (€10,581,826), 2016 (€10,727,731), 2017 (€10,836,192), and 2018 (€10,869,060) FET Service Plans.

<sup>16</sup> AONTAS, Upskilling Pathways Recommendation reaching Target Groups through Community Education 28<sup>th</sup> May 2018, <https://www.aontas.com/AONTAS%20-%20Upskilling%20Pathways%20.pdf>

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. As AONTAS has argued before and will continue to argue, a well-resourced and clearly defined RPL policy framework is required. The current ad-hoc system of provider driven RPL is not meeting the needs of education providers or learners. Providers are unsure about their responsibilities the best practices of RPL across the country, and the resources required, and learners exist in a system of unequal access to RPL depending on where in the country they live and depending on what institution they attend.

As stated earlier in this submission, the importance of RPL from the perspective of learners has been highlighted through the National Further Education and Training (FET) Learner Forum. Learners have said that they would like to see a national RPL policy that provides a clear and transparent pathway to accessing all levels of the National Framework of Qualifications (NFQ).<sup>17</sup> To meet this aim, AONTAS again states our support and willingness to actively participate in a re-evaluation of current RPL processes with the aim of drafting and implementing a national RPL policy.

The *Green Paper* finishes discussion about RPL by detailing the challenges for implementing a national RPL policy framework. These challenges include the human and financial cost of having experts in various fields available to create bespoke assessments and evaluate individual learner expertise. It is our argument at AONTAS that RPL is critical to widening and diversifying participation in education and that it is necessary for Government to make these investments and not only detail the difficulty of making such investments..

## Recommendations

Based on this submission the following recommendations are made as a way of promoting further discussions on issues introduced in the *Green Paper*.

- 1) Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners. Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. Learners are at the centre of the education system in both FET and HE and assessment should be varied and inclusive of all learners. 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.
- 2) Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards. 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.

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<sup>17</sup> AONTAS, *The National FET Learner Forum Advisory Report 2017* (April 2018), p.8.

- 3) The resources available for creating quality assessment must be equal to the costs of providing quality assessment. To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality, while also keeping their capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) Establish a national RPL policy. For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>18</sup> 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.

## Conclusion

AONTAS wants to again thank QQI for developing this *Green Paper* and engaging discussions on how assessments can be improved to ensure improved learning outcomes for all learners. While there are many interesting options for the future of assessment that are introduced in the *Green Paper* it is important that QQI and wider stakeholders in Government recognize that none of these options will ever come to fruition or otherwise be successful if we do not ensure that learner needs are heard and understood.

Thank you for taking the time to review our submission.

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<sup>18</sup> SOLAS, *National Further Education and Training Strategy*. p.93.



## QQI Green Paper on Assessment

### Response of the City of Dublin Education and Training Board

#### Introduction

The City of Dublin Education and Training Board (CDET B) welcomes the opportunity to contribute to the national debate on assessment facilitated by this Green Paper. In particular, the highlighting of the macro, meso, and micro levels in relation to assessment is a valuable framework for this debate. The CDET B believes the “Universal Design for Learning” approach to all teaching and learning, as well as the assessment of/as/for learning, is best practice and should be an underpinning principle of the resultant QQI Policy on Assessment. This approach is vital to the inclusion of the greatest number of citizens possible, to the greatest extent possible, in all of the education and training provided by CDET B. Indeed, the UN Convention on the Rights of Persons with Disabilities, recently ratified by the Irish government, places a legal obligation on CDET B, as a public body, to provide all of our services in a universally designed manner.

#### Evolving Policy Context

Further Education and Training (FET) in Ireland has undergone enormous change since 2010 with the establishment of SOLAS, the ETBs, and QQI. Coupled with the institutional and structural changes, the profile of the labour market, and the profile of the student body have similarly changed. Since 2016, SOLAS has published the following national policies that all have implications for assessment:

- Strategy for Technology-Enhanced Learning in Further Education and Training 2016-2019;
- Further Education and Training Professional Development Strategy 2017-2019; and
- Supporting Working Lives and Enterprise Growth in Ireland – 2018-2021 further education and training policy framework for skills development of people in employment.

In recent months, the government stated six national targets for the FET sector.

Target 1 - Skills for the Economy: 10% more learners securing employment after undertaking a relevant FET course;

Target 2 – Progression: 10% more learners progressing to other FET courses or higher education from relevant courses;

Target 3 – Transversal Skills: 10% increase in the rate of certification on courses primarily focused on social-mobility skills development that is transversal in nature;

Target 4 – Lifelong Learning: 10% increase of adult learners taking part in lifelong learning delivered through FET;

Target 5 – Certification and Qualifications: From 2018, for three years, an average of 10,000 more learners each year are to achieve qualifications related to business sectors where employment growth and skills needs have been identified;

Target 6 – Apprenticeships and Traineeships: 30,500 new apprentice and trainee registrations from 2017-2019.

This led to a process of developing Strategic Performance Agreements between SOLAS and each ETB. Assessment is a constant theme in all six of these targets. QQI similarly engaged in a process of strategic dialogue with each ETB as the governance for quality assurance shifted from the legacy centred-based situation to an ETB-wide perspective. Indeed, in its recent statement of strategy, QQI stated that the ETBs would be subject to an Institutional Review model similar to the CINNTE model that applies to the Institutes of Technology. This is in line with the ambition to see ETBs assuming Delegated Authority.

However, the success of macro-policy is entirely dependent on the local capacity to implement it. The trajectory of policy development in relation to quality assurance in general, and assessment in particular, has significant resourcing implications for the CDETB. Meeting these resourcing demands is a matter for central government and not within the gift of CDETB.

### **A Competence Approach to FET Programmes**

Mulder and Winterton (2017) state:

“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” (p.5)

This statement, in many ways, describes, to an ever-increasing degree, the experience of many FET programmes. The assessment associated with a programme is focused on the assessment of each module or component rather than the programme as a whole. The integration of assessments is often at the component-to-component level and occurs inconsistently. For the learners, this unitisation of assessment has resulted in an overloading of 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. This situation is unsustainable and unsound. Emphasising the assessment of the overall programme objectives, or core competencies, rather than of the individual component objectives would open the opportunity to perhaps a blend of programme-wide capstone assessment events, combined with a small number of component assessments.

Mulder (2015) states, “the meaning of competence is situation- or context specific” (p.4). As has been the case with apprenticeships for generations, learning to be part of an occupational ‘community of practice’ requires not only technical knowledge and skills, but also the social skills and the development of the situational or contextual knowledge of how the knowledge and skills are applied in the work place. The learner constructs meaning for him or herself by placing his/her learning within the appropriate occupational context. Mulder continues, “there are certain relationships between personality and ability factors, and competence and on-the-job performance ratings” (p.4).

Mulder refers to the most recent approach to conceptualizing competence as ‘situated professionalism’. He elaborates:

“A major constituent of this approach is the appreciation that a certain competence representation can mean something totally different for one job holder or job situation to another. Furthermore, important notions are that the agency of a person and the affordances of a job context enable the development of competence..., the idea that the work context takes shape as a community of practice in which players interact and share and negotiate meaning, and that personal epistemologies have a stronger influence on professional development than mere skills training. Finally, it also acknowledges that desired competence is defined by what key stakeholders in a professional context expect in terms of professional action” (p.1).

It is worth emphasising, as Mulder points out, 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. Taking a more holistic, developmental and transformative view of FET programmes, within a competence approach to assessment of/for/as learning, would provide the learner with a richer learning experience, which would prepare them for not only the job opportunities of today, but also with the capacity to respond to future occupational changes through lifelong learning opportunities.

### **The Changing Nature of the Format of Programme Delivery**

The increased engagement with employers and the changing nature of the labour market will demand a more flexible approach to all skill formation provision, both FET and HET. Requiring attendance in a classroom for a course in the medium to long term, as the only form of provision, will not be sustainable. In addition, the increasing acceptance of the value of work-based learning, with its implications for assessment, will also need to be part of the vision for the future. In short, education and training will occur in three principal venues – 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.

Employer engagement on all aspects of FET provision is an increased priority for all involved in FET. Indeed, the Evaluation Report of the Post-Leaving Certificate Programme (McGuinness et al. 2018) highlighted the weakness of the current approach to work experience. It is not inconceivable that work-based learning, and work-based assessment will be an increasing part of PLC-type provision into the future

### **Consistency of Standards**

A distributed approach is taken to the developments of assessment instruments in CDET. A centralised approach would be logistically impractical. Equally the idea that assessment instruments would be made available from an online repository would be resource intensive and contrary to a ‘situated professionalism’ approach to FET programme provision.

While higher education institutions tend to be located on a small number of campuses, FET provision with the ETB environment is more geographically dispersed. This has implications for the QA governance, particularly in the area of consistency of standards between centres. CDET has commenced work in this area and sees this issue as consisting of four pillars:

1. Consistency of Assessment Instruments;
2. Consistency of Marking (implementation of assessment instruments);
3. Consistency of External Authentication;
4. Internal Quality Auditing and Monitoring.

The general approach to Pillar 1 is to develop guidance documents for teachers to assist them in the devising of assessment instruments. This work would link strongly with the work in Pillar 2 that would involve ongoing staff marking seminars to develop a shared understanding of both the standards and their implementation. The work in Pillar 3 complements the work in Pillar 1 and 2. It consists of two main elements. Firstly, the role of the External Authenticator (EA) is being reviewed to examine how, by perhaps appointing the EAs at ETB level to a cluster of colleges, an explicit evaluation of the consistency between centres could be included. The second element of the work of Pillar 3 is examining the EA reporting process so as to ensure that the issue of consistency is addressed sufficiently. The work of these three pillars complement each other. They are co-dependent on each other. This approach is the most practical within existing resourcing constraints and therefore likely to be successful. The work of Pillar 4, which is crucial to the overall success of the QA system, has yet to commence, as it is dependent on securing additional resources.

CDETB explored QQI's Green paper on Assessment within the following consultation topics:

#### Consultation Topic 1: Further Education and Training Issues [Section 8]

##### **i. Current Award Structure, Guidelines and Framework for Consistency of Assessment**

*What issues are arising with current award structure in QQI CAS Awards, Award Specifications, and Assessment Guidelines? What is the impact on Assessment Strategy & Design?*

1. QQI CAS Award Structures: Within the current structure, it is difficult to develop new awards quickly to respond to emerging skills and training needs and meet new progression routes to higher level education requirements. While the current QQI Validation of Programmes policy allows a new award to be identified in conjunction with a new programme, application of the policy for new programme development is a lengthy process.
2. There current CAS award structures are very rigid, making it difficult to incorporate local variations and needs into course provision.
3. In addition, given that the ETBs will have the same governance, reporting and institutional review standards as the Institutes of Technology (IoT), might there be merit, in considering the next evolution of the CAS award structure, to bring FET awards into line with those available in IoTs?
4. Major award structures fit long-term full-time programmes; there are not a sufficient number of special purpose/supplemental award structures for shorter part-time programmes to meet skills shortages, and economic & societal needs.
5. Award specifications: Difficult to amend/update learning outcomes and assessment techniques. While validated modules can be amended within a 20% margin, meeting the award specifications continues to remain a priority in teaching, training, learning, and assessment.
6. Assessment Guidelines: Further development required on CAS awards meeting the appropriate NFQ level; further development required on grading classifications and national standards. The provision of assessment guidelines from QQI would narrow the field of interpretation at a local level, thereby making a positive contribution to the achievement of consistency of assessment standards.
7. Impact on Assessment strategy + design: Prescriptive assessment; over-assessment

## ii. Unitisation of Assessment

*The practice of unitisation/modularisation of Assessment is widespread in FET, what impact does this have on Assessment? What are the Pros and Cons?*

**See Above - A Competence Approach to FET Programmes**

## iii. QA Governance Demands Of Assessment on Providers

*What are the implications on consistency of individual providers designing and implementing summative assessment? What collaborative models could be explored? How can efficiency be ensured also?*

1. The key points in this area have been covered in the introduction to this submission. This is by far the most pressing issue for learners. In particular, 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.
2. This is an issue across a great deal of FET provision, which presents an opportunity for a wide collaboration at a national level.

## iv. Centralised versus Distributed Assessment

*What are the challenges in consistency of distributed model of assessment in FET? Current practice has a mixture of both through former FÁS and former VEC programmes. What is feasible in terms of a model for the future?*

**See Above - Consistency of Standards**

1. A centralised approach to assessment is impractical for a geographically dispersed organisation such as CDETb. The QA governance requirements to support a centralised system would involve prohibitive levels of resourcing and not good value for money.
2. Centralised Assessment is contrary to the principles of a situated professionalism approach to competence.

## v. Ambiguity in Current QQI Regulations

*What issues arise with current QQI Guidelines and award specifications for FET?*

1. Guidelines are often open to interpretation, e.g. procedures on deadlines of assessment. On the other hand, making guidelines too prescriptive can have a disabling effect on implementation. Achieving a delicate balance is an iterative collaborative process between QQI and providers.
2. FET Award specifications can lead to over-assessment v sufficient evidence presented

## vi. Micro-management by Regulation and Patchiness of Current QQ Guidelines

*Do you consider it Micro-Management in current approach and guidelines? What is needed from QQI?*

**See Introduction:** The success of macro-policy is entirely dependent on the local capacity to implement it. The trajectory of policy in relation to quality assurance in general, and assessment in particular, has particular resourcing implications for the CDETb. Meeting these resourcing demands is a matter for central government and not within the gift of the CDETb.

1. The assessment process is significantly resourced by CDETb by good QA practice, documentation, forms, and IV/EA processes.
2. Further support on QA assessment by QQI is always welcome.

3. Current Programme Validation policy places assessment alongside teaching & learning with assessment guidelines open for each provider to interpret for each type of provision (e.g. apprenticeships/PLC/adult education)

**vii. CAS Implementation within QBS and Grading**

*What issues arising with the current classification and grading calculation for the compound award? What alternatives could be considered?*

1. Lack of clarity around the complicated model for grading calculation. If a learner repeats/successfully appeals, is their grade re-calculated and a certificate re-issued? Are revised/final transcripts provided for learners when a compound award has been achieved after repeat/appeal?
2. Enhancing the role of the EA requires:
  - i. Clear procedures in place (at meso level) for the appointment of EA so that the requirements of EA are clearly set out and implemented at centre (micro) level
  - ii. Development of EA cross-centre mechanisms at Programme level (e.g. ECCE) and Programme Module level (e.g. Communications, Work Experience)
  - iii. Development of EA report format for use to include key information requirements by the provider, centre, and assessor
3. To facilitate progression of FET graduates to Higher education through the CAO system consideration should be given to a grade structure that might be more aligned to the Leaving Certificate grading system. For example:  
Upper Distinction - D1: 90-100  
Lower Distinction - D2: 80-90  
Upper Merit - M1: 70-80  
Lower Merit – M2: 60-70  
Pass P: 50-60

**viii. Other**

Are there other issues for Assessment of Learners and Learning which are not raised in the Green Paper?

Issues of importance to CDETБ in the assessment of/as/for learning are:

1. Over-assessment which has consequences for teaching and learning.
2. Rationalisation of former FÁS and VEC suites of programmes and assessment. Although a great deal of the rationalisation could occur at the funding level with SOLAS.
3. Given the geographically dispersed nature of CDETБ FET Centres, issues of consistency and assessment security require mitigation. This is resource intensive.
4. Assessment practice across provision – PLC, Youthreach, TCs, Adult Ed, Prisons
5. Quality Assurance policy + procedures on assessment practice
6. EA Process – CDETБ implements a thorough EA process and CDETБ QA is engaged with the national EA process currently under development by ETBI as well as establishing a CDETБ EA Panel. EA is essential in CDETБ to maintain levels of consistency in assessment. CDETБ is committed to:
  - i. Establishing new guidelines for EA for this coming year
  - ii. Appointing EAs with subject specialisms to undertake EA across centres/across programmes/across modules
  - iii. Enhancing the Results Approval Panel procedures for the review of EA reports and the follow up on recommendations to improve quality and consistency in assessment

## Consultation Topic 2: Apprenticeship Issues [Section 11]

### *i. What can be done to enhance capacity for developing MIPLOs and MIMLOS?*

1. CPD has to be provided for programme authors so that MIPLOs and MIMLOs can be written to a consistent standard and reflect the core objectives of the programme in line with the earlier discussion on an overall situated professionalism approach to competence.
2. Modifications to programmes are based on NFQ standards, labour market needs and HE progression routes requirements with the intention to deliver to MIPLOs and MIMLOs in future programmes.
3. To stimulate innovation & entrepreneurship and ensure MIPLOs and MIMLOs reflect these skills, providers can involve social partners, companies, chambers and other VET providers in programme development.

### *ii. What are the challenges in developing integrated approaches to the assessment of apprentices that avoid taking a silo-based approach to developing understanding of theory, practice skills, and role/context competence? What can be done to help and by whom?*

1. Work-based assessment must be quality assured and authenticated by appropriate subject matter experts. Just as consistency of assessment is an issue for FET Centres, it is equally important to address consistency of assessment in the work place. For example, producing guidelines and providing the associated training for work place mentors would be a step in the right direction.

### *iii. What can be done to help increase the reliability and validity competency of assessment in the workplace?*

1. QQI Guidelines on work-place assessment would provide the broad parameters within which providers could develop meso-level policies and procedures.
2. CDETB could provide training for work based mentors and/or assessors
3. Vocationally relevant Work Experience or Work Placement is a mandatory requirement for Level 5 and Level 6 Major awards. The issue is consistency of assessment standards in the work place is an issue for all types of FET programmes with a assessed work place component.

### *iv. What can be done to encourage industry to become more involved in discussions about approaches to assessment?*

1. By design, apprenticeships are industry-led and as such have industry involvement.
2. Encouraging industry involvement in CDETB-led FET programmes is more difficult. While many employers have been very generous with their time over the years, there has been considerable variation in this degree of involvement. As part of the considerations of the work experience element of the PLC programme by the PLC Programme Improvement Advisory Committee in SOLAS, a mechanism for incentivising employers to become more actively engaged may be worth including.

v. *What can be done to help support professionals in industry who are responsible for mentoring and assessing apprentices?*

1. As mentioned above, the production of QQI Guidelines would be very helpful. They would set the macro-level parameters for the meso- and micro-level implementation. In addition, as QQI Guidelines they would be authoritative and carry more weight than those produced at a meso- or ETB level.
2. QQI Guidelines in this regard would form the basis for the associated training for work place mentors and assessors.
3. 1 and 2 would add value to the existing structures already in place for the new and traditional apprenticeships.

vi. *Should workplace assessment results be graded as distinct from being reported as successful/unsuccessful without gradation?*

1. Concerns have been raised by the CSG for the auctioneering apprenticeship, as there was concern about the capacity of different workplace mentors to consistently grade apprenticeship assessments. This refers to the earlier comments about the need for QQI Guidelines. While different levels of performance by apprentices in the work place are inevitable, ensuring fair and consistent assessment is crucial but also logistically challenging. This is an issue that will require further discussion and deliberation before a definitive answer could be given to this question.

2. Certification/results data is a useful tool in measuring a range of outcomes and in supporting increased investment by ETBs to achieve FET outcomes

vii. *Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeship and traineeship?*

Yes, **See Above – The Changing Nature of the Format of Programme Delivery**

viii. *Other issues?*

Yes, **See Above - Evolving Policy Context**

### Consultation Topic 3: Academic Integrity in the context of Assessment [Section 13]

i. *What could QQI do to promote and support academic integrity in FET?*

Please see the introduction above particularly in relation to consistency of assessment standards.

1. Assessment policy developed by the national awarding body will ensure assessment in ETBs is
  - (a) fair & consistent,
  - (b) carried out professionally at all times and
  - (c) takes into account the extensive knowledge that exists about testing and examination processes

ii. *What can, and should providers do to promote and support academic integrity in FET?*



1. ETBs can implement their FET Strategy and align Learner Learning Goals to their FET provision (which is often diverse).
  2. CDETb assessment framework will continue to incorporate procedures and systems for the security and integrity of the assessment process.
  3. Revised assessment procedures are being implemented by some ETBs and are being piloted in CDETb, covering deadlines, compassionate consideration; reasonable accommodation; malpractice;
  4. Role of RAP strengthened to take account of course review meetings/programme improvement plans/previous EA reports.
- iii. Are there specific risks in this regard for FET?
1. In moving focus of QA governance from the legacy centred-based approach to an ETB-wide approach, the level of corporate risk for QA governance increased considerably. In the centre-based approach, if a problem occurred in relation to QA in one centre it could be ring-fenced and the remainder of the ETB's QA system could continue to function. However, in moving to a single ETB-wide system, a problem anywhere is a problem everywhere. This is a significant corporate risk that will require additional resources to mitigate it.
  2. Due GDPR diligence around the recent Nowak ruling, all assessment is the learner's personal data. CDETb GDPR policy applies to safety/security of learner assessment records and assessment evidence.

#### Consultation Topic 4: Towards General Principles and Guidelines for Assessment of Learning [Section 14]

- i. *Would it be useful for QQI to publish general principles and guidelines for assessment? [for FET]*  
 Yes, with some general principles and guidelines as follows:  
 QQI Guidelines reduce the range of possible interpretation and thus contribute to consistency. Guidelines in the following areas would be helpful:
- a. The development of capstone assessments of programme objectives as referred to above in the introduction;
  - b. The structure of assessment instruments for each of the six techniques at all levels;
  - c. Role and function of EAs with particular reference to consistency of standards between centres
- ii. *What should the principles and guidelines address?*  
**See Above – Introduction**  
 Guidelines should address:
- NFQ statements within validated programmes and assessment exemplars/briefs
  - Access, Transfer and Progression
- iii. *To whom should the general guidelines apply (should they extend, for example, to all providers and award bodies quality assured by QQI or only to providers with DA or QQI validated programmes)?*  
**See Above – Introduction**  
 Guidelines should apply to all providers for all awarding bodies

## Consultation Topic 5: Towards Sectoral Conventions and Reference Assessment Protocols for FET (and HET Sectors) [Section 15]

- i. What might usefully be addressed by sectoral conventions?*
  - 1. A measured approach to evaluate the effectiveness of an ETB's QA framework to cover all core processes in line with:
    - QQI Core Statutory Guidelines (2016)
    - QQI ETB Sector Guidelines (2017)
    - QQI Policies & Criteria for the Validation of Programmes of E&T (2017)which will enable CDETb and other ETBs continue to assure the quality of teaching, training, learning and assessment leading to certification from QQI and other awarding bodies
  
- ii. What might usefully be addressed by reference assessment protocols?*
  - 1. Greater flexibility to innovate in assessment and thus meet the emerging skills of the economy to respond to labour market needs and requirements in progression routes. **See Above - The Changing Nature of the Format of Programme Delivery**
  
- iii. What changes are required to the implicit protocols and conventions for Quality Assuring Assessment – Guidelines for Providers?*

**See Above**  
**Introduction**  
**Evolving Policy Context**  
**A Competence Approach to FET Programmes**  
**The Changing Nature of the Format of Programme Deliver**

## Consultation Topic 6: General Guidelines on External Moderation of Summative Assessment for NFQ Qualifications [Section 16]

- i. Would it be useful for QQI to publish general guidelines on external moderation and mechanisms (external examining and external authentication)?*

Yes – CDETb is committed to enhancing its External Authentication process and guidelines and would welcome national guidelines

- ii. To whom should the general guidelines apply?*

To the provider of the programme of education and training and to the External Moderator/Authenticator

- iii. What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?*

CDETB is developing and piloting EA guidelines & EA report template to cover all provision – training centres, PLC, Youthreach, Adult Education, Prisons and while some local adaption is expected (e.g. by TCs to meet TQAS requirements), it is anticipated the general over-arching principles and guidelines will be adopted.

### Consultation Topic 7: Other Topics/General Comments

#### *Extra Comment to involve the Learner Voice in Assessment:*

All CDETB centres have responsibility for learner induction at the beginning of all programmes supported by a variety of learner induction materials. CDETB plans to develop a centralised set of assessment learner induction materials based on the 4 identified learner groups within CDETB. A national approach to this development could help eliminate the ‘noise’ around assessment, for the provider and the learner. A centralised ‘Information to ETB Learners’ manual with templates for learner induction assessment materials would be welcome. In keeping with the CDETBs vision of a universally designed approach to all of its services, the inclusion of Learner Voice in Assessment would be a great importance.

### References

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Mulder, M. (2015) Professional Competence in Context – a Conceptual Study, unpublished paper at: *AERA 2015*, Chicago, USA, April 19.

Mulder, M. and Winterton, J. (2017). Introduction. In Mulder, M. (Ed.) *Competence-based Vocational and Professional Education – Bridging the Worlds of Work and Education*. Basel: Springer, pp.1-43.

QQI. (2018) *Statement of Strategy 2019-2021. Adding Value to Qualifications*. Dublin: QQI.

SOLAS. (2017) *SOLAS Response to the Findings of the Evaluation of The National Post Leaving Certificate (PLC) Programme*. Dublin: SOLAS.

-END-

## Integration of units of learning outcomes into overarching programmes learning outcomes and assessment

Due to the highly unitised delivery mode of FET programmes this level of integration at overarching programme level presents difficulties. The practice currently in the sector is based on the need to create a high level of flexibility for ETB centres to create individualised programme paths for groups of learners to one qualification. This is designed to give flexibility to alter programmes based on labour market requirements or HE progression routes negotiated by an individual ETB centre.

This is achieved through the provision of a large number of electives as options in addition to the core mandatory units (modules) which have their own predetermined set of learning outcomes. This means that centres can tailor the programme to meet a variety of needs while still leading to the same qualification.

A programme model which is unit-based and incorporates a flexible approach is useful from the employer and learner perspective for a number of reasons:

It is easier for employers engaged in work force planning as part of human resource strategies to clearly identify what units (modules) their staff will need to acquire to meet the knowledge, competence and skills needs of the organisation or that potential staff will need to have acquired to meet these needs. The HSE have done this in the area of health service staff, and ETBs alter programmes to meet these needs as they arise within the different areas of HSE provision. The unitised approach provides for greater transparency which leads to a better understanding of qualifications by employers.

From the learner's perspective:

*'a unit-based approach enables learners to gain their qualifications by bringing together units from different settings – and these units can take account of individuals preferred learning styles and their professional experience. This makes it possible for learners to develop individualised pathways to a qualification, to access learning in a more flexible way, and to organise their learning around their day-to-day activities and responsibilities'<sup>1</sup>.*

Through the CAS awards system, CDET centres give learners the opportunity to complete a different collection of units leading to the same qualification. This enables learners to be able to identify the units which will give them the specific skills that are required by employers in their desired career area or higher education course requirements where they wish to progress to further study.

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<sup>1</sup> ECVET Thematic Seminar on learning outcomes Report to the ECVET Users Group February 2015

This approach also means that centres can make adjustments to the units in programmes dictated by changing demands. The overarching programme learning outcomes are dictated by the selection choice of units by centres. Over integration at programme level of learning outcomes based on a particular selection of modules could hinder this ability to respond to changes.

By its nature the FET sector is more likely to have more transient learning outcomes<sup>2</sup> especially for units or within units due to the nature of its unitised programmes in that they are supposed to be designed to meet labour market needs. The latter can change and therefore the learning outcomes are likely to date more quickly. To provide for more profound programme learning outcomes at programme level they will have to be more generalised to take account of the unitised approach and transient nature of some learning outcomes at unit level.

CDETb accepts the importance within a programme of being able to clearly identify where learners should be starting from and where completing a programme of education and training should take them. However, CDETb places a high degree of importance on designing programmes to maintain inbuilt responsiveness capability across our network of centres. This is one of the major strengths of a unitised method of programme delivery within the FET sector. The selection of units informs the programme learning outcomes rather than designing them from the top down too rigidly and causing them to become static and out of date. Programme learning outcomes cannot therefore be overly specific to maintain the significant advantages of the system and ensure quality outcomes are achieved for graduates.

In terms of implications on assessment. Is it important that learners are provided with flexible learning opportunities, this is especially true of CDETb services that deliver in a part-time fashion or operate a rolling intake model such as the Adult Education Service, Prisons and Youthreach. It is necessary that FET programmes of education and training are capable of incorporating a model of unitised assessment to ensure we continue to reach cohorts of learners that are educationally disadvantaged and socially excluded and are often not in a position to complete a programme, which is premised on full-time academic year model of delivery. That is not to say the holistic-programme approach cannot be adapted for flexible delivery.

It is essential there is provision within FET programmes and assessment models to provide learners with the ability to build up to full awards. This also feeds into the concept of self-efficacy, as learners grow in confidence as they achieve certification at the minor award level. It is possible to strike the balance between the holistic programme approach, and flexible delivery models. This could involve a final integrated assessment which takes in the programme level learning outcomes. This could be reflected in a capstone type unit and passing such a unit could be required to achieve the overall major award.

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<sup>2</sup>HET Core Validation Policy And Criteria 2010, Revised 2013, Section 3.2.1, pg 3

05/12/18

**TLU Report relating to staff feedback collated in response to the QQI Green paper on Feedback & Assessment**

The survey which consisted of 23 questions sought to compile the opinions of staff (n=51) in CIT around both **current and future practices** relating to **feedback and assessment**. Below are the summary points which were noted:

- The responses were **broadly positive** where staff are generally **amenable to change**.
- Changes were most favoured around the use of **technology, reducing assessments, using alternative forms of assessments** and using more **student-centred** assessment approaches.
- **Time** and **workload** are the biggest barriers to changing current practices.
- Staff felt that **more training** needs to be provided to both **students and staff** around the various types of assessments faced by students.
- There was a general feeling that different staff members have different requirements from students and **more standardised forms of assessments** should be encouraged for consistency.
- It was felt that the **department** should take a stronger lead in **overseeing assessment practices** (including training) across programmes.
- The survey found that 60% of staff consider students are being **over assessed**.

The findings highlight the need and appetite for change around assessment practices, and presents opportunities at many levels to develop and support a range of new initiatives to facilitate change.

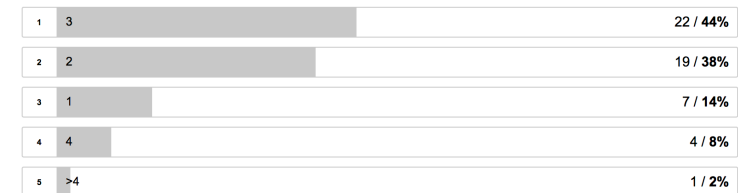
How many modules do you deliver per academic year (where you deliver on at least 50% of the module)?

50 out of 51 people answered this question



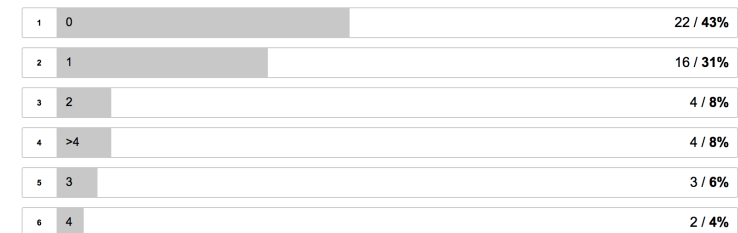
On average, how many summative (gradeable) assessment elements are there per module that contribute towards a student's final grade?

50 out of 51 people answered this question



On average, how many formative (non gradable) assessment elements are there per module?

51 out of 51 people answered this question



What types of summative assessment elements do you most commonly employ (Please pick your most common 3 from the list below)?

51 out of 51 people answered this question

1	Presentation	29 / 57%
2	Project	26 / 51%
3	Practical Skills evaluation	22 / 43%
4	Written report	22 / 43%
5	Short answer questions	18 / 35%
6	Essay	10 / 20%
7	Multiple Choice questions	9 / 18%
8	Written essay style exams	8 / 16%
9	Open Book exam	6 / 12%
10	Reflective journals	6 / 12%
11	Critique	5 / 10%
12	Performance Evaluation	5 / 10%
13	Exhibition	4 / 8%
14	Oral Examination	2 / 4%

How many of these have you used to support your assessment and feedback practices (please choose as many as you need)?

51 out of 51 people answered this question

1	Marking schemes and Assessment criteria (including rubrics)	44 / 86%
2	Whole class feedback	31 / 61%
3	Model answers / Exemplars	28 / 55%
4	Teamwork based projects	20 / 39%
5	Problem solving and Troubleshooting exercises	19 / 37%
6	Formative (non gradeable) assessment approaches	18 / 35%
7	Technology Enhanced Learning approaches	13 / 25%
8	Student based peer learning strategies	10 / 20%

When was the last time there was a formal review of assessment practices in your department?

51 out of 51 people answered this question

1	At programmatic review within the last 1-2 years	23 / 45%
2	At programmatic review within the last 2-4 years	17 / 33%
3	Never	7 / 14%
4	Greater than 4 years	4 / 8%
5	Annually	0 / 0%

What takes up most of your time from the list below?

50 out of 51 people answered this question

1	Grading assessments	29 / 58%
2	Providing feedback to students	13 / 26%
3	Administration work relating to assessment	6 / 12%
4	Researching and preparing assessments	2 / 4%

When delivering a module, how cognisant are you of ensuring the assessment strategy, teaching strategy and module learning outcomes are designed to support each other?

51 out of 51 people answered this question

1	Very much so	46 / 90%
2	Slightly	4 / 8%
3	Not at all	1 / 2%

"When delivering a module, how cognisant are you of the Programme intended learning outcomes and the role that each module plays in achieving these outcomes?"

50 out of 51 people answered this question

1	Very much so	28 / 56%
2	Slightly	17 / 34%
3	Not at all	5 / 10%

In general, across the course of a programme, do you think that students are being over assessed?

50 out of 51 people answered this question

1	Yes	30 / 60%
2	No	20 / 40%

In your opinion should there be an assessment design panel (to oversee and optimise the standardisation of assessment practices) appointed at:

51 out of 51 people answered this question

1	Department level	21 / 41%
2	Programme level	15 / 29%
3	None needed	10 / 20%
4	Institute level	2 / 4%
5	We already have one	2 / 4%
6	School level	1 / 2%
7	Faculty level	0 / 0%

Currently, in your department, do students receive any formal training on how to undertake the various assessment types they will undertake during their course?

51 out of 51 people answered this question

1	No	28 / 55%
2	Yes	23 / 45%

Have you received enough formal training on how to set and grade the various assessment types associated with the modules on your course(s)?

51 out of 51 people answered this question

1	No	33 / 65%
2	Yes	18 / 35%

In general, how satisfied are you with the types of assessments that are used across modules on your course(s)?

51 out of 51 people answered this question

Average: 3.16



Not at all

Quite satisfied

Totally satisfied

(If you are not involved in Work Placement [WP] please skip to Q 14). In terms of WP, approximately how many students in your department are placed every year

13 out of 51 people answered this question

1	>150	4 / 31%
2	50-75	3 / 23%
3	75-100	3 / 23%
4	<25	2 / 15%
5	100-150	1 / 8%
6	25-50	0 / 0%

How many credits are associated with this WP module?

13 out of 51 people answered this question

1	30	4 / 31%
2	10	3 / 23%
3	15	3 / 23%
4	5	2 / 15%
5	20	1 / 8%
6	25	0 / 0%
7	>30	0 / 0%

How is the WP module assessed (Please choose as many as you need)?

13 out of 51 people answered this question

1	Reflective Journal	12 / 92%
2	Work Place visit	11 / 85%
3	Employer Feedback	10 / 77%
4	Post placement interview	6 / 46%
5	Other	3 / 23%
6	Submission of CV	3 / 23%
7	Binary (pass / fail)	1 / 8%
8	Exam	0 / 0%



In general, across the course of a programme, do you think that students are being over assessed?

50 out of 51 people answered this question

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2	No	20 / 40%

In your opinion should there be an assessment design panel (to oversee and optimise the standardisation of assessment practices) appointed at:

51 out of 51 people answered this question

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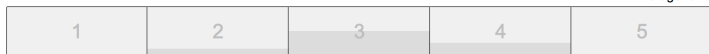
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2	Yes	18 / 35%

In general, how satisfied are you with the types of assessments that are used across modules on your course(s)?

51 out of 51 people answered this question

Average: 3.16



Not at all

Quite satisfied

Totally satisfied

With the appropriate training, how many of these initiatives would you be willing to try as part of a range of summative assessment practices (choose as many as you like)?

49 out of 51 people answered this question

1	Adopting alternative forms of assessment	32 / 65%
2	Using technology to assess and provide feedback to students	32 / 65%
3	Reducing the number of assessments	30 / 61%
4	Using more student centered assessment strategies	29 / 59%
5	Using formative assessment approaches	26 / 53%

"How much would you support the idea of de-coupling module delivery from our current assessment model in favour of assessing students more broadly across semesters and/or stages of a programme?"

50 out of 51 people answered this question

Average: 3.18



Not at all

Willing to try

Very much in favour

3		25 / 50%
4		12 / 24%
2		7 / 14%
5		4 / 8%
1		2 / 4%

I would like to see (choose as many as you like) more training on assessment and feedback from

46 out of 51 people answered this question

1	My Department	25 / 54%
2	My School	17 / 37%
3	The Teaching and Learning Unit	17 / 37%
4	My Faculty	10 / 22%

How many of these would be a factor in you considering whether or not to change your assessment practices?

49 out of 51 people answered this question

1	Time and workload	35 / 71%
2	It may not be fit for purpose	26 / 53%
3	Lack of training	12 / 24%
4	Professional / Regulatory Body constraints	12 / 24%
5	It may not be consistent with past practice	7 / 14%
6	Not aware of alternatives	5 / 10%
7	No incentive	4 / 8%
8	Fear of change	2 / 4%

#### Open feedback:

Discussion is a good beginning

We have made some progress in spacing assessments from different modules evenly across the semester but more needs to be done. Formative assessment activities are not mentioned in module descriptors so remain largely invisible and possibly undervalued.

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. 2 assessments are enough per module and 1 is enough if a formal exam is included.

Not all staff are in a position (due to service in etc) to change the module after a delivery to recommend other assessment practices. If they can, there is a huge delay getting a module amended through the Module moderator. Not all modules are delivered by the same staff each year. Perhaps that data could be collected?

We badly need a panel where there is a general overview of the various modules and assessment types as there is no consistency at all!

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

Teaching and Learning is not respected enough across the college and the only time assessment come into question is when a student fails. If no student fails across a module then no questions are asked. I also believe that the overloaded curriculum does not allow for students to consolidate their learning through feedback. Finally in relation to feedback, the

timing of and how it is delivered to the student is very important and teachers should be educated on this aspect of it.

I'm not sure what the point of this is. I'm an expert at what I do. I don't need a committee to tell me otherwise. This place is overrun with well meaning but ultimately unproductive committees smothering us in paperwork.

The amount of time and distraction from teaching that over assessment through modular system has brought is detrimental to the explorative work of teaching in fine art

I am quite stuck in the type of assessment I can give, as I primarily teach research oriented or research based modules e.g. Research Methods, and do a lot of supervision of final projects e.g. Dissertations. The assessments for those take an incredibly long time to correct. With regard to other modules, to be frank, when I have tried to change assessment in the past I have had the support of my HoD, but they have not been accepted by the moderation process.

I find that the more challenging the assessment that it must be given to the students later in the semester, this almost always means that early assessments are almost irrelevant and latter assessments are not formative

Shared modules pose a challenge if one wishes to change assessment. I think we could reduce content in modules and allow for deeper learner by using a variety of different assessment methods

The principal constraint in everything I do is lack of time. As it is, on average 2 days per week, I spend 13 hours per day in my office preparing for classes/assessments. 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.

I personally feel that we don't look at assessment across our programmes. At programmatic review time each of us looks at "our" module and makes whatever changes we see fit. There is no sense of what other lecturers on other modules are doing or how they are assessing similar assessments e.g. presentations etc.

I think some lecturers are more conscientious than others within a Department and some are seen as 'easy' or 'hard' markers. Some use a light touch when it comes to assessments and others are rigorous. no one size fits all.

Feedback and assessment approaches vary hugely from lecturer to lecturer, and more consistency would be good

A lot of assessment designs are based on an 'academic' type module. Mine are skills based so alternative suggestions from college wide initiatives are not useful for me. As for feedback I feel constrained by the 'sanctioned' format of feedback which is general and not the personal feedback that would be useful for students learning new practical skills on creative modules.

It is something we can improve on each year and I think people do.

Those who seek feedback are less likely to be the ones who really require the feedback. There is the element of responsibility for own learning and avoiding the handholding scenario. How to strike the right balance can be a challenge.

Consistency between lecturers needed. Reliable marking systems needed. Too much time needed to grade essay assignments.

To the consultation team,

I attended the QQI Green Paper event on Let's Talk Assessment and contributed to the workshop discussions. In addition, please find below some observations and comments in relation to the Green Paper on Assessment of Learners and Learning. I hope you find it useful.

Best regards,

Carina

## 1.

**P77 under Higher Education and Training Issues examines over assessment and** asks the question *'How can programme designers approach the optimisation of the modularisation of programmes to ensure that an appropriate balance is struck...'*

Perhaps the paper needs to be more explicit in requiring programme boards to engage with 'Teaching and Learning Units' prior to programme and module design, where 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. This exercise can also include students as partners in the design process. However, students need training in 'curriculum design strategies and tools' prior to live student-educator programme development partnerships. This has come up as a key requirement through the national NStEP programme and plans are in place to devise 'programme design training for student curriculum design partners'.

In summary, can avoid over assessment and manage assessment more effectively if there is a requirement for programme board teams to engage in 'Curriculum Design' CPD activities. A 'Digital Badge' could also form part of this engagement process and support the quality assurance framework plans of an institute.

## 2.

### Page 78 Assessment Literacy

*‘Concerns are sometimes expressed about the preparedness of some learners to transition to learning strategies that are compatible with higher education and training. What supports need to be put in place.....’*

First Year Skills modules are in place in many HEI’s to support this issue e.g. GMIT run a mandatory first year skills module titled *Learning and Innovation Skills* to support the transition to HE and develop problem solving and study skills. This module has many benefits, however there is more HEI’s could do to tackle this issue in first year and continue the support as learners progress through the higher education system. Something we are seeing that is resulting in challenges among the teaching community, is engagement of the Millennial Generation and managing the diversity of learners in the classroom or online. In addition, we are aware that one assessment type does not fit all learners and there is a requirement to provide a variety of assessment options to meet a range of learner needs.

What I am seeing, is we need to be thinking more about ‘Bootcamps on Assessment’ for learners at different stages in their higher education journey. Learners need an ‘induction’ / ‘preparation toolkit’ and a suite of facilitated workshops to prepare them on how to engage with assessment in HE. From understanding, rubrics, criteria, learning outcomes and a range of assessment types and how to be successful in assessment engagement etc.

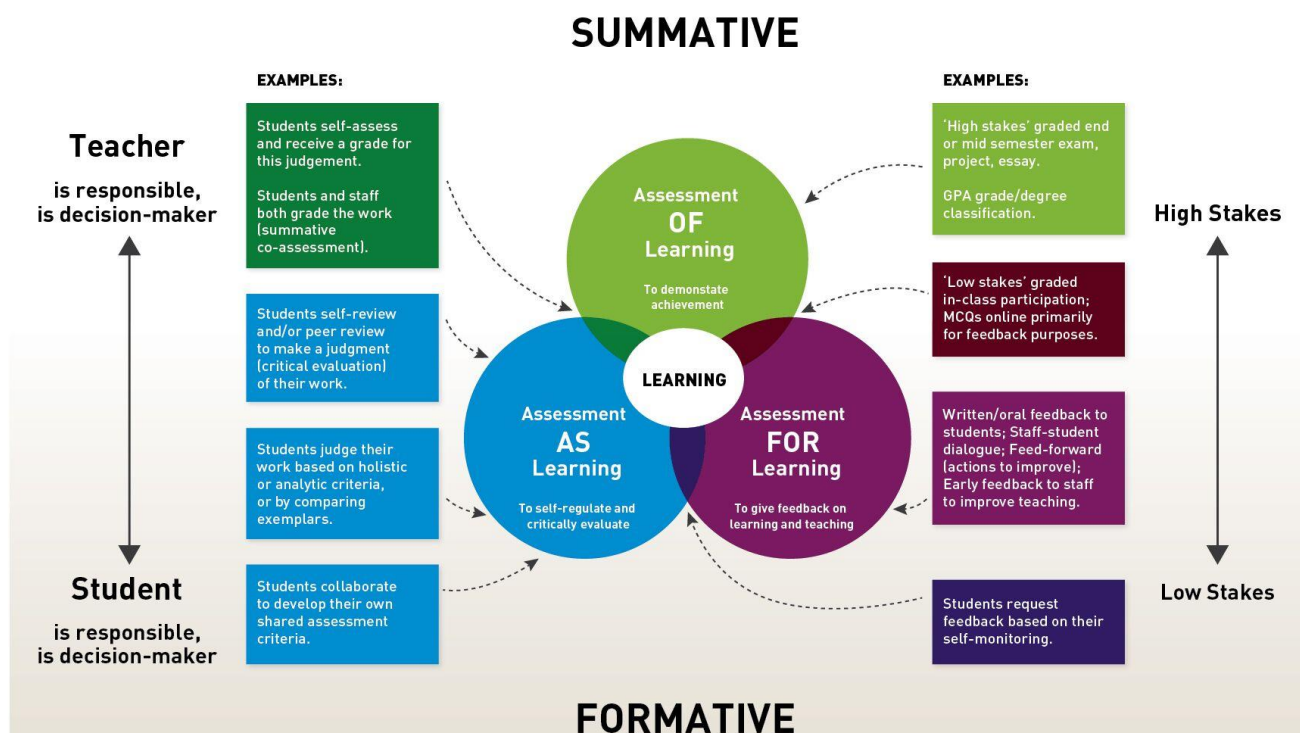
An interesting approach and toolkit I have come across is by **Peter Balan PhD, Senior Lecturer, School of Management, University of South Australia**. Peter has devised a Team Based Learning Collaborative Toolkit. Team-Based Learning (TBL) requires students to pre-learn course materials before a teaching session, where exercises rely on students using self-gained knowledge. This is the reverse to “traditional” teaching when course materials are presented during a lecture, and students are assessed on that material during another session at a later stage. Peter provides **introductory orientation class sessions on all modules that prepares and engages students to successfully participate in courses, particularly courses that require pre-learning and engage the ‘Flipped Classroom’ approach**. This approach has been implemented very successfully and effectively in a range of courses in different countries. This approach is described in: Balan, P, Clark, M, & Restall, G. (2015). Preparing students for Flipped or Team-Based Learning methods. *Education + Training*, 57(6), 639-57 (ERA A\*).

Our learners also need ‘Outduction’ to prepare them for the world of work and being employable (one example of innovation in this space is the development of an online toolkit, a module and suite of assessments and workshops called ‘The Next Step’ at GMIT).

### 3.

#### Page 78 Assessment as and for learning

This section in the Green paper is very light. A wider discussion and feature on this should be presented in the paper. There is a move away from 'of' learning and a lot more emphasis on the wide-ranging learning benefits gained from the 'as' and 'for'. I recommend reference to and presentation on the work conducted by Dr Geraldine O'Neill, UCD and outputs from the National Forum Assessment Publications in 2016/2017. Presented below is an interesting diagram that provides a visual story guide on this topic.



### 4.

#### Competency Based Assessment

Consider providing a dedicated section on Competency Based Assessment. This topic needs wider discussion and debate.

## 5.

### Page 55 Assessment of Prior Learning

This section requires further discussion and recommendations on how to manage RPL assessment effectively.

There are many examples in the sector of RPL practices that are working well. One example is the use of an **online RPL Portfolio assessment tool** (*see [myexperience.ie](http://myexperience.ie) and [rplportfolio.ie](http://rplportfolio.ie) - developed by GMIT, IT Sligo and LYIT. It has the potential to be deployed across a wide range of HEI's in Ireland that perhaps could support the national co-ordination idea for managing RPL effectively*). Perhaps this section of the paper could point to examples of RPL assessment practices in Ireland and internationally that are working well and are transferable to other HEI's.

## Staff Response to QQI Green Paper on Assessment questions

In late October and early November 2018, the QA Unit, ANON invited staff to be part of the consultation process on the QQI Green Paper on Assessment. The invite was issued using the 'forms' app on ANON staff Microsoft 365. 20% of those contacted responded and their feedback is documented below. The feedback represents views from PLC, part-time programmes, VTOS and Training.

### Why is assessment important?

To confirm that learning has taken place, identify gaps in learning and confirm entitlement to qualification.

It sets targets, goals and improves focus.

Assessment is important to monitor learning and attainment of the core knowledge, skills and competencies through the learning outcomes.

Assessment does more than allocate a grade or degree classification to students – it plays an important role in focusing their attention and, as Sainsbury & Walker (2007) observe, actually drives their learning. Gibbs (2003) states that assessment has 6 main functions: 1. Capturing student time and attention 2. Generating appropriate student learning activity 3. Providing timely feedback which students pay attention to 4. Helping students to internalise the discipline's standards and notions of equality 5. Generating marks or grades which distinguish between students or enable pass/fail decisions to be made 6. Providing evidence for other outside the course to enable them to judge the appropriateness of standards on the course. He states that with the exception of the last two points these should occur as frequently as possible to support effective learning. <https://www.ucd.ie/t4cms/UCDTLT0026.pdf>

Assessment recognises achievement. Initial summative/final assessment provides learner/tutor with a framework.

Places the learner in the most appropriate programme. It can help to identify gaps and the supports needed. It measures the learner's starting point.

Establish and maintain standards (even centre specific). Enables transfer of marks and eventual awarding by QQI of either a distinction, merit or pass. Leads to transparency for teachers regarding marking and based on quality of assignment. Ultimately the external authentication can oversee the work and validate the standard of work. This is why it is so important to have a professional panel of external authenticators available to the ANON centres. It is imperative that this panel covers all the all the different areas of learning to be examined.



## How does assessment support learning?

By informing learners of their progress, empower them to take the necessary action to improve their performance.

It provides evidence of attainment to learners and motivates them.

Assessment focuses learning and provides an opportunity to provide targeted performance-based feedback.

Assessment is about building a picture over time of a student's learning progress across the curriculum. It is the process of gathering, recording, interpreting, using and reporting information about a student's progress and achievement in developing knowledge, skills and attitudes.

Assessment is described as having four functions (NCCA, 2008)

1. Formative (identify needs, modify curriculum, & create learning context and adopt teaching strategies)
2. Summative (Summary for reporting)
3. Evaluative (of mediation of the curriculum)
4. Diagnostic (identifies areas of difficulties)

There are two interrelated and complementary principles that emphasise two aspects of assessment that are central to the teacher's work

1. Assessment for Learning (AfL)-The teacher uses evidence on an ongoing basis to inform teaching and learning
2. Assessment of Learning (AoL)-The teacher uses information from AoL for reporting, particularly to parents and other teachers. <https://www.sess.ie/resources/assessment>

The word itself may not always be positive for the learner e.g. failure at school. If used appropriately assessment can validate if a learning outcome is achieved or not. It may also identify areas which may need additional teaching.

Shows the learners their progress. It gives reassurance to the learner that they are learning and achieving. It can be a motivating factor in learning, gives a feeling of accomplishment. It tells the tutor if the teaching methods are right for the learner; changes in approach can be made as a result. It informs planning & delivery.

It is the tool the teachers use to track learner progress. Assessment when conducted appropriate to class progress should motivate the learner and give the learner clarity. The standard of assessment is measurable because the learner can see how they have met the specific learning outcome. This gives the learner the opportunity to show a real understanding of the course content. Constructive feedback gives an opportunity to the learner to build/improve skills. They can then adjust their work to produce a stronger academic standard. This in turn enables the learner to become independent, self-directed and builds confidence. Assessment supports learning because it reinforces the teaching. It also challenges learners and they can transfer skills to further education/world of work. Assessment develops research skills, report writing, problem solving, critical thinking, analytical skills, communication skills and teamwork skills. It enables the learner to go forward to realistic career options.

## How does assessment support quality?

Assessment can help to evaluate the quality of an education or training programme.

It keeps the focus on the material to be learned, sets pace.

Assessment does support quality but the current broad breath of learning outcomes sacrifices a depth of learning; quantity over quality in some modules.

We could of course enter into a debate around the definition of quality which indeed may be valid.

QQI Levels - Learning Outcomes - these ensure standards are maintained in the NFQ. Assessment ensures that each learner is provided with an opportunity to achieve a level relevant to their ability

The assessment has to be genuine and relevant to the Learning Outcomes being assessed. If this is consistent practice then assessment is reliable and an accepted (minimum) standard evolves.

Clear marking schemes and guidelines provide clarity for the learners and teachers. This ensures a high quality is maintained and that each learner is only put forward for certification at the level they are capable of attaining. In addition, constructive feedback enables learners to aspire to and attain a recognised standard. Quality is further maintained by ensuring that the processes of internal verification and external authentication are carried out to the highest standard.

### How does assessment support equality?

Assessment can help to establish if procedures for assessment are fair, reliable and consistent.

It provides a range of assessment techniques to enable learners to show skills and knowledge.

Assessment that is fair and transparent supports equality.

Assessments tools and systems which are designed to do only the task stated and are built with universal design learning principles <https://www.ahead.ie/udl> can foster an equality based ethos. Obviously this should be located within a wider framework. due care needs to be given that the assessment tool or method does not unnecessarily disadvantage a student e.g. no one should be losing marks for spelling if the object of the assessment is to show an understanding of health and safety principles.

All learners should be assessed using the same guidelines.

The LOs being assessed are the same for each learner on the course. The Teaching & Learning methods can be adapted to suit individual learning styles.

All learners are given the same assignments and marks are awarded fairly. In the case of examinations, where a second exam has to be made out, it is ensured that each of the exams at set at the same standard. This ensures an equal opportunity is given to all learners to perform well. Reasonable Accommodation ensures all learners can access learning/assessment without compromising the standards.

### How does assessment support standards and qualifications?

Valid and reliable assessment procedures ensure awards standards are upheld.

Assessment is conducted to a set of rules and generates evidence which can be compared externally to maintain standards.

Assessment supports quality as it provides a means of checking that standards are met and that delivery meets with expectations and descriptors as per QQI qualifications.

The green paper has addressed this.

Assessment of learners and learning is hugely important to support standards and qualifications. Assessment provides Anon with the relevant information to place the learner in an appropriate programme.

If assessment is genuine, relevant & valid, it will lead to a consistent standard and to a credible qualification.

By following the above I am confident that we fit into the National Framework of QQI qualifications by ensuring we meet the quality required and provide equal opportunities for all learners. This is done through internal verification and further validated by external authentication.



## How do we embrace the concepts of assessment of, for and as learning?

But providing fair, reliable and consistent assessment to confirm that the assessment criteria has been fulfilled and that the standards of assessment are upheld.

Assessment helps both learner and teacher to work to targets in a timely manner. It provides evidence of achievement for the learner.

Continuous assessment in particular.

This is built into how we teach, what we teach and how we design and carry out our formative and summative assessments.

I do not fully understand this question. We do embrace everything about assessment of learners and learning as it provides us with relevant information as to where the learners is initially, where they would like to go and how we can support them in this process. Regular assessment ensures that both the learner and the tutor are on the right track.

A hard question to answer but I think the answer is Yes. I believe that we are 'self-assessing' as we go along in Teaching & Learning and instigate change as a result but we don't have a formal structure for sharing the learning from assessment especially following internal & external verification. This question would be a good topic for a tutor in-service.

Yes we do embrace the concepts of Assessment as it allows us as teachers to track the progress of learners. This reinforces learning, results in constructive feedback, which develops/builds skills set that are relevant and can be transferred to further education or the world of work. Assessment is essential because it allows the teacher to gauge the level the learner is at and ultimately can be validated by the external authenticator.

By using the 'Wider Benefits of Learning Assessment Tool' we embrace the concepts of assessment for and as learning. Students set learning outcomes and can reflect on their progress and identify the benefits of learning specific to the learning outcomes and in relation to their personal learning, their health and well-being and their family/ community. It also allows for reflection on future educational or employment plans.



## **Response to the QQI Green Paper on Assessment of Learners and Learning**

**December 2018**

## **Introduction**

CCT College Dublin welcomes the Green Paper on Assessment of Learners and Learning and the opportunity to commence a sector-wide conversation on assessment design, integration, management, implementation, and regulations.

The Green Paper was wide-ranging in terms of the issues it identified and the questions it raised, as well as being intended for both further and higher education. While much of the response from CCT may transfer across further and higher education, as a higher education provider, this response is focused on assessment in higher education.

In formulating this response, the College participated in the HECA Colloquium on Assessment and the QQI and National Forum Symposium "Let's Talk about Assessment". This was in addition to the internal review and consideration of the paper by all academic staff, culminating in a discussion at Academic Council in November 2018. This response is the response of CCT College Dublin, as approved by the Academic Council and Senior Management Team. The main points addressed by the College are:

- The concept of assessment
- Over-assessment
- Programme level assessment
- No repeat for honours
- Integrated and holistic assessment
- Academic Integrity

## **Comments, Observations and Recommendations**

There is a shared understanding within CCT that assessment facilitates, informs and evaluates learning. This view places learning at the centre of assessment. There is, however, a concern that 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.

The College welcomes any initiatives, policies and guidelines that would deter assessing without real rationale and strategic assessment planning and the unnecessary or less suitable use of traditional assessment tools that overly rely on the restatement of facts. The College believes any policy position should promote assessment practice that encourages learner autonomy, reflects diversity in learning and maximises authentic assessment. The continued use of examination where it is not the most suitable assessment tool, and its perception in some areas of being the only true, reliable form of assessment needs to be addressed as part of this.

Policy change alone will not overcome these issues. There is a job of work in shifting mindsets and practice and providing the required guidelines, training, exemplars, case studies, and assurances that are required to facilitate making the change. This change management will need to consider:

- those staff and institutions that are dependent on examination as a measure of reliability
- those learners that have progressed through an education system that included a significant emphasis on examination and have developed a well-tuned exam technique to facilitate success

- validation panel members who may not have experienced alternative or innovative approaches to assessment

There is mixed opinion in CCT as to whether professional bodies impose requirements which conflict with effective assessment practice, likely due to experience with specific bodies. It is however agreed that experience with professional bodies generally requires the use of examinations and inhibits the freedom of a provider to determine the most suitable form of assessment or to introduce innovation in assessment, facilitating a “more of the same” approach. This is an issue at national and international level and will require QQI to look to work with professional bodies.

Supporting the position that learning is at the heart of assessment, CCT staff and students value learning outcomes and the role they play in setting standards, increasing transparency and in focusing assessment design and learning activities. They are, however, also identified as part of the problem in assessment. There is a view that attainment of learning outcomes is absolute, with each individual learning outcome either being met or not met and the not meeting of one being interpreted as a fail, rather than a scale of attainment and the coupling or grouping of learning outcomes in grading student assessment. This is particularly an issue at module or individual assessment level and can result in an overly prescriptive approach to assessment. It is difficult to pinpoint the root cause of this, but it is felt that there are a number of contributing factors including:

- The construction of learning outcomes and the challenge of balancing transparency and specificity with narrow and prescriptive, potentially inhibiting, statements.
- QA procedures such as validation and external examining and how they may contribute to the “safe” option of traditional assessment approaches, over-assessment, and over-prescription.
- The diversity of approach, across and within institutions, articulating learning outcomes and mapping them to assessment
- The need for further training and guidance for academics, external examiners and panel members in constructing and assessing learning outcomes.
- The operation of programmes in a modular structure and viewing programmes in this component structure at the expense of stage or programme level learning and assessment.

CCT feels there is a responsibility for individual providers to ensure there is a consistent understanding and application of the learning outcomes approach to assessment within their institution, but this needs to fit within a national approach. The implementation of learning outcomes focused assessment has been aided by the work of QQI and the National Forum, to date. Further work at a national level, reinforced at institution level, regarding writing and assessing learning outcomes as a collective and cohesive unit, as opposed to segregated individual statements of knowledge, skill or competence, is still required. Re-focusing on programme and or stage level assessment should be a core part of this. It is suggested that some of these issues arise as a result of providers using terminology that has been successful previously with validation panels. One suggestion to combat this fear of panel rejection is the creation of knowledge sharing groups to build expertise in expressing learning outcomes. These could be multi-disciplinary or discipline specific. There are arguments for both.

CCT recognises that for some institutions a programme or stage level approach to assessment may present bigger challenges particularly where a programme team is dispersed or where a module forms a part of multiple programmes. Nonetheless, the College believes this is an essential requirement and failure to develop and implement programme level assessment results in an inconsistent approach to assessment which impacts on learner experience and, ultimately, on the

graduate attributes. Refocusing on programme or stage level assessment may assist in addressing the challenge of reducing over-assessment. Section 7.5 of the Green Paper states that QQI believe holistic assessment can and should always be integrated. CCT requires integrated or holistic assessment to be included in all programmes leading to a QQI award, be it through capstone assessment pulling together the learning from all preceding and concurrent learning, through stage level projects that draw on concurrent learning but credit is attributed to one module, or through cross-modular assessment where the assessment relates to multiple modules and an independent grade assigned to each. The College agrees that holistic assessment can always be integrated, assuming the programme has been designed holistically and not as a series of components. Whether it should be is a matter of debate. There is a strong consensus that the focus should be on programme level assessment and the current modular approach can assure attainment of programme learning outcomes but also increases the likelihood of over-assessment. Once again, the concern about what will be accepted by validation panels was raised.

CCT successfully applies cross-modular assessment and finds this beneficial in aiding learners' understanding of the interrelationship between modules, the cohesion of the programme and reducing the assessment burden on all parties. It does bring additional challenges such as the potential for admissions with exemptions, designing the assessment and specific marking rubrics to reflect the potential that a student may pass some of the modules but not necessarily all of those being assessed, arrangements for re-assessment, arrangements for marking by multiple staff members and ensuring turnaround times and feedback requirements are fulfilled individually, for example. Potentially, missing or failing a cross modular assessment, including for reasons of mitigating circumstances, can also prevent progression with credit deficit, where this might otherwise be permitted. CCT benefits from providing programmes which are highly structured and are managed by close-working programme teams. This contributes to the success of this assessment approach. Where programmes and teams are less structured it will present a greater challenge. CCT believes that no one approach should be imposed on providers as academic freedom must prevail but all parties, including validation panels, need to be encouraged to embrace integrated and holistic assessment and be furnished with the tools to enable them to do this effectively. This is an area where development of academic staff knowledge and confidence across the sector would be beneficial. Some work has commenced with the National Forum but QQI specifically stipulating a preference for such an assessment approach may bring a greater change. A further suggestion put forward is for QQI to work with validation panel members to develop their openness to different approaches to assessment.

The sectoral convention of no repeat for honours may also be contributing to over-assessment. In an attempt to reduce the assessment risk in award bearing modules, modules are often designed with multiple assessments, so a learner has an increased chance of passing the module overall, even with some failure within that module. CCT finds this convention to be unjustifiably harsh and also disadvantageous for those students who are impacted by it, noting it does not apply across the university sector and there is variation in practice across the IoTs. A learner commencing a two-year Masters programme, a Higher Diploma programme or a one-year add-on for honours, could fail their first module at the outset of this learner journey and therefore be prevented from achieving higher than a pass award. This is demotivating for the learner and appears to be at odds with assessment being a learning process, making it a punitive process. It promotes the position that failure is penalised regardless of how well one learns from it. Furthermore, if the learner was completing a similar programme in the University sector, they would receive a capped mark for that module alone. The capping of a repeat mark prevents learners securing an unfair advantage but isn't sufficiently detrimental as to negate positive achievements throughout a programme of study.



Perhaps the more significant implications of this sectoral convention are the impact it has on a graduate's employability or application for further study where an honours profile is required. Potential employers or other education providers are likely to only note the award classification on any application form. It is unlikely that employers would be aware of the sectoral convention and the impact on award classification. CCT encourages the removal of the sectoral convention. It is proposed that there should be cross-sector consultation to reach agreement on practice for a suitable alternative or indeed whether an alternative should be provided. There are mixed opinions on this matter within the College, likely reflecting a national picture. Should inability to reach a pass standard at the first attempt warrant a penalty if assessment is genuinely about learning and learner development? Is a limitation on number of attempts enough restriction in itself? While a consensus may not be reached, the excessive severity of the penalty of the current convention is recognised.

The final matter debated by the College is that of academic integrity / academic impropriety. 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. The Green Paper states, "Providers need to create environments that encourage academic integrity" on page 98 and later on the same page "They (students) should be taught the disciplinary norms for expression through the media of their discipline and for respecting and citing the work of others. The skills of academic expression need to be developed and honed and will not be acquired without concerted effort and guidance."

The College shares the position that knowledge of this area cannot be assumed and that practice in Ireland differs from that in other countries, creating a bigger challenge for international students. Through the CCT Library and Centre for Teaching and Learning, the College has embarked upon an academic integrity project, identifying and implementing interventions to promote academic integrity. The project is still in its implementation phase, but positive impact has been observed already. Next stages of the project include enhancing knowledge and practice in designing assessments to which promote academic integrity and deter impropriety. Thus, the College welcomes the approach outlined in the Green Paper.

Good afternoon

I have had the opportunity to review your extensive Green Paper on Assessment and would wish to make the following observations. My responses refer to the numbered queries in your document. You highlight in your introduction that “trust” is key to this area. We fully support this view. As a professional institution with over 130 in existence (with 27,000 members and 6,000 students) we are happy to make some what we hope will be relevant comments. Your document appears to be primarily aimed at HE and FE institutions and we believe our experience is relevant here.

Section 7.3 & 7.4: The establishment of “communities of interest” as regards the implementation of learning outcomes in a consistent manner is an appropriate response. This might be assisted by the creation and sharing of best practice examples. Additionally there is a need (given the number of State bodies in the sector) to avoid having duplication of effort so clear lines of demarcation might help as needed.

Section 7.5: We would suggest that training of members of the assessment team is critical to the implementation of programme assessment strategies. Having appropriate quality processes supported by a reflective learning process should support this.

Section 7.7: Yes it is possible that the burden of QQI may be greater than some bodies can support. However QQI has a role and it is incumbent on any educating/assessment body to have appropriate resources to avail of the benefits of QQI accreditation. Collaboration/cost sharing with other bodies might ease some of the resource constraints identified.

Section 7.8: We are not sure that RPL should be restricted to specialists only. The key is that the persons undertaking this work have the appropriate expertise.

Section 7.9: We would be open to exploring your suggestion.

Section 7.10: We do agree that a pure “atomised” approach to assessment alone can give rise to problems. AN integrated assessment is typically needed in the assessment. Workplace assessments need to be undertake also by trained mentors.

Section 7.11: We agree with your comment.

Section 7.12: The creation of communities of common interest where experts from a professional area can meet periodically (perhaps with input from QQI) to discuss common challenges can assist with the concerns raised. QQI forums also allow learning from other areas and professions including outside of Ireland is also important.

Section 7.13: Grade referencing can be a challenge and give rise to a perceived grade inflation. There should be a requirement for bodies to explain material changes in outcomes where the education inputs (including academic achievements of students entering the system and the education programme itself) are consistent. In such cases consistency in exam outcomes should be expected.

Section 7.15: There is always a risk of award classifications being applied in an inconsistent manner. We would encourage consideration of a profession or faculty wide criteria being developed and shared externally. Clear guidance from QQI can asses also.

Section 7.18: Remote assessment can naturally raise challenges. Its effective roll out will depend on the technology platform supplier and the resources deployed in the system and the technology used.

Section 7.19: We are not aware of any practices in the area of accounting where professional bodies or regulators impose requirements on education and training which conflict with effective assessment practice. Any variation should be open to it being justified and be done in a transparent manner. Professional bodies have a role via accreditation processes, input into programme panels, peer review processes.

Section 7.20: We support this proposal.

Section 7.21: Engaging the learner in relation to the assessment processes can raise some challenges. We find student surveys and feedback on exams a useful way to do this.

Section 7.22: Assessment of workplace experience is important. Clear standards and guidance with appropriate oversight from the mentor and professional body can assist. QQI could play a role in developing or identifying best practice which can be shared. Significant changes in technology will have a profound impact on assessments going forward. We are in a very exciting and challenging time. The use of artificial intelligence for example could revolutionise exam marking. However any tool will only be as good as the underlying algorithms underpinning it.

Section 17.3: There is always a perception of there being different status and that different standards are applied in different colleges. QQI could assist in challenging these perceptions through the identification and sharing of best practice examples and by highlighting the complexity in assessment process. We do support the retention of the no honour degree award for students who have to re-sit exams unless the first attempt was impacted by such things as illness which is properly documented.

Section 17.5: We have experience of apprenticeships via our sister institute accounting technicians Ireland. The introduction of the AT apprenticeship was not without its challenges given the multiple state parties involved.

I hope this is of some benefit. Should you wish to discuss further please do not hesitate to come back to me.



## Education Unit

**Date** : 16 November 2018  
**Topic** : QQI Green Paper on Assessment of Learners and Learning  
**Author** : Fiona McVeigh, Education Policy & Standards Manager

CORU welcomes the QQI Green paper on assessment of Learners and Learning and recognizes the significance of providing clear guidance to Higher Education Institutes on assessment. It is reassuring to note the recognition that the awarding of qualifications are based on trust and everyone behaving with integrity is fundamental to this process. The breadth of consultation is comprehensive. As a regulator with a statutory function we are dependent on the qualification as a token of recognition of standard. With regard to protection of the public there are some areas of the consultation that could be considered more substantially.

There is no reference in statutory regulation in the document. On page 39 section 5.3 it would be preferable to differentiate between professional bodies and statutory regulator. The statutory regulator is for many professions, the Competent Authority, and would be the designate body for international crosslinks. The purpose of statutory regulation is to protect the public by promoting high standards of professional conduct and professional education, training and competence amongst registrants of the designated professions. Assessment is an integral part of underpinning the quality of professional education. We as the statutory regulator for 17 health and social care professionals are reliant on a qualification attesting to the Standards of Proficiency for entry to the register. And as such we are relying on the QQI's assessment of a qualification for verification of standard. There could be more recognition of this dependency of the regulators on the QQIs role for standards, contained within the document.

The issue of "awarded in the State" is one which consideration, discussion and recognition of the importance of, should be included in this paper. Where programmes are delivered in the State but awarded outside of the State and vice versa, guidance should be given on ensuring standards of assessment on these programmes.

Section 7.8: Assessment of Prior Learning causes concern from a regulatory perspective. This assessment has implications for entry onto programmes and as such it would be preferable to have a more robust approach to this assessment without being prescriptive in nature.



For regulators, assessment of competency of standards at programme level is challenging. If a student passes a programme, which pertains to cover required standards of proficiency, at 50%, do we as a regulator know that a student has

- a) Passed all of the standards of proficiency at 50%? or
- b) Passed 50% of the proficiencies?

When the an education provider is mapping modules across a curriculum will there be a guarantee that a student who has only achieved a pass mark will in fact cover all of the required standards of proficiency? 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.

Section 7.16 covering grading work place 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.

On page 61 in Section 7.19 the terms professional body and professional regulator are used interchangeably in the last paragraph. This should not be the case. Statutory regulators, it should be noted, do not impose requirements on standards of education and training. The pre-registration education and training Standards of Proficiency are set at threshold level for entry to the profession. These Criteria and Standards are specific but they are not prescriptive, allowing for academic autonomy by education providers to implement them in a way they see fit. Education Providers, upon application, to the professional regulator can attest to these Criteria and Standards but they are not imposed on them. Education Providers are entitled as they see fit to remain outside of approval and monitoring process.

The English language requirement is one which focuses on the introduction of a student to the programme. There is no reference to the English language standard at the outcome of the programme. Given the volume of Fitness to Practise complaints that arise from communication based issues this is an area for consideration to be strengthened. For the health and social care regulator the focus on inputs alone is a concern.

With consideration to Academic integrity as discussed in section 13, what would the QQI need to do to show that this is fully in place in the context of assessment? What advice or guidance is to be given on the review of results outside of the curve within programme level reviews with reference to MIPLOs? The foundation of trust in the QQI processes is this previously referenced academic integrity.



Overall, as we previously mentioned, the breadth of this document is impressive. However, given the extensive amount of work that has been done to date it would be strengthen the policy further to include the recommendations included in this feedback document.

7<sup>th</sup> December 2018

## Response to the Green Paper on Assessment of Learners and Learning

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of the Dublin Adult Learning Centre as I want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

The Dublin Adult Learning centre (formerly the Dublin Literacy Scheme) is a basic education centre based in the North Inner City. We have been providing literacy tuition since 1974 to meet the educational needs of adults in this area. *Our mission is to provide basic education services to ensure that everyone in the inner city has the opportunity to avail of their right to develop their literacy and numeracy skills.*

DALC defines literacy as follows:

*Being literate means being able to read, write and use numeracy and information technology competently to deal with situations and opportunities in your own environment. It means being able to fulfil your own goals as a family, community member, citizen and worker. Being literate depends on what you need or want at a specific time. Becoming literate is part of a life- long learning continuum.*

We have more than 500 students per year and we are funded by the CDETB. We have a voluntary board of management that has legal, community and business experience. From a service that initially provided 1:1 tuition we have expanded to provide a programme that meets the changing educational needs of this community. We offer both non-accredited and accredited programmes. Our programmes include the following.

1:1 tuition, 3 day intensive programmes, a variety of classes in reading, writing and spelling

QQI major awards at level 3, 4 and Healthcare Support at level 5.

We have an extensive Information Technology programme to meet the changing technological demands of everyday living.

A literacy and language programme for people with no literacy in their own language.

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

- 1) **Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education

provider learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.

- 2) **Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.
- 3) **The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) **Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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.

As a provider of community education in Ireland I want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

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<sup>1</sup> SOLAS, *National Further Education and Training Strategy*. p.93.



Kind Regards

NAME

Phone: ## ### #####

Email: [xxxxxx@xxxxx.xx](mailto:xxxxxx@xxxxx.xx)

I am sending this letter as on behalf of (myself, Name of Organisation)



## **Consultation feedback on QQI Green Paper on Assessment of Learners and Learning for Consultation (2018)**

### **Overarching Statement**

This green paper represents a significant strategic development in assessment for the FET sector. The development of assessment for learning as opposed to assessment of learning is welcome. In particular, the acknowledgement of the Macro, Meso and the Micro involvement in assessment recognises in particular how important Meso and Micro involvement is in assessment. The challenge for the FET sector is the development of the employee who can relate and translate assessment experiences into employment and use their learning assessment experiences through their life.

However, while this green paper is progressive, QQI as an agency of the DES, cannot ignore the extreme lack of resources within ETB's at the Meso and Micro level. Currently ETB's are being resourced at a head office level but resources are badly needed at centre level, particular in the large FET centres such as PLC College.

The comments outlined below are made on the assumption that DES, QQI, SOLAS and ETB's develop an effective mechanism to build resources and assessment capacity within FET centres on the ground.

For example: PLC Colleges have to manage the assessment process internally. The timetable has to stop to allow teachers supervise examination, complete IV and EA. In addition, the entire assessment process has to be completed prior to teachers finishing the academic timetable in May of any given academic year. QQI as an agency of the DES, along with ETB's and SOLAS are aware of this process which shortens the teaching and learning experience for students. If additional structure and resources were provided on the ground which alleviated this administrative burden there would be more time available to develop students assessment for learning experiences including deeper thinking, debate, critical analysis, independent thought and convergent thinking with students.

## p.103 Towards **General Principles and Guidelines for Assessment of Learning**

- **Would it be useful for QQI to publish general principles and guidelines for assessment?**

- Yes. In the interests of clarity for all, it would be useful for QQI to publish general principles and guidelines for assessment.

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

- The guidelines should include a clear and unambiguous distillation of QQI's understanding, and recommended application of, the concept of assessment in this context;
  - The QQI's position and role in the assessment process should be stated;
  - The position and role of other parties to the assessment process should be stated; particularly for the ETB sector where new validation and governance procedures now exist – ETB's governance structures.
  - 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 needs.
  - The precise meaning of the terms 'principle' and 'guideline' here should be stated;
  - \*The level of prescription of guidelines should be determined, e.g. 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. Assessment prescription at this level also facilitates a smoother EA process.
- 
- **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 (Diagnostic [narrow] Assessment) or QQI validated programmes)?**
  - Guidelines should be applied to all providers and awarding bodies.
-

## p.104 Towards Sectoral Conventions and Reference Assessment Protocols for FET and HET Sectors

- The idea is that, in the interests of consistency, [conventions and protocols] would be developed collaboratively with FET providers recognised by QQI and used by all FET providers. What topics should be addressed at [e.g. school/ institution] level FET in sectoral protocols and conventions? In addressing this please be specific.
- Collaboration in the interests of consistency would be welcome. The question of the design of grading schemes should emerge from the prescription of assessment guidelines (\*described above)? In general, common module/subject networks of collaboration across all interested providers would be welcome, e.g. a network of Communications teachers, or a network of Media teachers, etc. Such networks might facilitate the sharing of subject-specific developments, advances in teaching practice - including assessment, etc.

## p. 105 15.2 Further Education and Training [So]

- What might be usefully addressed by sectoral conventions?
  - See above. In addition consideration should be given when students move from one ETB to another and the forms of assessment, policies and procedures used etc should be consistent so that no confusion is created.
  - What might be usefully addressed by reference assessment protocols?
  - See above.
  - What changes are required to the implicit protocols and conventions in Quality Assuring Assessment – Guidelines for Providers? ?
  - CPD for admin and teaching staff within centres. This is not the cascaded CPD for a full suite of CPD that is supported and maintained by dedicated staff on the ground.
  - Currently all learning outcomes in a full award have to be achieved – 8 components could yield approximately 30 separate items of assessment. This needs to be changed where an approach to assessment links components to the vocational concept of the full award and reduced assessment instances. This will allow for the development of deeper thinking, critical analysis etc.
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p. 106 **General Guidelines on External Moderation of Summative Assessment for NFQ Qualifications (External Examining and External Moderation)**

- **Would it be useful for QQI to publish general guidelines on external moderation mechanisms (...external authentication)?**
- Yes, in the interests of full clarity around EA mechanisms. This will create confidence in assessment as students move from ETB to ETB or course-to-course. In addition it will create confidence that the assessment rigour in the FET sector is applied consistently so that when it comes to higher education progression confidence will exist in the quality of the FET student.
- **To whom should the general guidelines apply?**
- All at Macro, Meso, Micro levels, including students. But the guidelines should also show a link to assessment processes at higher level so as to prepare FET students for progression with the seamless integration into higher education assessment processes.
- **What changes could be made to improve QQI's Effective Practices Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?**
- Yes. QQI's EPGEE would provide an appropriate template for similar EA document for the FET sector.
- There is constant criticism of the EA system and the standards adopted by EA's universally throughout ETBs. QQI should oversee effective CPD with the ETB EA panel to ensure that the rigours of assessment and created in policy and applied in practice.

p. 111

- Please comment on the guidance on external moderation of assessment in QQI's Effective Practice Guidelines for External Examining (QQI, 2015)...consider whether the guidance could be usefully generalised to all moderation.
- See above.
- Consistent guidelines should be applied throughout ETB's.

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p. 107 **Summary of Issues Proposed for Discussion** (Refer to point 17.1 General Issues Concerning Assessment)

p. 110 **17.2 Further Education and Training Issues**

- **Recognising that providers are responsible for establishing assessment procedures, please comment on how QQI might support them.**
- Clarifications of guidelines as described above.
- ETB's need to be supported in the creation of effective guidelines and training that will allow for the increase in confidence nationally on the ETB assessment process. In particular, there should be a combined working group between FET and HE to create common assessment practices, which will in turn increase confidence in the FET offering.
- **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.**
- Is the suggestion here that final award decision (i.e. award classification) would be ultimately decided by QQI? Is QQI suggesting it take on the role of an awarding body (which would bring it into line with international practice? Is this the motivation here? This question is difficult to answer without more discussion.

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P. 69, 70 **This is Section 8.1 Summary on the topic of Unitisation of Assessment**

**Outline:**

- **Unitisation of assessment** = that there is no final assessment for a major award and the grade for the award depends exclusively on the grades for units of learning prescribed for the award [this is the current situation].
- The practice of initiation of assessment is widespread in the FET sector and has been actively encouraged by systems and policies.
- Unitisation of assessment is problematic when it facilitates the omission of explicit assessment of overarching learning outcomes [*my interpretation: an overall 'reflection' of the candidate's performance when measured also against the LOs*]. This problem is alleviated by including some 'capstone' units whose purpose is to provide an opportunity to achieve and demonstrate overarching outcomes that would otherwise not be assessed.
- Unitisation of assessment can also lead to inefficiencies for learners, who may be 'over assessed' as a result of each unit being assessed.
- **\*QQI's CAS awards specifications prior to more recent QQI policies encouraged unitised assessment and, while this is no longer the case, not all practitioners may have fully appreciated the implications of the**

## **QQI policy changes on the use and interpretations of CAS awards standards.**

p. 110 Please respond to the issues raised in section 8.1, above:

- **The Unitisation of assessment.**
  - The concept is good but currently students in FET are over assessed.
  - Consideration should be given to assessment communication through the vocational modules as opposed to a separate subject. This would make more sense.
- **The sustainability of the burden of assessment on providers.**
  - How will the "burden of assessment" be alleviated by this proposal? Proper support and sustained CPD needs to be in place for teachers. The cascade model is not sufficient enough.
- **Centralised versus distributed assessment.**
  - I have no strong opinions on this, but is this what QQI would prefer?
- **Perceived ambiguities in the QQI regulations.**
  - The assessment system and regulations need to be revisited and modernised in order to redefine practices. A sustained CPD process with more redefined assessment policies and procedures are required.
- **Micro-management of assessment through regulations.**
  - This would probably be the result, but it depends on the extent of management involved. Initially staff should be handled through a redefined process and supported on the ground.
- **Patchiness of current guidelines.**

The current guidelines have been open to interpretation throughout ETB's. While the overarching principles of assessment are being achieved, the operational issues are causing difficulty. For example, Payroll is now operated online in practice. Students are taught how to complete payroll on line yet the examination is a paper based assessment.

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**Note: there are specific sections (11 & 17) dealing with apprenticeship issues which have not been included here, but which should perhaps be addressed by a more specialist DFEi staff (?)**

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p. 114 17.6 **Macro (e.g. QQI), Meso (e.g. Institution) and Micro (e.g. teacher)**  
[levels of engagement]

- **Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so, what do you think guidelines should address.**
  - QQI need to have more involvement in aligning FET and HE assessment policies and procedures so as to increase confidence in the assessment process.
  - **Please comment on the need or otherwise for macro-level assessment principles and guidelines on assessment. What should any such principles and guidelines address?**
  - The macro level should assess the overarching Principles of assessment B6.1- B6.11. They should be broad and allow for the drilling down to a Meso and micro levels of assessment policies and procedures at centre level. QQI should not remove responsibility for assisting with the development of policies and procedures at Meso and micro levels.
- 

p. 115 17.7 **External Examining and Authentication**

- **What purposes do you think EE and EA serve? How can they better serve those purposes?**
  - Both EE and EA are crucial in maintaining standards of academic practice and general confidence in those standards. Perhaps the role and responsibilities of the EA might be more widely publicised, especially to learners?
  - **Do you think EE and EA 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?**
  - No standards are not the same. Time and effort should be spent at training EA's to the required standard. This will require human capital investment.
  - **Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET...?**
  - Discussed above.
  - **Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.**
  - EE, EA and (local) RAP would, from my experience, appear to provide appropriate oversight.
-



**In Section 17.8 asks respondents to this consultation to comment on Section 13 which deals with issues concerning academic integrity**

- **Recognising what is already being done, please indicate what additional actions you think should be taken, and by whom, to help support academic integrity in general and in your sector in particular.**
  - In-service training by the provider in the general area of assessment & academic integrity. This should be promoted by 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.
  -
-

## **Response to the HEA Green paper on Assessment of Learners and Learning - DIT**

There was general support across the Dublin Institute of Technology (DIT) for the preparation of a Green Paper on Assessment of Learners and Learning as a means of stimulating dialogue around key current assessment issues facing the HE sector in Ireland. The prompt questions elicited responses from a range of staff involved in assessment of learning related processes. Our responses are being returned to the QQI by individuals, schools/departments with a collation of emergent key themes arising from the institutional consultation process being presented within this paper.

### **General comments on the Green paper**

The QQI green paper has touched on many of the important current issues related to the assessment of learners in higher education. Educational providers have a substantial responsibility in guiding students through a set of learning, teaching and assessment experiences towards the achievement of explicit learning outcomes and graduate attributes that will equip learners with the skills that aim to ensure success in whatever future career path they chose. Over the last decade, there have been substantial changes within the higher education sector with more imminent as for example new Technological Universities are being established and new requirements for transparency and accountancy are introduced through new system performance frameworks

Assessment methods and requirements probably have a greater influence on how and what students learn than any other single factor (Boud, 1988). In addition, what is assessed and how it is assessed is often viewed as a strong indicator to both students and employers of what is important and valued across a programme ([Gibbs & Simpson, 2004](#)). It is perhaps timely to be reviewing assessment practices across the sector as means to provide quality learning experiences that seek to address the needs of the 21<sup>st</sup> Century learner in this time of change. It is recognised that any proposed changes to these practices do need to take into account, for example, new learning opportunities made possible through digital technologies as well the inclusion of more authentic assessment methods that are more tailored to the needs of the individual learner.

The QQI consultation combination of facilitated workshops, keynote presentations and expert inputs were felt to be an effective strategy in sharing responsibility and encouraging engagement between all stakeholder groups at a national level. This engagement was considered to be a valuable opportunity to develop stronger links and ultimately work towards smooth transitions for students between different levels (primary, secondary and tertiary) as well as across and between sectors/ external bodies/professional bodies. However, in parallel to this high level dialogue, there was also an identified need for the development of a set of clear national policy documents related to specific aspects of assessment (along the lines of for example <http://www.qaa.ac.uk/en/quality-code/advice-and-guidance/assessment>). Agreed national guidelines could help to remove some of subjectivity inherent within existing Quality Assurance processes as well as work to support the development of new potentially more flexible strategies that can better support Quality enhancement and innovation within an educational landscape that is in transition.

The ongoing collaboration between the National Forum for the Enhancement of Teaching and Learning and QQI was specifically welcomed and worked particularly well during the consultation phase for the paper. This relationship was considered to be worth developing further into the future with both organisations perhaps working together on a shared publication or set of publications ( see suggestions at the end of this submission). Such a collaboration would also afford the opportunity to align principles and practice with policy such the QQI blended learning guidelines, the National Forum for the enhancement of teaching and learning publications and institutional system performance measures. These could in turn be enhanced by links to relevant literature and supporting documentation already available from National Forum Open educational resources.

### **The role and purpose of assessment**

A recurrent theme within the institutional discussion related to the need for clarity around the purpose and role of assessment in learning as well as the importance of dialogue around assessment processes to assure transparency and a shared understanding around all processes. This dialogue could be, for example, within a programme team, between staff and students or take the form of negotiated learning agreement between an employer and a student on work placement. It was observed that there can, on occasions, be a mismatch between the commonly espoused core philosophy for a programme and what happens in operational practice. The continued use of more traditional assessment methods is perhaps perpetuated through the absence of clearer definitions and guidelines that could help to demonstrate the required academic rigour of more non-exam based systems. The provision of national agreed guidelines would help to legitimise more innovative processes and assure a consistency of an innovative approach more broadly. Development of a national glossary of terms has the potential to develop a shared understanding around better catering for the changing needs of all our students at a national level.

Further guidelines around the recognition of the richness of learning that happens outside the classroom could also be consolidated as a means to build upon the work of the National Forum as well as for example the Cedefop inventory of informal, nonformal learning (Cedefop, 2014) Prior learning also needs to be more formally recognised and supported by a specialized mechanism which has both the industry expertise and the academic expertise to be able to determine whether a person has met the learning outcomes of a given programme, has met the admission requirements or is eligible for programme exemptions.

The categorisation of Assessment of, for and as learning under the 2016-8 National Forum enhancement theme has been helpful as a means of encouraging individuals and teams to reflect upon the purpose of assessment and making decisions about the when, why and who is responsible within associated processes. These definitions are also useful to help determine and manage assessment workload for both a student and a staff perspective and to work towards a balance of provision.

There was a concern noted during the consultation, that modularisation and semesterisation had resulted in many cases to a chunking of assessment within programmes, the over assessment of easy to assess learning outcomes and on occasions the redundancy of assessment (sometimes a similar learning outcome is being assessed in different modules). For assessment to be a valid measure of learning, learning needs to be constructively aligned with and clearly expressed as intended programme learning outcomes. It was felt that the setting of threshold level warranted further discussion, however, it was neither suitable nor possible in some cases to express thresholds as numeric values placed against learning outcomes. While minimum knowledge, skill and competence should not significantly differ specific thresholds may vary and change, therefore the publication of thresholds are likely to be problematic.

There can also often be a disconnect between programme learning outcomes that are aligned with the relevant NQF, module learning outcomes and the way in they are accumulated within the programme to meet the programme learning outcomes. The often granularised activity of continuous summative assessment can hinder the learner pathway or overall professional development across a programme. A key recommendation emerging from an ongoing institutional Fellowship project (LEAF, 2018) proposes an holistic approach to programme assessment design. Such an approach is also supported by international research (see eg TESTA and PASS models). Programme design is generally left to the discretion of Schools and departments with a collegial agreement of LOs and marking schemes in advance of programme delivery. The mapping of MLO/PLOs onto each assessment can ensure a fair, appropriate and transparent assessment approach across all years of a programme.

Suggested ways of accomplishing this endpoint included a centralised dashboard system that could provide a measure of how each module contributes to each stage and each programme learning outcome, in real time. This could be used to provide an opportunity for feedback to students on the personal accumulation of credits.

The calculation of normal workload allowances for different assessment methods that can be scaled up across a programme could provide a rough guide to programme teams and also help to identify student time on task and what is really being valued. Such a model could be developed as a study that builds on the work of the National Forum's Profile of Assessment practices in Irish Higher education. Early studies in DIT of using programme assessment calendars to review the balance of assessments and avoid issues around assessment clumping have been viewed to be a successful initiative. The development and provision of a clear programme assessment strategy is essential for the learner's perspective and a best practice model/framework could be standardized at a National level.

### **Assessment Guidelines**

When students enter higher education, the type of feedback they then receive, intentionally or unintentionally, will play an important part in shaping their learning futures (Eraut, 2006, p. 118). Frequent feedback to students impacts on drive and motivation for both the learner and lecturer and has a demonstrable impact on the quality of learning achieved (see eg Black and Williams, 1989, Kuh, 2012), as well as enabling the targeted subsequent support for students. Learning analytics of student assessment behaviour can also be predictors of success or potential problems. Different assessment methods can serve different purposes at different stages of the students learning journey. For example, formative assessment followed by interactive and collective feedback prepares learners for summative assessment. Assessment designed as a learning process in itself can support a partnership approach within more authentic methods such as self reflection and/or peer review support the development of students as autonomous learners. However, many general assessment regulations do not formally recognise assessment methods that have the potential to have the more significant impact upon the overall quality of a student's learning.

The quality, nature and timeliness of feedback on assessment as noted in, for example, ISSE and internal monitoring processes, continues to be the focus for dissatisfaction among students across all disciplines. While the promotion of what constitutes feedback and the nature of feedback within the programme learning continuum is an institutional responsibility, clearer agreed national guidelines around feedback processes could help to address some of the feedback concerns of students. Recommendations around supporting dialogue around assessment, using feedback forward as a means to provide ongoing development feedback across a programme as well as involving students in assessment related decisions might also help to alleviate some of the identified issues.

Timely, appropriate, feedback on learning appears to be of particular significance during the first year of study when links with student retention have been suggested (Yorke and Longden, 2004). However, it was felt that additional supports need to be put in place to assist learners to engage with the modes of assessment of learning employed in HE. Initiatives that were felt to be successful included the provision of 'learning to learn' supports early in first year (or even before first semester, first year starts). Significantly enhanced exposure to authentic practitioners and graduates at a very early stage (first weeks of semester 1 of stage 1). Peer mentoring/Peer Assisted Learning; with associated recognition for the mentors/leaders (e.g. extracurricular module, good for their CV). There is also a need for guidelines outlining institutional support for students around assessment processes eg when receiving feedback and during appeal processes. These need to be agreed in partnership with students at a national level.

Tailoring professional development to better equip staff, who are involved in assessment, to be able to make informed choices about assessment was emphasised within the consultation. Staff need to know what assessment can actually do and the impact of assessment choices on student learning. Bearing in mind that academic staff role model best practice through their own teaching and research: by adhering to well thought out processes (ethics approval; plagiarism checking, etc.) and what is actively encouraged within their programmes from day one.

A particular emphasis within profession development should be given to building expertise in the use of statements of learning outcomes in teaching, learning and assessment as well as effective curriculum design and assessment strategies that can be used to support the student attainment of programme learning outcomes and graduate attributes. This is particularly relevant where professional standards or competences are required for external recognition or approval by external bodies. There was a suggestion that this professional development should be requirement for all new staff and certain key topics eg plagiarism, GDPR and dealing with academic integrity should be mandatory for all.

### **Assessment standards**

The requirement that all programme learning outcomes are aligned to the National Qualifications Authority of Ireland (NQAI) standards within the framework of qualifications means that graduates who have completed a programme at a particular level should have all achieved the equivalent level of knowledge, skill and competence for that framework level. Where there are particularly proscriptive programmes or required standards of proficiency (e.g. those that have restrictive professional body, statutory or accrediting standards) these between programme competences are likely to be more closely aligned. However, institutions that have more practice based or applied programmes and are likely to produce graduates with a slightly different skillset than those with more of a theoretical foundation. Monitoring and evaluation of mechanisms of programme standards are dependent on programme reviewers and benchmarking by external examiners. Such individuals could be more or less encouraging of changes in practice. Development of and provision of external examiner guidelines has the potential to help build more of a consistent approach or shift to more widespread innovative practice

### **Recommendations for future publications**

The green paper proposed the possible publication of a white paper or a set of papers on specific topics. This suggestion was supported during our institutional consultation and it was proposed that a series of publications might be helpful to this constituent group. Production of such publications could be led by the QQI, the National Forum for the enhancement of teaching and learning or written as a set of shared outputs to meet specific needs as follows:

**QQI** A set of guidelines for award classification is suggested that would help to standardise award classifications across HEIs. These should include assessment standards in relation to different modes of learning eg online/blended learning, work based etc as well as general guidelines for external moderation and authentication, external examiner guidelines with external benchmarking standards and programmatic reviewers. Any guidelines should apply to all providers including all awarding bodies. With the recent increase in Essay mills, it was felt that guidelines in relation to tackling contract cheating eg education for staff and students, detection and policy procedures (see Cedefop, 2015)

**National Forum** It was felt that there is a need for a nationally agreed set of assessment principles and guidelines applicable for all HEIs . See for example <http://www.qaa.ac.uk/en/quality-code/advice-and-guidance/assessments> These could build on the work of the National Forum enhancement Assessment for, of and as Learning theme. It was felt that any documentation produced should help to clarify the purpose and role of assessment with a focus on innovative methods of assessments for

learning and programme based balanced approaches to assessment design and management. The demonstrable importance of feedback and the concept of feedforward within assessment needs to be emphasised, as well as dialogue and supports around assessment.

***Shared between the National Forum and QQI*** An agreed glossary of terms would be helpful in developing a shared understanding between all stakeholder groups. Guidelines for writing effective learning outcomes at different NQAI framework levels and how assessment should be constructively aligned to learning outcomes and teaching methods would be helpful. In addition eg workload equivalences between different assessment methods eg essays vs video production etc Programme assessment strategy framework models aligned to learning outcomes, that can facilitate the streamlining, balance between assessment types of assessment and avoid assessment chunking and consider the learner pathway through a programme.

## **References**

Please see the following response to the Green Paper on Assessment currently being prepared by QQI. Firstly, congratulations on the document so far...it is comprehensive and addresses many of the questions facing assessment in education currently. As the Head of one of the three national Conservatoires (DIT Conservatory of Music and Drama), my feedback below specifically relates to issues that arise due to the fact that assessment within the Conservatoire world is quite different due to the performance nature of our educational process. The Association of European Conservatoires has done a lot of work via EU funded projects on assessment within our sector which is publicly available and can provide further information to what I write below.

Stakeholders are invited to address the following questions: »

1. Would it be useful for QQI to publish general principles and guidelines for assessment? What should the principles and guidelines address? 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)?

In my view, QQI has a national responsibility to publish general principles and guidelines for assessment. **The key is to ensure that all types of educational assessments (subject-specific) in Ireland are covered under whatever general principles/guidelines published.** There is an organisation called MusiQuE which is registered on EQAR that provides accreditation for the Music Conservatoire Sector as a subject specific QA organisation. I was involved in the teams that created the different sets of standards for Institutional and Programme Review for MusiQuE which led to its acceptance onto EQAR and am happy to provide further information if needed.

2. Would it be useful for QQI to publish general guidelines on external moderation mechanisms (external examining and external authentication)? » To whom should the general guidelines apply?

Again, external instrument-specific evaluation has long been an integral part of the conservatoire sector. As long as the general guidelines include the particular nature of this within the music sector, I would foresee no issues with general guidelines.

3. Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.

One thing the report does not reference is the number of students that need to complete their training part-time rather than in the full-time way. This is often due to the high cost of accommodation in Dublin. This has impacts on modules, concepts of progression from year to year and overall degree classification if modules are taken out of sequence (to accommodate prior learning/part-time needs). A healthy consideration of the reality of this would be important in the final paper.

I'm happy to feedback further on these issues and anything to do with the subject-specific nature of music/drama performance assessment as needed.

# RESPONSE TO QQI'S GREEN PAPER ON ASSESSMENT OF LEARNERS AND LEARNING (QQI, 2018)

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## INTRODUCTION

An event titled *Assessment in Further Education* was organised by [EPALE](#) and ECVET Ireland [Erasmus+ programmes managed in Ireland by [Léargas](#) (the national agency for Erasmus+)] and the Further Education Network. It took place on 10 October 2018 in the Gresham Hotel, Dublin. In addition to plenary addresses, including an input from Quality and Qualifications Ireland (QQI), the event facilitated group discussions on the consultation questions posed by QQI's *Green Paper on Assessment of Learners and Learning*. Those attending the event noted that the Green Paper is not presented as a draft policy but is rather intended to stimulate discussion. In this spirit, the points arising from the group discussions have been captured as a response to the Green Paper; they do not represent a consensus response within individual groups or amongst those attending, but rather an account of the views expressed. As a result, direct quotations are often used and a small number of examples to support points raised have been highlighted. Furthermore, the views expressed do not necessarily represent the views of the Further Education Network, Léargas, EPALE or ECVET.

Finally, it should be noted that the aim shared by EPALE Ireland and the Further Education Network is to provide a forum for connecting and strengthening further education and training in Ireland. The membership of the Further Education Network is diverse and includes those working in public and private further education and training and in higher education. It also includes individuals and researchers with an interest in the sector. EPALE is a multilingual open membership community for teachers, trainers, researchers, academics, policy makers and anyone else with a professional role in adult learning across Europe. The diversity in background and experience of the event's contributors is considered to add further value to this response to the Green Paper.



## RESPONSES TO SECTION 17.1 GENERAL ISSUES CONCERNING ASSESSMENT

The following represents the views from the working groups on questions posed in section 17.1 of the Green Paper.

### Do you agree that all programmes should include a programme-specific assessment strategy as indicated in this Green Paper?

- The Common Awards System (CAS) is prescriptive and hasn't provided any flexibility to establish a more holistic approach to assessment;
- The establishment of new apprenticeships in Further Education and Training (FET) has been a positive development in introducing the concept of capstone assessment and engaging with industry to ensure that effective and relevant assessments are designed. Consequently, learners are enjoying undertaking assessments that are authentic to the sector they wish to join;
- It's important for providers to take responsibility for the validity and reliability of the assessment strategy, but for this model to be realised, there needs to be a strong internal quality assurance system that is overseeing the consistency of how teachers, trainers and tutors are carrying out assessment. Continuous Professional Development (CPD) also needs to be provided to support professionals in moving from prescription to a more holistic model. These supports will need to be planned and funded.

### Please comment on the accommodation of diversity

- Learners who have difficulties in mainstream education are being accommodated through the second level system. However, the FET sector is less experienced and equipped for managing their needs;
- 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;
- Accommodation is required not only for those with disabilities but also those from different contexts, including from culturally diverse backgrounds and with language difficulties;
- Some tailoring of assessments for individuals does take place currently but it is very challenging. Perhaps 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;
- Tutors need to be trained in diversity and multi-culturalism;

- 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.

***Example provided of managing diversity in a learning environment:***

In a diverse group context, we used self-assessment to establish the goals of each person as an individual – some want to go to university, others don't. The learning outcomes were mapped to the success criteria and we got the learners to focus on their achievement of those. We're trying to make students active in their own learning.

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

- 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;
- 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. The task might be made easier if a more holistic approach to assessment was introduced;
- The RPL conducted for the Defence Forces by Donegal ETB is a good example of how RPL can work well. The mapping exercise was done, and it could be applied to a multiple of individuals with the same training;
- A national RPL strategy is needed for areas like childcare. Half of those working in the sector didn't survive the change in regulations around qualifications because they wouldn't go back to college. This is also an example where what is being assessed needs to be considered. If someone is extremely good at their job but they can't pass the assessment, are they being assessed on the right things? Or should the qualification level required be reconsidered?

**Do you agree that teachers and programme designers can sometimes struggle to address all the dimensions of the NFQ adequately in teaching and particularly assessment? What are the implications?**

- In the system changing to the CAS, some of the module descriptors were written very quickly and they are not entirely consistent. Some modules at Level 5 are very difficult

and others are light in the outcomes required. There is also inconsistency in the number of outcomes associated with a module. At Level 5, some modules have 8 outcomes and others have up to 23 outcomes. Those writing the outcomes didn't have a full understanding of the implications and the descriptors couldn't be changed once they were agreed;

- The number of outcomes leads to a corresponding struggle in covering all areas in a module descriptor and this is further influenced by the diversity of learners in any given group, which changes every year.

### **What applications can you think of for norm referencing in the context of assessment?**

- Norm referencing requires a large group and the ability to compare with other groups. It wouldn't be possible to norm reference with a small group in a manner that would be valid and reliable;
- The statistics of awards published by QQI show that thousands of awards are made in some disciplines and tens of awards in others. Even with a sample of 5000 learners, very sophisticated methods of norm referencing would be required.

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

- There can be great difficulty in establishing what a merit is nationally considering the diversity of disciplines and students;
- The notion of differentiation of grading hasn't permeated the FET sector in contrast to second level;
- 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;
- As External Authenticators (EAs) are now being appointed by the provider, they are less likely to be sourced from outside of the region where the provider is based. As a result, there is some diminishment in the ability of the EA to support consistency of standards of achievement at a national level.

### **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?**

- There are competing interests that providers are operating within. An internal example is assessing within the context of a programme, whilst also testing if learners will be able to progress to the next stage or level of learning. External examples include meeting the needs of professional bodies and employers;
- Moving towards a more holistic form of assessment will hopefully assist providers in managing these competing interests by ensuring that overall competences have been achieved, rather than focussing on skills within individual modules.

### **What do you think are the main challenges in remote assessment?**

- Integrity of assessment is the key issue.

### **What can be done to engage learners as partners in assessment?**

- Providers need to engage with learners about the achievement of learning outcomes within their individual contexts and aspirations;
- There is more flexibility in how a teacher can include learners in assessment than in writing learning outcomes. 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.

#### ***Example of engaging learners as partners in assessment:***

We have a module on assessment. Students do a presentation, are given a mark, and they must justify why they think the mark was given. They can mark their own assessment as well as being given a mark. That encourages them to reflect on their performance, to improve their work and to re-present it. The feedback element is often ignored unless a student wants to challenge it; in the assessment module the opportunity is provided to absorb the feedback. Once their own skills are built up they can mark each other's work within an agreed structure. We find the quality of work improves.

### **What kinds of changes is information and communications technology bringing to assessment? What significant future changes can you anticipate?**

- The use of ICT could improve the speed of undertaking and being provided with feedback on assessment. It could contribute to formative assessment;
- ICT could be used to support remote working, including remote external authentication of assessment, which would help to support the establishment and maintenance of a national standard;
- 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;
- Some further examples of how ICT could be used:
  - For skills demonstrations that could be recorded
  - To assess more personal development competencies – avatars about yourself and your personal journey through life
  - If there was a pool of questions online, 6000 questions for example, that would help to support a uniform standard
  - ICT offers scope for group assessments – young people are keen to work together using technology.

### **RESPONSES TO SECTION 17.2 FURTHER EDUCATION AND TRAINING ISSUES**

The following represents the views from the working groups on section **17.2** of the Green Paper.

#### **The unitisation of assessment**

- In general, the CAS system encourages teaching to the component rather than linking the components to the programme or award standard. This missing linkage is leading to over-assessment;
- From a guidance perspective, unitisation goes against the needs of the learner, the guidance professional is trying to make sense of the programme for the learner and to bridge the gap;
- Where unitisation of assessment is combatted, it comes from the top of the organisation. It requires strategic resourcing and training, with teachers working together rather than in silos and a clear direction being given to all staff;

- Part-time staff can feed into a silo mentality – more coherent CPD is required to assist all teachers/trainers/tutors on a programme to see it from a holistic perspective;
- The big issue in writing a new programme is integration. It's great because it reduces assessment, but we have to adapt to it. Time and space is needed for planning between teachers to manage integration.

#### Example provided of unitisation and over-assessment:

I teach a Level 6 business programme. Students must undertake 8 modules at Level 6 and because of direct entry to [an Institute of Technology] they have to also complete a Level 5 maths module. We also offer a Level 5 research and study skills module. So, we're talking 10 modules, 45 assessments and 5 exams between September and May.

#### The sustainability of the burden of assessment on providers

- The amount of paperwork associated with assessment is enormous and it's important to question if the methods used are appropriate and effective. An online approach to assessment could significantly reduce the amount of associated paperwork;
- Not all providers have someone responsible for Quality Assurance (QA) who can drive improved assessment practice across the organisation. This is a high-risk area with significant responsibilities for all.

#### Centralised versus distributed assessment

- There is a challenge in having centralised assessment that still allows appropriate levels of flexibility;
- Collaboration on assessment locally can be effective;
- Maths for STEM is a good example of how more centralised assessment can work in certain contexts;
- The EA responsibility is now with the provider and there are differing levels of knowledge and experience. It's important to have uniform practice in external authentication across the country;
- QQI could play more of a role in establishing a coherent approach to assessment across the FET sector. Providers are generally in support of a less centralised and more holistic

approach to assessment, but not all providers are ready to be left to their own devices yet. QQI could, for instance, assist in facilitating the sharing of good practice;

- It's also important to think about European standards as qualifications are not just for an Irish setting.

### Perceived ambiguities in the QQI regulations

- Regulations are understood but their interpretation and implementation varies. 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. QQI needs to think about quality, minimum requirements, and priorities;
- The EA system isn't providing enough support for the establishment and maintenance of standards within and across providers.

### Patchiness of current guidelines

- It is agreed that patchy guidelines can be damaging and cause confusion;
- It is difficult to know what the role of QQI is and what guidelines might look like and what their purpose would be. However, QQI could provide a framework within which flexibility is fostered;
- Areas of potential support identified by the working groups:
  - There is a lack of online access to different sources and models e.g., models of assessment that work elsewhere
  - One of the big challenges is knowing what's going on where in terms of networks, forums etc. that could assist in building professional practice
  - A huge emphasis now needs to be placed on assessment of workplace learning and guidance on that is required
  - Some assistance in translating NQF levels would be useful and help to address any views of inconsistency in the FET sector (from those outside the sector)
  - 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
  - A national programme of CPD for those designing and implementing assessment is required – in the same way that accountants must keep up their skills
  - A national mentoring scheme that is funded and bespoke would be valuable
  - 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

- QCI documents don't give a qualitative sense of expectations for the award of a distinction etc. There is a role to clarify expectations at Levels, 4, 5 and 6 and what a distinction looks like at those levels.
- Learners should be given an active role in developing guidelines.

### Assessment in the context of the QBS implementation for the CAS

- This issue merges staff, learners, levels, the Internal Verifier, the External Authenticator and the Results Approval Panel and can highlight academic integrity matters;
- The calculation of the compound should be the responsibility of the provider;
- The current system is very prescriptive, and it is difficult to compare attainment in FET with higher education as, for example, the marks for a pass and for a distinction are different.

### Conventions and protocols

- The achievement of more consistent progression opportunities for learners from further education and training to higher education requires facilitation at a national level;
- The relationship with work-based learning requires some support, this could include opportunities provided and facilitated by providers for staff to undertake short placements in the workplace;
- Assessment protocols need to be cognisant of the diversity of learners, particularly in an FET setting.



## RESPONSES TO SECTION 17.5 APPRENTICESHIP ISSUES

The following represents the views from the working group on section 17.5 of the Green Paper.

### **What can be done to help 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.

### **What can be done to encourage industry to become more involved in discussions about approaches to assessment?**

- If assessment focuses on skills, it will attract the interest of industry;
- It's important to expand the range of sectors in which apprenticeships operate, for instance in the digital sector;
- In America, the trades' union drive apprenticeship. There may be some lessons that could be learned from that model;
- Some incentivisation of employers might be helpful but these would need to be chosen carefully to ensure that standards are maintained.

### **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?**

- 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.

### **Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeship and traineeship?**

- It's important to have committees with provider, employer and learner voices and to keep those voices updated;
- Standards need to be flowing through both the provider and employer contexts.

## RESPONSES TO SECTION 17.7 EXTERNAL EXAMINING AND AUTHENTICATION

The following represents the views from the working groups on section **17.7** of the Green Paper.

### **What purposes does external authentication serve? How can it better serve those purposes?**

- The external authentication 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;
- There is a difficulty in sourcing EAs with appropriate experience and so a lot of EA reports are quite general;
- There used to be a centralised EA system with briefings at the start and end of the EA process and those individuals learned a lot from the engagement with their peers. Now that the system has changed, the EA is on their own. The system needs QQI to enable a dynamic system of exchange amongst EAs;
- A mentor system would be very valuable where advice could be sought by EAs;
- EAs often do not receive feedback on their reports and so there is very little opportunity for continuous development and improvement in their roles;
- The value of the EA identifying positive assessment practice should be highlighted further;
- The system relies on EA reports rather than on any discussion or clarification with the EA. The discussion with the EA is often mediated by one individual in the organisation and so there is no direct contact with teachers, which can be a missed opportunity;
- There are issues around low levels and differing levels of financial compensation for this role.

**Do you think that external authentication reliably ensures 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?**

- There doesn't appear to be an absolute standard across the country;
- In theory, EAs are supposed to be going into schools and colleges with a level of expertise in their areas, but they are often made to sign off on modules that do not match their primary areas of knowledge;
- There isn't any communication between the EA and learners. This may be right or wrong, but it raises questions about whether you can have a standard in the absence of an environment;
- The validity of the EA comments is not considered until the Results Approval Panel (RAP) and may be rejected. As a result, the EA doesn't know if suggested changes have been implemented;
- Some larger providers send EAs to multiple centres to look at the same programme – that establishes a sense of a local standard.

### **Do you think a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?**

- In higher education, universities have a wide degree of autonomy for policy-making, including for exams. QQI guidelines wouldn't necessarily be appropriate for HE because of that;
- In higher education, the External Examiner seems to speak to the lecturers and the learners and the reporting is more comprehensive. 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;
- There is a need for guidelines to support standardisation in an activity like external authentication which is carried out intermittently;
- QQI has a new policy on validation – there should be a requirement that the spec for the External Authenticator profile that is appropriate to assessing that programme is built into the programme document.

### **RESPONSES TO SECTION 17.8 GENERAL ISSUES CONCERNING ACADEMIC INTEGRITY**

The following represents the views from the working groups on section **17.8** of the Green Paper.

#### **Summary of comments from working groups:**

- 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;



- A lot of plagiarism issues can be solved if students are shown how to reference correctly;
- There is an assumption in the document of bad practice on the part of teaching professionals rather than it being an exception to the rule – not convinced that this is a widespread issue or that the research supports this assumption;
- Academic integrity is more about ethics and culture than policing. Software doesn't address behaviour;
- Issues around academic integrity can happen when you push people beyond the level at which they can participate successfully.



# Submission from Education and Training Boards Ireland on QQI Green Paper on Assessment of Learners and Learning

December 2018



**etbi**

Education and Training  
Boards Ireland

*Boird Oideachais agus  
Oiliúna Éireann*

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## Sectoral Submission on QQI Green Paper on Assessment of Learners and Learning

This submission represents Education and Training Board Ireland (ETBI) response to the Green Paper on Assessment of Learners and Learning in consultation with the 16 Education Training Boards (ETBs). The observations in this submission to the Green Paper have been compiled by ETBI in collaboration with the ETBs. This response does not attempt or endeavour to answer directly all questions and topics raised within the Green Paper, nor does it follow the Green Paper's chronological order.

Specific feedback and observations were communicated to ETBI by a number of ETBs through a defined template. This feedback and observations are integrated within this response. This response does not preclude any ETBs from making their own submission in response to this Green Paper.

### Introduction

Education and Training Boards Ireland (ETBI) is the representative body for the 16 Education and Training Boards (ETBs). ETBI welcomes this consultation process on QQI's Green Paper on Assessment of Learners and Learning. In addition to this opportunity to provide a written submission, it also acknowledges and appreciates the opportunity of the broader engagement and discussion at Let's Talk Assessment in Further Education and Training held on Tuesday, 13 November, at which a large number of ETB representatives were in attendance. The issues, solutions and recommendations presented and collected at Let's Talk Assessment in Further Education and Training should be considered collectively with this submission.

It is also noted that the Green Paper is intended to provoke discussion, and indeed the Paper attempts to take a systematic approach in covering wide ranging topics, and 'tackling this completed subject (p. 9)', within its scope. As this is the context, the outcome of this consultation process should result in further Green or White Papers setting out more detailed thinking arising from this consultation. Given this scope and the complexities outlines in the current consultative draft, this is noted and welcomed. ETBs look forward to further and more focussed consultation on the core topics raised.

### Background

Education and Training Boards offers a wide variety of life-long education options to anyone over 16 including apprenticeships, traineeships, Post Leaving Cert (PLC) courses, community and adult education as well as core literacy and numeracy services. Over 200,000 adults, approximately, avail of ETB services including marginalised persons, those with low base skills and/or those seeking second change education. A details overview of the type, depth and breadth of ETB courses is available on [www.fetchcourse.ie](http://www.fetchcourse.ie).

Prior to the introduction of QQI new validation policy (2017), ETB programmes were validated for awards through the validation processes of the former FETAC, within the Common Awards System (CAS). This was, and remains, the single unifying construct of national awards within

FET provision, even though QQI awards validation policies allows for programmes to be validated outside CAS. In 2017, an approximate total of 161,449 QQI Awards were awarded by ETBs, within the FET Sector, under CAS. This included 31,849 Major Awards, 120,960 Minor Awards, 8,630 Special Purpose Awards and 10 Supplemental Awards. In addition to QQI Awards, the ETBs have agreements and accreditation arrangements in place with a number of long established and internationally recognised awarding bodies, that are quality assured through recognised external QA agencies in other jurisdictions, i.e. Ofqual and Scottish Qualifications Authority (SQA). Many of these awarding bodies offer industry specific recognised skills qualifications, and provide and responsive mechanism to meet local, regional and national skill needs.

## Further Education and Training and Common Award System (CAS)

CAS was designed as a modular and unitised system of awarding within FET. The Learning outcomes are packaged into logical, self-contained components (minors), which together form the content for the compound (major) award. The expected learning outcomes are detailed within the compound and component award specifications. Other elements of the specification include the assessment requirements, guidance on assessment techniques and grading. There is no final (or 'capstone') assessment, and the 'final grade' for the compound award is calculated on an aggregate weighted average arising from the grades of the components. Within FET provision, this modularised structure within the CAS, as distinct from a linear programme, has many advantages.

One of its greatest advantages is the flexibility which it affords ETBs as providers of FET provision. CAS, utilising both mandatory and elective modularisation, enables the design of programmes that meet the needs of the learners and employers. For learners, the accumulation of components facilitates access, transfer and progression. It enables learners to select programmes that best meet their learning, occupational and personal needs. Modularisation also facilitates recognition of prior learning and credit transfer from one programme to another or in the longer term, potentially between FET and HET. There is also the potential to meet industry's needs more responsively, as individual programme modules can be designed and offered to satisfy occupational skills, knowledge and competencies within a given occupation and/or locality. CAS, as currently structured, is an important tool in meeting multiple constituents needs and demands within the Irish State's FET provision.

It is acknowledged that detailed collaboration and development is underway<sup>1</sup>, with QQI, to establish formal mechanisms and structure for shared curriculum, programme development and management, which is not limited to the confines of CAS. Still, CAS impacts assessment of learners and learning within ETBs; lending themselves to some the issues and challenges set-out within this response.

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<sup>1</sup> The pilots for 'Sectoral Model for Programme Design, Validation, Approval, Enhancement and Review.



## The Ambiguity Effect and the Transition to MIPLOs and MIMLOs

At the 'macro' level, it is clear within the Green Paper that the Minimum Intended Programme Learning Outcomes (MIPLOs) and Minimum Intended Module Learning Outcomes (MIMLOs), and not the CAS' Expected Learning Points (ELOs), are the reference point for assessment (pp 41-43). ETBs would accept this intent. ETBs are actively working on enhancement and capacity development within the sector in the development of MIPLOs and MIMLOs and the articulation of assessment strategies that support teaching and learning and alignment to same, as set-out in the validation requirements. However, there is at present a certain tension between the CAS awards with their many, highly detailed, learning outcomes, and the new 'Validation Policy and Criteria' with its MIMLO and MIPLO approach. Indeed, the paper notes that it would be "impractical" to **establish and maintain detailed** standards against which QQI awards would be assessed (as is currently the case with CAS awards). It is difficult to see how this tension may be resolved until awards are re-validated with MIMLOs and MIPLOs that are consistent with the CAS learning outcomes. While this process is underway, it will take some time to complete.

Furthermore, within the current format of the certificate specifications for CAS, this intent is ambiguous and, as a consequence, problematic at the meso and micro level, even if the intent is to be 'non-prescriptive'. The continued inclusion and allocation of specified weighing to specific assessment techniques and associated wording, such as 'in order to demonstrate that they have reached the standards of knowledge, skill and competence identified in all the learning outcomes, learners are required to complete the assessment(s)...'<sup>2</sup>, does implicitly, result in the continued interpretation that these specified assessment techniques are the prescribed requirements by QQI as an awarding body. This 'ambiguity effect' means that in practice programme and assessment design and development, will, more often than not, select the specific assessment techniques in the certificate specification, considering this to be the more favourable and safer option, rather than an alternative. This may also be the interpretation of an External Moderator (External Authenticator or External Examiner).

ETBs are working collaboratively with QQI on enhancement and capacity development within the sector in the development of MIPLOs and MIMLOs, and the assessment of learners and learning that is aligned MIPLOs and MIMLOs. Nonetheless, it is a change in mindset and practice, and a small number of pilots are underway to facilitate this change process. In addition, the transition from CAS awards assessed against ELOs to CAS awards assessed against MIPLOs and MIMLOs must also seek to ensure business continuity and minimal disruption in the provision and availability of qualifications for learners. The conditions for this transition must be specified as the award standard migrate from ELOs to MIPLOs and MIMLOs. QQI, as the certifying body for CAS awards, needs to address this 'ambiguity effect' within the current validation and award specification guidelines and in subsequent CAS development.

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<sup>2</sup> [https://www.qqi.ie/sites/docs/AwardsLibraryPdf/5N1849\\_AwardSpecifications\\_English.pdf](https://www.qqi.ie/sites/docs/AwardsLibraryPdf/5N1849_AwardSpecifications_English.pdf)

## Grading

The Green Paper also notes that there are grade related implementation problems with the CAS. Currently, QQI calculates the grade for a compound award based on the results of the component award.

It is QQI's view that the 2012 Act is clear that assessment is the provider's responsibility and that the calculation of grade is part of the assessment. Therefore, this should be the provider's responsibility. However, within the context of FET, QQI operates also as the certifying body. It could be argued in this role, as is the practice of other certifying bodies, the rules around final grade calculation are developed, implemented and awarded by QQI. Further exploration and discussions are required between the ETBs, the broader FET sector and QQI as to where responsibility for the grading of the award, and accountability associated with same, resides.

The current approach around grading within the QBS is also problematic. The QBS automatically calculates the learners' overall grades. It does not allow for grade calculation, or indeed rules regarding grading criteria to be implemented by the provider. For example, if there were a specific MIMLO or MIPLO outlined in the validated programme that the learner is required to pass in order to be successful, which they do not pass, but still receive an overall grade of 50%, the QBS automatically pass to the learner. It does not allow the provider to override or amend the result. QBS needs to reflect validated programme rules for grading. While the Results Capture Certification Request System (RCCRS), which is used in the training centres, does allow for learners to be referred, this system is not available to other centres. To address this issue, consideration should be given to developing interoperability between QBS, PLSS and RCCRS.

In the grading of work-based assessment considerable debate exists in research in relation to the pass/fail versus grading. Whilst both have valid rationale in their use, overall grades may be inflated using a pass/fail approach. This is particularly evident within the practice elements of the on-the-job setting. Furthermore, the use of a pass/grade fail can be demotivating for apprentices as they may perceive that recognition is not given for extra effort. A recommendation could be to blend academic achievements and achievements in the workplace, which is practiced across new apprenticeships within some ETBs and the traditional apprenticeships. Still this is a challenging area and guidelines specifically relating to grading the workplace would be welcomed.

Grading remains a desirable objective, for major awards at a minimum, for a variety of reasons. The primary reason is that grades facilitate horizontal and lateral progression into other institutes of learning. Grading also provides an insight into the academic and competency development on the part of the learner. Grades offer a universal language within learning environments, facilitating progression and/or recognition internationally. Grading provides employers an insight into the capability of an individual. Finally, grades provide intrinsic worth to learners.

ETBs are open to exploring alternatives to current grading structures in centre, workplaces and within on-line provision. For example, a formula to translate individual component awards grades into an overall award grade for the Major, which includes aggregating the total marks of all components based on the grade attained divisible by credits values or weightings.

Consideration would also need to be given to rules around the grade awarded, and the number of sittings wherein results were achieved. Standardisation of grading from post primary through to FET and HE could also be explored, as different marking threshold convolute access, transfer and progression for learners. ETBs would welcome initiation of a Grading Working Group to consider these issues in more detail and make recommendations on the way forward, including the possibility of devising agreed conventions and protocols around grading.

### Consistency of Assessment (Benchmarking)

CEDEFOP proposes that 'to strengthen trust in certification, results across the system based on the same qualification standards must be comparable. Comparability of results ensures that holders of the same qualification have actually achieved the learning outcomes required for it and therefore qualifications can be trusted' and...'Consistency can result from standardisation through measures such as the provision of standardised tests and centrally defined examination tasks' (2015, p.74). The Green Paper states that 'distributing responsibility for assessment to providers of validated programmes has advantages, but it makes consistency more difficult. (p. 71). The paper continues to note the limited capacity of award standards to bring consistency, but remarks on the potential gains from benchmarking (and processes such as external authentication), and suggests collaborative arrangements by providers in calibrating summative assessment.

All ETBs have in place a 'Results Approval Panel' and processes which reviews and approves results for all localities. In addition, the emerging and developing 'Governance Framework for Quality' in FET in ETBs, provides specifically for review and approval of assessment, and benchmarking of results across the ETB. For example, Kerry ETB has established its Quality Council for FET, and a standing item on the Quality Council agenda is the Results Approval Panel reports and External Authenticator summary analysis. These are very significant and positive enhancements within the sector in supporting the consistency of assessment.

At a meso level, the Directors of FET QA Strategy Group have commenced work to consider an assessment model and system for ETBs that includes establishing and sharing of resource banks; development of some centralised assessments, and processes for benchmarking, both within and across ETBs. At a micro level, a number of ETB training centres assessment instruments are calibrated, and centre based 'resourced' banks have been developed. The case study below is included to illustrate one example of practice within an ETB in this context.

### **Case Study of Practice: LCETB**

Consistency of Assessment is considered an area of critical importance and continues to inform the priorities of Limerick and Clare Education and Training Board's Quality Assurance Support Service. As presented at a Limerick and Clare Education and Training Board Quality Assurance conference in February 2016, 'Ensuring Consistency of Assessment across Multi-Centre Provision', analysis of certification results data showed a significant variance in achievement of results in centres across the ETB, over 30% variance was observed." Additionally, consistency of assessment in multi-centre provision, and the unique challenges this presented in a post-amalgamation environment was also a core focus. Since September 2016, significant progress has been achieved and there were a number of specific initiatives identified in this report which would advance the process further, e.g., "marking seminars and assessment exemplars; implementation of agreed procedures, input and rollout of revised external authentication process; and importantly, development of system to monitor and flag critical quality indicators."

LCETB Quality Assurance Governance structure established a Quality Assurance Working Group to develop a series of Marking Seminars for LCETB staff in September 2018. The purpose of these seminars was to allow teaching staff from all provisions in all regions of LCETB to come together for a professional development event focussing on training around consistency of marking in modules from Levels 4-6 on the National Framework of Qualifications (NFQ). The event also provided examples of good practice in marking various types of assessment, and facilitated teachers/instructors/tutors to participate in hands-on marking activities. It also provided a valuable networking opportunity.

Content of the Seminar included the following:

- Consistency of marking – what does this mean and how will we achieve it?
- Understanding grading criteria and award standards
- Marking Collections of Work, Assignments, etc.
- Best practice around feedback and marking – where and why marks are allocated
- Workshops
  - Getting Creative with Assessment Briefs
  - Alternative Approaches to Assessment
  - Rubrics – using this technique for marking assignments, interviews, role-plays, etc.
  - Moodle – online marking best practice approaches

Five subject areas were chosen as model for practical exercises, with Pass / Merit / Distinction examples of Completed Learner Assessment Evidence with associated Tutor Brief and Marking Scheme - Work Experience (5N1356), Communications (4N0689), Child Development (5N1764), Care of the Older Person (5N2706) and Information and Communication Systems (5N1952). 250 assessors from LCETB attended these seminars.

Participants felt that these seminars were valuable in that it provided:

- A greater understanding of standards, and the variability in standards and methods of marking.
- Opportunities to others' thoughts on marking through which one could make comparisons.
- Collaboration.
- An opportunity to see other briefs in the same subject area.
- Emphasised the importance of a good brief, explain what you want and how it should be done.
- An oversight in how variety of media can be used to assess work.
- Alternative ways in interpreting the module descriptors; a "thinking outside the box".
- An opportunity to benchmark marking.

But, more is required in this area. QQI, working in collaboration with FET providers, could coordinate and facilitate a systematic approach to benchmarking. It would be beneficial to consider enabling benchmarking across different provider groups.

There is also merit in considering a national stakeholder benchmarking group, to review certification results annually across the FET sector and consider patterns in specific disciplinary fields. ETBs would welcome engagement in such a process. It is the view of ETBs that a process whereby assessments are calibrated and benchmarked against comparable third parties could not be implemented without QQI responsibility. Finally, benchmarking could potentially create synergies between public and private providers, and FET and HET. The process for driving this kind of development would need to be done through a central networking point, i.e. QQI.

## Capstone and Integrated Assessment

The purpose of capstone assessment is to have the learner achieve and demonstrate overarching outcomes within the discipline; an integration of learning across modules. Its primary advantage being that it provides performance assessments for learners who have difficulties with more traditional forms of assessments. Integrated assessment, on the other hand, provides a more realistic assessment of transversal skills, as such skills must be demonstrated through some form of concretised application.

Nonetheless, there are many challenges in considering capstone and integrated assessment, including CPD, resources, time for planning, development and coordination. In addition, pre-existing conditions such as the programme structure required for funding, for example, apprenticeships or traineeships; structural constraints such as staffing contracts, timetabling and demands by multiple stakeholders at local, regional and national level strongly influence the amount of flexibility available in the programme design, purpose and length and the delivery structure, including the assessment techniques.

ETBs will continue to refine and improve its programme development and design processes, including assessment strategies. However, ETBs would not support capstone assessments for

all programmes. Capstone and integrated assessment, particularly where learners may obtain a major award through the attainment of modules over a period of time (part-time provision), requires further exploration and discussion. It is unclear as to how this will be managed, particularly when the accumulation of component awards leading to a compound award occurs over a number of years, and not necessarily in the same institutions. Before unilateral introduction, it is recommended that capstone and integrated assessment approaches and techniques be piloted at different levels within FET provision, and within different delivery models, e.g. part-time provision, work-based and blended learning. A framework should be developed by QQI, from the learning of the pilots, to assure continuity in assessment practice and outcome across the range of FET providers.

## Assessment Guidelines

QQI states that the 'examples of assessment criteria' in the current QQI guidelines are not a reliable source, and indeed in this section, (p.73) does surmise that 'patchy guidance (is) not better than no guidance. ETBs would concur. The current guidelines on assessment, which reflect the legacy processes and approach, do indeed delve into too much detail and attempt to 'micro' manage and regulate on one hand, whilst attempting to promote ownership, innovation and creativity on the other. There is a dichotomy between theses, and policy and criteria in others, for example the validation policy. To address same, it is recommended that QQI review the 'Assessment Guideline and Criteria' for FET; focusing on the challenges of assessment in the context of multi-centre providers who cater for wide diversity of learners needs and expectations. Also included in these 'Guidelines' should be how to manage the implications arising from data protection and other emerging relevant case law and legislation.

Communities of practice could be established to compliment these 'Guidelines', sharing good practice and examples of effective assessment of learners and learning. How the logistics of this process would be managed, e.g. responsibility for guidance, selection of best practice, necessitates further detail.

## Centralised Versus Distributed Assessment

Within the ETB sector, both centralised assessments, through former FÁS validated programmes and locally devised assessment models are in place, and as the Green Paper notes, there are strengths and weaknesses in both.

In FET provision, centralised assessment was used in the early evolution of vocational education, as well as training, and continues to be in operation in training service provision. The transition from centralised to distributed assessment in vocation education occurred for a myriad of reasons including perceptions of restrictiveness, its effect on programme flexibility and its inability to accommodate learners of diverse needs. Centralised assessment development is also resource-intensive and could be perceived to remove the teachers and/or instructor from the learning process outcome. ETBs advocate the use of distributed assessment, and it is our view that the use of centralised or distributed assessments should be left with the provider.

## Norm Referencing and Assessment

ETBs would consider that norm-referencing may be appropriate in a highly centralised and structured system such as the Leaving Certificate, but could be problematic in the current FET context, where providers could be potentially basing norm-referenced assessment for a national award on a very small sample size.

## Burden of Assessment on Providers

The Green Paper proposes that collaborative approaches to the design and implementation of summative assessment for smaller providers need be considered as the cost for valid and reliable assessments that have national consistency and fairness is not always feasible for smaller community and voluntary providers. ETBs would concur that collaborative approaches to the design and implementation of summative assessment should be designed, piloted and subsequently implemented, as collaborated. Protocols would need to be established.

But, this issue in respect of 'economy of scale' for smaller providers is not specific to assessment of learners and learning only. It also applies to quality assurance infrastructure. ETBs are progressing a model for shared programme development, management and external moderation with small community and voluntary FET providers who are grant-aided through ETBs. This would not address the needs of small community and voluntary FET providers not grant-aided through ETBs, e.g. POBAL. Therefore, the 'burden' of quality assurance, validation and assessment of learners and learning on small community and voluntary organisations warrants a separate consultative process, of and by itself, to ensure consistency, application and involvement across such organisations, while simultaneously reducing the cost burden to organisations and the State.

## Work-Based Learning (WBL) (including Apprenticeships and Traineeships)

The development of the professional development framework for WBL is a critical development in this regard. There is a requirement across the sector for training and upskilling in the areas of MIPLO and MIMLO development for new apprenticeship programmes (and more generally for FET programme development). This would enhance the capacity of those developing and teaching programme modules and in the development of an appropriate assessment strategy for apprenticeship programmes. In addition, training on how these can be aligned to 'Professional Award Type Descriptors' is necessary. This would assist development of relevant assessments. Integration and the role and benefits of the capstone module, in the context of work-based learning programmes, should also be included.

Structured guidelines for assessment design and implementation would be welcomed. The ETBs agree that a general methodological framework for assessment in apprenticeship and traineeships work-based learning needs to be developed. Who and how this framework should be developed would warrant further conversation with the Apprenticeship Council, SOLAS, FET and HET providers and industry. Included in this framework could be how to engage mentors in summative assessment development and the establishment of assessment rubrics to ensure validity and reliability of assessment. New and innovative

assessment techniques should be encouraged and explicitly identified within the framework, as well as integrated assessments (including capstone assessments).

## Recognition of Prior Learning (RPL)

The Green Paper notes the importance of Recognition of Prior Learning (RPL), outlining the multitude of reasons. The paper also notes the practical enablers of RPL, including mentoring and guidance. RPL is a complex and debatable topic. Questions remain with regards to RPL. For example, should RPL assessment become the domain of those who are specialised in this form of assessment? Is RPL a function of guidance or learning provision? Does RPL need to be resource-intensive?

ETBs are committed to utilising RPL as an instrument for determining standard access equivalences for the award of credit or exemptions to learners with qualifications or prior experience around a discipline for which they wish to undertake further education or training. This could include learner recognition in the form of initial or advanced admission to a programme, credits within a programme, exemption(s) from element(s) of a programme, or a full award. Nonetheless, there are implications for the ETBs as to how such applications for RPL are reviewed and processed, and how ETBs enable the learner to demonstrate required standards of knowledge, skill and competence, in the absence of a national policy direction and roadmap.

RPL warrants a separate consultative process of and by itself. To this end, a working group of key national stakeholders, the Department of Education and Skills, SOLAS, QQI, ETBs and NCGE should be convened to agree a national approach and roadmap for recognition of prior learning.

## Integrity of Assessment

Assessment integrity is accountable to the provider. Therefore, it is the view of the ETBs that frameworks, guidelines, mechanisms for detecting breaches, procedures for investigating breaches and sanctions relating to same should remain the responsibility of the provider. The veracity of the framework, etc. should be set-out through the quality assurance process, validation process and/or conditions for delegated authority.

Still, the suggestion in the Green paper of QQI organising a forum for discussing academic integrity as part of their quality enhancement activities, would be very welcome. While a FET-specific forum may be initially practical, a forum for both HE and FE providers would be very useful in terms of sharing practice. Furthermore, while it is not entirely clear how academic integrity might be included in the NFQ competence indicators, this is an interesting idea which warrants further consideration.

## Professional Development

The Green Paper refers to the importance of relevant professional development to ensure that deliverers are equipped with the competence to complete actions required in relation to assessment. To address its responsibilities in relation to FET, SOLAS have published the Further Education and Training Professional Development (PD) Strategy 2017-2019. It stems from a commitment set out in the Further Education and Training Strategy 2014–2019, which



reflects the strong link between professional development within the sector and the quality of the education and training provided. It also reflects national and European policy, which places the professional competence of the workforce as central to the ability of FET to respond to the changing needs of employers and learners.

SOLAS, ETBI and the ETBs are also collaborating on implementation of the FET Professional Development Strategy to develop the systems, infrastructure and funding for focused and targeted professional development in the FET sector, including assessment.

Within the professional area of Quality Assurance, a number of practice areas have been identified, including assessment. Under the direction of ETB's 'Professional Development Quality Assurance Working Group', the 'Professional Development Quality Assurance Technical Group' have developed a draft practice framework on assessment. The development, and future implementation, of this framework is a very significant and important development for the ETBs. The need for training and upskilling in a range of areas has been identified as a result of this framework, in addition to areas relating to quality assurance and programme validation.

## Establishment of Conventions and Protocols

It is the view of ETBs that there could be agreement on sectoral protocols and conventions, not a sectoral agreement, for which the level of detail would need to be agreed. These sectoral protocols and conventions should not be programme or provider specific.

## External Moderation (External Examining and External Authentication)

The external moderation of assessment is accepted as an important element in the quality assurance of the summative assessment process, both nationally and internationally. It is common practice by other awarding bodies<sup>3</sup> to assign an external verifier, and provide detailed guidelines for centres and verifiers, within the quality assurance process of summative assessment. City and Guilds for example provide a detailed handbook and guidelines for external verifiers<sup>4</sup>. Within an Irish FET context, whilst similarities exist, the responsibility for all aspects of quality assurance assessment is devolved to the provider.

This Green Paper does not explore or discuss the role of the external moderator in any detail. But it is important to highlight that the practice of External Authentication and the role of the External Authenticator is well established in quality assurance processes within the FET sector and in the ETBs.

ETBs recognise the necessity for the continuous improvement and enhancement of this role, and of the need for access to professional staff that have both the subject matter and/or disciplinary area of expertise to undertake the role and the knowledge, skills and competence specific to the role. The training and development provided through the Further Education Support Service (FESS) is hugely valuable in this regard. Nonetheless, there are a number of current challenges that need to be addressed.

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<sup>3</sup> <https://www.sqa.org.uk/sqa/74668.6220.html>

<sup>4</sup> <file:///C:/Users/m.gould/Downloads/Quality%20Handbook%20for%20External%20Verifiers%20%20v40%20May%202016%20pdf.pdf>

At the macro level, the current guidelines for the External Authenticators from QQI are those which were inherited from the former FET Awards Council. Considering the changing context of the role, these are no longer fit for purpose.

ETBs recognises a further challenge in ensuring trained and competent External Authenticators are available in a diverse range of disciplinary fields, and their responsibility in this regard. The national panel, established through the former Awards Council, is not being maintained and is no longer fit for purpose. ETBs have taken steps to address this issue. The formation of an 'ETB National External Authentication Panel' aims to create more than just a list of identified 'Experts' who carry out initial criteria evaluation and training. The model represents the framework for the development of a 'Community of Practice' in which EA's can operate in, providing continuous support to and among the panel members (see case study below).

The proposal for QQI to develop Guidelines or a Framework for External Moderation is welcomed. Nonetheless, it is recommended that in the development of such guidelines the principle of proportionality should be a key principle to ensure its fitness for purpose and functionality. ETBs also recommend that a national sectoral approach be taken to the training and development of External Authenticators to assure that a shared understanding of programme standards is consistently applied. It is also recommended that the role of the External Authenticator be extended to include pre-assessment engagement including comments draft examination papers, assessment briefs, marking schemes and model solutions, etc. and to assure assessment consistency across programmes delivered in different locations and settings.

#### **Case Study – New ETB Sectoral Panel**

The Directors of FET QA Strategy Group commissioned a project in November 2016 to: a) research and review current approaches to external authentication within the sector; b) identify issues and challenges arising, and c) explore optimum models of external authentication for the future. The project aimed to identify and recommend the necessary elements of a new ETB sectoral model and approach to external authentication, which would enhance consistency in the sector in quality assuring programme standards and learner achievement.

The methodology undertaken to complete this project was a combination of research on national and international practice, focus groups and stakeholder discussions. A thorough review of all elements of the current external authentication process was undertaken, including the related QQI guidelines<sup>5</sup>, the role of the External Authenticator (EA), the EA panel, current approaches to EA training and the EA process within and outside the sector. The result of this process was the publication of a consultation paper in 2017 'Developing an ETB Sectoral Model for the External Authentication of Assessment'. Throughout this

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<sup>5</sup> <https://www.qqi.ie/Downloads/Quality%20Assuring%20Assessment%20-%20Guidelines%20for%20Providers%20Revised%202013.pdf#search=Assessment%20Guidelines%202013%2A>

process consideration was given to the emerging QQI Green Paper on Assessment of Learners and Learning.

A detailed analysis was undertaken of the feedback received and a key outcome from the consultation identified as the need to establish an ETB National panel of External Authenticators (EA's) supported by a team of Lead Externs. In response to this an internal focus group was convened to develop a more detailed proposal with regards to a sectoral approach to the establishment of an EA Panel for the ETB's. This was ratified by the Directors of FET Forum in December 2017.

The establishment of a new national panel and sectoral approach has commenced. A detailed project plan has been developed and a working group convened to draft supporting material and develop the training initiatives and calendar of events for the EA Panel. Recruitment is planned to commence late 2018/early 2019.

The Formation of an ETB National External Authentication Panel aims to create more than just a list of identified 'Experts' who carry out initial criteria evaluation and training. The model represents the framework for the development of a 'Community of Practice' in which EA's can operate in, providing continuous support to and among the panel members. This presents an opportunity, in collaboration with QQI, in creating a symposium, thematic seminar or series of specialist seminars and events where we could look to benchmark international practice in this area and explore mechanisms to facilitate the development of a professional community of practice recognised by both the sector and QQI. ETBs would welcome engagement with QQI in this regard.

## Summary and Recommendations

1. QQI, as the certifying body for CAS awards, needs to address the 'ambiguity effect' within the current validation and award specification guidelines and in subsequent CAS development.
2. The current approach towards grading within the QBS is problematic. To address this issue, consideration should be given to developing interoperability between QBS, PLSS and RCCRS.
3. ETBs are open to exploring alternatives to current grading structures in centre, workplaces and within on-line provision. For example, a formula to translate individual component awards grades into an overall award grade for the Major, which includes aggregating the total marks of all components based on the grade attained divisible by credits values or weightings. Consideration would also have to be given to rules around the grade awarded, and the number of sittings wherein results were achieved. ETBs would welcome initiation of a Grading Working Group to consider these issues in more detail and make recommendations on the way forward, including the possibility of devising agreed conventions and protocols around grading.
4. QQI, working in collaboration with FET providers, could coordinate and facilitate a systematic approach to benchmarking. It would be beneficial to consider enabling benchmarking across different provider groups.
5. There is also merit in considering a national stakeholder benchmarking group, to review certification results annually across the FET sector and consider patterns in specific disciplinary fields. ETBs would welcome engagement in such a process. It is the view of ETBs that a process whereby assessments are calibrated and benchmarked against comparable third parties could not be implemented without QQI responsibility. Finally, benchmarking could potentially create synergies between public and private providers, and FET and HET. The process for driving this kind of development would need to be done through a central networking point, i.e. QQI.
6. Capstone and integrated assessment, particularly where learners may obtain a major award through the attainment of modules over a period of time (part-time provision), requires further exploration and discussion. It is unclear as to how this will be managed, particularly when the accumulation of component awards leading to a compound award occurs over a number of years, and not necessarily in the same institutions. Before unilateral introduction, it is recommended that capstone and integrated assessment approaches and techniques be piloted at different levels within FET provision, and within different delivery models, e.g. part-time provision, work-based and blended learning. A

framework should be developed by QQI, from the learning of the pilots, to assure continuity in assessment practice and outcome across the range of FET providers.

7. It is recommended that QQI review the 'Assessment Guideline and Criteria' for FET; focusing on the challenges of assessment in the context of multi-centre providers who cater for wide diversity of learners needs and expectations. Also included in these 'Guidelines' should be how to manage the implications arising from data protection and other emerging relevant case law and legislation. Communities of practice should be established to compliment these 'Guidelines', sharing good practice and examples of effective assessment of learners and learning. How the logistics of this process would be managed, e.g. responsibility for guidance, selection of best practice, necessitates further detail.
8. ETBs advocate the use of distributed assessment, and it is our view that the use of centralised or distributed assessments should be left with the provider.
9. ETBs would consider that norm-referencing may be appropriate in a highly centralised and structured system such as the Leaving Certificate, but could be problematic in the current FET context, where providers could be potentially basing norm-referenced assessment for a national award on a very small sample size.
10. ETBs would concur that collaborative approaches to the design and implementation of summative assessment should be designed, piloted and subsequently implemented, as collaborated. Protocols would need to be established. But, this issue in respect of 'economy of scale' for smaller providers is not specific to assessment of learners and learning only. Therefore, the 'burden' of quality assurance, validation and assessment of learners and learning on small community and voluntary organisations warrants a separate consultative process, of and by itself, to ensure consistency, application and involvement across such organisations, while simultaneously reducing the cost burden to organisations and the State.
11. The ETBs agree that a general methodological framework for assessment in apprenticeship and traineeships work-based learning needs to be developed. Who and how this framework should be developed would warrant further conversation with the Apprenticeship Council, SOLAS, FET and HET providers and industry. Included in this framework could be how to engage mentors in summative assessment development and the establishment of assessment rubrics to ensure validity and reliability of assessment. New and innovative assessment techniques should be encouraged and explicitly identified within the framework, as well as integrated assessments (including capstone assessment).

12. RPL is a complex process that warrants a separate consultative process of and by itself. To this end, a working group of key national stakeholders, the Department of Education and Skills, SOLAS, QQI, ETBs and NCGE should be convened to agree a national approach and roadmap for recognition of prior learning.
13. it is the view of the ETBs that frameworks, guidelines, mechanisms for detecting breaches, procedures for investigating breaches and sanctions relating to assessment of learners and learning should remain the responsibility of the provider. The veracity of the framework, etc. should be set-out through the quality assurance process, validation process and/or conditions for delegated authority.
14. It is the view of ETBs that there could be agreement on sectoral protocols and conventions, not a sectoral agreement, for which the level of detail would need to be agreed. These sectoral protocols and conventions should not be programme or provider specific.
15. The proposal for QQI to develop Guidelines or a Framework for External Moderation is welcomed. Nonetheless, it is recommended that in the development of such guidelines the principle of proportionality should be a key principle to ensure its fitness for purpose and functionality. ETBs also recommend that a national sectoral approach be taken to the training and development of External Authenticators to assure that a shared understanding of programme standards is consistently applied. It is also recommended that the role of the External Authenticator be extended to include pre-assessment engagement including comments draft examination papers, assessment briefs, marking schemes and model solutions, etc. and to assure assessment consistency across programmes delivered in different locations and settings.



## IBAT College Dublin

### Response to QQI Green Paper on Assessment of Learners and Learning

IBAT College Dublin would like to acknowledge the important work put into this green paper and thank QQI for the opportunity to contribute to the consultation. The green paper was distributed to staff from the Academic Council in February 2018 and views sought. This response is a collation of the views of the staff of IBAT College Dublin.

#### 1. Feedback

IBAT College Dublin supports the Green paper in respect of its approach to feedback. There is useful guidance included, backed up by literature and supported by the National Forum for the Enhancement of Teaching and Learning in Higher Education. We are encouraged by its prominence in the National Forums enhancement themes:

*Assessment FOR Learning: using assessment to give feedback on teaching and student learning*

However, ensuring that all learners in Higher Education benefit from useful, formative and timely feedback is more problematic. The new validation template ensures that programme teams articulate a programme assessment strategy and consider feedback and assessment at all stages in the programmes development. But the validation step only sets out what should happen. Awarding bodies are responsible for the standards of their awards and need to introduce mechanisms to assure stakeholders that learners are receiving quality formative feedback on time to ensure it actually supports their learning.

Where feedback is provided colleges should ensure that there are mechanisms to enable learners to receive and apply feedback to further learning. In the case of feedback on failed assignments, too often resits or resubmissions are just 'another go', with no measure of how the learner has utilised and learned from the feedback.

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. 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. *"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."*

[https://www.curriculumonline.ie/Junior-cycle/Junior-Cycle-Subjects/English-\(1\)/Assessment-and-reporting](https://www.curriculumonline.ie/Junior-cycle/Junior-Cycle-Subjects/English-(1)/Assessment-and-reporting)

How this is tested in practice must fall to Colleges to properly apply fit for purpose moderation processes and full use of External Examiners. External Examiners should be encouraged to comment

on the amount and quality of feedback in assignments and examinations and Colleges should be obliged to address issues where they are identified by External Examiners. Policies where learners are actively encouraged to review marked examinations should be in place. Awarding bodies will need to have a system of testing how this is applied.

## **2. Corruption of Assessment**

IBAT College supports the Green Paper's position on academic integrity. However the 'corruption of assessment' is a widespread issue in HE and needs to be addressed for the sake of all stakeholders.

<https://www.irishtimes.com/news/education/cheating-on-the-rise-in-irish-universities-1.3703264>

It is well defined and most organisations have appropriate policies to detect and deal with plagiarism. However there are situations where academic impropriety is overlooked either because it goes unrecognised or it is considered too difficult to deal with. The worst case scenario is where colleges are colluding with those learners intent on undermining assessment by not addressing issues, not supporting academics who raise issues, leading to an under reporting of cases of plagiarism, collusion or cheating.

Responsibility for the integrity of assessment and the assessment process lies with the Institution, their lecturers and learners. It is important that all institutions have appropriate implemented policies and procedures in place to promote academic integrity in their institutions. Implementation should begin at programme induction, addressing and quashing any mis-conceptions around academic integrity. Ultimately, all institutions should strive for an academic environment where both learners and staff take reasoned and appropriate action in cases of assessment corruption.

The HE sector as a whole suffers if we do not move quickly on this. An example could be graduates in the workplace whose knowledge and skills do not match up with what their institution says they know and can do. There is a risk that the institution is under-mined in the eyes of employers, and that the institution might be seen as condoning poor practice.

The work of Dr Thomas Lancaster is recommended to readers - [@DrLancaster](https://twitter.com/DrLancaster), and <http://thomaslancaster.co.uk/research/>

It is recommended that a review is undertaken to measure of how widespread this issue of assessment corruption is in Irish HE, and to what extent penalties applied are consistent across the sector.

Inter-institutional workshops could be useful to facilitate sharing of policies and procedures, and informal "rules-of-thumb" on academic integrity, and assessment design. Many institutions have at least one 'champion' in this area. These people have typically built up a solid knowledge base and are willing to share it.

## **3. Sectoral Convention Number 3**

Sectoral Convention number 3 has been over interpreted in the private HE sector. This is contrary to the 4<sup>th</sup> basic principle of assessment:

"Assessment procedures are credible. (a) Credible assessment is fair and consistent."

The convention, where interpreted incorrectly, is punitive and inconsistent. It is also long overdue (more than 8 years) for review as per the 2009 Assessment and Standards "*This position shall be reviewed within 12 months of the commencement of the Conventions.*"

Some, in the private sector have interpreted and applied the convention to ensure that if a student repeats any module at the award stage then their overall grade is capped at a pass, i.e. they do not allow a learner who has demonstrably achieved an honours award be awarded honours.



Marks are being used as currency and a punitive fine is being applied- the outcome of this is the grade no longer reflects achievement and is not in line with the principles of assessment as articulated in Assessment and Standards 2013.

Examination Boards wishing to work around this interpretation and ensure that the grade does reflect achievement may attempt to overcome this punitive interpretation and condone or otherwise contrive a situation where the fail is not explicitly acknowledged, this results in a student not resitting and therefore not having the opportunity to demonstrate that they achieved the MIMLO's of the programme – such a crude workaround means standards are compromised.

A fair interpretation is to logically apply a literal interpretation of the convention and calculate the award based on the credit-weighted mean value of the allowable grades at the first sitting. Repeats should not be allowed to bring the grade up to honours (i.e. not “repeat for honours”) but students should be allowed to retrieve a failed module, earn the credit and demonstrate achievement of the MIMLO's.

This can be simply explained in the following scenarios

### **Scenario 1**

A student has achieved an honours classification based on the credit-weighted mean value of the allowable grades at the first sitting.

However the student has failed one module and needs to resit that module to demonstrate that they have achieved the MIMLO's.

#### Outcome 1:

The learner has achieved honours based on the credit-weighted mean value of the allowable grades at the first sitting.

The have had one outlier and they are resitting to demonstrate they have achieved the MIMLO's for that module and therefore of the programme. They are not 'repeating for honours' they have already achieved an honours classification. The honours classification should stand.

This does not compromise standards – the student award reflects achievement AND all learning outcomes have been demonstrably achieved albeit at the second sitting.

### **Scenario 2**

A student has achieved a pass classification based on the credit-weighted mean value of the allowable grades. It is just under the honours threshold.

However the student has failed one module and needs to resit that module to demonstrate that they have achieved the MIMLO's. On completion the capped mark raised the class to a 2:2.

#### Outcome 2:

The learner has achieved a pass grade based on the credit-weighted mean value of the allowable grades at the first sitting. They have had one fail and they are resitting to demonstrate they have achieved the MIMLO's of that module and therefore of the programme. They cannot 'repeat for honours' therefore the pass classification stands.

A quick review of some IoT regulations (Appendix 1) shows that IBAT College is not alone in considering this convention to be invalid, however asking learners to 'apply' for to retain an honours classification means that the rule is applied to those who engage in the application process and is therefore inconsistent.

#### **4. Section 7.21 Engaging Learners as Partners in Assessment**

This opinion is informed by IBAT College Dublin Associated Policy 1.12 Guidelines on Assessing Group Work and attendance at the QQI conference in partnership with HEA, ISSE, IUA, THEA and USI on 'Best Practice in Student-Centred Approaches in Education and Training' at the Printworks in Dublin Castle on 20 November 2018.

##### **Introduction**

This opinion relates to the use of collaborative learning (teamwork) and involving the learner in the process.

No one disputes the benefits of using collaborative learning in higher education. Reasons vary from 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. Largely teamwork is reported as having a positive impact on students but for others it can create anxiety as a fear arises that grades are compromised and work can be unevenly distributed. Other problems include inefficiencies in the formation and coordination of the groups, unequal participation by certain members ("free-loader" or dominant individual).

Increasingly as higher education institutions compete for international students these additional multicultural influences on language and communication exchange in teams may further impact team performance and outcomes, notwithstanding the obvious benefits of having a culturally diverse student cohort.

Prior to any learner involvement any assessment must be considered in the context of the agreed programme assessment strategy as articulated and approved at programme validation stage. Certain programme/module learning outcomes may be best achieved through collaborative learning. The task too may be too large to complete individually or is ideally carried out by a team with clearly defined roles. Resource limitations such as access to equipment or "real-world" participants or companies can also dictate the efficacy of choosing such an approach.

##### **How to involve the learner**

###### **A. Assessing Group Work**

In accordance with IBAT College Dublin Associated Policy 1.12 Guidelines on Assessing Group Work marks are assigned to both the product of the collaboration, e.g., report, plan etc. and to the student's effort and contribution to the process.

IBAT consider that collaborating in a partnership manner with our learners on the assessment criteria and determination of grading has numerous positive impacts on the learner experience. Learners feel empowered, increasing their sense of ownership and accountability.

Differential grading on team work is justifiable when clear guidance and oversight is provided on the criteria for assessing the process.

###### **B. Agreeing the ground rules for collaboration**

In addition to involving the learner in the design of an assessment component I have experienced in the past that a co-drafted Student Code of Practice specifically in respect of Teamwork can establish ground rules on how the team works, ensure clarity in roles assigned, manage expectations on effort, agree/understand a grievance process in the unfortunate event of concerns arising.

Accompanying the Student Code of Practice I recommend the use of a Group Agreement (see Appendix 2) that is signed by all group members. This is an invaluable source of evidence to demonstrate the process used to produce the product being assessed. It also imposes a discipline on the group. In addition an outcome from discussions at IBAT Class Representative meetings suggested that group assignments should be managed through Google Classroom or similar software to enable the assessor track engagement and participation. Our Head of School and IT Manager are considering the implementation of such a process.

## Appendix 1

### Sectoral Convention #3 Example of Regulations at IoT's

#### **Blanchardstown:**

*“Honours (or Merit/Distinction) award classification is normally granted when candidates meet the requirements for award classification in one single sitting (see 3AS06 section 9). This includes passing all modules and achieving the required GPA for the award classification in the first sitting. Thus, candidates may not repeat modules to increase their GPA in order to achieve an Honours award classification.*

*However, when not all normal circumstances for gaining an Honours (or Merit/Distinction) classification have been met (i.e. one module up to 10 credits was failed at first sitting), candidates may apply to the examination board for recommendation on an exceptional basis that an award of Honours (or Merit/Distinction) classification is retained. The examination board will only consider such an application if specific conditions have been met at the time when modules were taken at the first sitting.*

*This form is to be used by a learner when applying to an examination board for consideration to retain Honours (or Merit/Distinction) award classification on an exceptional basis.*

#### **The conditions under which a candidate may apply to the exam board**

*This application may be made where a learner meets all of the following criteria:*

- *Obtained the required GPA for Honours (or Merit/Distinction) classification in the first sitting of all modules (see 3AS06). **AND***
- *Obtained an F grade in no more than one module, up to a maximum of 10 credits, in the first sitting of an award year. **AND***
- *Obtained a grade D or higher when the failed module was repeated at the next available opportunity (usually the following autumn sitting).*

#### **Procedure**

*It is the responsibility of the student to apply. Applications must be submitted by the student to the examinations office at least 2 days before the relevant examination board meeting where the repeat sitting for outstanding credits is considered i.e. in advance of the learner knowing the results of the repeat assessment. Examination board meeting dates are published on academic calendars or can be determined from school administrators or the examinations office. The highest award classification that can be obtained is that achieved originally with a GPA from the first sitting of modules, not the GPA that includes the outstanding module.*

*As the outstanding module must be passed at the next available opportunity, the majority of these applications will be considered by an examination board in the autumn examination board meetings (repeat assessment after summer examinations), although in a minority of cases where first sitting of programmes does not co-incide with the traditional academic year, they could be considered at any examination board meeting.*

*Late applications will not be accepted, and retrospective applications cannot be considered. This application must be present in the examination board meeting to be considered. “*

**Tallaght:**

*Application to retain Honours (or Merit/Distinction) award classification*

*The Honours, Merit and Distinction award classifications are normally granted when a student meets the requirements for award classification in one sitting (see Sections 4.1 to 4.6 inclusive). **Thus students may not repeat modules to increase their GPA in order to achieve a higher award classification.***

*However students may apply to have an honours (or merit or distinction) classification awarded under the following specific conditions:*

- 1. Students must formally apply to the Institution to avail of this policy. Applications are made on the standard Repeat Examination Registration Form*
- 2. Student must have achieved a GPA of  $\geq 2.50$  at sessional examinations (i.e. at first attempt). For taught Master Degree programmes Student must have achieved a GPA  $\geq 3.00$ .*
- 3. The Project or Dissertation is a module that cannot be repeated to achieve honours award*
- 4. Modules must be normally repeated at the next available opportunity (unless a Deferral by the normal Deferral Mechanism is applied for and granted)*
- 5. There is only one repeat attempt to achieve an honours award. (If a student fails a repeated module then the maximum award classification is PASS)*
- 6. Only one "F" grade can be repeated up to a maximum of 10 credits*
- 7. A minimum of a "C" grade must be achieved in the repeat attempt to be considered for an honours classification. If a "D" grade is achieved then the overall degree classification is PASS*
- 8. Final Award Classification is based on initial GPA achieved at sessional (i.e. first attempt) examinations*
- 9. Students who have deferred one or more final session exams and have one 'F' grade up to a maximum of*
- 10 Credits are also eligible to repeat the failed module and be considered for merit/distinction or honours award classification at the same time as sitting their deferred exams. The overall GPA for award classification will be calculated based on the first attempt result in each module*

**Waterford:****12.3.2**

*The overall average a candidate achieves in their first attempt at the modules constituting the award stage determines the classification of the award. Where the candidate has failed to achieve an overall award at the first attempt (i.e. they must repeat some modules) then the award will be recorded at a pass award except where the candidate has*

- i. Has a cumulative average mark at a higher level, calculated according to the standard formula for calculating award marks that applies to the programme concerned (see below);*
- ii. Has failed no more than 10 credits all of which have been passed in a repeat attempt.*

**12.3.3** *The mark obtained on the first sitting—not the mark obtained in the repeat sitting—is the mark that is used in calculating the cumulative average result.*

**GMIT**

*Award classification levels above a 'Pass' performance shall be based on first attempt pass grades.*

**APPENDIX 2: TEAM AGREEMENT (SAMPLE TEMPLATE)**

Team Members	Contact Details	
	Mobile	E-mail
1		
2		
3		
4		
5		
<p><b>Meetings (Formal Communication)</b></p> <ul style="list-style-type: none"> <li>Agree rules on calling meetings formally. Produce agenda with clear purposes, agree topic, review draft etc. Papers circulated in advance, attendance is taken, minutes/actions items assigned circulated after the meeting.</li> </ul>		
<p><b>Informal Communications</b></p> <ul style="list-style-type: none"> <li>List agreed modes to share information, docs &amp; resources, e.g. by email, facebook, whatsapp, wikis, google docs etc.)</li> <li>Also consider issues on the appropriateness of when it is acceptable to communicate (no too early &amp; not too late in the day). Another consideration is to state the lead time expected to receive a response before initiating subsequent contact.</li> </ul>		
<p><b>Making Decisions</b></p> <ul style="list-style-type: none"> <li>State the basis on how decisions will be made – majority, consensus etc.</li> <li>How are matters of deadlock treated?</li> <li>An openness &amp; objectivity is required to meet the demands of producing the product required in the assessment.</li> </ul>		
<p><b>Sanctions (refer back to Student Code of Practice)</b></p> <p>We all hope to work well together. We acknowledge we have different strengths, experience and backgrounds. We accept that this assessment is a team piece of work and we are all personally responsible for doing our best. However, we agree now that</p> <p>(i) If individuals have difficulties in working with the team or on the task we will try to sort them out promptly</p> <p>(ii) We will seek advice as soon as is possible from our tutor / MC for those serious problems which we cannot resolve ourselves.</p>		
<b>Signature of team member:</b>		<b>Date</b>
1.		
2.		
3.		
4.		
5.		



## **QQI Green Paper on Assessment of Learners and Learning** **Institute of Technology Carlow Response**

### **Abstract**

The following document presents the Institutional response of Institute of Technology Carlow to the *QQI Green Paper on Assessment of Learners and Learning*. It has been compiled through collaboration with all staff and consultations with groups, including committees of *Academic Council* and representation from the Institute's *Teaching and Learning Centre*. It presents an overall comment on the Paper, before analysing the themes addressed within. The response also highlights some issues around assessment for further consideration, which have not been fully explored in the paper.

### **Overall Comment on the Paper**

This is a welcome document from QQI and timely especially given all the work which has been conducted under the banner of the National Forum's Enhancement theme of Assessment. In that sense, the document has acted as a starting point for some opportune conversations around assessment and has created a space for some fruitful discussions on this very important theme. It is a very readable document and the way in which it is structured, with 25 discussion questions, has allowed for wider dialogue on the issue of assessment.

### **1. Themes addressed**

- 1.1. **Definitions and scope of assessment:** a broad range of issues around the theme of assessment are raised, which is great to see; it is also good to see *assessment of, for and as learning* highlighted in the introduction (p.9), along with the assertion that assessment is "integral to the curriculum, to teaching and to learning". Whilst it is understandable that not all aspects of assessment can be addressed within the document, it is slightly disappointing that the focus is exclusively on assessment of learning (especially given that for many educators in higher education, the focus in recent years, has moved towards assessment *for and as learning*).

The definition of assessment (p.12) also seems to move towards a more summative version of assessment - an evaluation related to standards based on evidence - yet just below provides a broader description - where learners may assess themselves. The examples of assessment on the same page (p.12) do give a much broader description of assessment and perhaps this could be reflected in the definition earlier on the same page. Also there are some very useful definitions of 'effective learning, teaching and assessment' presented on p.17. This section begins with a wide ranging definition/description of "effective learning" (p.17) - this needs to be embedded into all

programmes of learning. In addition, more clarification on the concept of implementing a holistic assessment (p.51) would be welcome.

The term “attitude” and the assessment of attitude is also referred to a number of times in the document, including on p.28 - this is an interesting concept/development and one which could be further explored. In line with the assessment of attitudes, it would be apposite to include the assessment of values, particularly as many programmes are now aligned to institutional graduate attributes, where values and attitudes feature strongly and the assessment of these can often prove difficult.

With an increase in the number of programmes moving to a blended/online space, it appears that the document is more or less silent on assessment within this domain and there is scope for a piece on this. We are aware that Blended Learning has been the subject of a White Paper, but the focus of that was quality assurance, rather than purely assessment. A more detailed examination of the issues around online or remote assessment (p. 61) would be very relevant, and not just around the use of technology but also around the proctoring and moderating of such assessments.

**1.2. Grading/results/standards:** it is reassuring to see that the document acknowledges the presence of extraneous variables when it comes to assessment and outcomes (as illustrated in the examples presented on p.10) and that grades/results standards may vary within an institution and that, as such, it is often hard to pinpoint the reason for same; this could be further explored in terms of the challenges of implementing effective assessment strategies, both within departments and across institutions.

Section 5.9 *Standards for Award Classifications* highlights the lack of any recent systematic study about how awards classifications are determined in Ireland and on p.44 mentions the vagueness of classification criteria. Further discussion is necessary here on how to align a learning-outcomes approach with a marking scheme/classification approach.

Section 7.14 *Whether to Grade* is one which would benefit from further development, as would the subsequent section on the *Reliability of Grading*.

Section 13.3.1 *Failure to Grade to Reasonable Standards* is also a very interesting piece and it's good to see its presence in the document and interesting to explore what is being done in NZ around same with 'consistency reviews'.

**1.3. Terminology adopted:** on p. 11, in section 1.1., it would be good to include the terms 'facilitating' and 'moderating', especially as these terms are used more and more as we enter blended/online spaces.



On p.12, where the reasons for assessing are listed, it might be good to also include 'recognise prior learning' and 'promote peer collaboration'. 'Experiential learning' is included but 'prior learning' can be more than that and this should be acknowledged.

**1.4. Learning Outcomes:** some good examples of writing learning outcomes presented on p. 50 - with the acknowledgement that terms such as 'critically analyse' should be considered within the context of the entire sentence and not just the verb alone. There is also the acknowledgement on p.50 that writing learning outcomes is 'an art'. Again, this would need to be viewed in line with staff professional development and the need for pedagogical upskilling/development.

We would also welcome the view expressed on p.50 that terms such as 'critically analyse' can be incorporated at any level of the 10 NFQ levels and that 'individual word choices are not that important if the ideas are comprehensible'. It would be very useful if these interpretations were shared across the sector, in all areas relating to module and programme design.

Section 7.4 echoes this and illustrates the role "words" play in learning outcomes, whilst highlighting the need for those writing LOs to reflect what learning is expected or intended for the learner, rather than selecting words that are felt to correspond to NFQ levels. A good example is given for the use of "critically analyse" and this would open up a useful discussion around same.

Learning-to-learn outcomes mentioned on p.13; it is a good suggestion that these should be built into programme learning objectives (intended learning outcomes), as they often get lost in individual module learning outcomes.

We welcome the distinction between intended learning outcomes, actual learning outcomes and expected learning outcomes (p.14) and the specification of need for (i) assessment strategy, (ii) assessment tasks & associated robust arrangements, (iii) assessment criteria & robust arrangements. Also, it is good to see a recognition of the difficulty designing assessment that aligns LOs, and is valid and reliable (p.16).

Some key principles of assessment, articulated on p.49, emphasise the integral nature of assessment in programme design and delivery, which is positive to see; suggesting a "lack of sufficient reflection about the overall programme as distinct from its constituent subjects"; "impression that minimum intended programme learning outcomes...sometimes created more to comply with...requirements that as educational goals that govern the design & delivery of programmes and, particularly, assessment strategies".

Section 6, which deals with *Programmes as Transformational Processes* is most welcome, as are some of the points made on p.46: 'interested not only in the learners' absolute achievements but also how they are enabled to achieve'; 'a programme is a

transformational process that is designed to take a person from one standard to another...not defined by the start and end points'; '...we aim to address the transformational process and not only assure that the intended learning outcomes are fitting goals'. These are all very pertinent issues that warrant further discussion.

## 2. Areas for consideration

**2.1. Timings of Assessment:** at the top of p.19, it states 'to evaluate the transformation, it is necessary to assess learners at the beginning and end of a programme'. We think it is important here to emphasise that assessment should be a process that is continuous throughout a programme rather than just specifying the beginning and end points. By suggesting otherwise, it is only reinforcing the idea that assessment is a bolt on at the end and this is something that many of us, as educators, have already moved away from. The focus seems to be on inputs and outcomes rather than the transformative process mentioned previously in the document.

**2.2. Nature of assessments/assessment strategies:** it is positive to see that Section 7.5 of the document clearly articulates the need for programme assessment strategies, thereby reinforcing the move from modular to programme assessment. This would need to be considered in line with staff ongoing professional development around approaches to assessment.

The question of workplace assessment is also highlighted in section 7.5. Although this is particularly timely, it needs further consideration, particularly around the role of the assessors both in the workplace and the institution itself.

Section 7.6 makes a point about the validity and reliability of assessment when applied to different types of learners, or learners coming from different educational systems/backgrounds. Is an assessment less reliable or valid if the learner is 'different' - do we need to design different assessments to suit each 'learner type'? This also begs the questions as to whether or not we need to make assessments so broad and all encompassing in nature so as to accommodate all 'types of learner' and all previous learning experiences.

Section 7.19 makes a point about professional bodies and regulators having a role in supporting the quality and relevance of programmes. Although, the involvement of professional bodies is very much welcomed, it is also worth noting that they can sometimes inhibit the redesign of assessment strategies.

**2.3. Diversity and Assessment:** Section 7.6. on **Diversity and Assessment** would benefit from more detail, 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.

- 2.4. Assessment Literacy:** it is interesting to read on p. 90 that even though Ireland is 'academic integrity mature', some teachers were undecided on a recent study as to what counted as plagiarism, which opens up the discussion on the need for more explicit mention of assessment literacy.
- 2.5. 13.3 Misconduct or Negligence:** very interesting piece in 13.3 on *Misconduct or Negligence* involving providers and teachers - well worth exploring this further and maybe a good suggestion to provide a national workshop/seminar on same, as 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.
- 2.6. In 7.17 Capacity and Competence to Assess:** there is an extremely interesting comment about research prestige being potentially prioritised over pedagogical competence. We think the nexus between teaching and research is an area that would very much benefit from further examination and the way in which this can influence the overall assessment strategy.

### 3. Emerging issues or ones which are silent/underdeveloped in the document

- It would be interesting to further explore the frameworks adopted to underpin this paper - IEO and MMM (p.10-11)
- In section **4.7 Economic Context**, the issue of resources, though acknowledged, is not examined at all in the context of its impact on assessment practices. It would be beneficial in this section to expand more on the implications of same - both in terms of physical infrastructure, time constraints and human resource issues. This section is scant despite the assertion that 'the maintenance of assessment infrastructure requires significant resources'. The resourcing of assessment is paramount. 'Good/effective' assessment requires investment of resources and time.
- There is a much larger piece to be explored in relation to apprenticeships (p.34) and the assessment process of same.
- Section **5.6 on Standards for Foreign Language Proficiency** could be explored in much greater depth and this includes the whole issue of language assessment prior to entry onto a programme.
- **Section 5.8:** it is not fully explained as to why MIPOs could not be used as an assessment criteria.
- More clarification on the concept of implementing a holistic assessment (p.51) would be welcome.
- Section **7.21 on Engaging Learners as Partners in Assessment** provides a great launch pad for discussions and would benefit from more examples of how students could be partners in the assessment process, both in terms of formative and summative assessment practice; learners should be involved in the overall

teaching, learning and assessment strategy and not just the assessment design but also the assessment process (through self and peer assessment);

- Problems of validity are mentioned on p.13 - example of how assessment can determine standards or curriculum rather than standards or curriculum guiding assessment - assessment creating an alternative curriculum.
- Point 3.3 on p.19 gives very little attention to RPL, transfer and progression. Equally RPL is not mentioned on p.12 in the list of reasons to conduct assessment. It would be beneficial to see this further explored.
- The debate around NFQ level indicators being *typical or threshold* needs to be addressed further in the sector (pp.37-38).
- Equally the lack of research (mentioned on p.38) as to how well the 'NFQ reflects reality' is something for further consideration and/or resourcing and would make for an interesting discussion across the sector.



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**HECA RESPONSE  
TO THE  
QQI GREEN PAPER  
ON THE  
ASSESSMENT OF LEARNERS AND  
LEARNING**

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December 2018



HECA

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# HECA Response to the QQI Green Paper on the Assessment of Learners and Learning

## Introduction

As the representative association for the providers of private and independent higher education in Ireland, HECA welcomes the opportunity to respond to the QQI Green Paper on the Assessment of Learners and Learning. The genuine candidness and breath of the questions is a beneficial direction for future discussions on assessments in the higher education sector.

In particular, HECA supports QQI's commitment to driving excellence in assessment of learners and learning in the sector and embraces the transparent way in which QQI is approaching assessment reform.

## Summary Overview

We welcome this opportunity to respond to the QQI Green Paper published in March 2018. This submission follows the same general thematic headings as the Green Paper, with sections covered that are of interest to HECA. Comments relating to particular questions in the Green Paper are flagged, for ease of reference.

HECA do not intend to engage in a detailed critique of the Green Paper. Rather we intend to succinctly outline the key assessment issues, implications and potentials for assessment reform. Moreover, due to the comprehensive breath of assessments issues in the Green Paper, HECA is determined to focus on the key assessment issues that affect HECA providers.

HECA is committed to working with QQI to achieve a system that makes a valuable contribution to the sector on higher education assessment reform. Putting assessment at the core of the higher education is an important focus for the Green Paper and this fits with HECA's commitment. Excellent teaching characteristically builds on and is intimately linked with excellent assessment strategy and practices. This is central to the outstanding learner's experience HECA providers deliver. Furthermore, we believe that the objectives of any assessment reform should:

- promote continuing institutional improvement of assessment strategy
- give learners valuable information about assessments to inform choices
- encourage diversity and innovation in the higher education sector
- promote pedagogy driven quality digital assessment
- minimise administrative processes, duplications and outlays
- evade unfair market misrepresentations
- conserve and support the reputation of the Irish higher education sector



HECA's response has been informed and developed through extensive consultation across the HECA sector including a HECA Colloquium based on the Green Paper and assessment reform, as well as dedicated consultations with HAQEF (HECA Academic Quality Enhancement Forum) on this issue. Our response aims to echo the views of the diverse and innovative HECA sector. This response also builds upon QCI's 2013 *Quality Assuring Assessment* report as well as the National Forum for the Enhancement of Teaching and Learning publication on *Assessment OF/FOR/AS Learning over 2017-18*.

We acknowledge that there are already many mechanisms in place to ensure assessments of quality, equality, and improved learners' outcomes are enforced across the HECA sector. HECA are constantly seeking ways to innovate and improve assessments for learners and learning and we have invested heavily in time, effort and resources to ensure that we provide a broad depth and range of assessments to support our learner's varied needs and abilities. We welcome ideas in how to further improve assessments for our learners and learning and therefore, welcome, the open, transparent and consultative nature of the Green Paper.

## General Assessment Issues

### ADAPTABILITY

We believe that adaptability is important in the practical scholarship of assessment especially in relation to the uptake of new technologies and the evolution of digital assessments. New technologies are rapidly changing higher education and the workforce; therefore, the assessment of learners and learning needs to facilitate the forward-thinking graduate and support the learner's ability to respond to the changing themes of the modern world. Digital assessments and processes need to achieve the same level of rigour as written exams and construct new responses to the current emphasis on high-stakes summative assessment.

The whole higher education sector 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 in higher education. Assessment practices need to adopt technology in innovative ways to improve efficiency and support learners establish a sustainable career if they are "*to remain matched to current needs and realities*". We believe that focused work in digital assessment necessitates collaborative working across the higher education sector to create a community of shared learning that cultivates the rapid changes in technology with vision, experience, leadership and a genuine understanding of the challenges faced.

## WORKING WITH INTENDED LEARNING OUTCOMES AND HOLISTIC ASSESSMENT

*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)*

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. We acknowledge that there may be different approaches and competencies in expressing learning outcomes and aligning learning outcomes to assessments. Therefore, to enable expertise on this subject, we need to look at how we can provide a common vocabulary and understanding of assessment development for modular and programme teams, validation panels and regulatory bodies to operate within.

A critical step would be instigating an expansion of the concise principles referred to in QQI's Quality Assuring Assessment Guidelines for Providers (2013) and building on this to establish an agreed framework across the higher education sector on assessment principles. It is recommended that rather than having a set rule of defining methods or rules and regulations, QQI determine a set of principles with some flexibility at grass-root level. Learning outcomes can be grounded in these and though the principles should be immutable, interpretation should allow for some innovation in context to certain disciplines. Conversely, core assessment principles would be aligned to core learning outcome statements and that should be universal and apply in all contexts. If there were absolute principles, that cannot be breach, then we can develop quite good dialogue and expertise locally and we can develop appropriate interpretation.

Another point is that academics at modular level can be very well intentioned in their chosen method of assessment but may require support at developing competencies to directly address what constitute a valid intended learning outcome (ILO) statement and ways in which we can adequately assess it. Training in aligning modular assessments to programme level, as well as developing a clearer understanding of the validation processes are essential in building expertise.

## CONSISTENT INTERPRETATION OF STATEMENTS OF LOS

*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)*

We agree with this question, and in keeping with the inclusive spirit of the Green Paper, we suggest that disciplinary communities should include as many different stakeholders as possible. Providers, practitioners, student representatives and learning communities themselves are all part of the communities of practice that are central to the interpretation and development of intended learning outcomes.

Fundamentally, disciplinary communities i.e. professional bodies are interested in the end-product of what the learning outcomes achieves; the graduates as professionals. There is also the potential to involve other bodies or groups (internal or external to the relevant discipline) which can add a further perspective in the transformational processes that happen within the programme itself. On the other hand, employers, for example, don't have expertise on assessment strategy but they do have expertise on the role of the disciplinary communities in supporting the programme. These professionals can all exert influence on educational programmes but from a different perspective of standards to academics.

A significant opportunity for holistic enhancement would be establishing a forum of the collective voices at the beginning of a programme development or programme review. This is key to giving an equality of expression across the spectrum of relevant disciplinary communities, from learners to statutory bodies. By uniting the communities of practice with one voice, it may also remove the need for providers to move between statutory bodies and awarding bodies and efficiently establish a clear interpretation of learning outcomes.

#### PROGRAMME ASSESSMENT STRATEGY AND INTEGRATED ASSESSMENT

*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)*

Yes. The problem is the academic culture has leaned towards individuals acting alone, rather than seeing themselves as part of a team capable of taking a programme view. This academic individualist culture barrier is being overcome but ensuring that there is a programme-specific assessment strategy will help.

If the programme-specific assessment strategy is too detailed and specific it may have unintended consequences that may impede the learning that the programme is trying to achieve. A set of assessment principles embedded within each programme to address what you want learners to achieve but with flexibility at a modular level is recommended.

#### *Other Points to be addressed by a Programme Assessment Strategy*

- A more flexible approach to programme assessment strategies would be advantageous and reduce the risk of duplication. For example; assessments in modules can be quite rigid and require a considerable length of time to change, especially examinations. Also, when submitting the programme schedule, further changes can be made to continuous assessment but not exams.
- The language used for programme-specific assessment strategy is varied and is open to different interpretations.
- Innovative ways, as well as lessening potential duplication, could be achieved through more nuanced interpretation rather than rigid interpretation.

Additionally, we need to build capacity within the sector for good MIPLO and MIMLO framing. The more opportunities we have to share practice, the better. This is really an issue

of building a community of practice and programme design expertise which QQI could facilitate.

It's generally accepted in the higher education sector that it is best practice to incorporate the learner in the programme-specific assessment strategies and process. Moreover, it is a part of the QQI guidelines. In the same way, educational providers greatly appreciate QQI's recent inclusion in giving providers a voice in reviewing and reforming assessments policies, strategies and practices.

## DIVERSITY AND ASSESSMENT

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

Learner diversity has many dimensions, including considerable 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. All learners must be taught, assessed and reach a proficient standard in the learning outcomes of the programme. Still, the reality of learner diversity challenges higher education providers to deliver demanding programmes that meet learners where they are academically, maximise their growth as learners, and accelerate their learning to achievement the relevant standard and programme award.

It is not surprising that diverse students have differentiated needs and it is a significant quest to understand 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? The recommendation to QQI would be to start work, and this is no easy or quick task, on how this circle can be squared.

One potential method of supporting the development of the diverse learner i.e. international or mature learner is through learner training. An international learner may receive training in the Irish educational system and specific assessment practices that the international learner may not be familiar with. Another method could be to have effective interventions to match and support the diverse learners needs while maintaining the same assessment strategy and practice for all learners. The use of formative assessments that create personal and educational development may also be beneficial. In relation to the mature learner, building on their experiential learning, utilising more coursework than exams may provide beneficial.

Effective learner-centred feedback cannot be understated and its essential that diversity and feedback is brought in at all levels in combination with a balanced workload. It may be that the educator requires further support or CPD to set up a reliable, robust and secure infrastructure to accommodate the diverse learner.

In relation to mature and international learners, HECA would encourage the provision of additional support for the diverse learner whilst still enforcing the same assessment and learning outcome standards. It may also be beneficial to explore diversifying the

curriculum/assessment, e.g. allowing learners to utilise blockchain portfolios where the learner's knowledge and skills gained and applied over the programme are traceable in a portfolio of their learning. In turn, this could be significantly more beneficial to future employers as a gage of competencies, skills and knowledge than a heavily weighted summative or final exam.

## ASSESSMENT IN THE QUALIFICATIONS AND QUALITY ASSURANCE (EDUCATION AND TRAINING) ACT 2012

*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? (section 7.7)*

Yes. There is a risk of over assessment and unnecessary duplication of work with a strict compliance to summative assessments. This can dampen motivation for learning and learners. Formative assessments could be use at an agreed proportional level to lessen the burden of summative assessments. Formative assessments could be aligned to learners evaluating their own and peer learning as well as supporting learners grasp of specific topics or practices. This could be used to enhance the learning process without it contributing to the grade, module or programme. Modular learning outcomes that feed into the same programme learning outcomes could also be assessed summatively once in the programme (instead of in every module) to avoid unnecessary duplication of assessments and to avoid over assessment.

## ASSESSMENT OF PRIOR LEARNING

*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)*

No, the onus should be all providers; in principle, to be able to facilitate RPL. Otherwise, it may be unfair on the learner, for example, due to geographical constraints. It is, however, acknowledged that some types of programmes can facilitate RPL more readily, i.e. it is more problematic and difficult if not modularised.

For learners who have received their qualification in another jurisdiction, they may be required by professional bodies to demonstrate evidence of the learning outcomes achieved. For example, the Irish Teaching Council requires registration applicants who have received their professional qualification outside of their jurisdiction to showcase appropriate evidence and elements covered in the programme that they have undertaking. The Teaching Council then identifies where there are areas of deficit and learners then apply as modular students to address the areas of deficit identified by the Teaching Council.

## DISINTEGRATING COMPETENCE

*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)*

Ultimately an atomistic approach is not enough, though competency-based model confers with the professional requirements of many occupational practices; caution, however, is advised lest defined competencies become over-atomised. In order to enhance learning, the use of holistic competencies within a developmental continuum is recommended. Such a continuum has the advantage of illustrating explicitly the direction of learners rather than merely pointing out the level below which they should not fall. Context is meaningful in both the development and expression of competence and, as such, has an important part to play in both learning and assessment.

Industry professionals should be involved in developing generic skills in higher education programmes, for work placement and employment. Generic skills can be taught and assessed, both in and out of context, in vocational programmes. However, the implications of consistency, standards (NFQ levels), authenticity and reliability cannot be underestimated. Work-based assessors will require education and training to understand and apply this criterion. This also applies to academic tutors who assess learners in the workplace; they need to be educated in assessing generic skills in the context of the work placement. Clearly, there is much to be done in the development of workplace generic assessments which are robust, fair, comparable and consistent. It is essential that early involvement of all stakeholders is advocated to create a synergy between all their associated requirements (both competency and generic assessments) through an overall holistic approach (though at times, an atomistic approach is warranted). Importantly, we need to be confident in our definitions of terms and language so that we can translate it effectively and make sure everyone has a shared understanding.

## ASSESSMENT HINDERING LEARNING

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

Yes, it's important to mitigate against such outcomes and ensure that all higher education teachers have training for appropriate MIPLO and MIPLO framing of assessments while still enabling creativity and innovation.

## KNOWLEDGE, SKILL AND COMPETENCE

*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)*

Yes. Programmes are not perfect, and the application can have unintended outcomes resulting in positive or negative implications for teaching and assessments. In fact, it may not necessarily be negative, as active reflective practice can identify and bring forward new ways of addressing the dimensions.

## **NORM REFERENCING**

The common use of norm referencing is not up to the task of representing achievement in anything like an absolute sense. Norm referencing such as the Bell Curve Model/Grading by Proportion Model typically employ grade distributions that correlate with the specified proportions, and the learner's relative achievement standing within the cohort. The rationale behind norm referencing or the use of the bell curve/grading by proportion model has its roots in the classic market approach to regulating normal market value when there are no stable independent reference points. In higher education assessments, signifying merit is inherently different from market value, and it is merit, not scarcity, which is the key to grade integrity. By allocating grades through a proportional model, each grade goes to represent a relative position in the cohort, not necessarily the actual level of achievement reached.

Additionally, grade integrity is challenged further by having norm referencing whereby it can make the award of grades structurally blind to a variety of factors and contexts that affect achievement and its assessment. The context of the learner cohort is very relevant, factors such as; learner–lecturer ratios; quality of teaching and academics' qualifications; admission policies and learner entry levels which influence the academic abilities of cohorts; the demographic profiles of cohorts; teaching resources and the availability and type of support services; the quality of teaching; and the quality of assessment programme/strategies are all factors that affect assessment grade integrity.

The use of norm referencing seems to contradict the principles of meeting minimum programme learning outcomes (MPLO). For grades to be true representations of academic achievement, the singular consideration should be how the level of achievement inferred from evidence compares with the minimum levels required for the different grades.

HECA recognises that the Bell Curve Model has the advantage of expressing different scales onto a common scale which will have currency across institutional and national boundaries.

## **WHETHER TO GRADE**

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

Generally, it is accepted that grades satisfy and motivate the learner, especially, the competitive or high achiever learner. Additionally it gives all learners an insight into the level of their learning and learning outcome achievements.

Removing grade/award classifications to only adopting a binary pass/fail is not recommended. If learners believe that their final award classification or subject grades are

limited to pass or fail it removes some of the need for feedback, can stifle continuous improvement and creativity/innovation (in both assessment and student aptitude). There could possibly be some further exploration of the different bands, maybe at five-point intervals

## RELIABILITY OF GRADING

*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)*

There is a consistency within institutions and the QQI sector in general. However, consistency is not as evident across the higher education sector. This lack of consistency implies an unfairness in award classifications nationally especially when one acknowledges that learners may be endeavouring to compete for employment in the same sector. A national classification scheme would support consistency and potentially transparency.

Generally, it is acknowledged that there is a disparity between grading/classifications of awards from one institution to another. This is natural due to differences in MIPLO's/MIMLO's, assessment strategies etc of each provider's programme. While QQI set the award standards, each provider is free to interpret those and develop their own MIPLO's and subsequent MIMLO's for their respective programme. This programme, while within the same award discipline could/would have different programme objectives than a similar programme from another provider.

There may also be implications within an institution and further focus should be on the pattern of gradings/classifications within an institution. It shouldn't be 'one shoe fits all'.

*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 classifications are worthwhile and should be maintained. In relation to consistent classification, it depends on all sorts of variables. There is room for consistent transparency of awards.

There is some disparity in the spread of grades that influence award classification which may contribute to the perception of a lack of fairness in the classifications, e.g. from pass to the threshold of 1<sup>st</sup>/Distinction all have a 10% spread while the 1<sup>st</sup>/Distinction has a 30% spread. There may be merit in creating a 'higher pass' or a 'lower pass' grade.

We should consider developing an explicit set of assessments principles that underpin our approach to practice and improve the transparency and consistency of the grading of award classifications across the higher education sector.



## GRADING WORK-BASED LEARNING

*This goes back to If assessments work-based learning should contribute to the final award classification or grade and, if so, how to ensure consistency.*

Yes, they should. As stated in the Green Paper, it is important that the work-based assessment is aligned to the MIPOs (minimum intended programme learning outcomes) and effective monitoring (supervision) and training of work-based assessor should support consistency.

## CAPACITY AND COMPETENCE TO ASSESS

*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)*

With this question, we want to focus on the unfairness experienced by HECA providers in relation to competitors outside HECA. QQI consider the assessment outcome grade of 40-59% as within a PASS bracket (PME Programme) which is validated by Teaching Council. However, awards to students completing PME Programmes in other institutions not under QQI but also validated by the Teaching Council, permit an honours award for learners achieving an assessment grade of 50-59%. Learners from QQI validated PME who achieve between 50-59% have a balance of competences with learners from the other institutions but a disadvantage in the competing stage of employment. In fact, this has a negative impact on graduates from HECA provider, Hibernia College, who achieve between 50-59% as their award is seen by prospective employers as being a PASS as opposed to it being identified as an honours classification from their peers qualifying elsewhere.

## ONLINE OR REMOTE ASSESSMENT

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

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.

## CONTRIBUTION OF PROFESSIONAL BODIES AND PROFESSIONAL REGULATORS

*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)*

It presents more as an opportunity than a risk to enable professional bodies the opportunity to contribute expertise and practical knowledge to shape assessment practices suited to the discipline and endorse by the professional themselves. However, it needs to be acknowledged that the priority of the professional body or regulatory body may not be the same as the educator and this can have an adverse effect on effective assessment strategy.

Overall, we agree that they can assist with effective assessment practice but should not be the decision maker on assessment strategy.

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

An effective method would be engagement with early stage graduates (first year of work) to evaluate how assessments have prepared them for their profession.

### CONNECTION WITH COMMUNITIES OF PRACTICE

*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, it would be a positive decision to enable academic assessors to collaborate with relevant communities of practice to ensure that assessments are fit-for-purpose and based on current, valid skills, abilities, knowledge or overall competencies for the profession.

Keeping in touch with communities of practice informs a more practical and cohesive understanding of the shared competencies, tacit and explicit knowledge, and expertise required to support the goals and design of unique, innovative, effective and efficient assessments in the relevant disciplines. Communication with professional bodies will assist the academic in developing a more holistic assessment approach to competencies and education, thereby creating a more rounded learner with discrete skills, knowledge and competencies at module and programme level.

### ENGAGING LEARNERS AS PARTNERS IN ASSESSMENT

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

Traditionally, learners have been excluded from assessment design, however, engaging and developing learners as partners in assessment enables them to be active participants in their own learning and is part of the recognition of the importance of 'assessment for learning'.

Engaging learners as assessors, such as peer and self-assessment, is a particularly effective form of learning. In such peer-learning situations, learners may have scope for negotiating the content and nature of the learning activity as well as enabling the learners to interpret the rudiments of the role of teachers or assessors of learning. Learners who can negotiate their choice of assessments have an increased engagement in their learning. There are

implications though, especially when all learning outcomes are aligned to summative assessments.

Another key way is engaging the learner in the assessment process; enabling learner involvement in the design, delivery and assessment of their learning which brings about a meaningful learning partnership. The authority relationship in assessment partnerships is usually pointedly different than those in peer-learning partnerships.

It's important to not only engage with learners on assessment strategy but also to educate the learner in how to prepare for the roles they may play in such partnership. The Green Paper is opening the discussion on learners as part of the communities of practice to support learning which is creative and exciting. However, learner engagement must be in a meaningful and not tokenistic way. It's important that the learner is at the centre and empowered to understand pedagogical expertise on assessment strategy and practices *of, for* and *as* learning.

Engaging with learners on assessment strategy at the beginning (or at review stage) of programme development can inform learning outcomes and assessment practices. Engagement can be with existing learners on the programme, or learners at the end of the programme who are about to enter a particular discipline or first year graduates in an active professional environment. Learners at the end of their programme or first year graduates are in an effective position to give feedback on the learning from programme assessments which would allow feed into potential assessment modification.

## QUALITY ASSURING ASSESSMENT IN THE WORKPLACE

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

Building on the QQI's (2013) quality assurance principles for assessment, validity, reliability, fairness, quality, transparency and complementarity, HECA believes confidentiality should also underpin the QA of the workplace assessments. Constraints of confidentiality and highly regulated environments can impact upon assessment in the work-place and access for assessors. Non-disclosures may be required for access of anyone involved in assessment at any stage including first, second and external markers. Regulatory issues could be considered as part of the learning contract so that terms are negotiated in advance.

Additionally, there needs to be a clear delineation of roles and expectations of stakeholders (including students, supervisors, assessors) involved in work-place learning specifically to prevent learners having inconsistent learning opportunities and experiences. 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. Guidelines and principles to support this process could be beneficial to create sectoral consistency without relying on prescriptive

requirements which could constrain autonomy to create and structure work-place learning opportunities.

## Higher Education and Training Issues

### AWARDS STANDARDS, ACTUAL LEARNING OUTCOMES (ALOS) AND CLASSIFICATIONS

*We suspect that the way higher education students are assessed allows for a spectrum of standards to be maintained for major awards. A move to a system where assessment is absolutely valid and reliable for the purpose of maintaining nationally agreed threshold standards might have consequences that would be uncomfortable for society if it demonstrated a wide spread around mean standards and identified those programmes where the standards were below the mean (i.e. half of all programmes should the distribution be symmetrical).*

It is very difficult to have absolute validity.

*If we pick two first class honours bachelor degree qualifications from different institutions but in the same subject should we expect them to be equivalent? If so, what do we mean by equivalent?*

Yes and No.

Yes, the same standard should be equivalent within bands.

No, as it depends on what is meant by equivalent. For example, both programmes may have different PLO's, MLO's, assessment strategies which will impact on the knowledge, skills and competence. The only equivalent thing between them would be the title of the final award and some subject headings.

The answer from the market is also no, most notable in relation to higher education ranking and reputation. However, in a practical sense, this does not necessarily mean that all programmes from a higher education provider in a top ranking is better than a programme from a provider in a lower ranking. Positive promotion of a programme can also be a factor in the public's perception of the standard of an award. A recommendation for QQI is not to impose standards on assessment but to go public about how learning is assessed.

In addition, we accept that learners and other stakeholders should reasonably expect institutions to maintain their own academic output standards. However, we do not accept that learners and other stakeholders can or do expect '*reasonable comparability*' in academic output standards across the Irish higher education system.

To be truly "*equivalent*" would require a uniformity in curriculum, assessment criteria and classification standard that would undermine institutional diversity of provision.

*Is there an 'A list' group of providers whose qualifications are significantly more valuable in some sense? Would we, as a society, be happy to have a tiered system where qualifications from 'A list' providers are much harder to get than those from 'B list' providers (recognising that that might be due partly to selective enrolment)? Are we already in that state?*

There is a perception that qualifications from certain providers are more valuable than others. However, this does not necessarily mean that the qualifications from the 'A' list providers of the same standard or title are '*much harder*' to get than those from the 'B' list and society should and would expect the standard and level of work for a similar award to be equivalent. Having said that, entry standards are a factor in gaining entry, as are equity of access and student pathways. There is, however, a perception in society that we are already in a two-tier higher education system where one sector's qualifications and assessments are perceived as higher and "*harder*" contrary to awards alignment to the NFAQ.

In relation to question, we are probably already in that state, if the measure is the perception of the consumer. It is not possible for QQI, or others, to impose a tiered/group system that would be acceptable to all providers. The market will do this anyway.

*Is the restriction on repeat for honours still warranted? If not, should learners be allowed to keep repeating examinations until they achieve their desired result? Are examinations designed for first-attempters valid and reliable for repeating students? If there is to be a penalty for those who must repeat, what should it be?*

No, the repeat for honours restriction is in principle intrinsically unfair. Frequently you have learners who perform excellently throughout a three- or four-year programme only to experience a "bad day" and have their final award capped. This concept is grossly unfair and creates a prejudicial award classification where providers obtaining their higher education validations from QQI are capped with no repeat for honours while other higher education sectors are not capped.

HECA has considerable resistance to the current policy on 'no-repeat' for honours. A system whereby the module was capped rather than the award would be better. Under these circumstances, QQI's policy on fairness and not disadvantaging a student is challenged by this process.

Moreover, to compound the unfairness, we understand that different practices are employed across the IoT sector in relation to this issue. Therefore, learners are treated inconsistently. The conventions were established to avoid inconsistencies.

There should be a limit on how many times a learner can repeat an assessment and a capping penalty at a modular level. For consistency and fairness, the examination designed for first-attempters should remain for repeaters, unless, the assessment strategy allows for different assessment practices to achieve specific learning outcomes.

## 2009 Sectoral Conventions for Assessment

*What has been the experience of operating with these conventions for nearly a decade?*

It has enabled providers speak the same language. However, is it now timely to revisit or review NFQ?

See points above regarding repeat for honours and the conventions.

## INTEGRATED ASSESSMENT

*Modularisation when taken to extremes can be problematic (section 7.5). But there is also a risk with any modular programme that the overarching intended programme learning outcomes are not given due prominence in teaching, learning or assessment.*

*What can be done to help ensure that the overarching intended programme learning outcomes are given due prominence in teaching, learning and assessment?*

- Programme handbook-module descriptor
- MIMLO and MIPLO - perhaps with a focus on the mapping communication of MIMLO and MIPLOs.
- Module descriptors to refer to MIMLOs and MIPLOs
- Assignment to link with module aims and PLO.
- Mentorship/training for programme teams in curriculum development (to have the bigger picture of the whole programme, especially looking at how each module fits into the whole programme and how the whole programme hangs together).
- Cap on module is fairer than a cap on award.
- Cross compensation guidelines needed.

*How can programme designers approach the optimisation of the modularisation of programmes to ensure that an appropriate balance is struck between optimising opportunities for effective learning and optimising the use of the provider's resources, recognising that there are trade-offs involved?*

- It's essential that the module meets all the LO, this is the minimum standard.
- Robust assessment strategy.
- Cross module assessments, grading system and MIMLOs are being examined.
- Its important to avoid duplicity and over burdening the provider (and learner) with too many assessments.

## ASSESSMENT LITERACY

*What supports need to be put in place to assist learners make the transition and, particularly to help them to engage with the modes of assessment of learning employed in HE and to avoid hazards associated with these?*

- Early learner education and training on assessment strategies and practices of higher education and training.
- Formative assessments with focused feedback. Early intervention and support of “at risk” learners.
- Educator training in the pathways to HE e.g. a broad understanding of Post primary assessment strategies and learning outcomes.

## ACADEMIC INTEGRITY IN THE CONTEXT OF ASSESSMENT

As stated in the Green Paper, there is significant literature and policies on academic integrity. In general, it’s essential to have policies and procedures as well as providing learners and teachers/assessors with guidance and training on what signifies academic or research misconduct and the development of good practices in maintaining academic and research integrity.

In the context of assessments; resources can influence academic integrity with some demanding assessments considerably reducing the risk of compromised academic integrity such as viva voce. Academic integrity on the teacher’s part needs also to be highlighted e.g. when the teacher has set knowledge of the test, it can lead to a distortion in results. On an institutional level, publication of award classification and grades can challenge ethics. On this theme, QQI refers to academic integrity in relation to institutions awarding “*unduly high grades relative to the norm*” thereby giving its learners an “*unfair advantage and undermining trust in qualifications generally*”. It must be noted that unwarranted grade inflation and deflation to adhere to a bell curve must also be considered as a breach of academic integrity.

Notably if a higher education provider loses its reputation for academic integrity, the implications for its continued existence are endangered. Reputational damage to one provider may also lead to damage to the wider Irish higher education sector. Providers need to monitor the effectiveness of practices and systems, including partners in work-based learning, to ensure that they are congruent, compatible and equally robust. The details in this regard must be thoroughly worked through before agreements are entered into. Providers need to be proactive by minimising opportunities to engage in academic dishonesty as well as being alert to new forms of academic misconduct. 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.

## Towards General Principles and Guidelines for Assessment of Learning

*Would it be useful for QQI to publish general principles and guidelines for assessment?*

Yes

*What should the principles and guidelines address?*

See section WORKING WITH INTENDED LEARNING OUTCOMES AND HOLISTIC ASSESSMENT

*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)?*

All

### EXTERNAL EXAMINING AND AUTHENTICATION

*Do you think that external examining and authentication 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?*

This is generally true. However, external examiners tend to work with only one institution at a time which may not lead to useful comparisons across the institutions.

Interaction between public/private/independent/IoTs and Universities helps to ensure reliability but cannot fully do so. Without external examining, there could be lower standards. Overall more standardisation, training and time (the cycle could be extended to four years) is required. Former FE practices could also provide a model for HE.

*Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?*

Yes. This would be beneficial to some providers combining HET/FET QA for Re-engagement (re IV/Exam Board/Approved List).

*Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.*



- Academic Council has QQI Monitoring
- Provide an extra line of moderation
- Peer review?
- Randomised?

Would it be useful for QQI to publish general guidelines on external moderation mechanisms (external examining and external authentication)? To whom should the general guidelines apply?

Yes, specific guidelines for providers that span both FE and HE, public and private providers would be useful.

*What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?*

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.

It is still unclear how an enhanced external examiner system would work in practice under the improved guidelines. 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.

Another concern is related to an external examining system that would require participants to undertake more demanding training. Is this appropriate only to those early career academics who may not feel that they have enough experience to put themselves forward? Undeniably, a reluctance to engage could also be true of those more experienced academics who may feel that it is unnecessary to engage with a training process for something that they may have been involved in for numerous years.

## DIGITAL ASSESSMENT

*What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?*

Applications of technology to assessment and feedback are becoming more embedded in the institutional vision for high-quality assessment, teaching and learning. These changes drive

assessment enhancement when implemented with associated pedagogic principles and academic technology training.

Already, information and communications technology are commonly used for accessing information and to produce assessments in a digital format. Conversely, the ability to use personal technologies in assessment; greater opportunities to use creative media in assignments; engage in online discussions and collaborative authoring; technology-enabled peer and self-assessment are beginning to gain more credibility in higher education assessments. Technology has already established significant supports for grading, plagiarism detection and provision of feedback.

While the incorporation of technology into higher education assessments is presently growing at a steady pace, technology itself is evolving even more rapidly. We increasingly expect higher education providers to employ a variety of technology-based tools in future assessments. The future focus of digital assessments aligned to the most appropriate assessment strategies will be driven from the grassroots level; the effective innovative, early-implementer in the academic workforce who have engaged with technologies in designing assessment *of, for* and *as* learning.

Assessments will become ever more varied with authentic ways of assessing learning via e-enabled assessment management and administration systems to monitor learners' progress and improve teaching and learning i.e. e-portfolios, blockchain portfolios, digital peer to peer, collaborative writing, social media based, simulations and online scenarios, personal feedback by video, audio and digital ink annotation and large-screen handheld devices used for fast on-location assessment, marking and feedback. While many of these are already being utilised by higher education providers, it is anticipated that technology will in the future facilitate assessment enhancement previously difficult to achieve at scale. Automated assessment/intelligent tutorial systems are also showing potential in terms of reduced workload around assessment, especially so if the systems provided automated feedback.

Building on our adaptability points discussed earlier in this response, it is recommended that future focus on next generation learning management across the higher education sector would help educators keep pace with the needs of 21st century learners, especially in the context of promoting digital assessment that drives development in this area rather than technology developers who may not have significant regard for pedagogy.

## Apprenticeship Issues

In relation to apprenticeship learning, there is an intersection between apprenticeship learning and traditional work-based learning where both are forms of employer-led learning. This suggests that all work-based learning can sit in one over-arching framework rather than creating individual frameworks for each. Although employer consultation has always been important, the apprenticeship has created a new emphasis which purposefully puts the employer at the forefront of development.

For the majority, every programme is intending to produce workplace-ready graduates and multiple stakeholders (students, employers, academics, professional bodies and standards, regulatory bodies) need to be actively involved in the programme development to enable that outcome.

*What can be done to help increase the reliability and validity of competence assessment in the workplace?*

Traditional modes of assessment which are thought of as reliable should be used with caution in the workplace. An emphasis on academic assessments and outcomes should not be conflated with actual work-place performance. The practicalities of scaling up assessments that require multiple layers of moderation for reliability purposes needs to be considered.

All skills should be learned in context so that learning can be transformational and valid rather than task-based. Key occupational tasks can be identified through an occupational profile modelled on the apprenticeship requirements, which can be used to scaffold development MIPLOs and MIMLOs with work-place requirements at the forefront of development.

Intuitively speaking, work-place supervisors who are witnessing learners in action are best placed to determine if they are achieving their intended goals. In practice there can be a disconnect where work-place supervisors don't view themselves as 'assessors'. Training is required for work-place supervisors to clearly outline expectations and requirements. Standards for non-academic work-place assessors could help inform training and resolve this disconnect.

Scheduling is another consideration. Traditional block-release modes of learning can cause siloed learning where students are reacclimatising to a specific mode of learning at each block rather than integrating theory with practice. Sequential structures that allow theory to be taught in tandem to work-based learning (time split between traditional learning and work-based learning on an ongoing basis) can allow students to consistently apply and develop their understanding of theory as it becomes contextualised in the work-place.

This goes back to the culture of trust that is promoted in the green paper. What QQI may consider for future guidelines is more practical guidance on how a culture of trust can be instilled given that we are coming from such a low-level starting point.

See also section on DISINTEGRATING COMPETENCE

*What can be done to encourage industry to become more involved in discussions about approaches to assessment?*

Bring industry in as early as possible in the development of programmes, the validation of programmes and the re-validation of programmes. QQI can stipulate the need for industry engagement.

- Encouraging industry to be involved from the beginning where they can inform assessments rather than at the end of the programme.
- Highlight the key set of skills to hit the ground running as a graduate in the industry. Work with the industry to identify what a graduate should be capable of in the sector.
- Have the industry represented on validation panels.
- Identify effective assessments that are of benefit to the learner, the higher education provider and the industry.
- Integrate industry focused learning contracts and incorporate industry needs and competencies into learner's portfolio.

*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?*

As mentors already have a job, integrating supports that do not considerably add to their time pressure is beneficial i.e. design user friendly documents/operational checklists etc to support assessment; alignment of assessment aims to the professional bodies and standards; create a code of conduct template for employers/mentors; standardised assessment template. This may work easier in some industries more than others.

Supervision of mentors and/or more than one person grading the outcome may also support consistency.

Fundamentally, it's important that employers work with the educators to identify the key learning outcomes of skills required during each stage of work placement. This needs to be transferable to the mentor clearly and concisely in a methodology that is still flexible enough to consider the diversity of the workplace setting and learner.

*Should workplace assessment results be graded as distinct from being reported as successful/unsuccessful without gradation? Why/why not?*

It is easier for the employer to have a pass/fail marking. However, it may be a disincentive for some learners unless they see potential future employment from the work placement. There may also be a reluctance from the assessor in workplace assessments to be the ultimate grader even though they are often best placed to judge set competencies.

On the other hand, the relevance of assessment may benefit from a weighted grading; again, this varies depending on certain circumstances, clear descriptors, objective national or industry standards and types of industry.

*Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?*

Yes, probably, depending on the industry sector and would be beneficial and certainly easier if the standard or generic grid was set by industry regulators or professional bodies (if there is a professional body, if not, it may be more difficult). There could be an overarching framework.

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## **INSTITUTE OF PROFESSIONAL AUCTIONEERS AND VALUERS**

The Institute of Professional Auctioneers and Valuers (IPAV) was established in 1971 as a representative professional body for qualified, licensed auctioneers, valuers and estate agents throughout Ireland. IPAV is the only representative body in Ireland which solely caters for the professional and educational requirements of auctioneers and valuers practicing throughout Ireland. IPAV currently represents over 1,300 members.

### **1. Education**

The ethos of IPAV ensures education plays a continuous and significant part of its member's professional development. In addition to upskilling existing members, IPAV provides CPD and education programmes to educate aspiring auctioneers and valuers to the high professional standards expected of an IPAV member. IPAV's education programmes are delivered to ensure best practice and the highest international standards are achieved. The courses are subject to continuous review and updated to reflect changes in the industry.

In conjunction with Institute of Technology Tallaght (ITT), IPAV has a Level 6 programme in Real Estate (Valuation, Sale and Management) since 2013. The programme is recognised by the Property Services Regulatory Authority (PSRA) for licensing purposes. To date, more than 300 students have graduated from the programme.

In April 2018, IPAV launched an add-on Bachelor of Business in Real Estate (Level 7) in conjunction with Athlone Institute of Technology. This programme will largely be delivered online and the first intake students will take place in January 2019.

IPAV collaborated with Ballsbridge College of Further Education and other stakeholders in the development of the QQI Advanced Certificate in Auctioneering and Property Services – Level 6. This is a two-year apprenticeship programme aimed at school leavers and mature applicants who wish to follow a career in the Property Services sector. Learners will be employed in Auctioneering, Estate Agency, Property Management and Property Letting firms. On successful completion of the programme, the learner is eligible to apply for a PSRA licence.

IPAV also has a Diploma Course in Fine and Decorative Arts. The aim of this course is to give a modern approach introducing different topics enabling the fine art student to have a wider vision of the Arts and Ancillary Arts.

In January 2018, IPAV was awarded a contract by the Property Services Regulatory Authority (PSRA) to deliver Continuing Professional Development (CPD) to all licenced agents throughout Ireland. Further information is available at [www.ipav.ie](http://www.ipav.ie)

## 2. Affiliated Bodies

IPAV is a Member of:

- CEPI – The European Association of Real Estate Professions represents over 30 national associations and more than 350,000 real estate professionals in the EU and European Free Trade Association (EFTA) countries.
- National Association of Realtors (NAR) The Association became the largest trade association in the United States in the early 1970s, with over 400,000 members. Today, the National Association of REALTORS® has over 1.1 million members, 54 state associations (including Guam, Puerto Rico, and the Virgin Islands) and more than 1,300 local associations.
- TEGoVA, the European Group of Valuers Associations, is a European non-profit making association composed of 72 valuers associations from 37 countries representing more than 70,000 Valuers across Europe.

TEGoVA is the European umbrella organisation of national valuers associations. Its main objective is the creation and spreading of harmonised standards for valuation practice, for education and qualification as well as for corporate governance and ethics for valuers. It supports its member associations in the introduction and implementation of these standards.

TEGoVA speaks with a common voice on valuation to European legislators and policy-makers, and promotes a set of minimum educational requirements with which members of European professional bodies for valuers must comply.

TEGoVA's Recognised European Valuer (REV) and TEGoVA Residential Valuer (TRV) programmes are designed to maintain, enhance and harmonise valuation standards and the valuation profession in Europe. By the granting of the status and designations REV and TRV, they provide individual practising valuers in each member country with a well-defined indicator of qualification and experience, with the aim of assuring clients of their valuation proficiency.

TEGoVA has published (EVS) European Valuation Standards since the early 1980s. The eighth edition, EVS 2016 – (The Blue Book) was launched on 13 May 2016 at TEGoVA European valuation conference in Brussels.

IPAV has been a “TEGoVA Member Association” (TMA) since May 2013 and is the only Irish Valuer Professional Institute awarded the right to confer Recognised European Valuer (REV) and Residential Valuer (TRV) status on its members.

REV and TRV status is a guarantee that IPAV (REV) & IPAV (TRV) valuers are proficient in TEGoVA Minimum Educational Standards (MES) and can complete valuations to “Blue Book” EVS standards.

Further information is available at [www.tegova.org](http://www.tegova.org)

## **IPAV's RESPONSE TO QQI's GREEN PAPER ON ASSESSMENT OF LEARNERS AND LEARNING**

IPAV agrees with and supports the eight principles concerning assessment by the National Forum for the Enhancement of Teaching and Learning.

### **1. Higher Education and Training Issues**

IPAV believes that the current situation whereby IoT's act under delegated authority from QQI to make awards continues to work effectively. The arrangement ensures that the IoT's and other institutions with delegated authority, have robust systems in place to ensure quality.

IPAV supports the continued use of modularisation within the HET sector. Since its introduction, it has proven to provide greater flexibility and the more efficient use of resources.

IPAV believes that honours classifications should be based on first attempt grades. Only in situations where exceptional mitigating circumstances exist, should a repeat grade as a first attempt grade. A consistent approach should be adopted across all HET institutions in the country.

### **2. Apprenticeship Issues**

IPAV supports the new occupational apprenticeships in Ireland to include financial services, property, logistics, ICT, biopharma and property services.

A consistent approach to assessment is required across different employers and the FET sector. Both on and off the job assessment should be integrated to ensure that the apprentice is afforded the best opportunity to integrate their learning experiences and development integrated competencies.

Workplace mentors must be supported to ensure that learners are assessed on a consistent basis.

A portfolio of work is an effective means of demonstrating evidence-based learning and on the job training.

IPAV students of the Level 6 programme in ITT use the moodle virtual learning environment to demonstrate competencies and to have these validated by their lecturers. Such platforms are an ideal for apprenticeship programmes given the combination of college and work-based learning.

IPAV supports the use of a portfolio of works and reflective journals to promote their own learning and self-development.

IPAV agrees that MIPLOs and MIMLOs must be clear to all concerned and they should also be deliverable and be consistent with the relevant occupational profiles.



### 3. Academic Integrity

IPAV recognises the importance of ensuring academic integrity. Students on the IPAV/ITT Level 6 programme are told of the importance of issues such as citing the work of others as part of the “Critical Skills Analysis” module. Plagiarism detection software is used to check student coursework. The importance of ethics in the workplace is also covered as part of the “Communications, Agency Practice and Ethics” module.

Academic integrity should be promoted by highlighting progress made by providers through use of quality assurance procedures.

### 4. General Issues Concerning Assessment

Providers can help build expertise in expressing learning outcomes by involving practitioners from industry in the development of learning outcomes and aligning assessments with them at module and programme levels.

Disciplinary communities have an important role in the supporting and consistent interpretation of learning outcomes. Such communities have the practical experience to ensure the relevance of learning outcomes.

All programmes should have programme specific assessment strategies as this allows for a flexible approach to be adopted across the wide variety of provision across the education spectrum.

IPAV acknowledges that RPL assessment is complex and those involved should be trained and experienced in the assessment of RPL.

All awarding bodies making awards that are recognised within the Framework should set and maintain threshold standards for their own awards having regard to the NFQ in the interests of simplicity and transparency.

Both discrete and generic skills can be taught and assessed in the context of vocational programmes. This belief is based on the proven effectiveness of the Professional Practice modules which form part of the IPAV/ITT Level 6 programme in Real Estate (Valuation, Sale and Management). These modules comprise an online portfolio of evidence which demonstrates competence in both discrete and generic skills.

IPAV’s experience indicates that programme designers are competent in the addressing of knowledge, skills and competence in the design of its programmes.

IPAV believes that current award classifications serve their purpose well as they clearly acknowledge the levels of effort and ability evident among the student cohort.

As mentioned above, the Professional Practice modules, which form part of the IPAV/ITT level 6 programme, are assessed remotely. Students must describe their competence in a number of areas and this competence must be backed up by the attachment of evidence to verify the competence. In the light of this, IPAV believes that remote assessment is an effective method of assessing student work.

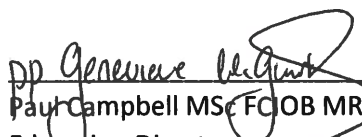
IPAV's experience in its collaborative involvement with 3<sup>rd</sup> level educational institutions over 20 years, indicates that no conflict exists between professional bodies and providers.

This is because IPAV recognises its role as a professional body and leaves educational issues to the experts in the institutions.

IPAV believes that it is of vital importance that those responsible for assessment maintain regular contact with the relevant communities, such as professional bodies, in order that programmes and assessment methods remain current and fit for purpose.

IPAV believe that learners should be involved as partners by involving them as members of programme boards and by having due regard for their feedback and comments on the programme.

In future, more programmes will be delivered by blended learning which will lead to increased levels of remote assessment.

  
Paul Campbell MSc FCIQB MRICS MSCSI  
Education Director  
Institute of Professional Auctioneers and Valuers

# Consultation on Green Paper – IRAAL contribution

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The Irish Association for Applied Linguistics (IRAAL) welcomes the opportunity to take part in a nationwide discussion on assessment that may lead to the development of general guidelines for Ireland. As IRAAL brings together language lecturers, language teachers, and researchers in linguistics, applied linguistics, and sociolinguistics, the aim of this document is to offer considerations on the section of the Green Paper dealing with the assessment of/for second (SL) and foreign (FL) language learning.

In this respect, we find that the Green Paper falls short of a comprehensive and detailed section dedicated to language testing other than English Language Education (ELE). Language testing is indeed an area of applied linguistics with a long-standing history of research, the results of which have provided language educators with useful insights in the assessment of second and foreign language learning. Particularly, after the publication of *Languages Connect*, Ireland's strategy for foreign languages in education, by the Department of Education and Skills, a stronger focus on SL and FL testing is advisable.

With reference to assessment, *Languages Connect* advocates the alignment of all Irish foreign language examinations to the Common European Framework of Reference for Languages (CEFR) (p. 20) and the promotion of the framework in the wider society. The Green Paper follows from this recommendation in Sections 4 and 5. Section 5.6, however, needs some clarification in the use of the terminology. Where the title of the section is *Standards for Foreign Language Proficiency*, in the first line the term *second language* is used. As the two terms can stand for different constructs, it would be advisable to provide a definition. Also, the bullet point on page 6, which reads 'place a person at a level in a language programme' should be elaborated to read 'determine language competence and ensure appropriate placement in a language programme'.

Commendably, Section 10 of the Green Paper deals extensively with the assessment of ELE, but fails to engage in any analysis of assessment frameworks currently used in Ireland (e.g. TESOL competencies, IELTS, Pearson, TOEFL), which would lead to discussion of the best fit for ELE assessment in Ireland. Further, we note that, at present, the sections addressing the much-needed oversight and regulation of the ELE sector do not fit within the framework of QQI. The ELE sector should be regulated like any other business and its qualifications should be the remit of the professional standards for Continuing Professional Development courses in Ireland. It can be argued that, until ELEs can demonstrate that they abide by their own industry standards, they should not be included in policy surrounding QQI in the educational sector.

More importantly, as stated previously, a section on ELE, albeit essential, is not enough when referring to language testing, given the variety and amount of FLs taught at secondary and third level in the country.

Finally, IRAAL would welcome a section on how heritage languages (i.e. the native languages of the new Irish) can be assessed in schools that have Irish or English as a medium of

instruction. Moreover, IRAAL would welcome any acknowledgement of the multilingual competencies and functional abilities of students for whom neither English or Irish are a home language and who still access primary and secondary education in this country in the same contexts as those for whom English and/or Irish are home languages. Either pedagogical concerns (which are beyond the scope of this Green Paper) or assessment consideration has to be paid to this rising cohort of students in primary and secondary education in Ireland.

Dear QQI,

We are involved in the delivery of training in Horticulture especially in Greenkeeping Grounds and Landscaping.

The Assessment of awards in Horticulture in an overall context are sometimes 'out of touch' with employers in Horticulture.

Horticulture is a very practical 'hands on' industry and the assessment of awards at level 3 and 4 for new operators/employees especially those whose first language is not English need only be skills based only at these introductory standards, especially when employers sometimes require a component award delivery for staff as opposed to a Major award.

Employers require training awards for operators to use machinery safely that is focused on safe use without the requirement of theory assessment at these introductory levels. More bite sized awards focusing on specific equipment rather than a range of equipment that rarely applies to all in the industry...

We would also suggest attendance based certification leading to assessed certification....which helps those whose first language isn't English. Without this in place it puts too many people off enrolling onto training.

For all levels 3 to 6 there needs to be more consultation with employers to ensure QQI awards are relevant and more easily delivered to keep up to speed with the actual training requirements of employers as opposed to the other way around. For example Pesticide spraying certification needs a radical overhaul....in consultation with the dept of Agriculture.

Yours Sincerely,

Irish Institute of Sport



## **Green Paper on Assessment of Learners and Learning Response**

iScoil is an online and blended learning programme that aims to expand access to education for young early school leavers. iScoil offers a variety of courses through a flexible and agile design for online learning that responds to the unique needs of each student. For iScoil, online learning is a platform for inclusion that can be adapted to fit any context. The iScoil collaborative teaching approach guides students using adaptable, interest-led content.

iScoil addresses the need for an accessible educational programme for early school leavers. We work with young people aged 13-16, who have been out of mainstream education for at least six months, and who have been referred to us by the state agency Tusla who have a statutory remit for early school leaving. These young people are at-risk of disadvantage and limited life opportunities and we open education pathways to with an innovative model of online and blended learning.

Education and inclusion are at the heart of our work and drives our creative application of technology and media to support our students to continue to learn. We value collaboration and partnership that considers the wellbeing of each individual student as a key to success. Empowering young people to direct their own learning and create their futures underpins our work. We believe every young person deserves the opportunity to fulfill their potential and contribute actively and positively to their communities and the future growth of our society.

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. Every iScoil student has a unique online learning plan updated daily, that reflects their individual ability, interests and learning needs. Technology allows us to monitor student progress and provides a platform for our online mentors and tutors to work with students and set learning goals (SLOs) and a targeted education plan. Using our technology platform every student has their online learning plan updated daily, that reflects their pace, monitors their progress and works to build on their learning.

### **The unitisation of assessment**

Throughout our programme, our learners are assessed using formative and summative learning. This ensures that the relevant knowledge, skills and competencies have been developed and assessed throughout each student's progression students progression. Whether



a student completes two to three component modules or the compound Level 3 general learning award

they will have achieved the required learning outcomes, and will have demonstrated these through their learning, culminating in a portfolio of work with students evidence of learning.

The balance of formative learning combined with summative learning is carefully managed. The summative assessment often takes place in the form of a skills demonstration, project work or similar piece. This allows the student to bring together the sum of skills gained and demonstrate their knowledge and understanding of the topic, without over assessment being an issue.

Through a balance of teaching, formative assessment for learning and summative assessment we ensure all learning outcomes are achieved and assessed. We feel that unitisation of assessment is ideal for our learner context, where a focus solely on summative assessment would be to their detriment. They failed to engage in mainstream education for a variety of reasons, and summative assessment can be part of that.

### **The sustainability of the burden of assessment on providers & Centralised versus distributed assessment**

On iScoil our learners and their progression are at our core. To this end we focus on creating content and assessment processes that are tailored to make the educational experience an engaging one. While we recognise the benefit in collaborative approaches to creating summative assessment, for our learners, and in our context, we would be reticent to engage in such a process. Our learners, and our service is unique, and we have a duty of care to provide the best service we can, using our model in the way we know best supports them - while still working to QQI standards and guidelines. This would also be the same for centralised versus distributed assessment. While we again recognise its benefits in certain contexts and for certain providers, it would not fit our remit, and as such, feel it is not suitable in our context.

### **Perceived ambiguities in the QQI regulations**

Clear and concise guidelines are easy to follow, and ensure that QQI regulations can be adhered to. iScoil would appreciate that all QQI guidelines are clear and lead to no ambiguity. This would be a benefit to all providers. If there is text that is open to other interpretations then this must either be rectified, or else have the flexibility to allow for this interpretation.

### **Micro-management of assessment through regulations**

iScoil welcomes clear and concise regulations and guidelines. But we also welcome the ability to have autonomy over assessment, in order to provide the best learning experience for our context. We agree with the requirement of meeting QQI guidelines on assessment. We would



agree with micro-management being to the detriment of providers, tutors and learners. We would welcome the freedom to retain control over these minute details, in order to

focus on delivering the best teaching and learning experience for our particular context and learner group.

### **Patchiness of current guidelines**

The QQI guidelines overall are clear and give good guidance on what is expected and the processes to follow. Appendix 5, while referenced to in the document as examples of assessment criteria, is certainly more of a list of terms to help devise assessment types. In the iScoil context we use a variety of assessment types to engage with our learners. Determining these types of assessment requires knowledge, experience, expertise and research. We agree that there is a wealth of literature available on effective practice in assessment. We feel that allowing each provider determine the assessment types that suit them is the best approach to take.

Regarding instructive examples of effective assessment in the Irish FET context, perhaps each FET provider can provide one example of an assessment type used. These could all be compiled into a FET sample assessment document, grouped and searchable by assessment types, for reference in the sector.

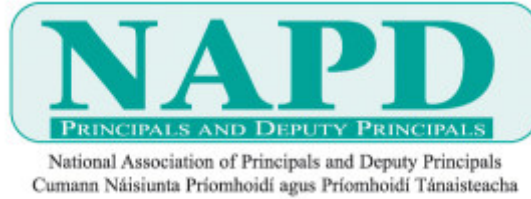
### **Assessment in the context of the QBS implementation for the Common Awards System**

iScoil recognises our role and responsibility in calculation of grades in assessment. As such if QQI was to implement changes to the CAS in the context of the QBS to reflect this role falling on the provider we would be supportive. We would, however, require that the system for evidencing and grading be clear and simple to follow, and any additional workload on QBS is minimal. All of our component awards that lead to compound awards aim to achieve the compound ELOs, as our programme is designed to work either as a whole, or in part, when it comes to awards.

### **Summary**

iScoil recognises and values the input of QQI into maintaining the requirements of assessment. We feel that a set of clear, simple, easy to follow guidelines from QQI to providers, covering the general principles of assessment would be beneficial. 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.





## **QQI Green Paper on Assessment**

### **Response of the National Association of Principals and Deputy Principals**

#### **Introduction**

Dr Rory O’Sullivan, Chair of the NAPD-FET Committee, completed this submission.

The National Association of Principals and Deputy Principals (NAPD) is the professional association for all Principals and Deputy Principals in Post Primary schools and Further Education and Training (FET) schools and colleges in Ireland. The NAPD-FET committee also represents Principals and Deputy Principals from the FET schools and colleges in Ireland under the auspices of the three managerial bodies, ETBI, JMB and ACCS. Established in 2000, this committee has represented NAPD on many national working groups and committees involved in FET. In addition, a representative of this committee is a member of the NAPD National Executive and works with the NAPD Executive in addressing FET issues as they affect Principals and Deputy Principals in their role in leading and managing their schools and colleges.

This submission is based on the collective experiences and knowledge of Principals and Deputy Principals who are involved in delivering many different FET programmes such as:

- Apprenticeships (Standards Based Construction Trades)
- PLC Programme
- Traineeships
- SkillsETB
- Momentum
- BTEI
- PLC Programme
- VTOS
- Adult Education – part-time night provision

NAPD-FET schools and colleges have been catering for a diverse range of learners on the above programmes for many years.

- Direct entry from second level schools
- Direct entry from the senior cycle at special national schools
- Direct entry from Youthreach centres
- Recently unemployed
- Long-term unemployed

- Those up-skilling
- Those retraining
- Those seeking employment
- Part-time Night Students
- Graduates
- International students
- Those who do not thrive in HE and revert to FET
- Mature learners
- Early retirees who are seeking a career change
- Those seeking a change of career

The NAPD-FET committee is available to meet directly with QQI to discuss the issues raised in this submission.

The National Association of Principals and Deputy Principals (NAPD) welcomes the opportunity to contribute to the national debate on assessment facilitated by this Green Paper. In particular, the highlighting of the macro, meso, and micro levels in relation to assessment is a valuable framework for this debate. NAPD believes the “Universal Design for Learning” approach to all teaching and learning, as well as the assessment of/as/for learning is best practice and should be a underpinning principle of the resultant QQI Policy on Assessment. This approach is vital to the inclusion of the greatest number of citizens possible, to the greatest extent possible, in all of the education and training provided by FET Providers. Indeed, the UN Convention on the Rights of Persons with Disabilities, recently ratified by the Irish government, places a legal obligation on all public bodies, to provide all of our services in a universally designed manner.

### **Evolving Policy Context**

Further Education and Training (FET) in Ireland has undergone enormous change since 2010 with the establishment of SOLAS, the ETBs, and QQI. Coupled with the institutional and structural changes, the profile of the labour market, and the profile of the student body have similarly changed. Since 2016, SOLAS has published the following national policies that all have implications for assessment:

- Strategy for Technology-Enhanced Learning in Further Education and Training 2016-2019;
- Further Education and Training Professional Development Strategy 2017-2019; and
- Supporting Working Lives and Enterprise Growth in Ireland – 2018-2021 further education and training policy framework for skills development of people in employment.

In recent months, the government stated six national targets for the FET sector.

Target 1 - Skills for the Economy: 10% more learners securing employment after undertaking a relevant FET course;

Target 2 – Progression: 10% more learners progressing to other FET courses or higher education from relevant courses;

Target 3 – Transversal Skills: 10% increase in the rate of certification on courses primarily focused on social-mobility skills development that is transversal in nature;

Target 4 – Lifelong Learning: 10% increase of adult learners taking part in lifelong learning delivered through FET;

Target 5 – Certification and Qualifications: From 2018, for three years, an average of 10,000 more learners each year are to achieve qualifications related to business sectors where employment growth and skills needs have been identified;

Target 6 – Apprenticeships and Traineeships: 30,500 new apprentice and trainee registrations from 2017-2019.

This led to a process of developing Strategic Performance Agreements between SOLAS and each ETB, and non-ETB FET provider. Assessment is a constant theme in all six of these targets. QQI similarly engaged in a process of strategic dialogue with each ETB as the governance for quality assurance shifted from the legacy centred-based situation to an ETB-wide perspective. Indeed, in its recent statement of strategy, QQI stated that the ETBs would be subject to an Institutional Review model similar to the CINNTE model that applies to the Institutes of Technology. This is in line with the ambition to see ETBs assuming Delegated Authority.

However, the success of macro-policy is entirely dependent on the local capacity to implement it. The trajectory of policy development in relation to quality assurance in general, and assessment in particular, has significant resourcing implications for the FET Providers. Meeting these resourcing demands is a matter for central government and not within the gift of FET Providers.

The policy discourse in relation to all of the policy changes in FET is dominated with references to ETBs. However, as NAPD represents FET providers in ETB and non-ETB schools and Colleges, the impact of these policy changes is a concern in how they will affect non-ETB providers and the consequential resourcing implications.

### **A Competence Approach to FET Programmes**

Mulder and Winterton (2017) state:

“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” (p.5)

This statement, in many ways, describes, to an ever-increasing degree, the experience of many FET programmes. The assessment associated with a programme is focused on the assessment of each module or component rather than the programme as a whole. The integration of assessments is often at the component-to-component level and occurs inconsistently. For the learners, this unitisation of assessment has resulted in an overloading of 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. This situation is unsustainable and unsound. Emphasising the assessment of the overall programme objectives, or core competencies, rather than of the individual component objectives would open the opportunity to perhaps a blend of programme-wide capstone assessment events, combined with a small number of component assessments.

Mulder (2015) states, “the meaning of competence is situation- or context specific” (p.4). As has been the case with apprenticeships for generations, learning to be part of an occupational ‘community of practice’ requires not only technical knowledge and skills, but also the social skills and the development of the situational or contextual knowledge of how the knowledge and skills are applied in the work place. The learner constructs meaning for him or herself by placing his/her learning within the appropriate occupational context. Mulder continues, “there are certain relationships between personality and ability factors, and competence and on-the-job performance ratings” (p.4).

Mulder refers to the most recent approach to conceptualizing competence as ‘situated professionalism’. He elaborates:

“A major constituent of this approach is the appreciation that a certain competence representation can mean something totally different for one job holder or job situation to another. Furthermore, important notions are that the agency of a person and the affordances of a job context enable the development of competence..., the idea that the work context takes shape as a community of practice in which players interact and share and negotiate meaning, and that personal epistemologies have a stronger influence on professional development than mere skills training. Finally, it also acknowledges that desired competence is defined by what key stakeholders in a professional context expect in terms of professional action” (p.1).

It is worth emphasising, as Mulder points out, 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. Taking a more holistic, developmental and transformative view of FET programmes, within a competence approach to assessment of/for/as learning, would provide the learner with a richer learning experience, which would prepare them for not only the job opportunities of today, but

also with the capacity to respond to future occupational changes through lifelong learning opportunities.

### **The Changing Nature of the Format of Programme Delivery**

The increased engagement with employers and the changing nature of the labour market will demand a more flexible approach to all skill formation provision, both FET and HET. Requiring attendance in a classroom for a course in the medium to long term, as the only form of provision, will not be sustainable. In addition, the increasing acceptance of the value of work-based learning, with its implications for assessment, will also need to be part of the vision for the future. In short, education and training will occur in three principal venues – 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.

Employer engagement on all aspects of FET provision is an increased priority for all involved in FET. Indeed, the Evaluation Report of the Post-Leaving Certificate Programme (McGuinness et al. 2018) highlighted the weakness of the current approach to work experience. It is not inconceivable that work-based learning, and work-based assessment will be an increasing part of PLC-type provision into the future

### **Consistency of Standards**

A distributed approach is taken to the developments of assessment instruments in ETB and non-ETB providers. A centralised approach would be logistically impractical. Equally the idea that assessment instruments would be made available from an online repository would be resource intensive and contrary to a 'situated professionalism' approach to FET programme provision.

While higher education institutions tend to be located on a small number a campuses, FET provision is more geographically dispersed. This has implications for the QA governance, particularly in the area of consistency of standards between centres. One ETB has commenced work in this area and sees this issue as consisting of four pillars:

1. Consistency of Assessment Instruments;
2. Consistency of Marking (implementation of assessment instruments);
3. Consistency of External Authentication;
4. Internal Quality Auditing and Monitoring.

The general approach to Pillar 1 is to develop guidance documents for teachers to assist them in the devising of assessment instruments. This work would link strongly with the work in Pillar 2 that would involve ongoing staff marking seminars to develop a shared understanding of both the standards and their implementation. The work in Pillar 3 complements the work in Pillar 1 and 2. It consists of two main elements. Firstly, the role of the External Authenticator (EA) is being reviewed to examine how, by perhaps appointing the EAs at ETB level to a cluster of colleges, an explicit evaluation of the consistency between centres could be included. The second

element of the work of Pillar 3 is examining the EA reporting process so as to ensure that the issue of consistency is addressed sufficiently. The work of these three pillars complement each other. They are co-dependent on each other. This approach is the most practical within existing resourcing constraints and therefore likely to be successful. The work of Pillar 4, which is crucial to the overall success of the QA system, has yet to commence, as it is dependent on securing additional resources.

There are clear opportunities for non-ETB FET providers to benefit from such work in collaborative arrangements with ETBs.

NAPD explored QQI's Green paper on Assessment within the following consultation topics:

### **Towards General Principles and Guidelines for Assessment of Learning (p.103)**

- **Would it be useful for QQI to publish general principles and guidelines for assessment?**
  - Yes. In the interests of clarity for all, it would be useful for QQI to publish general principles and guidelines for assessment. The provision of guidelines by QQI would also contribute to narrowing the field of possible interpretations and thus contribute to consistency.
- **What should the guidelines and principles address?**
  - The guidelines should include a clear and unambiguous distillation of QQI's understanding, and recommended application of, the concept of assessment in this context;
  - The QQI's position and role in the assessment process should be stated;
  - The position and role of other parties to the assessment process should be stated; 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 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.
  - As mentioned above, the principles of Universal Design should underpin all guidelines.
  - The precise meaning of the terms 'principle' and 'guideline' here should be stated;
- **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 (Diagnostic [narrow] Assessment) or QQI validated programmes)?**

- Guidelines should be applied to all providers and awarding bodies.

### **Towards Sectoral Conventions and Reference Assessment Protocols for FET and HET Sectors (p.104)**

- **The idea is that, in the interests of consistency, [conventions and protocols] would be developed collaboratively with FET providers recognised by QQI and used by all FET providers. What topics should be addressed at [e.g. school/ institution] level FET in sectoral protocols and conventions? In addressing this please be specific.**
- Collaboration in the interests of consistency would be welcome. The question of the design of grading schemes should emerge from the prescription of assessment guidelines as mentioned above. The developments of Communities of Practice within knowledge domains both within and between FET and HE would be welcome. Such networks might facilitate the sharing of subject-specific developments, advances in teaching practice - including assessment.

### **Further Education and Training (p.105)**

- **What might be usefully addressed by sectoral conventions?**
- See above. In addition, the development of within ETB/non-ETB and between ETB/non-ETB conventions would contribute significantly to the consistency of standards. It would also facilitate the smooth access, transfer, and/or progression of FET students between ETBs and non-ETBs.
- **What might be usefully addressed by reference assessment protocols?**
- See above.
- **What changes are required to the implicit protocols and conventions in Quality Assuring Assessment – Guidelines for Providers?**
- It is important that a shared understanding of assessment principles and process is developed among teaching and non-teaching staff within centres. This shared understanding would focus on the standards required for the development of assessment instruments and their implementation. Issues of academic integrity would also be crucial.
- As mentioned the unitisation of assessment which has led to a situation in which learners on a full-time programme are expected to participate in over 30 assessment events in an academic year. There needs to be a great use made of capstone assessments to mitigate this unsustainable situation.

### **General Guidelines on External Moderation of Summative Assessment for NFQ Qualifications (External Examining and External Moderation) (p.106)**

- **Would it be useful for QQI to publish general guidelines on external moderation mechanisms (...external authentication)?**

- Yes, in the interests of full clarity around EA mechanisms. This will create confidence in assessment as students move from ETB to ETB/non-ETB or course-to-course. As mentioned above the role of the EA needs to change to explicitly evaluate consistency of standards between centres. This would be greatly facilitated by appointing EAs at the Meso or ETB/non-ETB level rather than at centre level.

- **To whom should the general guidelines apply?**

- All at Macro, Meso, Micro levels, including students. The guidelines should also show a link to assessment processes at higher level so as to prepare FET students for progression with the seamless integration into higher education assessment processes.

- **What changes could be made to improve QQI's Effective Practices Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?**

- QQI's EPGEE would provide an appropriate template for similar EA document for the FET sector.
- There is constant criticism of the EA system and the standards adopted by EA's universally throughout ETB/non-ETB providers. QQI should contribute to the effective CPD with the EA panel, through the provision of rigorous guidelines for EAs, to ensure that the assessment is of sufficient rigour.

### **Further Education and Training Issues (p.110)**

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

- Clarifications of guidelines as described above.
- ETB/non-ETB providers need to be supported in the creation of effective guidelines and training that will allow for the increase in confidence nationally on the FET assessment process. As mentioned above, QQI could convene a meeting of FET and HE practitioners at which shared experiences and practice could take place. Such a meeting could prove to be a catalyst for the development of Communities of Practice within knowledge domains.

- **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 calculation of the grade for a compound award is part of the certification process. Consequently, the locus of certification should be responsible for the grade of the compound award. Most, if not all, certification for FET awards is currently a matter for QQI. Therefore, currently QQI should have the responsibility to calculate the grade of the award. When a FET Provider achieves Delegated Authority status then that responsibility would shift to the FET Provider.

### **Summary on the topic of Unitisation of Assessment (pp.69-70)**

#### **Outline:**

- The practice of initiation of assessment is widespread in the FET sector and has been actively encouraged by systems and policies.
- Unitisation of assessment is problematic when it facilitates the omission of explicit assessment of overarching learning outcomes. This problem is alleviated by including some 'capstone' units whose purpose is to provide an opportunity to achieve and demonstrate overarching outcomes that would otherwise not be assessed.
- As mentioned above, unitisation of assessment can also lead to inefficiencies for learners, who may be 'over assessed' as a result of each unit being assessed.
- QQI's CAS awards specifications prior to more recent QQI policies encouraged unitised assessment and, while this is no longer the case, not all practitioners may have fully appreciated the implications of the QQI policy changes on the use and interpretations of CAS awards standards.
- **Centralised versus distributed assessment.**
- A centralised approach to assessment is impractical for a geographically dispersed organisation such as an ETB, as well the non-ETB FET providers. The QA governance requirements to support a centralised system would involve prohibitive levels of resourcing and not good value for money.
- Centralised Assessment is contrary to the principles of a situated professionalism approach to competence.
- **Perceived ambiguities in the QQI regulations.**
- **Micro-management of assessment through regulations.**
- **Patchiness of current guidelines.**
- The assessment system and regulations need to be revisited and modernised in order to redefine practices. The current guidelines have been open to interpretation throughout FET providers. While the overarching principles of assessment are being achieved, the operational issues are causing difficulty.

#### **Macro (e.g. QQI), Meso (e.g. Institution) and Micro (e.g. teacher) [levels of engagement] (p.114)**

- **Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so, what do you think guidelines should address.**

- QQI need to have more involvement in aligning FET and HE assessment policies and procedures so as to increase confidence in the assessment process. This would greatly facilitate FET to HE progression.
- **Please comment on the need or otherwise for macro-level assessment principles and guidelines on assessment. What should any such principles and guidelines address?**
- The macro level should assess the overarching Principles of assessment. They should be broad and allow for the drilling down to the Meso and Micro levels of assessment policies and procedures at centre level. QQI should not set aside responsibility for assisting with the development of policies and procedures at Meso and Micro levels
- **External Examining and Authentication**
- **What purposes do you think EE and EA serve? How can they better serve those purposes?**
- Both EE and EA are crucial in maintaining standards of academic practice and general confidence in those standards. Perhaps the role and responsibilities of the EA might be more widely publicised, especially to learners?
- 
- **Do you think EE and EA 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?**
- See above.
- **Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET?**
- Discussed above.
- **Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.**
- EE/EA and (local) RAP would, from experience, appear to provide appropriate oversight.

## Academic Integrity

- **Recognising what is already being done, please indicate what additional actions you think should be taken, and by whom, to help support academic integrity in general and in your sector in particular.**
- The approach to addressing to issue of consistency of standards, as outlined in the introductory preamble, 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.

## References

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Mulder, M. (2015) Professional Competence in Context – a Conceptual Study, unpublished paper at: *AERA 2015*, Chicago, USA, April 19.

Mulder, M. and Winterton, J. (2017). Introduction. In Mulder, M. (Ed.) *Competence-based Vocational and Professional Education – Bridging the Worlds of Work and Education*. Basel: Springer, pp.1-43.

QQI. (2018) *Statement of Strategy 2019-2021. Adding Value to Qualifications*. Dublin: QQI.

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-END-

## **Response from the Institute of Technology Blanchardstown (ITB) to the QQI Green Paper on Assessment of Learners and Learning**

As a Higher Education Institution, ITB welcomes the opportunity to contribute to the discussion on Assessment of Learners & Learning as presented by the QQI Green Paper and we would be happy to participate in further consultation workshops in the future.

*The answers given below are from academic staff at ITB and contain individual views that are not necessarily the view of ITB as a whole.*

### **TOWARDS GENERAL PRINCIPLES AND GUIDELINES FOR ASSESSMENT OF LEARNING**

Q. Would it be useful for QQI to publish general principles and guidelines for assessment?

A. Yes

Q. What should the principles and guidelines address?

A. *Good code of practice and guidelines to prevent over assessment of students.*

Q. 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)?

A. *Apply to all providers and awarding bodies.*

### **TOWARDS SECTORAL CONVENTIONS AND REFERENCE ASSESSMENT PROTOCOLS FOR FET AND FOR HET SECTORS**

#### **Section 15.1 Higher Education and Training**

Q. Are there particular conventions that should be agreed across the whole HET sector (e.g. on classifications of awards)?

A. *Yes especially on classification of awards.*

### **GENERAL GUIDELINES ON EXTERNAL MODERATION OF SUMMATIVE ASSESSMENT FOR NFQ QUALIFICATIONS (EXTERNAL EXAMINING AND EXTERNAL MODERATION)**

Q. Would it be useful for QQI to publish general guidelines on external moderation mechanisms (external examining and external authentication)?

A. Yes

Q. To whom should the general guidelines apply?

A. All sectors.

Q. What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?

*A. No specific changes needed but should apply to all kinds of external moderation.*

## **SUMMARY OF ISSUES PROPOSED FOR DISCUSSION**

Q. 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)

*A. QQI should have a consultancy role in the development of academic programmes. 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.*

Q. 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)

*A. Having disciplinary guidelines would be helpful.*

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

*A. Working group of academic staff with programme development experience from across the HE sector would help identify issues and solutions.*

Q. 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. Yes, we agree with having programme-specific assessment strategies with flexibility in the assessment approach.*

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

*A. 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.*

Q. 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? (section 7.7)

*A. If QQI had a catalogue of approved courses at their disposal for other institutions to adopt by a programme development team, then this would reduce costs to the institution and speed up the validation process.*

Q. 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)

*A. This is a big problem for HE institutions when engaging with organisations such as Technology Ireland ICT Skillnet on sponsored academic programmes. The problems involve the numbers of candidates being presented for RPL processes as well as 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. What is needed is 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.*

*A. Section 7.8 on RPL can best be summed up, as the document states, by “Assessment in the context of RPL can potentially be challenging” (p. 55). RPL is a difficult, involved, topic, to which there do not appear to be generic solutions. It is good to see this being acknowledge to an extent in the document, but, perhaps 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).*

Q. 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)

*A. Yes, this would be helpful.*

- *move towards threshold standards, i.e. Minimum Learning Outcomes that must all be achieved for a student gain a pass in a module*
- *40% to pass a module is meaningless in terms of defining which LOs to which level of achievement LOs have been demonstrated*

Q. 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?

*A. Yes.*

Q. 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)

A. Yes.

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

A. Yes. *Students learn at different rates and some need more time than others to achieve the Learning Outcomes.*

Q. 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)

A. Yes. *QQI need to be more actively involved in the development of courses before they go to validation panels.*

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

A. *Norm should always be a standard and not relative to a peer group.*

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

A. *Grading is necessary and useful. It shows a student their current level and where they need to improve. Best applied to theoretical exercises or a mixture of theoretical and practice. For practical skills, a pass or fail is sufficient as they can or cannot use the skill.*

Q. 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)

A. *We agree with the comments in section 7.15.*

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

A. *Having a National Standard Exam independent of the HE institutions would create a benchmark for the award classifications.*

Q. 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)

A. *This is more of a challenge for technology based courses that we are embracing but requires investment in equipment and training to get it right. Working best for part-time distance learning courses and for blended learning with one-day a month in-person workshops.*



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

*A. Biggest challenge is knowing the student did the work themselves. In-person lab tests or written exams ensures this but need alternative assessment for remote assessment.*

Q. 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)

*A. Yes, professional bodies can have different agendas to HE institutions but our experience is the professional bodies have a good standard and requirement needs that is compatible with HE programme quality assurance policies.*

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

*A. Professional bodies tend to have their own validation processes but it would be helpful if QQI and Professional Body validation processes could be aligned to lessen the work load on institutions.*

Q. 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)

*A. Yes.*

## **HIGHER EDUCATION AND TRAINING ISSUES**

Please respond to the commentaries on the issues raised in section 9.1, viz.:

### **Section 5: Standards in Ireland**

We would welcome a review of the NQF 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.

Section 5.9: Classification of First Class honours

- programme team to be able to define threshold required for award of first class honours related to discipline of award
- (e.g. for example, grade B+ or better for final year computing project, as well as GPA of 3.25) - i.e. more than just accumulated GPA mathematical calculation

### **Section 6: Programmes as transformational processes**

#### **Minimum Learning Outcomes**

“Our (QQI’s) validation policy is more explicit, requiring that programmes specify minimum intended programme learning outcomes that must be achieved by all who pass..” (p. 48)

This approach is completely incompatible with a grading system where an overall result of an award is computed based upon an average of grades across different modules. For example, a student gets 40% in each of 12 five credit modules which add together to form an overall 60 credit add-on degree at level 7.

Their overall mark is pass, their mark in each module is pass, but, the 40% result in each module represents 40% achievement, and I would challenge anyone to point to minimum learning outcomes that they could attain with a 40% grade in a module. So, the concept of minimum learning outcomes is not compatible with grading systems as they are commonly used. However, will anyone dare say this, and risk being told that their programmes are not compatible with QQI standards?

Lets imagine, however, that QQI’s system is possible. Do you then have two parallel processes for each student, one where you measure their performance to come up with a grade to give them an award, and another, separate, but related, one, where you measure whether they have attained the minimum programme outcomes, which gives a pass/fail grade and potentially over-rides the more traditional award computation.

Some real examples where QQI explained that they really intended here would be useful.

#### Transparency

“Writing intended learning outcomes statements is an art. The statements must be comprehensible at an appropriate level to learners, to teachers, to members of the discipline’s wider communities of practice and to other key stakeholders” (p. 50)

The NFQ concept of transparency, to which this statement is linked, is quite questionable. How can intended learning outcomes, written by experts in a field, to reflect knowledge of a discipline that learners do not have, possibly be comprehensible to learners at an appropriate level. If they are, then how could they be of any use to the other stakeholders, the lecturers, the communities of practice, etc... e.g. a programme outcome of a mechatronics programme is “Analyse, design, communicate, connect, implement, reflect and critically evaluate technology and resource choices”. This means quite a lot to me, but, I argue, any prospective student who might read this, or any student in the early years of study, would get so little meaning from it to be valueless.

# QQI Green Paper on Assessment

The QQI is looking for responses on any of the Green Paper's content or on any matters concerning assessment. The following is a summary of some of the main issues proposed in the paper for discussion.

[17.1 GENERAL ISSUES CONCERNING ASSESSMENT](#)

[17.3 HIGHER EDUCATION AND TRAINING ISSUES](#)

[17.5 APPRENTICESHIP ISSUES](#)

[17.6 MACRO, MESO AND MICRO](#)

[17.7 EXTERNAL EXAMINING AND AUTHENTICATION](#)

[17.8 GENERAL ISSUES CONCERNING ACADEMIC INTEGRITY \(ALL SECTORS FET, HET AND ELE\)](#)

## 17.1 GENERAL ISSUES CONCERNING ASSESSMENT

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)

This would be a collaborative effort including a number of stakeholders (lecturers, course coordinators, department heads, instructional designers etc.). Certainly this would require more opportunities for these individuals to cooperate and communicate. The establishment of working groups to assess challenges and develop solutions could be beneficial in this regard.

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. Writing

outcomes and aligning assessment requires collective input from a variety of stakeholders. It is also important to consider learning opportunities as well as learning outcomes.

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)

Disciplinary communities have a vital role to play in ensuring that standards are maintained, that learning outcomes are evolving to meet changing demands and incorporate the latest developments in the field. As noted in the report frequently such factors are not adequately captured by written statements. Therefore consultation with lecturers and those involved in the development and delivery of programmes would likely be necessary. Participation in the working groups suggested above may be beneficial in this regard. Additionally opportunities for observation and access to coursework, projects and activities could enlighten external collaborators. Inviting members of the disciplinary community to engage actively with programmes through guest workshops could offer insight into the course and the student experience, while at the same time offering students valuable contact with industry.

Agree - meaningful assessment - that leads to improvement of learning- is not possible without discipline engagement. There will naturally be differences of opinion but colleges and universities need to engage these so that learning outcomes & assessment reflect the culture and practice of the disciplines and the uniqueness that each discipline brings.

Opportunities for improvement might include an Institute/College wide student learning outcome assessment process

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

This may require a change in values for educational systems/ providers and students who have traditionally favoured and expected concise, standardised and easily quantified learning outcomes. As noted in the report current needs and realities do not necessarily lend themselves to this. Rather learning outcomes encompassing these changes will likely need to consider the subjective development and experience of the student, how they engage with and develop the learning material. This is inherently more complex and may require a more conceptual/ narrative/ descriptive approach to the development of learning outcomes.

Moving from an objective, easily quantifiable approach may also require a greater degree of trust in the autonomy of the lecturer as a learning professional. The lecturer is best placed to assess the student's progression and relationship with the learning material. In this way they are most qualified to specify how these should manifest in the learning outcomes.

Perhaps more recognition of the value of learning outcomes of what students will be able to do after they complete a programme. It is about focusing on the knowledge, skills and

attitudes that students can develop in the programme.

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)

We agree that all programmes should include a programme-specific assessment strategy. We think the main obstacle to this approach is the compartmentalised/ individualistic nature of higher education environments and the lack of opportunities for learning professionals to collaborate. As noted above working groups could address this, offering opportunities to share experiences, challenges, insights. In this way individual modules could be coordinated with one another offering a unified/ complimentary approach to student development and hence assessment.

In addition, programme specific assessment strategy should incorporate skills that students need for their future. The exam/coursework must assess skills other than just content. Obstacle is in engaging department/disciplines to work together in teams to create the programme assessment - but this is not insurmountable if working groups are formed. Lead in time to programme development is a real factor so plenty of time must be afforded to the development of programmes and amendments/modifications to existing programmes so that sufficient time can be afforded to both modules and programme assessment.

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

Obviously students will be required to achieve certain competencies in order to successfully complete their course, however the processes through which these competencies are achieved will in all likelihood vary significantly. This diversity of experience and approach is a great asset to the learning environment, particularly in relation to the development of current needs and realities referenced in the report. It is vital that cultural and linguistic diversity become a central classroom resource, not to provide a 'service' to 'minorities', but to improve the educational experience for all students. 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. This should be facilitated in such a way as to allow students to confront real conflicts of power and interest, rather than introducing diversity in a tokenistic manner. In this way differences can be recognised by such means as to complement each other, while at the same time students are granted the opportunity to expand their cultural and linguistic repertoire enabling access to a broader range of cultural and institutional resources

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? (section 7.7)

Yes, developing and maintaining the quality of programme assessment outlined here would require the constant review and adaptation of programmes. This would necessitate opportunities for learning professionals to collaborate with one another as well as to engage with industry and the disciplinary community. Such an approach necessitates significantly more resources and investment than a standardised form of delivery.

Agree - there is a huge resource required in terms of time to ensure high quality standards are maintained.

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 embodies the type of responsive, student centred assessment advocated in this report. Moreover it presents a significant opportunity to diversify the learning environment, introducing a range of backgrounds and learning experience. While integrating RPL would present significant challenges this is the type of inclusive assessment learning institutions should be striving towards for all students.

This is something that potential students are demanding more of- for real cognisance to be taken of experiential learning and experience.

The practice, across Irish HEIs, of recognising and validating prior learning, particularly prior experiential learning, remains ad-hoc and idiosyncratic. Many HEIs do not undertake RPL and those institutions that do will only do it for people applying for their courses. 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. 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.

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)

A focus on minimum requirements may send the wrong message, instilling a focus on attainment of credentials over meaningful educational growth and professional/ personal development.

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 this is a reasonable expectation

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)

Yes, performing a skill in context presents a number of challenges and insights that cannot be replicated in an unrelated environment. It therefore offers a more authentic depiction of a learner's competency.

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

Yes, the development of 'skills that people need to function in the modern world' such as creativity and analysis do not lend themselves to modularised, high stakes testing. They require students to challenge themselves, to take risks and be prepared to fail to a certain extent. As noted in the report granular assessment discourages this approach. Together with this students may have difficulty relating isolated subjects to one another. This could have the effect of instilling a fragmented perception of their learning development.

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)

Yes, this is mainly due to the insular nature of departments and the development of a prevailing culture focusing on specific aspects of assessment over others. This may have implications for the relevance of the course and inhibit the opportunities for positive external influences.

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

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

Some grading is necessary to give students an insight into their attainment and progress, however as earlier noted in order to develop necessary skills they must challenge themselves, experiment and be given the opportunity to fail. Over-grading can discourage this and

engender a conservative mentality in relation to their work. As such, grading should be summative, taking the learning journey of the student, their ability to confront challenges and respond to setbacks into consideration.

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)

No, and this is a significant issue. There is pressure on learning providers to inflate grades and if one programme succumbs to this there is a knock on effect. As the report notes it is difficult for external examination to address this and if the holistic approach to assessment advocated here is adopted this will become even more complex. 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.

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?

Yes. 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.

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

As noted above this would require greater collaboration between learning provider and examiner. This could include the provision of narrative summative assessments, learning diaries detailing the progress and achievements of projects and work experience, observation of students in occupational/ learning contexts, student interviews. This would give a more authentic representation of student competency and attainment.

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)



Ideally staff would take a unified approach to their research and teaching, with one enriching and complimenting the other. In reality this is not always the case and this may be another symptom of the compartmentalised nature of higher education institutions. There is also a cultural issue here to do with the value placed on teaching in relation to career advancement/ institution rankings etc. One way of addressing this would be to involve the students themselves in research projects. This could offer valuable experience to students and an important resource to research project development.

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

It is important to define what is meant by remote assessment - is it an exam taken in an HEI or exam centre in another country, an online exam or a piece of continuous assessment carried out in the workplace or at another remote site? What is critical is the need for authentic assessment and the authentication of the student. The Erasmus+ TeSLA project appears to offer solutions to the latter but it will be up to HEIs to address the former.

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)

While professional bodies have a fundamental role to play, their objectives may not always be perfectly aligned with that of learning institutions. Education must prepare students for the demands of the work environment so that they can make themselves heard and engage critically with the conditions of their professional lives. This is not necessarily the same as producing docile compliant workers, as such there is a balance to be struck here and learning institutions must favour assessments and learning objectives that are in the interests of the students over those that prioritise industry.

It is critical that HE providers and professional bodies work together to map learning outcomes (HE) and required competencies (professional bodies) and where these are addressed and assessed within the programme.

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

Collaboration with professional bodies can ensure that institutions are held to account in terms of relevance and reliability. They can offer input with regards to industry changes as well as offer opportunities for students to develop their skills in context through work placements and other collaborative projects

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, this is essential in terms of professional development, keeping abreast of industry changes and maintaining relevance in regard to curriculum design.

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

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

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

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. Learning providers should work in consultation with employers and students to discern what form these achievements should take and what would be considered acceptable in terms of proof.

What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?

The wide availability of technologies such as cameras, drawing, animation and image manipulation tools provide a number of opportunities for self-expression, while the development of editing tools mean that these ideas can be experimented with freely. Added to this, such creations can be shared and discussed on a global platform, offering new possibilities in terms of distance learning, peer-learning/ review and engagement.

Traditional skills such as the consumption and reproduction of learning materials are undermined by the ubiquity of information in the digital age. As such, assessments must be reimagined to measure more relevant skills including analysis, creativity and problem-solving.

Added to this ease of information transfer combined with the persistence of standardisation raises significant problems relating to plagiarism.

To a certain extent responding to these challenges will require a complete re-evaluation of pedagogical approaches. Students will need to move beyond seeking meaning and towards creating meaning. This will necessitate less standardised modes of assessment and an increasing focus on learning processes, student development and reflection. 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.

## 17.3 HIGHER EDUCATION AND TRAINING ISSUES

Recognising that providers are responsible for establishing assessment procedures, please comment on how best QQI might help support them. Please respond to the commentaries on the issues raised in section 9.1, viz.:

- Awards standards, actual learning outcomes (ALOs) and classifications.
- 2009 Sectoral Conventions for Assessment.
- Integrated assessment.
- Over assessment and manageability of assessment.
- Repeat for honours convention (this applies to programmes leading to QQI awards and those made under delegated authority).
- Assessment literacy
- Assessment as and for learning
- Assessment strategy
- Engaging learners as partners in assessment

In my view qualifications from different institutions in the same subject should be equivalent. This means that students should have a comparable level of skill and proficiency, although this could be demonstrated in a variety of ways. As noted above this may require greater collaboration between the QQI and learning providers in order to ascertain a meaningful insight into how such competencies are achieved.

Integrated assessment could be facilitated through greater opportunities for collaboration such as the development of working groups. The QQI could formally recognise this approach and engage with such groups in order to gain an insight into how integrated assessments are designed and implemented.

Over assessment can be addressed through formal recognition of summative/ descriptive/ narrative assessment, as well as progressive self-assessment and learning reflections. The recognition of learning processes and summative assessment could offer students space to transition to new learning strategies. Considering how students respond to these challenges could also promote assessment as and for learning.

Please comment on the questions posed in section 14.

The QQI should publish general principles, but these should be flexible. The guidelines should outline the principle achievements students should demonstrate, leaving room for a variety of means through which they may do so.

Please comment on the conventions and protocols as set out in section 15.

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.

Please raise any other issues that need to be considered.

## 17.5 APPRENTICESHIP ISSUES

What can be done to enhance capacity for developing and using MIPOs and MIMLOs?

In general terms, what are the challenges in developing integrated approaches to the assessment of apprentices that avoid them taking a silo-based approach to developing understanding of theory, practice skills and role/context competence? What can be done to help and by whom?

What can be done to help increase the reliability and validity of competence assessment in the Workplace?

What can be done to encourage industry to become more involved in discussions about approaches to assessment?

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?

Should workplace assessment results be graded as distinct from being reported as successful/ unsuccessful without gradation? Why/why not?

Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?

Please raise any other issues that need to be considered.

## 17.6 MACRO, MESO AND MICRO

*We suggest that you consider what kinds of things might be done at the macro level (in our case these might be quality assurance guidelines, validation policies and criteria, sectoral conventions and reference protocols established jointly with providers); meso level (at institutional level e.g. ETB, university, college) and micro level (e.g. school/centre, programme, module) to help regulate and support assessment of, for and as learning. What can QQI do to help?*

Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so what do you think such guidelines should address?

Do you think that there should be any conventions agreed across the whole HET sector (e.g. on degree classifications)?

Please comment on the need or otherwise for macro-level assessment principles and guidelines on assessment. What should any such principles and guidelines address?



## 17.7 EXTERNAL EXAMINING AND AUTHENTICATION

*External examining and authentication are widely used in higher and further education respectively.*

What purposes do you think they serve? How can they better serve those purposes?  
Do you think that external examining and authentication 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?

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).  
Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?

Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.

## 17.8 GENERAL ISSUES CONCERNING ACADEMIC INTEGRITY (ALL SECTORS FET, HET AND ELE)

Please comment on the presentation of the issues (section 13).

Recognising what is already being done, please indicate what additional actions you think should be taken, and by whom, to help support academic integrity in general and in your sector in particular.

- *Why is assessment important?*
- *How does assessment support learning, quality, equality, standards and qualifications?*
- *How do we embrace the concepts of assessment of, for and as learning*

Assessment is important but should be secondary to teaching. In recent years focus has shifted from the quality of teaching/information to assessment. If this continues, minimum standards will be met, but the opportunity to impart valuable information, appropriate to industry, will be lost.

Module descriptors, in their current form, are the root cause of many assessment issues. Their proscriptive nature undermines the skills and talents of the staff delivering programmes. Example, 24 LOs in Anatomy and Physiology; repetition through-out many modules descriptors. A solution would be to reduce LOs to 3 or 4 in all modules, and the use of a marking rubric. This would allow more creative and imaginative approaches to content development, as well as assessment methods.

The healthcare assistant course is top heavy with written assignments. In reality, a care assistant's working life will never include developing/writing policy documents. Instead it will involve using metrics and indicators [tick box and scoring system] to assess risk and ensure tasks are completed.

External authenticators are excellent. However, many take on a policing role, rather than identifying and suggesting new or alternative assessment techniques. The consensus is that students at level 5 and 6 are over assessed.

Exams are necessary as a means of addressing plagiarism. Sharing assessment across modules is a good idea. Greater use of technology, i.e. apps and software, would improve the student experience of assessment.

Writing/literacy skills and the reading of drafts prior to submission provide valuable supports for students at levels 5 and 6. However, expectations are different at third level, making the transition challenging for many. Attainment of distinctions may not be a measure of a student's ability to adapt to the higher levels. Where there is a progression route, a greater alignment of level 5 and 6 assessment to third level methods and standards must be developed.

## QQI Green Paper on Assessment of Learners and Learning<sup>1</sup>

### ETB Sector Consultation Feedback Form November 2018

This form has been developed to assist in documenting and collating feedback on the issues and options contained in QQI Consultation Green Paper on Assessment of Learners and Learning, from the ETB sector.<sup>2</sup>

Your comments will be considered and will inform the development of a sectoral response.

#### Contact Details

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#### Template Purpose

This template summarises the main topics and specific questions posed in the QQI Green Paper. You may submit responses to the topics and questions as outlined in the Green Paper, or you may wish to make a submission on another aspect of the topic or on an Assessment related topic that is not covered in the Green Paper.

Sections 1-7 provide the background and context, setting out QQI's understanding of assessment of learning and learnings, working definitions, national context and general assessment issue, you are advised to familiarise yourself with these sections before considering the topic specific consultation issues/questions.

In your responses and feedback, you are requested to cite current best practice examples/models in the ETB sector and current research in the topic you may have explored.

1

<https://www.qqi.ie/Downloads/Green%20Paper%20Assessment%20of%20Learners%20and%20Learning%20March%202018.pdf>

<sup>2</sup> QQI ETBI Event: 'Let's Talk about Assessment Exploring QQI's Green Paper on Assessment in Further Education and Training' takes place on Tuesday 13 November.

<https://www.qqi.ie/Articles/Pages/Conferences-and-events.aspx>.

## Consultation Topics

### Consultation Topic 1: Further Education and Training Issues [Section 8]

There are no specific questions posed at the end of this section, a number of issues for discussion are explored. These should form the basis of commentary and response, consider the impacts, implications and issues for Assessment.

[The questions below are provided for guidance they are not directly from the QQI paper]

*Please comment*

#### i. Current Award Structure, Guidelines and Framework for Consistency of Assessment

What issues are arising with current award structure in QQI CAS Awards, Award Specifications, and Assessment Guidelines? What is the impact on Assessment Strategy and Design?

- Assessment techniques need to reflect the diversity of learners in FET with their various learning styles.
- Assessment techniques need to reflect relevance to the workplace and employers' needs in order to maintain currency of the awards with employers. Employers and SMEs are included in the development of the new apprenticeship programmes, and the new programme in Agriculture.
- Establish a system of timely review of the component specifications. This will address components or LOs which are no longer fit-for-purpose and changes will be reflected in the updated validated programmes.
- Establish Programme Development units in the ETBs or a National Programme Development Unit with inputs from the ETBs.
- Learning Outcomes in the Common Awards structure are specific and prescriptive and don't really lend themselves to RPL (less prescriptive and individual based)

#### ii. Unitisation of Assessment

The practice of unitisation/modularisation of Assessment is widespread in FET, what impact does this have on Assessment? What are the Pros and Cons?

- Advantages: Unitisation of assessment facilitates flexibility for FET learners. Many FET programmes are part-time or students leave and return to programmes at a later date.
- Allows building on previous certification.
- Supports certification of work-based learning
- Disadvantages: Unitisation can lead to over assessment which is an added burden for learners and assessors.
- Learning and assessment is in discrete blocks, which does not support transfer of learning.
- Does not demonstrate competences of overarching Learning Outcomes.
- RPEL requires a variety of assessment methods as assessments need to be very flexible in order to capture the experiential of individuals.

### iii. **Burden of Assessment on Providers**

What are the implications on consistency of individual providers designing and implementing summative assessment? What collaborative models could be explored? How can efficiency be ensured also?

- More training of assessors needed so that assessors understand the NFQ levels and assessment at the different levels.
- The establishment of an ETB or National Programme Development Unit would ensure efficiency in programme development and assessment. It would also contribute to consistency in assessments.
- Explore communities of practice model of collaboration.

### iv. **Centralised versus Distributed Assessment**

What are the challenges in consistency of distributed model of assessment in FET? Current practice has mixture of both through SOLAS programmes and former VEC programmes. What is feasible in terms of a model for the future?

- Distributed model:
  - Allows flexibility to cater for FET's diversity of learners and learning styles. Assessment briefs can be tailored to meet the different assessment needs, while being mindful of the award standards.
  - Consistency of assessments briefs while meeting the MIPLOs and maintaining the award standards is a challenge.
- Centralised model:
  - Ensures consistency of assessments.
  - May be more helpful for workplace assessors.
  - Lacks flexibility for assessors.

### v. **Ambiguity in Current QQI Regulations**

What issues arise with current QQI Guidelines and award specifications for FET?

- Interpretations differ. This applies to assessors and external authenticators.
- There is some confusion around the validation criteria for new CAS programmes and the programmes already validated under the old system e.g. the relationship between award standards and MIPLOs.
- Need better channels of communication from QQI when changes are made e.g. national misunderstanding around exemptions and the 5-year rule.

### vi. **Micro-management by Regulation and Patchiness of Current QQ Guidelines**

Do you consider it Micro-Management in current approach and guidelines? What is needed from QQI?

- Clear guidelines are essential from QQI for the sector.
- The current policies and criteria for programme validation micro manage the programme development process. The level of detail required for programme validation could prove restrictive when the programme is delivered. It is important that learners get the best experience possible through high quality provision.

**vii. CAS Implementation within QBS and Grading**

What issues arising with the current classification and grading calculation for the compound award?  
What alternatives could be considered?

- Discussion needs to take place around the responsibility of the provider v the responsibility of QQI regarding grading. Assessment is the provider's responsibility but QQI is the certifying body.
- The main risk with the QBS is errors being made at the input stage.

**viii. Other**

Are there other issues for Assessment of Learners and Learning which are not raised in the Green Paper?

What needs to be done to enhance capacity in the sector? What is the learning to date in the evolution of FET (NCVA → FETAC, → QQI, change in public FET Providers, (FÁS & VEC amalgamation to ETBs)

- As the FET sector develops stronger links with employers we must consider what employers are looking for in employees. Employment is an important progression route for many FET learners.
- The availability of ongoing professional development is critical for teachers and assessors. Professional development needs to include training in the use of e-portfolios, online assessments, TEL, digital skills, consistency of assessment etc. The use of technology in teaching, learning and assessment allows for greater flexibility in programme delivery and assessment, which suits part-time learners and learners in the workplace in particular.

## Consultation Topic 2: Apprenticeship Issues [Section 11]

The following is a summary of questions posed at the end of this section. Please consider the questions posed and other questions/issues which are not raised which should be considered.

*Please comment*

- i. What can be done to enhance capacity for developing MIPLOs and MIMLOS?
  - Professional development to help mentors, teachers and assessors understand the language and the concepts of MIPLOs and MIMLOS.
  - It is important that MIPLOs and MIMLOS are understood in the context of the rationale for new apprenticeship programmes.
  - The validation process for new programmes references RPL and MIPLO's and MIMLO's support assessment in the RPL context.
- ii. What are the challenges in developing integrated approaches to the assessment of apprentices that avoid taking a silo-based approach to developing understanding of theory, practice skills, and

role/context competence? What can be done to help and by whom?

- Professional development in assessment and integrated assessment for mentors is essential as mentors are workplace assessors for apprenticeship programmes.
- The main challenge is to recognise the different learning styles of the learners in devising appropriate assessments types. GRETB, through its apprenticeship support service, has a system in place which determines the learning styles of the apprentices and has developed resource materials to suit those styles.
- Professional development for external authenticators to authenticate integrated assessment evidence.
- GRETB's Apprentice Support Service has the following in place to support apprentices with their learning and assessment:

Support to Apprentices is offered at both Phase One (on the job) and at Phase Two (in the Training Centre) in Maths, Study skills, Drawing and Literacy. Language support is also available if needed.

Phase One: 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.

Phase Two: 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.

Other classes: Language support for trainees on the Pharmacy course and on the Clean room course is also offered.

iii. What can be done to help increase the reliability and validity competency of assessment in the workplace?

- GRETB's Quality Council, QA Steering Group and National Programme Board will act as a framework to ensure the reliability and validity of new apprenticeship assessments. Variations of this type of framework will be used by all ETBs to ensure reliability and consistency of assessment for all new apprenticeship programmes.
- Training in assessment for mentors.

iv. What can be done to encourage industry to become more involved in discussions about approaches to assessment?

- Increase the involvement of industry in programme design.
- The introduction of (I)CSGs as part of the development of new apprenticeship programmes will encourage greater involvement from industry.
- 

v. What can be done to help support professionals in industry who are responsible for mentoring and assessing apprentices?

- Professional development is essential for mentors. A Professional Development



Strategy for new apprenticeship programmes would be beneficial as more new apprenticeship programmes are validated.

- Establish communities of practice for the vocational areas.
- Utilise the CSG to recommend necessary supports.

vi. Should workplace assessment results be graded as distinct from being reported as successful/unsuccessful without gradation?

- In general workplace competences should be pass/fail. Criteria should be in line with the minimum industry requirements. Exceptional performances could be graded as pass with distinction.

vii. Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeship and traineeship?

- A framework would be useful to ensure consistency.

viii. *Other issues?*

- RPL for new apprenticeship programmes, where no programme existed previously, is challenging to resource.

### Consultation Topic 3: Academic Integrity in the context of Assessment [Section 13]

There are a number of topics and issues raised in this section, though there are no specific questions asked, you are asked to consider what can be done to promote and academic integrity.

*Please comment*

i. What could QQI do to promote and support academic integrity in FET?

- National training for EAs which includes authenticating both FE and apprenticeship programmes. One system for all FET programmes leading to QQI awards.

ii. What can, and should providers do to promote and support academic integrity in FET?

- Professional development for teachers and assessors on the assessment processes and plagiarism.
- Install software to detect plagiarised assessment evidence.
- Training for learners on plagiarism and referencing.
- Include marks for correct referencing in the assessment section of programmes submitted for validation.

iii. Are there specific risks in this regard for FET?

- The scarcity of SMEs working as EAs has an impact on the integrity of the assessment, in particular regarding the academic integrity of the subject area.

#### **Consultation Topic 4: Towards General Principles and Guidelines for Assessment of Learning [Section 14]**

The following is a summary of questions posed at the end of this section. Please consider the questions posed and other questions/issues which are not raised which should be considered.

*Please comment*

- Would it be useful for QQI to publish general principles and guidelines for assessment? [for FET]
  - Assessment principles and guidelines published by QQI would at least provide a common understanding for the sector.
- What should the principles and guidelines address?
  - The principles and guidelines should address assessment methods, assessment procedures, inclusivity and equitability, formative and summative assessments, role of feedback, assessment load.
- To whom should the general guidelines apply (should they extend, for example, to all providers and award bodies quality assured by QQI or only to providers with DA or QQI validated programmes)?
  - All FET providers should follow the same guidelines.

#### **Consultation Topic 5: Towards Sectoral Conventions and Reference Assessment Protocols for FET (and HET Sectors) [Section 15]**

The following is a summary of questions posed at the end of this section. Please consider the questions posed and other questions/issues which are not raised which should be considered.

*Please comment*

- What might usefully be address by sectoral conventions?
- What might usefully be addressed by reference assessment protocols?
  - Standardised grading is an important area to be addressed.
  - Consistency of assessment
  - Developing assessments to meet employers' needs.

- Assessment strategies which recognise learner diversity and learning contexts.
- iii. What changes are required to the implicitly protocols and conventions for Quality Assuring Assessment – Guidelines for Providers?

### **Consultation Topic 6: General Guidelines on External Moderation of Summative Assessment for NFQ Qualifications [Section 16]**

The following is a summary of questions posed at the end of this section. Please consider the questions posed and other questions/issues which are not raised which should be considered.

*Please comment*

- i. Would it be useful for QQI to publish general guidelines on external moderation and mechanisms (external examining and external authentication)?
- Yes, then regardless of whether you are an ETB provider or another provider everyone would be operating from the same guidelines.
- ii. To whom should the general guidelines apply?
- See (i) above.
- iii. What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?

### **Consultation Topic 7: Other Topics/General Comments**

Are there other topics on Assessment of Learners and Learning which should be included for further discussion and/or in future Green Papers/discussion documents/guidelines?

Please provide feedback on topics which should be included for further discussion or other general feedback/comments you wish to give below.

*Please comment*



## Kerry ETB Staff Response to QQI Green Paper on Assessment questions

In late October and early November 2018, the QA Unit, Kerry ETB invited staff to be part of the consultation process on the QQI Green Paper on Assessment. The invite was issued using the 'forms' app on Kerry ETB staff Microsoft 365. 20% of those contacted responded and their feedback is documented below. The feedback represents views from PLC, part-time programmes, VTOS and Training.

### Why is assessment important?

To confirm that learning has taken place, identify gaps in learning and confirm entitlement to qualification.

It sets targets, goals and improves focus.

Assessment is important to monitor learning and attainment of the core knowledge, skills and competencies through the learning outcomes.

Assessment does more than allocate a grade or degree classification to students – it plays an important role in focusing their attention and, as Sainsbury & Walker (2007) observe, actually drives their learning. Gibbs (2003) states that assessment has 6 main functions: 1. Capturing student time and attention 2. Generating appropriate student learning activity 3. Providing timely feedback which students pay attention to 4. Helping students to internalise the discipline's standards and notions of equality 5. Generating marks or grades which distinguish between students or enable pass/fail decisions to be made 6. Providing evidence for other outside the course to enable them to judge the appropriateness of standards on the course. He states that with the exception of the last two points these should occur as frequently as possible to support effective learning. <https://www.ucd.ie/t4cms/UCDTLT0026.pdf>

Assessment recognises achievement. Initial summative/final assessment provides learner/tutor with a framework.

Places the learner in the most appropriate programme. It can help to identify gaps and the supports needed. It measures the learner's starting point.

Establish and maintain standards (even centre specific). Enables transfer of marks and eventual awarding by QQI of either a distinction, merit or pass. Leads to transparency for teachers regarding marking and based on quality of assignment. Ultimately the external authentication can oversee the work and validate the standard of work. This is why it is so important to have a professional panel of external authenticators available to the Kerry ETB centres. It is imperative that this panel covers all the all the different areas of learning to be examined.



## How does assessment support learning?

By informing learners of their progress, empower them to take the necessary action to improve their performance.

It provides evidence of attainment to learners and motivates them.

Assessment focuses learning and provides an opportunity to provide targeted performance-based feedback.

Assessment is about building a picture over time of a student's learning progress across the curriculum. It is the process of gathering, recording, interpreting, using and reporting information about a student's progress and achievement in developing knowledge, skills and attitudes.

Assessment is described as having four functions (NCCA, 2008)

1. Formative (identify needs, modify curriculum, & create learning context and adopt teaching strategies)
2. Summative (Summary for reporting)
3. Evaluative (of mediation of the curriculum)
4. Diagnostic (identifies areas of difficulties)

There are two interrelated and complementary principles that emphasise two aspects of assessment that are central to the teacher's work

1. Assessment for Learning (AfL)-The teacher uses evidence on an ongoing basis to inform teaching and learning
2. Assessment of Learning (AoL)-The teacher uses information from AoL for reporting, particularly to parents and other teachers. <https://www.sess.ie/resources/assessment>

The word itself may not always be positive for the learner e.g. failure at school. If used appropriately assessment can validate if a learning outcome is achieved or not. It may also identify areas which may need additional teaching.

Shows the learners their progress. It gives reassurance to the learner that they are learning and achieving. It can be a motivating factor in learning, gives a feeling of accomplishment. It tells the tutor if the teaching methods are right for the learner; changes in approach can be made as a result. It informs planning & delivery.

It is the tool the teachers use to track learner progress. Assessment when conducted appropriate to class progress should motivate the learner and give the learner clarity. The standard of assessment is measurable because the learner can see how they have met the specific learning outcome. This gives the learner the opportunity to show a real understanding of the course content. Constructive feedback gives an opportunity to the learner to build/improve skills. They can then adjust their work to produce a stronger academic standard. This in turn enables the learner to become independent, self-directed and builds confidence. Assessment supports learning because it reinforces the teaching. It also challenges learners and they can transfer skills to further education/world of work. Assessment develops research skills, report writing, problem solving, critical thinking, analytical skills, communication skills and teamwork skills. It enables the learner to go forward to realistic career options.

## How does assessment support quality?

Assessment can help to evaluate the quality of an education or training programme.

It keeps the focus on the material to be learned, sets pace.

Assessment does support quality but the current broad breath of learning outcomes sacrifices a depth of learning; quantity over quality in some modules.

We could of course enter into a debate around the definition of quality which indeed may be valid.



QQI Levels - Learning Outcomes - these ensure standards are maintained in the NFQ. Assessment ensures that each learner is provided with an opportunity to achieve a level relevant to their ability

The assessment has to be genuine and relevant to the Learning Outcomes being assessed. If this is consistent practice then assessment is reliable and an accepted (minimum) standard evolves.

Clear marking schemes and guidelines provide clarity for the learners and teachers. This ensures a high quality is maintained and that each learner is only put forward for certification at the level they are capable of attaining. In addition, constructive feedback enables learners to aspire to and attain a recognised standard. Quality is further maintained by ensuring that the processes of internal verification and external authentication are carried out to the highest standard.

### How does assessment support equality?

Assessment can help to establish if procedures for assessment are fair, reliable and consistent.

It provides a range of assessment techniques to enable learners to show skills and knowledge.

Assessment that is fair and transparent supports equality.

Assessments tools and systems which are designed to do only the task stated and are built with universal design learning principles <https://www.ahead.ie/udl> can foster an equality based ethos. Obviously this should be located within a wider framework. due care needs to be given that the assessment tool or method does not unnecessarily disadvantage a student e.g. no one should be losing marks for spelling if the object of the assessment is to show an understanding of health and safety principles.

All learners should be assessed using the same guidelines.

The LOs being assessed are the same for each learner on the course. The Teaching & Learning methods can be adapted to suit individual learning styles.

All learners are given the same assignments and marks are awarded fairly. In the case of examinations, where a second exam has to be made out, it is ensured that each of the exams at set at the same standard. This ensures an equal opportunity is given to all learners to perform well. Reasonable Accommodation ensures all learners can access learning/assessment without compromising the standards.

### How does assessment support standards and qualifications?

Valid and reliable assessment procedures ensure awards standards are upheld.

Assessment is conducted to a set of rules and generates evidence which can be compared externally to maintain standards.

Assessment supports quality as it provides a means of checking that standards are met and that delivery meets with expectations and descriptors as per QQI qualifications.

The green paper has addressed this.

Assessment of learners and learning is hugely important to support standards and qualifications. Assessment provides Kerry ETB with the relevant information to place the learner in an appropriate programme.

If assessment is genuine, relevant & valid, it will lead to a consistent standard and to a credible qualification.

By following the above I am confident that we fit into the National Framework of QQI qualifications by ensuring we meet the quality required and provide equal opportunities for all learners. This is done through internal verification and further validated by external authentication.





## How do we embrace the concepts of assessment of, for and as learning?

But providing fair, reliable and consistent assessment to confirm that the assessment criteria has been fulfilled and that the standards of assessment are upheld.

Assessment helps both learner and teacher to work to targets in a timely manner. It provides evidence of achievement for the learner.

Continuous assessment in particular.

This is built into how we teach, what we teach and how we design and carry out our formative and summative assessments.

I do not fully understand this question. We do embrace everything about assessment of learners and learning as it provides us with relevant information as to where the learners is initially, where they would like to go and how we can support them in this process. Regular assessment ensures that both the learner and the tutor are on the right track.

A hard question to answer but I think the answer is Yes. I believe that we are 'self-assessing' as we go along in Teaching & Learning and instigate change as a result but we don't have a formal structure for sharing the learning from assessment especially following internal & external verification. This question would be a good topic for a tutor in-service.

Yes we do embrace the concepts of Assessment as it allows us as teachers to track the progress of learners. This reinforces learning, results in construction feedback, which develops/build skills set that are relevant and can be transferred to further education or the world of work. Assessment is essential because it allows the teacher to gauge the level the learner is at and ultimately can be validated by the external authenticator.

By using the 'Wider Benefits of Learning Assessment Tool' we embrace the concepts of assessment for and as learning. Students set learning outcomes and can reflect on their progress and identify the benefits of learning specific to the learning outcomes and in relation to their personal learning, their health and well-being and their family/ community. It also allows for reflection on future educational or employment plans.





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December 10<sup>th</sup> 2018

## TO WHOM IT MAY CONCERN

### Response to the Green Paper on Assessment of Learners and Learning

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of ACCESS 2000 (Wexford) CLG as we want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

#### Information about ACCESS 2000 (Wexford) CLG

Access 2000 CLG is a Community Development Organisation whose aim is the delivery of community education and training programmes as a means for people to return to education, to develop progression routes into further education and ultimately employment. By this means, our organisation is an educational resource for the people of Wexford. It is managed by a Voluntary Management Committee that is representative of the local communities in Co. Wexford.

We have experienced two quality assurance processes: FETAC, now (QQI) in order to be an approved provider of FETAC (QQI) courses, and the AONTAS Quality Assurance Framework for Women's Community Education.

ACCESS 2000 prioritises people who need educational programmes delivered in a friendly and supportive way. Meeting the needs of such participants is supported through the principle of reflective practice, in order to continually evaluate the learning and accreditation needs of local people and the educational processes used by our organisation.

ACCESS 2000 has formed links with other community-based organisations such as the Southend FRC, Local Community Development Projects (CDPs), Ferns Diocesan Youth Services (FDYS), Wexford, Youth Train, Women's Refuge and the Rape Crisis Centre. We work with state agencies such as the Waterford & Wexford Education and Training Board (WWETB) Wexford Local Development, the HSE, and Wexford VEC. We have built relationships and continue to work with the Home-School Liaison Officers in Wexford schools.

We have four validated programmes with QQI and we are currently delivering the QQI Level 4 Major Award in Employment Skills Training to a group of young people aged from 18 to 30 and Level 3 I.T. skills to a group of women who are participating in a Linking Cultures Project.

#### Comments on the Green Paper

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

Directors: E. Hughes, F. Roche,  
M. Brennan, M. Dempsey,  
Co. Registration No: 6353839L



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- 1) **Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education provider learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.
- 2) **Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.
- 3) **The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) **Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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.

As a provider of community education in Ireland we want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

Kind Regards

I am sending this letter as on behalf of the Management and Staff of ACCESS 2000 (Wexford) CLG

Directors: E. Hughes, F. Roche,  
M. Brennan, M. Dempsey,  
Co. Registration No: 6353839L

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<sup>1</sup> SOLAS, *National Further Education and Training Strategy*. p.93.



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# **KWETB Response to QOI Green Paper on Assessment of Learners and Learning.**

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## Introduction

KWETB welcomes the publication of the QQI Green Paper on Assessment of Learners and Learning. This document represents an interesting starting point for the discussion of approaches to assessment, especially in relation to the FET sector, and to the ETB sector in particular.

KWETB held two focus group meetings in relation to the Green Paper, including members of the FET Management Team; Centre Coordinators, Teachers, Tutors, Training Staff, Assessors, QA personnel, and External Authenticators.

The Green paper promotes academic discussion of the purpose and role of assessment, in particular highlighting the importance of trust in the process of assessment; the relationship of standards to educational awards. It raises some points about the importance of the relationship between the regulator (QQI) and the provider. The use of two perspectives from CEDEFOP, assisted in the approach to considering the themes and topics under discussion. A review of the Common Award System is essential in parallel with this process, as standards and assessment are connected.

These are: the 'Inputs, Environments and Outputs' (IEO) (Astin: 1991) perspective and the 'Macro, Meso and Micro' (MMM) perspective (CEDEFOP: 2015) – both are referenced in the Green Paper.

These perspectives both provide useful lenses for further consideration of the role and impact of assessment within an ETB and of external actors.

The green paper authors provide comprehensive questions for consideration by different actors within the education and training environment.

KWETB held two focus group meetings seeking responses to specific themes emerging from the Green Paper.

This document is broken into three parts:

Part 1: Responses to the Green Paper with reference to questions posed by both QQI and ETBI

## Part 1: QQI and ETBI questions

The following section draws some of their responses together in response to key questions presented in the Green Paper:

*Would it be useful for QQI to publish general principles and guidelines for assessment?*

*What should the principles and guidelines address?*

QQI should continue this engagement with providers, supporting enhancement of provider awareness of approaches to assessment, and indeed to other aspects of quality delivery of education and training.

The Macro, Meso and Micro model is a useful tool to assist analysis of current structures and to inform clarity around structures.

QQI should continue to publish policy for, and principles of, assessment. These publications should be supported with guidelines where these are required, and in response to specific issues arising in the interpretation/application of policy.

The principles should address assessment, based on solid academic and practical theory. It should be possible for a provider to take these guidelines and adapt them for use in 'in-house' CPD and training.

It would be very useful to have guidelines on professional practice in assessment, including developing assessment instruments, writing criteria, fair marking etc.

*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?)*

QQI has produced some useful guideline documents, not least the 2007/2013 Guidelines for Quality Assuring Assessment, which influenced the development of assessment policies and procedures now embedded in ETBs albeit in different ways under the headings of 'Further Education' and 'Training'.

It might be sensible for QQI to take responsibility for the dissemination of general principles in the form of guidelines, and then to allow quality assured providers, and umbrella organisations for those providers to develop appropriate sector-level guidelines.

There is a risk of over-interpretation and over-parsing, and, as a result, generation of 'rule-bound' approaches which can stifle creativity and autonomy on the part of providers.

### **Sectoral Conventions**

*'It is useful to reflect on where to find the optimal balance between regulation, guidance, agreed conventions and protocols (macro) and provider-specific (meso) and programme specific (micro) arrangements for assessment: which topics should be addressed at each level?'*

It would be very useful to define the macro, meso and micro across the sectors, and to define which organisations sit within and across each band. There is some space for discussion about this – should these be defined by the DES, or should each organisation or entity at each level ‘self-define’ where their role and responsibility sits? This analysis would help to define the responsibilities of each group within the FET environment, and would enhance the communication of, and understanding of, the impacts of national policy on assessment. The Macro, meso and micro lens would be useful for analysing the various roles in assessment, and could be used by organisations to assist in clarifying roles and responsibilities.

*What might usefully be addressed by sectoral conventions?*

See above – sectoral umbrella groups should be responsible for the development of guidelines about assessment, and for the promotion and exchange of learning about good practice for practitioners with reference to the specific identified needs and norms within the sector.

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

Assessment protocols for reference purposes would be very useful for the FET sector. These should ideally be divided into categories or sections, including: Developing assessment regulations specific to the institution (ETBs), including templates, and good practice in implementing assessment regulations; good practice in assessment, including examples of, and reference to, good practice in assessment in specific contexts, such as work- based assessment; assessment techniques and methods; writing assessment criteria, developing assessment instruments and writing marking schemes; catering for diversity in assessment, including adapting assessment; providing reasonable accommodations and compassionate considerations; the principles of giving feedback, when to give feedback, approaches to giving feedback, recognising feedback as an integral part of learning; cross moderation; the external authentication process updated; providing transparency in assessment.

It would also be useful to consider the provision of an accredited programme in assessment for practitioners, delivered by one of, or a number of universities/Higher Education Institutions.

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

The guidelines for Quality Assuring Assessment (2007/2013) have been very useful to providers for informing the current models in place. However, there is a need to align the existing knowledge of providers with new requirements for Programme Validation to enable providers to ensure that learner achievement will be assessed applying the core principles and theories of assessment. Please see above section re ‘reference assessment protocols’.

In consultations about the Green Paper on Assessment of Learners and Learning, participants cited issues with the ambiguity of levels – there is a need to review the Grid of Level Indicators to improve some of the statements and improve clarity. This problem with interpretation of levels and standards has also arisen due to the abandonment of cross moderation and this was also raised as an issue by focus group participants.

**General guidelines on External Moderation of Summative assessment for NFQ Qualifications (External Examining and External Moderation).**

Would it be useful for QQI to publish general guidelines on external moderation mechanisms (external examining and external authentication)?

To whom should the general guidelines apply?

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. It would be useful to have clear guidelines on both for application in all sectors.

**General Issues concerning assessment**

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?

At Macro level, clear principles for assessment should be published. CPD, practice and engagement in the writing of Minimum Intended Programme Learning Outcomes and Minimum Intended Module Learning Outcomes, and the mapping of these to assessment, together with constructive evaluation during the development phases, would help to build expertise in expressing learning outcomes.

Using a 'domino' model of training/professional development would also be useful. From the perspective of an ETB this opportunity to develop expertise should be distributed across levels and funding strands.

In the FET sector, Solas have identified curriculum development and assessment as areas of focus for professional development. It may not be sufficient to simply deliver academic training in this field to staff, but to have staff learn through participation in development projects. This will require a change in approach to commitment to, funding and recognition of this work. ETBI/FESS could have a role in supporting these activities/providing a space for this work to take place. It is ironic that the NCCA has actively supported teachers and schools to participate in the development of the new Junior Cycle curriculum – it would benefit the FET sector to replicate this model.

Staff participation in these activities would help to improve understanding of, and confidence in, the assessment processes, as well as promoting ownership of a quality assured assessment process.

Our focus group participants highlighted the lack of clarity regarding levels and standards a number of times – involvement in the process of programme development and the reintroduction of cross-moderation would create a collaborative approach which would underpin greater clarity regarding levels.

The participants agreed that, with clear national standards, there would be more freedom to interpret and to create relevant, purposeful assessment at local levels.

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?

Involvement with disciplinary communities can be very constructive, as their knowledge of the discipline can influence accurate teaching and assessment of the skills required. These communities



have a role to play in the evaluation of new programmes. They would also provide clarity about what elements must be assessed.

Collaborative development of programmes with professional communities, and employers potentially provides greater opportunity for the development of work-based assessment.

Disciplinary communities have a role in maintaining relevance and quality of programmes, and partnership in the field of assessment supports the informed development of occupational standards.

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

In the FET sector, Solas have identified curriculum development and assessment as areas of focus for professional development. It is not sufficient to deliver academic training in this field to staff, who already have experience as educators and trainers, but would also be constructive to have staff learn through participation in programme development projects. This will require a change in approach to commitment to, funding, support and recognition of this work.

The Solas PD strategy could include training of staff in assessment. There is also an argument in favour of including curriculum development specialists in each ETB QA unit to lead the development of new programmes and develop capacity within each organisation, and to provide in-house training where necessary.

A national support system similar to that provided for Junior Cycle Reform would be helpful to support the ongoing changes in relation to programme development and assessment.

*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?*

All programmes should include a programme-specific assessment strategy, in order to help reduce the burden and quantity of assessment. Development of expertise needs to be part of the Professional Development processes referred to earlier. This would also help to ensure coherence between that which is being taught, and the assessment.

The programme assessment strategy helps to define and clarify why, and what, is to be assessed - it helps to focus on the major purpose of the programmes. It also communicates expectations to multiple teachers/tutors or assessors. Existence of a requirement for a programme assessment strategy would help to encourage innovation in assessment, and development of relevant assessment tasks.

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

There is a need to promote the use of RPL/ VNFIL in a way that will ensure that the population will be able to access services without being disadvantaged due to their location. Therefore, knowledge and understanding of processes should be embedded at local levels. Transparent systems that make access to education and training and certification easy, and without barriers are needed throughout Ireland, and procedures for assessment to access RPL/VNFIL should follow the principles of assessment. RPL policy and procedures should be provided as per the FET Strategy.

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?

Firstly, QQI have legislative responsibility for establishing the standards of Knowledge, skill and competence to be acquired by learners. Practitioners in KWETB 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.

This is a matter for further deliberation, as these standards may take the form of general statements about how people are expected to perform at the different levels. In other cases, there are some vocational fields where there may be a need for distinct, national, vocational standards, agreed with professional or vocational bodies.

There was recognition by focus group participants that many of the Learning Outcomes in current Component Specifications need updating and/or rewriting.

MIPOs and MIMLOs provide an opportunity for providers to address this issue – from a national perspective however, some statement of standards is required to maintain confidence in the system of education and training.

The message of MIPOs and MIMLOs has only permeated sections of ETBs concerned with delivery of apprenticeships. Review and modernisation of the Common Awards System would be welcome.

Clearly agreed national standards are highly valued, and help to secure the recognition of the award, and confidence in the award.

‘Threshold standards/ are linked closely to programmes of learning which illustrate how learners can progress through levels, and ensure that this is possible for learners within the constraints of the programme described.

What do you think are the main challenges involved in remote assessment?

The main issues for remote assessment (on-line assessment) include lack of resources; provision of digital equipment; patchy access to broadband across Ireland (lack of equity of access); lack of knowledge on the part of practitioners/developers about how to structure learning (instructional design) and assessment to ensure that learning is internalised. Lack of knowledge of Technology Enhanced Learning.

Practitioners expressed concern about ‘personalisation’ of the learning process – potential barrier between learner and teacher/tutor/learners affecting the teaching of traditional skills.

There is a perception of lack of resources for scoping, developing and testing programmes, materials and content within the public sector, and balancing the need for investment with the need for investment in other aspects of the FET system.

Unitisation of assessment

This allows for mobility of learners, and portability of credits. Possibilities for learners to select components extends their current level of learning or skill – i.e. being able to choose components reflecting their level of skill – they may choose Level 4 in one skill and Level 6 in another.

In some cases, where learners are engaging in a programme leading to a major award, then there is evidence of overassessment. There is also risk that some learners may continue accessing learning at the same level, being assessed multiple times in similar skills.

Unitisation has also lead, in some cases, to a practice of assessing, in a granular fashion, learning outcome, resulting in over-assessment of learners, and production of too much evidence for assessment.

Unitisation of assessment, applied to programmes leading to major certificates has resulted in bureaucratic and administrative overload, and substantial stress for learners and practitioners.

#### *Burden of assessment on providers*

Large amounts of paperwork, and reduction of ambiguity in interpretation of policy can be challenging. High levels of professionalism by assessors, coupled with quality assurance systems and the work of the regulator –helps reduce associated risks, confirms that the assessment is high quality and that standards are maintained.

Participants talked about concerns about ‘teaching to the test’, and the necessity to prevent this becoming a practice; maintaining and improving practitioner competence; difficulty reducing stress levels for all involved in the assessment; performance pressure; lack of time to address issues arising with existing assessment instruments; inflexibility of existing programmes; prospect of review of existing, and development of new programmes. Good teachers and tutors tend to avoid this, placing the interest of learners first.

#### *Centralised vs distributed assessment*

Challenges – Being able to maintain integrity and robust, consistent assessment given the number of programme variations within and across FET providers. Current structures, timelines and operational matters in the ETB sector militate against the implementation of new models. National supports are required to assist the emergence of new and innovative models.

Issues rising from legacy centralised and distributed models include

- Attachment to those models
- Challenge of drawing together the strengths of each model
- Difficulty adjusting or changing content and assessment quickly and efficiently to meet local needs
- Lack of opportunity to develop expertise in assessment due to the perception that existing materials cannot be changed.

On a more practical level, if distributed approaches are adopted, teachers then have agency and ownership of assessment, due to their involvement in the development of assessment instruments, and there is a closer link between assessment and learning.

There are concerns that assessment practices may differ a lot from provider to provider, and if this is not clear to learners, may affect their confidence if they move between providers.

Without robust, clear standards, quality assurance and governance, the validity of distributed assessment may be called into question.

### Perceived ambiguities in the QQI regulations

In the green paper, guidelines and policies are referred to as regulations – documents referred to include the 2007 Guidelines for Quality Assuring Assessment – these are not referred to as regulations anywhere on the QQI site. The guidelines for Quality Assuring Assessment (2007/2013) have been very useful to providers for informing the current models in place. However, there is a need to align the existing knowledge of providers with new requirements for Programme Validation to enable providers to ensure that learner achievement will be assessed applying the core principles and theories of assessment.

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.

The intersection of guidelines with the Common Awards System also requires review and consideration in order to ensure that all are appropriate for the current context.

### Micro-management of assessment through regulations

Issues tend to occur in the interpretation of QQI guidelines. Sometimes when guidelines are published, their status as ‘guidelines’ prompt interpretation and further development of more rules and guidelines at national level. QQI, as the national regulator, should focus on publishing policy (Macro) and associated guidelines where issues arise with policy interpretation. At a Meso level then, 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. In the formational stage, QQI could also act to advise and support the implementation/regulate through the Statutory Review process. Without clear role delineation and separation of responsibility, the translation of regulations into effective implementation and activity is complicated and results in lack of understanding and clarity.

### Assessment in the context of the QBS implementation for the Common Awards System

There are technical issues with the design of the QBS, and the RCCRS, including the fact that providers must enter the marks achieved by learners in order to generate the overall grade for the award. This may affect the design of new integrated programmes under the new validation policy.

Awards at Levels 1-3 are classified as successful where a learner has achieved all of the outcomes for the award. This has an impact on the teaching of content – for example, influencing teaching to the learning outcome. If the concept of a progression route is valued, then it is important that learners develop competence that enables them to progress to higher levels if they wish. This grading also causes some issues about the perception of what is required for a learner to progress to Level 4 – e.g. the perception that a learner who has been graded ‘successful’ at Level 3 has not achieved the required level to progress to Level 4, and may need to participate in a ‘bridging’ course to progress – this interpretation of lack of coherence between the levels may be inhibiting progression. The question that arises is whether achieving a certificate at level 3 is a reliable indicator of the learner’s capacity to progress to a higher level.

The overall grading of ‘successful’ is difficult – for example, learners completing Maths Level 3 under an AIS for that component must achieve 100% of the assessment in order to be successful. A tutor in

a FE setting may not require learners to achieve 100% in a specific maths test to be successful but may require learners to demonstrate the ability to respond with a correct answer a number of times within a given test, or to demonstrate understanding of the concept being taught. In both cases, the learner may achieve a result of 'successful'. The issue is whether each learner understands and can apply the concept that they learned during their course in a range of situations/ in response to a number of problems presented. The approach to grading needs to be understood in the context of programme development and delivery.

This raises issues too about the grading and classification at the higher levels too. It also raises issues regarding equity of treatment for learners undertaking programmes at different levels.

### Other Issues

With clear national standards, it was felt that there would be more freedom to interpret and to create relevant, purposeful assessment at local levels.

At macro (regulator and policy level) there should be a focus on setting standards; informing the development of theoretically robust practice in assessment through information, and quality assuring programmes through the 2017 Validation Policy.

More clarity around the macro, meso and micro aspects of assessment, and understanding of different roles and responsibilities is needed.

One of the challenges in this model is that the 'meso' environment is complex – with umbrella bodies involved in the production of 'reference' documents for the sector, based on QQI publications, and with other 'meso' actors – the ETB institutional management. This messy environment has an impact on the transmission/application of policy (regulation) to practice via the micro level.

Within the FET sector, there is a need to review the two national models (FAS/IVEA) through which programmes were developed (and, by default, assessment for those programmes), and subsequent programme development using a neutral agency in order to genuinely learn from the processes. This review should influence understanding and knowledge of how to support ETBs in their role as Programme Developers, and by default, the assessment of the programmes.

These are internal issues for the ETB (Macro - Meso levels). This level of interrogation and learning from previous projects should in turn influence how teachers, tutors and trainers are involved in the development of assessment, including assessment criteria, assessment instruments and briefs, marking schemes etc.

Other issues include the approach to External Authentication and whether this role should change in any way. The External Authentication system, together with the internal verification process is perceived as one of the ways in which consistency, transparency and fairness and thus assessment, are quality assured. In the ETB sector at the moment, 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. The importance of clear communication with EAs about their role and task was stressed. Again, consistency was perceived as key to a robust system.

### 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?

Where organisations are very small, with a very small group of learners, then this might present challenges to the reliability of assessment. In the development of programmes by these organisations,

it may be possible for them to include a third party that would be responsible for the summative assessment of learners, but this may result in the incurring of additional costs. It would also result in the removal of assessment from the programme. There may also be a possibility for SLAs with larger organisations such as ETBs for example, both for the use of the ETB validated programmes and assessment.

## Part 2: Analysis of Focus Group Feedback

### SCOT Analysis of Current Practice

#### Strengths

KWETB focus groups highlighted the flexibility and adaptability of the current assessment system as being a strength, citing experience of both centralised and locally devised assessment as positive for further development of more cohesive approaches to assessment across the organisation.

In terms of learners, the 'portability' and possibility of credit accumulation over time was perceived by participants in the focus groups as a positive element for learners, contributing to flexibility and agency.

A strong culture of quality assuring assessment enhances the integrity of the assessment process, which is underpinned by External Authentication and Internal Verification. It also enhances the reputation of education and training provision, with learning and certification easily available to the local community, and enabling progression through the NFQ. It is interesting to note that, where effort has been made in this area of quality assurance, it is appreciated, and contributes to confidence in the system.

The teacher/tutor/trainer/assessor model, with involvement of assessors in the development of assessment is valued, and levels of practitioner knowledge was cited as contributing to the strength of this model.

Collaboration and communication through ETB networks; communities of practice, Results Approval Processes and an on-line communication platform were cited as supporting the quality and standard of both learning and assessment.

## Challenges

Some challenges cited are the direct opposite of the strengths highlighted above – perhaps identifying the challenges with the scale of assessment operations for providers, where models have emerged in an organic fashion in response to the 2006 QA agreements, and the 2007/2013 ‘Quality Assuring Assessment Guidelines’.

Thus, issues such as inconsistent central auditing; out of date learning outcomes and assessment instruments, legacy issues with programme design, maintaining consistency, and programme structures required based on existing CAS Certificate Specifications were seen as challenges to maintaining an effective assessment system.

Administrative and psychological stresses associated with overassessment of learners was cited frequently by participants as a challenge and concern. The administrative burden includes quantity of paperwork; pressure arising from new funding models; and new reporting requirements across the FET sector.

CPD – participants felt that all levels would benefit from improved levels of CPD specifically targeted at improving knowledge of assessment, as it applies to teaching and learning, together with opportunities for teachers and trainers to ‘upskill’ in their subject areas, and in their professional skills.

Provision of modular programmes is potentially useful, but current use of a modular approach which is time-bound to short duration courses was perceived as negative for the quality and intensity of learning, and, by default, a stressor for both learners and assessors.

There is a challenge arising from changes in value placed on the activity of teaching and assessment, with lack of equity perceived as a challenge to the quality of assessment in the FET sector – i.e. – the academic undertaking that underpins assessment is not recognised in the sector – which caters for many learners with high levels of need.

## Opportunities

Improved opportunities for learners to advance through adoption of new or modernised assessment methods and principles.

Respondents were very positive about the scope for development, particularly in the area of integrated assessment. Integrated assessment is seen as a way of offering more positive experiences of assessment to learners, and of addressing current ‘granularity’ in assessment. There are opportunities for updating and improving standards, modernising courses, programmes and assessment, and the Green Paper was welcomed as a nationally published document which may assist in promoting new opportunities/discussion/policies.

New developments give scope for the introduction of high quality work-based assessment.

There are opportunities to provide CPD, staff induction and training, and the Green Paper goes some way to focussing on the nature of assessment as a professional undertaking, opening the door to the use of modern knowledge about how people learn/cognitive development in the development and delivery of education and training. There is potential for the prioritisation of assessment as a theme in Initial Teacher Education.

There is potential for innovation, new programmes and new standards with modernisation.



There are opportunities to reduce the quantity of assessment and standardise local processes to create links between local practice and national standards.

There are opportunities to review the Common Awards System to align it with 2017 Validation Policy.

### Threats

Lack of time, resources and funding to be responsive, and to update existing assessment/develop new programmes. No defined strategies in place for modernisation. Reputation of awards and providers may suffer, and numbers fall, if steps are not taken to create systems for development of curriculum and assessment.

Pressure of responding to government/statutory mandates quickly may result in a lower standard 'product'. Tension between economic and social models. Competition from private providers who deliver shorter courses and programmes, including on-line delivery.

Absence of a structure for RPL/VNFIL and lack of knowledge of this is seen as a threat.

Pressure from new reporting systems may result in compromises which may undermine the value of assessment, and thus, the reputation and value of the awards.

**The focus groups discussed Professional Practice:** Impacts of current models of assessment/Key skills of assessors/responsibility for decision making/ devising materials/ principles of assessment/supporting the maintenance of academic integrity etc.

### **IMPACTS OF CURRENT MODELS OF ASSESSMENT**

#### **Time, administration, teaching to the test and performance pressures for practitioners.**

Focus group participants identified that at times there are specific pressures on practitioners and learners. They highlighted the perception that there is a high volume of paperwork associated with assessment administration, but not directly with the actual assessment of learners, and that the time required to complete paperwork sometimes draws them away from the teaching and assessment which is more important to the learners.

They thought that existing programme structures, as defined in the QQI Certificate Specifications, inform the format of the assessments, and attitudes to assessment and can limit freedom to be creative, and to improve the way in which assessment is carried out. The fact that development of assessment evidence takes time arose in the focus group. This seems to indicate an issue with clarity about role – defining who is responsible for developing assessment instruments and assessing, and who is actually responsible for providing the assessment evidence. It may also indicate that there are some advantages to giving teachers, tutors and trainers more opportunities to discuss their practice and for addressing misinformation if this exists. *Is it possible that more opportunities for involvement in development and design/ clearer instruction at local level would help address some of these concerns?*

#### **Motivators and demotivators for learners**

The focus groups recognised that the process of participating in assessment can affect the value of assessment positively and negatively. They highlighted the fact that learners placed a high value on learning and assessment that is relevant, transparent, fair and valid.

They felt that learners developed confidence from participating in assessment, and that it can be a source of affirmation of the learning of knowledge and skills. Assessment also provides opportunities to celebrate achievement, thus further enhancing the value of the learning.

For some learners however, assessment can be stressful, particular over-assessment. This was considered a risk of burnout for all – both learners and teachers. Participants identified risks for learners associated with learning in order to meet the requirements of the learning outcomes, resulting in rote learning, and failure, at times, to engage in deep learning. If our goal is to enhance the likelihood that learners will be confident about, and engaged in, further learning at different times in their lives, then it is important that learning takes place in a way that internalises what has been learned, and enables learners to synthesise and apply their knowledge in other contexts and environments.

Alignment of assessment which is too close to the content being taught can be problematic in terms of learners' ability to replicate their learning at later stages. On the other hand, there needs to be latitude for teaching some learners in a very disciplined, incremental fashion in order to help them to become functioning learners/more confident in their own abilities.

### **Do quality assurance, rules and regulations affect the quality of assessment?**

Focus on rules, regulations and administration of assessment/data collection were deemed to draw attention away from the relevance of the assessment. Current processes were deemed at times to curtail the potential for the use of innovative practices in assessment.

The pressure of administration and preparation on teachers/practitioners were deemed to sometimes affect the quality of assessment and the quality of teaching and learning. This was also associated with perceptions regarding timelines for programme delivery, and the lack of time for 'slow learning' ( [The Slow Professor](#)). Teachers/practitioners identified one of the primary motivators for themselves and their students as the 'magic' of teaching and training – being able to witness the transformation of learners throughout their experience on courses. They felt that the pressures identified in the previous paragraphs can undermine the transformative potential of the programmes offered.

### **KEY SKILLS FOR PRACTITIONERS**

The focus group discussed the key skills for practitioners in depth, and these could be loosely categorised into the language of assessment; developing assessment; the practice of assessment; and assessing. The level of discussion indicated a real interest in the area, and a need to provide more opportunities to engage in shared professional communities of practice in order to learn more and develop new approaches.

What was clear is that there is a need to focus on the professional task of assessment, as part of the task of teachers/practitioners in FET. Who would be responsible for this would be a matter for further discussion.

Practitioners were concerned that some learners are not accessing the correct course for their needs and existing levels of knowledge and skills, and expressed a need for better initial assessment/programme entry assessment/trust in the accreditation presented by the prospective learner in order to access a programme. Gaining access to an inappropriate course can have long-term impacts on the learner's experience, both of learning and of assessment.

### **Language and vocabulary of assessment**

One key theme that arose in the focus groups was that of assessment literacy, defined as 'the knowledge about how to assess what students know and can do, interpret the results of these assessment, and apply these results to improve student learning and program effectiveness' (Digital Chalkboard). The participants stressed the importance of clear and easily understood, unambiguous language in the context of assessment, at all levels. They also acknowledged that it is important for practitioners to have opportunities to enhance and extend their 'assessment vocabulary' and their 'assessment repertoire' (the range of methods and techniques which could be applied).

### **Developing assessment**

Focus groups expressed real concerns about their responsibilities as practitioners to ensure that learners/assessment candidates are assessed correctly, using the correct techniques and instruments. A very important part of practice, for them is the activity of devising assessment,

integrating assessment and designing integrated assessment. In the context of devising assessment, the group members talked about the challenge of knowing what to assess, and about the fact that, in current practice, this is being addressed by assessing everything in a granular fashion to ensure everything is covered. Practitioners need to develop confidence in their own capacity to know what must be assessed and how it should be assessed. They also need to have confidence in the quality and relevance of any centrally devised assessment instruments, in order to trust the assessment process. There was agreement on this across practitioners from Further Education and Training. Concern was expressed about the quality and appropriateness of some existing, legacy assessment techniques and instruments associated with the implementation of the Common Awards System. The review of this will help to address some of these issues.

This discussion then moved into discussion of the task of assessing.

### **The assessment task**

The focus group participants were concerned about knowing what is best for assessment candidates, and ensuring that candidates are treated fairly. In discussion of provision of reasonable accommodations/catering for diversity however, there is a tension, as sometimes, teachers are charged with making a decision about whether an assessment candidate can avail of reasonable accommodations – in this case, they have to base a decision on their prior knowledge of the candidate. The challenge is to then assess all learners based on exactly the same criteria without bias. This goes to the heart of assessor practice and responsibility. Participants felt that there is a need for more training and focus on the use of Universal Design for Learning in the development of assessment materials, how to use assistive technology for assessment, and in the provision of resources for assessment. The use of feedback in assessment was also a ‘hot topic’ – when it should be used, how, purpose of feedback, and the impact of feedback on learners.

Who should be responsible for devising assessment?

Responses to this question were varied, and based on the experiences of the practitioners attending. The focus groups felt that ‘subject matter experts’ should be involved, and that assessment should be devised as close to the ‘chalk face’ as possible. This could prompt further discussion – there may be some confusion about who sets the standards, who devises the assessment instrument, and who uses the assessment instrument to assess whether the candidate has reached the standard. In the FET sector, there are two models currently in existence in the legacy/CAS assessment – locally devised assessment and centrally devised assessment. In the locally devised assessment model, the assessor, who is also the teacher, is perceived as a subject matter expert. In the centrally devised model, the ‘subject matter expert’ is perceived to be at a remove from the assessment activity. This warrants further exploration and study in order to decide what approach would be best in the future.

One focus group felt that locally devised assessment provides a useful opportunity for collaboration. All agreed that ethical considerations were of the utmost importance in both models.

## **SUPPORTING ACADEMIC INTEGRITY**

The focus groups were asked what interventions supports promote academic integrity. They identified the need for CPD to improve the communication of information; in change management and to support the sharing of practice. Some identified constructive use of Communities of Practice in order to ensure that academic integrity is maintained through 'buy-in' to high quality practice and sharing of experience and knowledge. Mentoring of new teachers/assessors would also support this.

More variation in the range of assessment modes possible was suggested as another way of maintaining academic integrity – the limited range of assessment instruments, and the likelihood that learners may share assessment evidence previously produced was perceived as a risk to academic integrity, especially in smaller, tightly-knit communities, typical for much FET delivery locations.

The groups also made a strong case for the reintroduction of cross-moderation to support shared understanding and knowledge of levels and of processes. The provision of anti-plagiarism software as a standard tool across all sectors was advocated.

## **DIVERSIFYING ASSESSMENT**

There was considerable shared interest in the diversification of assessment, some of which has been covered in previous sections of this document. It was perceived in different ways – as changing the range of ways in which learners can be assessed, including providing fair and consistent assessment to cater for inclusion and cultural diversity; extending into new contexts (for Irish FET) such as the workplace and the use of technology. There is a need to improve knowledge of Mainstreaming Equality and embedding it in assessment practice.

There was a resounding positive response to the idea of finding and providing new ways and opportunities for learners to demonstrate their knowledge and skills, including offering more culturally appropriate ways of assessing learners and varying the opportunities and modes so that learners with different strengths can demonstrate their knowledge and skills.

The focus group participants have begun to experience more challenges working cultural differences, including catering for a larger range of people from different belief systems. These issues can manifest in the form of timekeeping; meeting deadlines and acceptability of collaborative work/sharing (the 'Ubuntu' principle). The outcome of this discussion was that enabling practitioners to use a range of different assessment modalities without compromising the standard, and maintaining the integrity of the assessment would be helpful. There was recognition that there are instances when it is not possible to vary the assessment, and that in these cases, positive communications with learners about the process of assessment are key to effective assessment.

## **Technology and assessment**

There was broad interest in, and commitment to, exploring the use of technology for assessment. There would be challenges however. For example, resourcing and teacher/assessor competence were identified as potential preventatives to the use of technology for assessment. Lack of use of technology for assessment was identified as a gap in current practice, with variations in access, depending on decision-making at local level. Typically, technology is used as a tool to allow learners to create assessment evidence (assignments, word documents.....and so on). The potential of e-

portfolios and online assessment is an area where considerable development and resourcing is required.

The positive potential of technology for assessment includes portability of assessment evidence; creation of e-portfolios that are easily added to, and can be a 'building block' for further learning and assessment; ability to assess large numbers of people to the same standard; the potential for remote learning and assessment; providing a modality for candidates who may not respond well to normally accepted assessment modes.

Limitations to the use of technology for assessment include lack of knowledge of instructional and assessment design in the sector; risks that candidates may not have opportunities to create rich and relevant assessment evidence using technology; limited knowledge and understanding of how technology can be used for assessment – for example, it can be used across a spectrum from responding to online tasks and discussion boards, creation of blogs to developing programmes, making and publishing videos in response to a theme and making a technological response to a task. Other limitations include structural issues such as access to broadband; access and resourcing of technical support and management of IT equipment.

Focus group members also identified that using technology may create a more impersonalised approach to teaching, learning and assessment, and may also create unfair advantage based on lack of personal access to technology and broadband.

### **Work-based assessment**

Discussion of this theme ranged from engagement of employers in assessment to how to structure and negotiate work-based assessment. Participants were drawing on their experience, in the main, of delivering Work Experience modules. They identified that one of the issues in assessment of this module is linked to difficulties learners experience in finding a placement that is relevant, supports the application of their learning, and provides an on-site work experience supervisor who contributes to the process.

An important element which was discussed is the 'on-the-job' assessment in the apprenticeship model, which includes on-the job assessment, monitoring and feedback as an integral part of the apprenticeship. The benefits of this system present an opportunity for further learning within the sector.

A key to work-based assessment is the further development of employer engagement to inform programme development and to ensure that programmes are relevant for learners and that assessment can be effectively linked with the vocational field.

It was acknowledged that positive relationships and engagement with employers must be built over time, consistently and slowly. The importance of making choices that suit learners with different profiles, taking into account ethical responsibilities was highlighted.

### **Health and Wellbeing**

This is an unanticipated theme which emerged during the focus group sessions. It arose when practitioners discussed the fact that they often work with students who have undiagnosed physical and mental health conditions, which sometimes emerge during their participation in programmes.

This can have an impact on how the learners participate in assessment. These also have an impact on assessors in the form of uncertainty about how to respond to the needs presented.

Finally, under this section, we discussed the importance of enhancing the capability of teachers/assessors to use what was called the 'science of teaching and learning' based on extensive modern knowledge about how cognitive skills develop, and the impact of this on learning. This may lead to greater emphasis in learning slowly, in a way that allows learners to internalise deep, replicable knowledge.

The group also discussed the potential of moving towards more 'strengths-based approaches', and the integration and use of models such as the 'recovery college' model.

### **UNITISATION OF ASSESSMENT**

The focus groups again identified positive and negative aspects associated with the unitisation of assessment. It can provide for mobility for learners within the system, and can provide greater flexibility for learners. This is allied with the current use of the structure of programmes as it applies to the CAS – with programme structure often including a very broad range of module options.

On the other hand, one problem identified with unitisation of assessment is over-assessment and bureaucratic, administrative overload. Learners experience repeated assessment and repetitive use of the same type of instruments for assessment of different components (this can then be broken down more into the practice of repeatedly assessing using the same modes in order to ensure learners have achieved every learning outcome).

**We asked the second focus group what action they would take immediately if money were no object. This is what they said:**

- Rewrite the programme modules
- Rewrite national standards (QQI)
- Create a localised curriculum development unit
- Engage practitioners and employers in programme development
- Promote, encourage and apply a team-based and partnership model to programme development
- Involve learners in development of programmes and assessment
- Reposition assessment – moving away from the summative assessment model favoured – or favour more innovation such as the use of capstone assessment while also placing more emphasis on assessment as learning.
- Integration – give time to developing integrated assessment
- Create a bank of our own exams
- Engage learners more positively in the assessment process.

## Part 3: APPENDIX 1 Compilation of Focus Group Inputs

### Macro-meso-micro analysis

**We broke the group into three, and asked them to identify how current practices fit with the 'macro-meso-micro' model. This exercise led to some rich reflection on issues and possibilities.**

#### Macro influences/practices

- Modularisation
- Reporting – gathering data to meet statutory requirements
- Curriculum development guidance/policy needed
- Perception that Resources are not sufficient
- Principles and guiding values that protect the education/training model from the economic model are needed.

#### Meso/practices

- Grade inflation
- Modularisation – time available has had an impact on assessment
- 'Slow learning' can't happen in a high pressure environment – concerns about allowing learners to 'internalise' what they are learning.
- The 'value for money' imperative – pressure on numbers
- It would be great if there was a coordinator for each major award
- Intake of 'qualified' learners – language and foundation learning skills are important – more latitude required for initial assessment
- From curriculum development – to implementation of assessment - clear processes for are critical
- Clarity needed around standards of assessment
- There are opportunities for innovation
- Systematic QA training required
- There is enormous time pressure on Coordinators
- CPD will always required
- Recruitment of staff and students can be difficult
- Programme planning
- Resources

#### Micro Practices/impacts

- Formalising teacher collaboration
- Ambiguity of levels – competencies – generic examples of particular levels needed
- Uniformity – no system for tutors to gauge level expectations
- Lack of consistency
- Holistic assessment is valued
- Plagiarism has impacts on teachers and students
- Relevance of materials
- Testing and using knowledge outside of the sample answers – (AIS)



- Impacts on grading
- Need for well-qualified teachers/tutors
- There is a perceived lack of consistency across different programmes/funding strands.
- Assessment criteria n component specifications are out of date.
- Positive impact on quality
- Retaining flexibility
- No opportunities for integration of learning
- Common Awards System enables empowerment for learners – when it works well, there are better opportunities to achieve.
- Integrity can be compromised when delivery becomes compromised due to time constraints or lack of initial learner assessment
- CAS – value of awards – review of CAS by QQI is a welcome development.

7<sup>th</sup> December 2018

## **Response to the Green Paper on Assessment of Learners and Learning**

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of the Larkin Unemployed Centre as I want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

### **Information about the Larkin Unemployed Centre**

The Larkin Centre was established in 1986. It is a community based organisation, limited by guarantee. The Larkin Centre is committed to the achievement of a more inclusive and just society for all. The focus of the Centre's activities is to champion the rights and interests of those who experience disadvantage and develop responses appropriate to their needs. Its way of working prioritises dialogue and teamwork as a means of achieving sustainable outcomes for all beneficiaries.

The Larkin Centre prioritises working with adults who would not normally access learning opportunities. The Centre's education and training methodologies and general ways of working are grounded in the principles of equality, respect and the entitlement of each person to be self determining. The Centre seeks to promote a positive orientation towards learning, recognising that earlier foundations in learning for many are sometimes fragile. This is characterised by its vision of education as respecting the rights of each individual to determine their own goals, accommodate a range of expectations and experiences and create the conditions that will facilitate each to contribute in their own unique way. Addressing the educational needs of participants is undertaken within the context of acknowledging other issues that may impact on the quality of their lives.

The Larkin Centre's Community education programme encompasses a diversity of roles that is both in the community and of the community and that can be broadly characterized as supporting personal and community development. Our programmes serve as a critical first step on a pathway to learning, opening up new options and possibilities in peoples' lives. Learners who participate in community education and training come to these settings from a variety of backgrounds and with a range of needs. Attitudes towards learning can vary among new learners as school memories for some, can serve to undermine confidence and highlight fears.

Each learner comes to the Programme with their own set of hopes and expectations of what they want to get from it and the starting point for each in the learning cycle can be quite different. Creating learning opportunities that can enhance participation in all aspects of community life, economic, social, cultural and environmental is fundamental to our Programme purpose. Our programmes are not restricted to human capital development but embrace a holistic view of

personal growth, the fostering of those attributes, attitudes, resilience and capacity of each to meet the challenges and transitions that characterise their life.

There are limited opportunities for adults in this community to engage in meaningful, practice based learning programmes. Education allows learners to be exposed to different perspectives, narratives and analyses which can help shape their understanding of world.

### **Comments on the Green Paper**

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

- 1) **Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education provider learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.
- 2) **Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.
- 3) **The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) **Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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

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<sup>1</sup> SOLAS, *National Further Education and Training Strategy*. p.93.

2012 on the validation of non-formal and informal learning. Unfortunately these clear policies have not yet come to fruition.

As a provider of community education in Ireland I want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

Kind Regards

Anne Flannery  
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I am sending this letter as on behalf of the Larkin Unemployed Centre

## QQI Green Paper on Assessment Meeting

### Introduction.

Limerick Institute of Technology welcomes the QQI Green Paper on Assessment of Learning and Learners and appreciates the opportunity to provide feedback on this important topic. A team from the Registrar's Office in LIT met to review the Green Paper and have noted the following observations/points with respect to same.

**1. Section 14:**

This section titled *Towards General Principles and Guidelines for Assessment of Learning* might be more suitable to have earlier in the document, for example after Section 7 *General Assessment Issues*. This might give a better flow and provide foundation for the sector specific headings that follow.

**2. Page 8:**

With respect to *Context and Stakeholders* the extent to which professional bodies shape and influence learning and assessment in HE may be worthy of comment given their emphasis on final exams and the career gateways they control. This is partially addressed on page 61. Also p. 109 asks this question directly and raises issue of possible conflict between the two, which is very valid.

**3. Page 10**

The IEO-MMM Model: An alternative or complement to this well recognised systems based model of policy making could be the inclusion of a process model which better captures the dynamic and matrix nature of contemporary policy making with the emphasis on the how and when rather than the who.

**4. Page 12:**

Include in the list of bullet points reference to the implicit relationship between learning outcomes and assessment.

**5. Page 13:**

Unintended and Unforeseen Consequences of Assessment: This could be expanded on to address such issues as over assessment (p.77), instrumental learning and teaching to the test, the latter, which they mention.

The paper outlines the importance of formative learning outcomes (learning to learn). Guidance should be given on how to include this type of learning in programme/module outlines.

**6. Page 14:**

Section 2.2 under Terminology could include more guidance regarding the three types of learning outcomes (ILO's, ALO's and ELO's) and include follow-up guidance in terms of addressing in programme and/or module learning outcomes. In terms of intended learning outcomes (including formative and summative), guidance should be given on how both can be balanced in the outline of programme and module learning outcomes that enable both student-centred learning and assessment and curriculum learning and assessment of the learning.

**7. Page 27:**

It would be very beneficial to include guidance in relation to marking or grading standards and the associated competencies or quality required to achieve the respective categories.

**8. Page 28:**

Further clarification and guidance required on the balance for LO's (Frances please clarify if possible).

**9. Page 48:**

A clearer definition of *Minimum Intended Learning Outcomes* would be beneficial. For example does it refer to a minimum number of learning outcomes from a specified list or the achievement of all learning outcomes from a specified list at a minimum specified passing grade. Further guidance could be included here in the context of achieving the minimum intended learning outcomes.

**10. Page 50:**

In Section 7.4 include reference to Blooms Taxonomy, and other relevant taxonomies and the usage of verbs, that demonstrate the achievement of learning outcomes. Verbs are important when writing programme/module LOs. It is important to select appropriate verbs that facilitate measurement of the work in the classroom and write the LO to reflect that learning, to the appropriate NFQ level.

**11. Page 62:**

Learners as Partners in Assessment; the potential and the limits of this approach needs to be codified especially around issues of academic independence and professional boundaries.

**12. Page 76:**

In Section 9.1, it would be beneficial to give guidance with respect to achieving programme level learning outcomes, in particular guidelines with respect to integrated assessment, including cross modular, for the achievement of overall programme learning outcomes.

**13. Page 77:**

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 to be included.

In this context, the importance of establishing reliable and valid assessment is mentioned (page 16). More guidance on the ways in which such measures can be achieved in practice in the type of assessments set could be provided.

**14. Page 79:**

The Section on Engaging Learners as partners in Assessment is under developed. Further guidance would assist here especially around the area of involving students in designing assessment practices during new programme development and programmatic reviews.

**15. Page 98:**

In Section 13.4 the inclusion of a statement such as the following would be beneficial.

*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.*



## LONGFORD WOMEN'S LINK

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7<sup>th</sup> December 2018

### Response to the Green Paper on Assessment of Learners and Learning

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of Longford Women's Link as I want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

Information about Longford Women's Link:

Longford Women's Link (LWL) is a women's centre based in Longford Town and has been in existence since 1995. We are a long standing provider of Community Education in Longford Town and County with Education and Training delivered according to the principles of Women's Community Education (WCE) at our dedicated WCE Facility. We provide a wide range of services, including Education and Training (QQI Centre), using our Integrated Service Model. LWL is a third level Outreach Centre for IT Carlow, NUI Maynooth and a partner college of the Irish Academy of Public Relations and An Cosán's Virtual Community College (VCC). LWL's purpose is to link women with the resources to change their lives and transform their communities and we have a long history of promoting the transformative nature of WCE.

LWL is a member of AONTAS, the National Adult Learning Organisation, and is represented on the AONTAS Executive Committee by our Deputy CEO, Tara Farrell, who was recently elected Chairperson. Tara was a member of the Community Education Network (CEN) Steering Group up to early 2018 and has represented AONTAS on the Joint QQI/Community & Voluntary Sector Working Group

#### Comments on the Green Paper

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

- 1) **Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education provider learners are at the centre of



Company Registration Number 241515 CHY 11744

Registered Office: Willow House, Ardnacassa Avenue, Longford.

Directors: Chairperson: Sheila Reilly, Stephanie Igoe, Elsie Moxham, Mary Carleton Reynolds, Teresa Kearney, Tess Murphy, Nancy Bermingham, Vicky Crosby, Pat Murphy, Olive Quinn



the education system and assessment should be varied and inclusive of all learners. 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.

- 2) **Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.
- 3) **The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) **Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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.

As a provider of community education in Ireland I want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

Kind Regards



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I am sending this letter as on behalf of Longford Women's Link

<sup>1</sup> SOLAS, *National Further Education and Training Strategy*. p.93.



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7<sup>th</sup> December 2018

C/O 267 O'Malley Park  
Southill, Limerick

## **Response to the Green Paper on Assessment of Learners and Learning**

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of Limerick Community Education Network as I want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

Limerick Community Education Network(LCEN) is a network of community, voluntary and statutory groups involved in the provision of community based adult education in Limerick city which was established in 1993. There are 15 member organisations representing local networks providing adult education. These include community education providers in Moyross, Southill, Garryowen, St. Saviours, Queen of Peace, Northside FRC, Limerick CCDP St. Munchins, ADAPT together with PAUL Partnership, and LCETB. Six community member organisations are currently providing QQI Certification in local settings across Limerick City,

LCEN aim is to provide a platform for sharing of information and ideas and working collaboratively to ensure: Good practice, resourcing of community education, local awareness of community education and provision of training and support for members

### **Comments on the Green Paper**

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

- 1) **Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education provider learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.
- 2) **Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.

- 3) **The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) **Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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.

As a Provider of community education in Ireland I want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

Kind Regards

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I am sending this letter as on behalf of Limerick Community Education Network(LCEN)

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<sup>1</sup> SOLAS, *National Further Education and Training Strategy*. p.93.

**Mater Misericordiae University Hospital, Dublin**  
**Centre of Nurse Education**  
**QQI Green Paper on Assessment**

**Intended learning outcomes** It is important that MIPLOs (minimum intended programme learning outcomes) are consistent with the relevant occupational profile and the relevant NFQ Professional Award-type Descriptors. The assessment arrangements must be properly aligned with the MIPLOs. In practice, many providers find it challenging to think in terms of programme-level outcomes and to demonstrate the necessary consistencies and alignments.

**Some questions**

What can be done to enhance capacity for developing and using MIPLOs and MIMLOs?

A few examples of both MIPLO's and MIMLO's would help providers. Also an example of a poorly worded MIPLO on the same programme.

In general terms, what are the challenges in developing integrated approaches to the assessment of apprentices that avoid them taking a silo-based approach to developing understanding of theory, practice skills and role/context competence? What can be done to help and by whom?

This challenge must be addressed in the programme teaching strategy in that the teachers must link the theory to the practice of the particular occupation or profession and also link the theory and practice to the assessments for that unit of learning or Module. Also helpful to map the learning outcomes to the scheduled timetabled topics / practice sessions and the link assessments. Then the student can see the logic of why they are asked to study or practice a particular subject.

What can be done to help increase the reliability and validity competence of assessment in the workplace?

All workplace assessors/ mentors/preceptors must be trained / educated on how to assess competence. They must also be familiar with the programme learning outcomes and they should be well supported by the education provider to address student learning needs and challenges. The competence assessment tools must be clear and unambiguous with no jargon – a clear pass / fail - either the student can do the competency/skill correctly 100% all of the time or not. It is not reasonable to do a skill 'half right'.

What can be done to encourage industry to become more involved in discussions about approaches to assessment?

Industry would need to be involved at the programme development stage in order to gain their interest in subsequent assessments.

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 in particular is suitably consistent while allowing for necessary workplace diversity?

Industry professionals need to be educated and supported before they are expected to do any student assessments. It is a very skilled based job to be in a position to do an assessment in the workplace. It needs a lot of sensitivity, fairness and confidentiality etc on behalf of both student and the assessor. The education provider is responsible for making this happen and providing ongoing support to the assessors in the workplace. A considerable number of different professionals in the country have considerable experience in this aspect of work such as medicine, nursing, teachers etc.

Should workplace assessment results be graded as distinct from being reported as successful/ unsuccessful without gradation? Why/why not?

A skill or competency is either done 100% performed correctly every time – I don't believe in grading a skill only done half right. This could lead to major safety concerns for a lot of professions and apprenticeships ie would you like your car engine half hanging out of your car as you pull out of the garage to the nearest motorway or would you like the medical surgeon to remove your kidney on the wrong side of your body??

Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?

A general methodology framework may help but certainly should not be prescribed by QQI as the variety of assessment types are used deliberately to assess programme specific learning outcomes and clearly linked to the specialty of the course. Educators should be appropriately qualified for the positions they hold and assessment types are a major part of education courses for teachers and lecturers.

## GENERAL PRINCIPLES AND GUIDELINES FOR ASSESSMENT OF LEARNING

We (QQI) are privileged to work with three distinct parts of Ireland's educational system: FET, HET and ELE. Different paradigms apply in each part and this has substantial implications for procedures for the assessment of learners.

Nevertheless, there is, we propose, a core set of principles and guidelines that might apply across the board at least to relevant providers of QQI validated programmes or with delegated authority to make awards.

### **Stakeholders are invited to address the following questions:**

Would it be useful for QQI to publish general principles and guidelines for assessment?

General principles would be useful as long as they are not prescriptive. Educators should be appropriately qualified for the positions they hold and assessment types are a major part of education courses for teachers and lecturers.

What should the principles and guidelines address?

Different types of assessment methods to suit different student learning styles. It should also be linked to the programme learning outcomes and clearly linked to a future workplace for the student. Most programmes are run to prepare students to join the country's workforce with skills that employers require.

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)?

All providers and QQI validated programmes. This is aimed at setting standards but should not prevent ongoing progress in this area of education as we move more into a digital age.

## **SUMMARY OF ISSUES PROPOSED FOR DISCUSSION**

We would be grateful for responses on any of the Green Paper's content or on any matters concerning assessment. The following is a summary of some of the main issues proposed in the paper for discussion.

### **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)

A few examples of both MIPLO's and MIMLO's would help providers. Also an example of a poorly worded MIPLO on the same programme. Educators who are developing programmes should be appropriately qualified and with appropriate experience. Junior staff should not be leading this process. Should use subject experts and communities of practice staff. Capstone Modules in major awards is good practice.

Do you agree that disciplinary communities have an important role in supporting the consistent interpretation of learning outcomes? **Yes**. How do such communities exert influence on educational and training programmes? Are there opportunities for improvement? (Section 7.3) **Yes specialist communities should have a role in this process. Sharing between different communities is also very beneficial and would lead to improvements. The third level sector has considerable expertise in this area. The pool of External Examiners is too small in Ireland therefore there is a need to look outside the country for the subject experts so as to avoid too much 'familiarity' with the education personnel.**

What more can be done to build expertise in the use of statements of learning outcomes in teaching, learning and assessment? (Section 7.4) **Ongoing seminars would help and linked to evidence based research in this area of education. Link to National Forum on Teaching and Learning in Higher Education**

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) **Yes absolutely. I would expect sample assessment details included in the assessment strategy. This would provide useful information to a validation panel.**

Please comment on the accommodation of diversity. (section 7.6) **Not sure what is meant by diversity here. Is it student diversity or assessment diversity. I agree with using both**

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? (section 7.7)

**Programmes of education need to have appropriate assessment load – it is about student learning and assessment not the sustainability of organisations. If the organisation cannot sustain programme assessments then they should not be involved in providing education.**

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) **Absolutely – this is not a simple process and staff need training in this aspect of their work – to ensure student fairness and equality.**

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 I agree with indicators of minimum knowledge, skill and competence. This ensures that a variety of students will access programmes and that improves the learning experience for all.**

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**

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) **Discrete skills have a place at the beginning of programmes so that a student can gain in confidence and then move into more complex skills and related to the theory and research supporting that subject. This might improve student compliance with finishing a programme of study. A considerable number of students drop out of a programme in the first year in third level – this needs to be analysed further. Some subjects are difficult to teach such as changing attitudes and changing behaviour.**

Do you agree that well-intentioned but non-strategic arrangements for assessment can hinder the achievement of intended programme learning outcomes? (Section 7.11) **Yes if the assessments are for the benefit of the teacher and not the student.**

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) **This should not be a major issue with qualified experience teachers / lecturers. The implications are that the programme is not fit for purpose and future employers will subsequently have to provide the education in the workplace – which is a burden on the state.**

What applications can you think of for norm referencing in the context of assessment? (section 7.13) **The use of internal verifiers and external examiners and peer reviews is useful here.**

What are your views on the purpose and necessity of grading in the context of assessment for/of learning? (section 7.14) **I agree with the use of both methods of assessment. I have found it useful in my own teaching over the years.**

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) **To the best of my knowledge the classifications are consistent – having worked in many colleges and universities in 2 countries.**

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? **It is desirable and it is appropriate to know what it means as part of a qualification. It is useful for the student so that they know what aspects of their careers they should progress and for employers –so that they know the typical competencies of their workforce and at what level.**

What can be done to support consistency in the actual standards of achievement that must be demonstrated and assessed to qualify for Framework awards? **By insisting that the actual standards are incorporated in a programme at validation time.**

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) **By having good quality assurance mechanisms in place and by continuing to monitor same and publish monitoring results and quality improvement plans.**

What do you think are the main challenges involved in remote assessment? (section 7.18) **Plagiarism, Staff management of same and academic integrity issues.**

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) **Yes that is a potential issue but it needs to be challenged by QQI and monitoring.**

How can/do professional bodies help support the validity and reliability of assessment in the context of professionally oriented programmes? **They currently do this and usually have standards and monitoring mechanisms to keep assessment valid. By supporting the assessment task with backup research.**

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) **Absolutely – this is good practice.**



What can be done to further engage learners as partners in assessment of, for and as learning? (section 7.21) **Have frequent formative assessments in both theory and practice. Keep the assessment process engaging with students doing their own projects and also group projects.**

What principles do you think should underpin the quality assurance of assessment in the workplace? (section 7.22) **As mentioned earlier – workplace assessment should be given the exact same rigour as theory assessments and examinations.**

What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate? **A lot of changes and this will need very careful monitoring by education providers. There is so much material that students can access ie purchasing essays, plagiarism etc It can be difficult for educators to identify this at times – a variety of assessment methods can help here ie using Objective Structured Clinical Examinations for example**

## 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. **Regular audit and monitoring and QQI workshops on assessment procedures.**

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.

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

The unitisation of assessment. – **use it for learning and of learning**

The sustainability of the burden of assessment on providers. – **needs to be considered on the overall student workload and yes if it's a burden on providers then this could lead to quality decreasing.**

Centralised versus distributed assessment. – **distributed assessment may reduce student workload and improve study compliance and relevance**

Perceived ambiguities in the QQI regulations. – **yes this can lead to provider exhaustion – too many regulations is not appropriate**

Micro-management of assessment through regulations. **Not necessary to micro manage**

Patchiness of current guidelines. **A lot of changes has occurred since FETAC & HETAC amalgamated and it is difficult to keep up with all the QQI documents & changes**

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

**That is OK**

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

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 FET sectoral protocols and conventions? In addressing this please be specific. **Quality assurance in assessment, Grading systems for theoretical knowledge, Grading systems for practical competencies. The grading curve**

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). **Moderation of assessment guidance should be part of validating a programme and should be the responsibility of the provider.**

Please raise any other issues that need to be considered.

**17.3 HIGHER EDUCATION AND TRAINING ISSUES -?? have already answered elsewhere**

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

Please respond to the commentaries on the issues raised in section 9.1, viz.:

Awards standards, actual learning outcomes (ALOs) and classifications. **OK**

2009 Sectoral Conventions for Assessment. **OK**

Integrated assessment. **Good practice**

Over assessment and manageability of assessment. **Can be a major issue & should be addressed at programme validation stage**

Repeat for honours convention (this applies to programmes leading to QQI awards and those made under delegated authority).

Assessment literacy – **needs to be clear**

Assessment as and for learning **Good practice**

Assessment strategy **Good practice**

Engaging learners as partners in assessment **Good practice and could be done at programme development stage**

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

Please comment on the conventions and protocols as set out in section 15.

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.

Please raise any other issues that need to be considered.

17.4 ENGLISH LANGUAGE EDUCATION ISSUES – **I cannot comment on these**

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

Please respond to the commentaries on the issues raised in section 10.1, viz.:

External proficiency tests

CEFRL

Provider assessment systems

Assessment of English proficiency for access to higher education and other high-stake purposes

Assessment in the context of the International Education Mark (IEM) for ELE providers

Please comment on what if anything QQI can do by way of supplementary assessment related guidelines to support ELE schools.

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

Please comment on the conventions and protocols as set out in section 15 (with reference to QQI validated programmes only).

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). **These are adequate**

Please raise any other issues that need to be considered.

#### 17.5 APPRENTICESHIP ISSUES - **addressed elsewhere – this is repetitive**

What can be done to enhance capacity for developing and using MIPLOs and MIMLOs?

In general terms, what are the challenges in developing integrated approaches to the assessment of apprentices that avoid them taking a silo-based approach to developing understanding of theory, practice skills and role/context competence? What can be done to help and by whom?

What can be done to help increase the reliability and validity of competence assessment in the workplace? **Workplace assessors need to know the curriculum and detail of assessment process in order to engage and be fair to students**

What can be done to encourage industry to become more involved in discussions about approaches to assessment?

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? **Have a template that covers minimum standards and that could be used by different industries**

Should workplace assessment results be graded as distinct from being reported as successful/unsuccessful without gradation? Why/why not? **A skill or competency is either done 100% performed correctly every time – I don't believe in grading a skill only done half right. This could lead to major safety concerns for a lot of professions and apprenticeships ie would you like your car engine half hanging out of your car as you pull out of the garage to the nearest motorway or would you like the medical surgeon to remove your kidney on the wrong side of your body??**

Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?

Please raise any other issues that need to be considered.

#### 17.6 MACRO, MESO AND MICRO

This paper aims to stimulate discussion not only about what we (QQI) might do but also about what might be done by others involved. We invite you to share your views on this. We plan to publish the outcomes of the discussions on the Green Paper including suggestions about opportunities for others to contribute to enhancing assessment practice.

We suggest that you consider what kinds of things might be done at the macro level (in our case these might be quality assurance guidelines, validation policies and criteria, sectoral conventions and reference protocols established jointly with providers); meso level (at institutional level e.g. ETB, university, college) and micro level (e.g. school/centre, programme, module) to help regulate and support assessment of, for and as learning. What can QQI do to help?

Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so what do you think such guidelines should address? **Macro level only**

Do you think that there should be any conventions agreed across the whole HET sector (e.g. on degree classifications)?

Please comment on the need or otherwise for macro-level assessment principles and guidelines on assessment. What should any such principles and guidelines address?

### 17.7 EXTERNAL EXAMINING AND AUTHENTICATION

External examining and authentication are widely used in higher and further education respectively. What purposes do you think they serve? How can they better serve those purposes? **I am reasonably happy with the current system as long as standards are maintained and recommendations acted upon and there is good governance in place.**

Do you think that external examining and authentication 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? 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). **Yes it is a good mechanism – however Ireland being a small country can very soon run out of talent in this area – so a considerable number of 3<sup>rd</sup> level organisations link in with examiners from the UK and visa versa.**

Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET? **Yes**

Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers. **Monitoring and audit every 3 to 5 years.**

## Response to QQI Green Paper 2018

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Generally, I was encouraged by the line of questioning within the Green Paper with a few areas that I was particularly interested in. I have found over the years that publications and viewpoints expressed by QQI have generally been very progressive and supportive of the FET and HET sectors. In my experience it is how the various providers apply the QQI specifications that can often create areas of concern.

The points below relate to my experience and thoughts as an Adult Educator and BTEI Coordinator in the FET sector. My main area of experience for the last 10 years has been at QQI Level 5 but I am familiar with other levels due to my work as coordinator of other programmes. My main areas of questioning and concern related to the following areas:

Effective learning involves not only the receipt of information by the learner but processing that information, engaging with it..., linking it with prior learning, and reflecting on whether and in what ways they have been transformed' (QQI 2018: p.17)

- Do our assessment techniques capture this?
- Are we as educators undermining the adult education principles and practices we work so hard to develop as soon as it comes to assessment time?
- Is our assessment practice constrained or limited by the practices of providers?
- Are we viewing assessment AS learning, i.e. interpreting assessment as learner-centred and meaningful educational discovery that is an integral part of programme delivery rather than a summative task at the end?

Suggestions:

1. Providers running QQI validated programmes should receive more general guidance from QQI on how to assess learners in a manner which is more consistent with the ethos and value system evident in this Green Paper – for example:

- Guidance on how to use assessment as learning;
- Guidance on how to utilise the trust relationship to allow for more learner involvement and autonomy in assessment; and
- Guidance on how to adequately incorporate the learning outcomes into meaningful and purposeful assessment tasks rather than just viewing assessment as a summative piece.

2. There is a need for a simplification and standardisation of the design and language *that is applied by providers* when they interpret QQI's assessment techniques. Generally, QQI Component Specification is broad and open-ended, particularly when outlining the assessment techniques. When these techniques are interpreted by other institutions there appears to be widely varying results across the modules, with some modules having very open-ended and clear

assessment requirements that link with the learning outcomes, yet allow for learner autonomy<sup>1</sup> and others becoming rigid and overly complicated, for both learner and educator<sup>2</sup>.

This type of situation can often provide the tutor/educator (who are experts in their field) with the difficult task of attempting to interpret what they think the assessment guidelines/criteria might entail. In a recent dialogue from the HEI FET 2018 conference a group of highly qualified and experienced educators were describing how they often have to interpret what they *think* is required for assessment and then present it in a simplified manner for the learner and then translate it back again into the language used in their programme module, as written by their provider, in order to collect evidence that they have met the criteria.

3. I will return again here to the issue of trust because it is named so explicitly in the Green Paper -

"Fundamentally qualifications are tokens that depend on trust relationships underpinned by valid and reliable assessment" ( QQI, 2018: p.20)

"Assessment depends on trust." (QQI, 2018: p.21) -

Yet stories from the field regularly point to issues of mistrust – particularly mistrust of the tutor - often leading to overly detailed production of 'evidence' to justify marks awarded (Fitzsimons, 2017)

This leads to immense pressure on tutors to provide highly detailed evidence to account for each part of the assessment process. Assessments are often broken down into such small component parts, each of which must be accounted for and marked accordingly, that they lose their holistic purpose. I witnessed a Communications Level 4 module where each task had been broken up into tiny component parts with a hugely detailed tutor-marking sheet. Learners were achieving incredibly complicated decimalised marks for each individual task (e.g. read and evaluate 7 different pieces of text – broken down minutely into 5% with learners achieving marks such as 0.23% out of 0.5% etc). In my work as an educator in the HEI sector with Maynooth University I have never had to account so precisely for each 0.5 of a % and I doubt this is what QQI would view as best practice for the FET sector. The example provided above details assessment in its most narrow form - a series of tasks that must be achieved with no overarching assessment rationale. Providers should be encouraged/required by QQI to see assessment in a holistic and meaningful way and to support their tutors to do likewise.

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<sup>1</sup> For example, the DDLETB programme module 5N1273 Equality and Disability

<sup>2</sup> For example, the DDLETB programme module 5N0754 Psychology details a useful and meaningful assignment in section 11c then includes overly complicated assessment criteria on the Learner Marking Sheet that bears little resemblance to the assessment guidelines or learning outcomes



Much of this division of tasks into minute parts comes from a need or desire for providers to ensure that tutors/teachers are documenting evidence at every stage of the learning process. This seems to contradict some of the Green Paper's assertion in the importance of trust - trust that the learner and the tutor are engaging effectively and honestly in the assessment process without always having a need for documented evidence at every point...or decimal point!

Standardised marking schemes and rubrics, which sit alongside assessment techniques, could make a huge impact on delivery of assessment.

In summary, rather than seeing assessment as a series of individual, meaningless tasks we should encourage assessment that allows for assessment AS learning, such as:

- Independent research
- Project work that encompasses the necessary learning outcomes
- Group work
- Skills Demonstration
- Dialogue, and so on.

All of these methods can be contextualised by the learner and therefore provide meaningful assessment techniques that capture skills acquired while simultaneously providing a learning experience in their own right.

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QQI (2018) Green Paper on Assessment of Learners and Learning

<https://www.qqi.ie/Downloads/Green%20Paper%20Assessment%20of%20Learners%20and%20Learning%20March%202018.pdf>



**Maynooth  
University**

National University  
of Ireland Maynooth

## **QQI Proposal**

*Faculty of Social Sciences,  
Department of Adult and Community Education,  
Maynooth University,  
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**Word Limit for Assignment: N/A**

**Actual Word Count: 2,592**

Higher Diploma in Further Education

History and Policy of Further Education AD533

06/12/2018

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## Introduction

As a group of five students studying on the Higher Diploma in Further Education programme at NUI Maynooth, we have put together a proposal. This follows our examination of the contents of the Green Paper. Throughout this work, we were particularly interested in the relationship between disciplinary groups and their influence on student assessment. To inform our opinions on assessment, we essentially relied upon our own experiences of how we have been assessed throughout our lives in the educational system. We also leaned on our experiences whilst on student-teacher placements to help formulate recommendations for the Paper.

As is to be expected within a group, there were many different views and opinions voiced during our work. Oftentimes, they were completely polarized. There was, however, universal agreement on one key aspect of the text of the Green Paper: the language that is used throughout is very complex. We also felt that there is an excessive use of abbreviations. It was considered that if student-practitioners in the field were having difficulty with the language, then perhaps the same rings true for stakeholders (maybe even to a greater degree). We concluded that the language causes an unnecessary barrier that has the potential to confuse stakeholders, if not completely disinterest them. Valuable input and feedback are, therefore, placed at risk.

For us, the Paper threw up lots of questions and concerns. One burning question was: if QQI assessment were to become *centralized*, would this mean that Further Education students would be subject to evaluation like that currently in use in post-primary? This caused much debate in our group; ultimately, we came to the conclusion that there are few positives to this concept. In the paper it states: “they are not angling to become involved in centralized assessment, but rather the need to calibrate local summative assessment” (QQI Green Paper, P. 72). Taking into account the diversity and range of the sector (*e.g.* QQI providers, participants, stakeholders)

we posed the question: is centralized assessment even possible for Further Education?

We believe that a positive outcome that could be achieved from a centralized assessment could be an environment for the sharing of resources and ideas between the Further Education community and all stakeholders. Actually, this point was raised at Maynooth University as recently as the 17<sup>th</sup> November 2018 at the Higher Education of Ireland FET Conference: Visioning Pathways in Further Education & Training Teaching and Learning (FET). The stakeholders included representatives from QQI, ETBI, Teaching Council of Ireland, Universities, and Further Education Colleges. Absentees were the TUI and the Department of Education and Science. We opined that a "one-size-fits-all" approach to summative assessment by adult learning providers might hinder efforts at a more holistic approach to assessing learners. It could, we believe, lead to discouraging learners who have already been "failed" by the centralized-system approach to assessment.

As mentioned in the Green Paper, if providers were to arrange their *own* summative assessment (QQI Green Paper, p.68) they could tailor their program to their learners. Providers know their learning environment; they are aware of the particular interactions between learners and teachers and are, thus, better positioned to consider how best *intended learning outcomes* can be assessed (and achieved). This enables providers to plan and act particularly, rather than generally, for their students. We suggest that this is a more suitable model than one which "caters" for students wholesale.

## **The 6 points of assessment**

As a group, we asked: are the 6 points of assessment that are proposed in the Green Paper compulsory? We discussed at length if these are the best methods to examine learning outcomes. The majority of us agree that assessment should be carried out with a more holistic approach in mind. Furthermore, we think that there is little room to manoeuvre, taking the assessment criteria as a guide.

Again, we believe that some of these methods may hinder the holistic approach to learning and assessment. We can further engage learners as partners in their educational journey if we do not make assumptions.

Overall, we feel that facilitators should be granted more autonomy and flexibility under the present system. They should, perhaps, be allowed to apply a wider range of assessment-types; this might allow them to meet the learning outcomes in a broader (and, maybe, fairer) manner. This could be achieved whilst we get to know our students and what kind of learners they are. For instance, if they have been away from the educational system, what social, cultural, and environmental backgrounds are they coming from? These factors all have a major impact on their learning. It is important to ensure that they are assessed by various methods to display the knowledge, skills and competence they have acquired through the entire learning process.

We also begged the question: do the learning outcomes consider the different methods of learning used by individuals? It can be argued that many of the learning outcomes that are derived from the QQI do not consider the individual attributes of the learner. These include visual, auditory, reading/writing, and kinaesthetic learning. This is a very complex issue for all involved. To introduce the holistic approach, some freedom should be given to the facilitators. This whole the question creeps around the issue of fairness: if different learning centers mark/grade

differently, would this be just learners, presuming the objective sameness of their work? Here we are relying on external examiners to be fair and discrete in their judgement. It also calls for an awareness of the type of centre in which the assessment takes place (idiosyncrasies and all) and, to some extent, knowledge of the subject.

The whole process, from assessment to certification, is long and drawn-out.

It should be possible to apply a holistic approach to the learning. Given the constraints on a micro level, such as time-management, teacher timetables, college resources, and facilities in any given centre, we must ask “is this possible”? In Further Education, there are numerous assessments that are undertaken in each module. Is this the best way to approach the testing of learning outcomes? 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). As a group, we feel that this is a major issue in assessment today and in education generally. In simply learning what is needed to pass, have we fallen victim to our own education? The pressure that is placed on learners by assessment, let alone external factors such as financial costs, means individuals consistently revert to the modus operandi of “getting over the line”, not learning what is being taught for long-term usage. This also applies to the classifications of results. They clearly have a big impact on the learner's future, particularly with regard to their education. Is achieving a distinction by cramming the night before an exam a fair reflection on what they will remember going forward? Or will it be forgotten after a few days? This model seems to be the norm from our own experiences within our group and needs to be addressed in Ireland if learning is to become more life long, holistic, and ruminative in value.

**We also asked the question: do we agree that disciplinary communities have an important role in supporting consistent interpretation of learning outcomes?**

There was much debate within the group over this question. It is in many ways contentious; arguments from both sides had good points.

On the “YES” side, we thought that teamwork and collaboration amongst disciplinary communities are essential. They provide the input necessary to develop a curriculum that meets the ever-changing needs and realities of society. Of course, it is not simply the social needs of society that have to be accommodated: there are also industrial and employment needs. With reference to the *“Visioning Pathways in Further Education & Training Teaching and learning”*, we feel this is not just important but crucial.

In contrast to this, on the “NO” side, it can be argued that different communities might lack all the information needed to change feasible learning outcomes. Stakeholders may not have all the appropriate information to make informed decisions on issues such as funding and facilities, for example. Even though it would be great to bring a new course on board to help the students advance in their studies, the facilities in various locations may not have the physical space, equipment or even appropriate level of staffing in to deliver the programme. Many disciplinary communities may not be privy to such information and their decisions may not be well informed enough to seek goals that are ultimately unattainable.

There are many ways that communities exert influence on educational and training programmes. The first would be lobbying groups. These are groups that listen to the concerns of the communities, such as facilitators. They could then contact QQI. The problem with this is groups may be lobbying for change to meet their own specific needs and not the needs of the learners around the country.



The importance of industry advancements is critical and will set standards in many areas of industrial related courses and in the labour market for years to come. Having open lines of consultation with the leading manufacturers in Ireland will shape how teaching will develop in the coming years. Why train individuals in techniques that are outdated and not serve any purpose to the workforce? Disciplinary committees set out standards of employability, so for learners to have the resources and be compatible for employment, the learning outcomes and assessment must suit the demand of disciplinary committees.

## **As a group, we explored opportunities for improvement within the further education sector?**

We came to the conclusion that there are many opportunities for improvement in this sector. There should be more emphasis on moving away from a clinical or centralised assessment to a more holistic approach. This would permit individual learners to progress and develop more effectively.

Of course, the educator must not forget the importance of workplace expectations in the midst of all this. First there is an interest in the welfare of individuals and social groups. A criticism that can be observed by the teachers unions: one of the implications of involvement in statutory bodies such as the National Council for Curriculum and Assessment (NCCA) and investigative bodies such as the Primary Education Review Body is that it serves to not allow for particular issues becoming policy agenda and circumvents the range of solutions which are considered.

Another issue is the growing influence of teachers unions within the Irish Congress of Trade Unions (Quin S, 1999, p92). This influence affects a dual agenda; at one level, this influence supports a number of initiatives designed to tackle, for example, disadvantaged areas in the Irish educational system. On another level, many of the initiatives that have been negotiated, such as improved staffing levels, are also designed to improve the working conditions of teachers. While on occasions there may be happy coincidences between both objectives, sometimes the latter consideration may dictate the choice of which measure is adopted.

Not to labour the point but extra staffing can be allocated specifically to schools in disadvantaged areas. The outcome presents a choice between the pursuits of trade union interests and those with an equality agenda. An example within education is policies being drawn up by teachers addressing certain needs but not addressing the financial requirements that must be addressed. Too frequently, the education body

expects teachers to achieve certain requirements despite a lack of resources and/or training.

As facilitators in this field we have seen the restraints that are attached to the old model. We are looking at more workplace learning which could lead to other forms of assessment involving the disciplinary communities. An example of this type of assessment technique would be evident in a practical subject such as hairdressing. The facilitator could produce an image of an end product with a step-by-step process to achieve that end product. The facilitator could then make an assessment by identifying the type of evidence needed to show competence, as well as the techniques that would or could be used to gather that evidence (integrating several aspects of competency). Holistic assessment underpinned by professional judgement can reduce the assessment time. We agreed that this promotes greater equity of the assessment process. This would then reflect the real world and skill requirements needed for the industry (Skills Recognition, 2018). Most of us are in agreement that, as facilitators, assessing holistically is based on professional judgement.

This would go hand in hand with the development of the "Slow Scholarship program" and would make the process more fluid. The Green paper itself discusses this programme, which was derived from Tom Hartland from the University of Otago. This programme suggests that learners need time and space within a programme to develop confidence. This is something that is really undermined within the learning environment in Ireland today. With the current system, as stated earlier, there is an emphasis on assessment and to get the marks to pass the module. As a group, we feel that the assessment can contribute to damaging the development of confidence.

Other factors that can damage confidence can be negative marking, poor assessment techniques, demanding workloads from many different areas (different classes etc.) and poor teaching techniques. From our own experience, we feel that

individuals need more time to flourish in the professional practice than others. Everybody is different and learns differently. The current learning environment does not support this to happen.

The showcasing of Tony Hartland's "Slow Scholarship Programme" work at the National Symposium on Assessment in Higher Education in Dublin on October 31st, 2017 highlights the opportunity to develop this in Ireland. This work contradicts what the Green Paper suggests is best practice for learning and assessment in Higher Education. It begs the question, why mention the "Slow Scholarship" programme if the suggestion is ignored? The approach has been shown to work in New Zealand, so why not in Ireland?

## Conclusions

As a group, the first thing that we feel needs to be addressed in the Green Paper is the sometimes impenetrable language. Less complex wording and a more “layman” approach would allow readers grasp the issues more fully.

We also feel that disciplinary communities can have an impact on learning outcomes, and this can be achieved by lobbying groups and experts in the field and employees in respective disciplines. This can be both positive and negative as stated previously not all stake holders have all the information and may try to suit themselves and their learners and not the greater good of the sector. This needs to be managed correctly and evaluated on a regular and ongoing basis.

It is our belief that participation by the teachers and disciplinary communities should always be involved in the process of developing policy even if polices never come to fruition, as it highlights the need for progression, and it creates inclusion with the sector.

It is believed that sticking to the norm of teaching in Ireland is self-defeating. To achieve more effective policy needs, collaboration between stakeholders including the following is paramount in obtaining desired outcomes:

- 1) QQI
- 2) ETBI
- 3) Teaching Council of Ireland
- 4) Universities
- 5) Further Education Colleges & the Department of Education and Science.
- 6) Trade unions
- 7) Teachers unions

We are aware that progress takes time. Hopefully some of these suggestions will be taken on board and help shape future policy documents. Let’s make a difference!

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## Comments from Maynooth University on the QQI Green Paper on Assessment of Learners and Learning

The recognition in the Green Paper that what it calls the 'massification' of higher education necessitates a constant reflection on the nature and functions of assessment is welcome. In particular the Enhancement Themes, which stress assessment **of, for** and **as** learning, are useful coordinates for the creation of a holistic and productive approach to assessment in contemporary Higher Education. The Green Paper seems to apply these Enhancement Themes less in its section on HE than it does in other areas of learning and we feel it would be beneficial to the discussion arising from the Green Paper if the principles behind those Enhancement Themes were more fully to the fore in the discussion of the HE sector.

The following specific points are noted:

On pages 74-75 the Green Paper discusses what it calls 'tacitly norm referenced' awards classifications in HE in Ireland. The Green Paper appears to express some suspicion of, or distance from, this practice and links this to the designated status of HE institutions in Ireland. Given that the link here might be taken to imply that such 'norm referenced' practices are dubious, and that this might in turn be linked to the awarding power of the universities and other HE institutions with such powers, the university should seek clarification on what is suggested (what it is 'tempting to suggest') here, and specifically whether the QQI sees a role for itself in providing explicit norms or frameworks. There is no evidence provided here of the very thing that is suggested which, if accepted as true, might lead to an argument that a national body should oversee degree standards.

The status of Designated Awarding Bodies (DABs) is referenced, either implicitly or explicitly, in other parts of the report: in discussions of awards in general (p.40); in regard to capacity and competence to assess (p.60); and in relation to norm referencing (see above). It would be good to see clarity on QQI's intentions with the Green Paper in due course in this context—the paper mentions the possibility of updating sectoral conventions (from 2009) or moving on from this Green Paper to establish guidelines. The issue of institutional autonomy in relation to DABs becomes an even more important point in this context.

Section 9.1 proceeds, with no evidence ('We suspect'), to move towards an assumption about A and B list institutions which it seems to have already formed. The university should, in our view, strongly resist such an assumption structuring discussion of assessment outcomes in Irish HE or being a possible endpoint of the debate.

The suggestion that we consider the link between increased modularity and the nature of overarching intended programme outcomes is useful and pertinent, though this moves well beyond the remit of assessment standards and practices to the whole teaching and learning experience and thus needs to be addressed in that context and not just in terms of assessment, even in its broadest forms.

On the issue of over-assessment, it is unclear what the nature of the discussion could be, based on this section of the Green Paper. Further clarity could be sought here, and in particular how this issue might intersect with supposed 'tacit norms' and programme outcomes.

On page 78, the concerns about how learners transition to higher education in terms of their assessment (and, in that, as part of their wider transition as learners) are something that Maynooth University is keenly aware of and is working hard to address. As with all other areas of learning, this involves a complete experience – difficulty in transitioning to higher level assessment is entwined with challenges in understanding and achieving standards in learning techniques, study skills and analytical capacity. Separating these from assessment is counter-productive.

Assessment strategies at programme level are worth consideration, and may enhance the cohesion of the student experience, though the previously mentioned context of modularisation mitigates against this and tends to push such consideration to the generic rather than programme outcome level, since the potential variety of programmes (and thus specific associated outcomes) makes it difficult to legislate for heavily modularised study.

It is notable that assessment is largely treated in this section of the Green Paper at the level of awards classifications. HE in Ireland in general has done much in recent years, partly as a result of the changing student cohort ('massification'), to re-consider assessment practices, including, for example, thinking about assessment as a formative teaching and learning experience. An approach to assessment which not only sees students/learners as partners (page 79) but takes into account their entire learning experience would be welcome.

**The Irish Language:** Nowhere in the documentation is reference made to Irish language teaching and learning. They talk about English language teaching and learning, and they also refer to 'foreign' languages, in the context of teaching and learning a 2<sup>nd</sup> language. The Irish language is most certainly not a foreign language, although it is the 2<sup>nd</sup> language of most students who take it at 3<sup>rd</sup> level!

Overall, there are useful things to think about in this Green Paper. We would suggest that some of the premises of the Green Paper in regards to Higher Education are such that they could be seen to anticipate a specific outcome of the Green Paper, which would be to question the extent and desirability of HE institutions as self-designating bodies. The Green Paper neither provides nor cites any evidence for the value of this assumption or approach. The Green Paper underestimates the innovations in assessment which are ongoing in the HE sector and subsequent discussion could learn much from the thinking behind those innovations. Nevertheless the Green Paper highlights useful areas for discussion - in particular, the challenges posed by increased modularisation in providing verifiable standards of assessment across the sector.



## Responses to specific questions

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

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.

*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)*

“It is not always safe to assume that the overarching outcomes will look after themselves if the modules are delivered well and discretely assessed. We consider that holistic assessment can and should always be implemented.” Summative assessment at program level would be difficult without moving beyond a purely modular approach. An option could be to include some program LOs in modules like a final year project or dissertation.

*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)*

Peer-review is not perfect but contributes to maintaining standards and quality. An advisory role for external peer review is important and beneficial.

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

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.

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

I think grading is very useful to provide indication of performance, although it may be easier to implement more transparent (or more quantitative) marking/grading schemes in some disciplines than in others (e.g., numerical vs descriptive based assignments).

*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 useful to provide information on performance and to what extent LOs may have been achieved by the student. It should be a good reflection of this if well designed assessment and appropriate standards have been provided/enabled by the awarding body.

*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)*

The needs of enrolled learners should be taken into account to ensure programme LOs are achieved and assessed properly; appropriate support should be provided to students and staff (e.g. sufficient resources, training to acquire competencies that enable well-designed assessment practices).

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

Initiatives such as introduction of peer-assessment could be useful to increase engagement, however, meaningful implementation of these practices can be resource intensive.

*What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?*

Ease to access to information-risk of plagiarism and ineffective assessment.

Much information on the web is not peer-reviewed and can be wrong/misleading; learners should develop ethical thinking skills to assess validity of resources.

Technology should facilitate some types of assessment such as MCQ.

*Awards standards, actual learning outcomes (ALOs) and classifications.*

At the bottom of this discussion is how the ILO and ALO have been defined for specific programs. So if comparisons are to be made, should we consider the ILO of programs to evaluate their equivalence? In other words, is disparity in award standards and classifications by education providers a consequence of assessment or of program design?

*Assessment literacy*

Regarding preparedness of some learners to transition to learning strategies that are compatible with higher education and training, there seem to be a disconnection between a “teach towards the test” approach followed in secondary education and the learning strategies desirable in higher education. Maybe this transition could be facilitated by clear communication to the students about what is understood by assessment in higher education and what they are to expect; also provide training in skills they will need (e.g. critical skills).

*Assessment strategy: What should a programme assessment strategy address? What should the purpose of a programme assessment strategy be?*

Programme assessment strategy should be developed alongside with programme LOs and should address/ensure evaluate appropriately if such LOs have been achieved. It should include means to provide feedback, to enable assessment for learning.

*Engaging learners as partners in assessment: What can be done to further engage learners as partners in assessment of, for and as learning?*

Peer assessment can be challenging to implement and resource-intensive, if done properly. Perhaps a more effective approach would be to incorporate provision of feedback and reflective practices on assessment strategies/approaches.

*Would it be useful for QQI to publish general principles and guidelines for assessment?*

General core principles and guidelines could be useful; however, it should be taken into account that different programs may require specific adaptation of those general principles and provision for such adaptation should be observed.

*What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?*

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.

*Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so what do you think such guidelines should address?*

This would be a major undertaking: on what criteria would be QQI select or appoint topic experts for topic specific QA guidelines on assessment? The requirements can vary significantly from topic to topic. Also would this not interfere with how each institution envisions the formulations of the ILOs for their programmes and have control over their choices on most appropriate assessment practices?

*Do you think that there should be any conventions agreed across the whole HET sector (e.g. on degree classifications)?*

This would be quite difficult to achieve, as to be truly meaningful they would have to be quite specific - general, across-disciplines broad classifications may be achieved, however if the conventions are too loose, they may not fulfil their purpose.

*External examining and authentication are widely used in higher and further education respectively. What purposes do you think they serve? How can they better serve those purposes?*

Peer-review is not perfect but contributes to maintaining standards and quality. I think an advisory role for external peer review is important and beneficial.

*Do you think that external examining and authentication 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?*

The external examiners can advise to some extent if the standards and LO of a programme are appropriate; however, comparisons with programmes in other institutions would be beyond the role of what would be expected for an external examiner. Also different programs in the same discipline may have different focus in different institutions, so a certain degree in variability is to be expected. At the same time, institutions should have the flexibility to design their programs with their particular vision on LOs, without compromising their standards; a centralized-discipline based regulation could endanger this.

*Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?*

There is too broad a landscape across all FET and HET institutions-would these guidelines be able to accommodate them in order to be meaningful/useful?

*Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.*

Objectivity in assessment starts at the micro level, informed by meso and macro level policies and guidelines. These guidelines need to be clearly defined, fair and feasible for a sustainable experimentation across the three levels - micro, meso, macro. Appropriate training should be provided to people responsible for assessment at the different levels so that awareness of and implementation of these guidelines can take place effectively.

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

The following are some comments on some sections on the document, not specifically highlighted in the discussion section.

*Page 28*

*NVAO Peer Learning Event on Assessment and Demonstration of Achieved Learning Outcomes*

The recommendations about assessment - i.e., moving from teaching-centred assessments that assess the curriculum to student-centred assessments are extremely valid and some efforts have been made; however, we must recognize that this presents an enormous challenge due to resources - this may not be feasible across the board.

*Page 32 "programme approaches to assessment and feedback in Irish higher education"*

This is a very interesting area to be developed; nevertheless, it poses significant challenges, mainly alluding to need to develop effective channels for feedback on assessment to students, in particular regarding summative assessment strategies.

*Page 35: We do not dwell, in this Green Paper, on the economic context but it is relevant nonetheless because the maintenance of assessment infrastructure requires significant resources.*

Unfortunately, this is a reality: some assessment methods can be extremely resource costly - so implementation may not be feasible on economic grounds; however, we should strive to find cost-effective, fit-for-purpose strategies for assessment.

*Page 50-section 7.3 and 7.4 and 7.5: Writing intended learning outcomes statements is an art. The statements must be comprehensible at an appropriate level to learners, to teachers, to members of the discipline's wider communities of practice and to other key stakeholders.*

In summary, many of the issues discussed in this green paper arise from the fact that in the transition to a modular system, LOs have been identified in a program to comply with QA policies (top-down approach), rather than revise or design programs starting from intended LO (bottom –up approach). Part of this is that academics involved in program design are not appropriately trained. Articulation of LOs and strategies for assessment can be challenging. To acquire this knowledge/training could require significant resources and investment.



## Department of Adult and Community Education

### Submission to QQI on the *Green Paper on Assessment of Learners and Learning*

7<sup>th</sup> December 2018

To the Consultative Panel,

Thank you for the opportunity to comment on the *Green Paper on Assessment of Learners and Learning*. This submission is on behalf of academic and administrative staff within the Department of Adult and Community Education at Maynooth University, Co. Kildare, Ireland. The following outlines key reactions to the document as well as some suggestions for change.

Our overriding observation is a belief that **assessment** cannot be looked at in isolation without considering wider contexts such as the purpose of education more broadly, pedagogical approaches, learning methodologies, curriculum design, and national policy directives on education. We support a systemic approach that encapsulates all aspects of the educational experience.

We also suggest you acknowledge the contested nature of many of the terms at the core of this document.

Further comments have been organised under the interconnected heading of: the nature of assessment, the limitations of learning outcomes, the nature of knowledge, the role of external examination, diversity and assessment, Higher Education, supporting educators and providers and other comments.

Thank you for taking the time to read this document, we hope it is useful.

We are happy for this submission to be published in full and to be attributed to the Department of Adult and Community Education, Maynooth University.

## **The Nature of assessment**

The assessment of learning is complex, fluid, nuanced and difficult to definitively pin down. Rather than represent a process which ‘tests’ students on their ability to ingest and retain certain ‘set’ knowledge, it is a continuation of the learning process and should be directed as much as possible by students in collaboration with education providers. With this principle as our guide,

We welcome the assertion that students should take an active role in “creating the learning process” (p26), the inclusion of self-assessment, recognition for the experiential nature of learning, and some breadth in interpretation of assessment.

We welcome the emphasis on feedback (p32) and on holistic assessment (p51). These have long been at the heart of Adult Education. Assessment strategies should build on good practices that already exist where educators creatively and imaginatively develop really useful assessments that are appropriate to student groups and contexts. Any changes to assessment policy must preserve this freedom for educators. We are concerned about issues of consistency and inconsistency in assessment. Assessment can only be consistent if teachers have the autonomy to adapt it to the context and specific needs of student groups and even individual students as required.

We therefore oppose 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. This builds from much literature that suggests the school system of meritocracy has generated a culture of rote learning, preserved competition over collaboration, enhanced a culture of examination over learning and entrenched rather than addressed inequality. Both Higher Education (HE) and Further Education (FE) must retain the right to be contextually led and must be free to create environments where there is trust in the capacity of educators to respond appropriately to the educational needs of students.

The point above links to the welcome clarification within the Green Paper on the importance of critical thinking at all levels of the NFQ. We agree that an unhelpful culture has emerged where certain verbs are linked to learning outcomes at particular levels. This, we believe, has emerged from an uncritical adoption of Blooms taxonomy. We welcome QQI distancing itself from this practice.

We welcome the inclusion of assessment of prior learning. This is established practice in some institutions and we welcome models for RPL that are not overly burdensome for those seeking exemptions. We support calls for a national policy on RPL but caution that such a policy must support bottom-up initiative and not curtail innovation.

The document strongly emphasises summative assessment with other forms less prominent such as formative. Others are absent (performative, impassive, experiential...). Moreover, section 7.14 ‘Whether to grade’ fails to consider ways in which summative assessment can distort deep reflective practices.



## **The limitations of Learning Outcomes**

The document fails to critique a learning outcomes approaches to education. This method is reductionist, blind to unanticipated and delayed outcomes 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.

The Green Paper explicitly suggests transformative learning can be measured through assessment at the beginning and end of a recognisable process. This fails to comprehend the immeasurable nature of learning/knowledge; something we suggest is akin to measuring a dream. We suggest instead that we seek to express and critically reflect on key moments as a fluid, immeasurable and ongoing process

## **The nature of knowledge**

We are concerned about the description of effective learning as “*not only the receipt of information by the learner but processing that information..*” (p. 17) This represents a banking approach to education where knowledge is interpreted as something that is acquired through exposure to set expertise and delivered by experts. This understanding of education has long been contested within the all disciplines of education with most national and international curricula acknowledging the constructivist nature of knowledge.

The document asserts ‘teaching and learning always involves assessment’ (p13) we caution against any approach that places significant power with the educator and providers thereby minimising the centrality of learners/students in the co-creation of knowledge.

A concept of Slow Scholarship is put forward – this has long been an idea supported within the discipline of Adult Education and draws more widely from the slow movement – some scholars<sup>1</sup> explores slowness as a vital part of quality education and (with others) posits the idea of slow institutions and draw attention to the inequities that need to be faced for such practices to become embedded

Some language is notable through its absence. We suggest the word ‘facilitation’ is added to the list of expressions covered by the term teaching (p11) and ask that the language used more deliberately refers to the participative and dialogic nature of learning.

We are concerned that the Green Paper appears to align with the SOLAS strategy for vocational education and thus has a strong skills based, work-readiness approach where the end game is to service the workplace. We believe education should cater more deliberately to our intellectual, emotional, spiritual and civic needs. In the face of such global issues as rising inequality, mass migration, ongoing racism and ecological instability we suggest an alternative vision for education that extends beyond the limitations of vocational demands across the educational spectre.

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<sup>1</sup> for example the work of Maggie O’Neill at UCC.

## **The role of External Examination**

We note the inclusion of some discussion on external examination but are concerned by its limited interpretation which is principally as a monitoring process that addresses “conflict of interest” (p21). External peer assessment emerged from within university systems themselves and were implemented to ensure peer learning and support, not to monitor each other’s practice. We trust the integrity of educators to work in a way that is fair and consistent without the need for monitoring.

We absolutely support external evaluation and believe this is a cornerstone of good quality, critically reflective practice. However, this should be progressive where standards are set internally and where the focus is on the present and the future; and not retrospective where the focus is on the external imposition of standards and the monitoring of practice.

Research has revealed disparity in the way external examiners involved with QQI awards interpret their role<sup>2</sup>. We suggest QQI look to those within HEIs that embrace progressive models where the primary role is to support the development of programmes including methods of assessment and where there is less emphasis on overseeing of results.

We believe those externally examining within FET should 1) be experienced Adult Educators themselves 2) have a knowledge of the subject field under examination.

We are concerned about a current over-assessment in FE and a continued reluctance by practitioners to integrate assessments across modules. 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 appropriate standard.

## **Diversity and assessment**

We welcome the section on diversity and assessment but believe this should be expanded.

The document makes assumptions about learners’ however it also makes assumptions about knowledge: whose knowledge? To what extent does the assessed knowledge reflect diversity across gender, ethnicity, class, disability etc. Are assessment processes complicit in reproducing inequality (through content and/or processes) or are they challenging inequality and contributing to widening participation?

There is little about the inclusion of people of Intellectual Disabilities (ID) other than the mention of ‘reasonable accommodations’. Further Education and Training has legislative responsibilities (New Directions, Disability Acts) to promote inclusion and some examples of good practice has emerged<sup>3</sup>. and FET could be a leader in the field.

We are concerned about suggestions that ‘divergence’ is problematic rather than a strength (p59).

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<sup>2</sup> Fitzsimons, C. (2017) *Rhetoric and reality: The Irish experience of Quality Assurance*. The Irish Journal of Adult and Community Education. pp. 15-32

<sup>3</sup> Galway Education and Training Board is one such example.

## Higher Education

The document's interpretation of *academic integrity* is both limited and punitive in its approach. Similarly the section on *higher education and quality assessment* is over-reliant on UK documentation and includes the suggestion that "*the student demographic has changed dramatically in recent decades*" (p32). This is not our understanding of the demographic of those attending Higher Education, particularly within universities.

We suggest all sections relating to Higher Education, are re-conceived in direct consultation with academics working within Higher Education institutions.

Pages 44-45 focus on standards for awards classification and draws comparisons between HE and FE criteria and appears critical of the 'vagueness' of HE benchmarks in measuring learning. We present this as a strength that links back to the impossibility of measuring learning and the problematic nature of reducing all education to pre-prescribed learning outcomes.

The document also refers to an internet search that yielded information on UCD's grading criteria. We suggest a more deliberate engagement with HEIs to gather data on their grading criteria should this be required. This information is available through marks and standards on each organisation's website.

## Supporting the role of educators and providers

As asserted at the beginning of this document, the assessment of learning cannot be conceived of in isolation from the socio-cultural context within which it exists. At the moment this context includes a precarious educational workforce who, across HE and FE are often paid for their contact hours only, a reality that has implications in terms of educator's capacity to participate in this very consultation process. For assessment to work, educator professionalism must be acknowledged to ensure that those dealing with students in the day-to-day are also paid to invest in the design, implementation and enhancement of the assessment of learning. Many, particularly new graduates into FET are finding it difficult to see career pathways in FE, particularly, with ETBs<sup>4</sup>.

CEDEFOP recommendations on ensuring assessors are 'competent and trained' and 'sharing responsibility of certification QA at all levels' (p. 25) relies on ongoing professional development in assessment and design. We ask QQI to support the statutory right to continuous professional development for those working in Further Education and Training (FET) to ensure spaces can be created for practitioners to critically reflect and to develop and implement holistic ways of working.

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<sup>4</sup> O'Neill and Fitzsimons (2018) <http://eprints.maynoothuniversity.ie/10205/>

## **Other general comments**

Overall the document is too long (meaning our response is also long) and we suggest some sections are removed particularly where these are speculative and without substance. 7.17 does little more than speculate on the motivations of HEIs when hiring staff and section 7.21 does little more than repeat the document's assertion that students should be engaged as partners in the assessment of learning.

We are concerned about the statement on p54 that refers to the viability of what it describes as "niche programmes for a few learners". This is of particular concern to community education providers and we dispute the suggestion that valid and reliable assessment necessarily involves high costs. We support the waiving of institutional fees for Community Education providers who have, for many years been providing locally based opportunities for many adult learners. We do not agree that the size of a provider necessarily equates to an undermining of quality, as the document appears to suggest. Where colleges do not have the facilities required to carry out assessment (for example kitchens and health care environments) funding should be made available to rectify this.

We are uncomfortable with such expressions as "controversial topics", "uncomfortable reading" or "healthy" teaching and learning, that "trust can wax and wane" and other similar statements throughout the document.

*Submission for QQI Green Paper on Assessment*

*Sub-group from the Department of Adult and Community Education, Maynooth University.*

*This submission has been developed out of a workshop with former students and current staff in the Department of Adult and Community Education. It supplements other submissions from the department.*

*We focus on general principles and guidelines and on assessment for Further Education*

*Page 103:*

*Would it be useful for QQI to publish general principles and guidelines for assessment?*

Yes, together with a considered discussion on the value of assessment overall and the alignment with the values of education per se.

*What should the principles and guidelines address?*

The values underpinning education as a social institution overall and the role of assessment in reflecting these values

The different roles of different educational dimensions in further, higher and adult education and in vocational training.

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.

Assessments need to be appropriate for each of these dimensions: demonstration of skills and foundational knowledge; rehearsal of professional practice; community engagement project; and so on.

In particular, the principles and guidelines have to be critical of assessments which do not contribute to learning and development.

*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)?*

It is vital that assessment be part of a general conversation about the ultimate purpose of education for a critically engaged citizenship.

As Hyland's research has shown, the Leaving Certificate fails to prepare people for higher education, (Hyland, Áine, 2011, *Entry to Higher Education in Ireland in the 21st Century*). When the Leaving Certificate was framed as the substitute for the Matriculation Examination, for entry to higher education, the Leaving Certificate took on that task. However, not only does it fail to prepare people for higher education, it also fails them for preparation for life. Thus, part of this conversation on assessment has to be held with the post-primary sector, in order to interrogate the Leaving Certificate and whether it's fit for purpose; that is, fit for the purpose of preparing people to take their place in the world, rather than as an enormous filter to separate people into disparate social classes.

P 105 15.2

FET

*What might usefully be addressed by sectoral conventions? What might usefully be addressed by reference assessment protocols? What changes are required to the implicit protocols and conventions in Quality Assuring Assessment - Guidelines for Providers?*

In consultation with our colleagues, we propose the following for Further Education.

Firstly, we appreciate the jargon busting approach taken in this Green Paper. We recommend it for all aspects of adult, community, further and higher education.

Secondly, we recommend the following:

To frame *Assessment as Learning*. That is, to move away from the practice of the assessment of learning, which is by and large, regurgitation and memory testing.

Thus, assessment becomes part of the learning outcomes and students could be encouraged and supported to engage in their own learning in order to develop their own assessments. The model for this is obviously research, but this can be streamlined to fit with portfolio, 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.

The social aspect of learning respects the different learning styles, and assessment could be designed in order to reflect the different learning styles, drawing on theories that have developed in the latter part of the 20<sup>th</sup> Century, as well as the social movements of the 21<sup>st</sup> Century.

In addition, it is vital to reduce the administration and bureaucracy involved in assessment in Further Education. This creates an enormous amount of work for adult educators, without a benefit to the students or a dividend for the educators.

Finally, it is vital to see assessment as process rather than product. That is, it is not an end-product and students can have feedback throughout the process. In addition, it is vital for students to reflect on the process as part of the assessment as learning.

## Comments from Maynooth University on the QQI Green Paper on Assessment of Learners and Learning

The recognition in the Green Paper that what it calls the 'massification' of higher education necessitates a constant reflection on the nature and functions of assessment is welcome. In particular the Enhancement Themes, which stress assessment **of, for** and **as** learning, are useful coordinates for the creation of a holistic and productive approach to assessment in contemporary Higher Education. The Green Paper seems to apply these Enhancement Themes less in its section on HE than it does in other areas of learning and we feel it would be beneficial to the discussion arising from the Green Paper if the principles behind those Enhancement Themes were more fully to the fore in the discussion of the HE sector.

The following specific points are noted:

On pages 74-75 the Green Paper discusses what it calls 'tacitly norm referenced' awards classifications in HE in Ireland. The Green Paper appears to express some suspicion of, or distance from, this practice and links this to the designated status of HE institutions in Ireland. Given that the link here might be taken to imply that such 'norm referenced' practices are dubious, and that this might in turn be linked to the awarding power of the universities and other HE institutions with such powers, the university should seek clarification on what is suggested (what it is 'tempting to suggest') here, and specifically whether the QQI sees a role for itself in providing explicit norms or frameworks. There is no evidence provided here of the very thing that is suggested which, if accepted as true, might lead to an argument that a national body should oversee degree standards.

The status of Designated Awarding Bodies (DABs) is referenced, either implicitly or explicitly, in other parts of the report: in discussions of awards in general (p.40); in regard to capacity and competence to assess (p.60); and in relation to norm referencing (see above). It would be good to see clarity on QQI's intentions with the Green Paper in due course in this context—the paper mentions the possibility of updating sectoral conventions (from 2009) or moving on from this Green Paper to establish guidelines. The issue of institutional autonomy in relation to DABs becomes an even more important point in this context.

Section 9.1 proceeds, with no evidence ('We suspect'), to move towards an assumption about A and B list institutions which it seems to have already formed. The university should, in our view, strongly resist such an assumption structuring discussion of assessment outcomes in Irish HE or being a possible endpoint of the debate.

The suggestion that we consider the link between increased modularity and the nature of overarching intended programme outcomes is useful and pertinent, though this moves well beyond the remit of assessment standards and practices to the whole teaching and learning experience and thus needs to be addressed in that context and not just in terms of assessment, even in its broadest forms.



On the issue of over-assessment, it is unclear what the nature of the discussion could be, based on this section of the Green Paper. Further clarity could be sought here, and in particular how this issue might intersect with supposed 'tacit norms' and programme outcomes.

On page 78, the concerns about how learners transition to higher education in terms of their assessment (and, in that, as part of their wider transition as learners) are something that Maynooth University is keenly aware of and is working hard to address. As with all other areas of learning, this involves a complete experience – difficulty in transitioning to higher level assessment is entwined with challenges in understanding and achieving standards in learning techniques, study skills and analytical capacity. Separating these from assessment is counter-productive.

Assessment strategies at programme level are worth consideration, and may enhance the cohesion of the student experience, though the previously mentioned context of modularisation mitigates against this and tends to push such consideration to the generic rather than programme outcome level, since the potential variety of programmes (and thus specific associated outcomes) makes it difficult to legislate for heavily modularised study.

It is notable that assessment is largely treated in this section of the Green Paper at the level of awards classifications. HE in Ireland in general has done much in recent years, partly as a result of the changing student cohort ('massification'), to re-consider assessment practices, including, for example, thinking about assessment as a formative teaching and learning experience. An approach to assessment which not only sees students/learners as partners (page 79) but takes into account their entire learning experience would be welcome.

**The Irish Language:** Nowhere in the documentation is reference made to Irish language teaching and learning. They talk about English language teaching and learning, and they also refer to 'foreign' languages, in the context of teaching and learning a 2<sup>nd</sup> language. The Irish language is most certainly not a foreign language, although it is the 2<sup>nd</sup> language of most students who take it at 3<sup>rd</sup> level!

Overall, there are useful things to think about in this Green Paper. We would suggest that some of the premises of the Green Paper in regards to Higher Education are such that they could be seen to anticipate a specific outcome of the Green Paper, which would be to question the extent and desirability of HE institutions as self-designating bodies. The Green Paper neither provides nor cites any evidence for the value of this assumption or approach. The Green Paper underestimates the innovations in assessment which are ongoing in the HE sector and subsequent discussion could learn much from the thinking behind those innovations. Nevertheless the Green Paper highlights useful areas for discussion - in particular, the challenges posed by increased modularisation in providing verifiable standards of assessment across the sector.

## Responses to specific questions

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

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.

*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)*

“It is not always safe to assume that the overarching outcomes will look after themselves if the modules are delivered well and discretely assessed. We consider that holistic assessment can and should always be implemented.” Summative assessment at program level would be difficult without moving beyond a purely modular approach. An option could be to include some program LOs in modules like a final year project or dissertation.

*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)*

Peer-review is not perfect but contributes to maintaining standards and quality. An advisory role for external peer review is important and beneficial.

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

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.

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

I think grading is very useful to provide indication of performance, although it may be easier to implement more transparent (or more quantitative) marking/grading schemes in some disciplines than in others (e.g., numerical vs descriptive based assignments).

*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 useful to provide information on performance and to what extent LOs may have been achieved by the student. It should be a good reflection of this if well designed assessment and appropriate standards have been provided/enabled by the awarding body.

*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)*

The needs of enrolled learners should be taken into account to ensure programme LOs are achieved and assessed properly; appropriate support should be provided to students and staff (e.g. sufficient resources, training to acquire competencies that enable well-designed assessment practices).

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

Initiatives such as introduction of peer-assessment could be useful to increase engagement, however, meaningful implementation of these practices can be resource intensive.

*What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?*

Ease to access to information-risk of plagiarism and ineffective assessment.

Much information on the web is not peer-reviewed and can be wrong/misleading; learners should develop ethical thinking skills to assess validity of resources.

Technology should facilitate some types of assessment such as MCQ.

*Awards standards, actual learning outcomes (ALOs) and classifications.*

At the bottom of this discussion is how the ILO and ALO have been defined for specific programs. So if comparisons are to be made, should we consider the ILO of programs to evaluate their equivalence? In other words, is disparity in award standards and classifications by education providers a consequence of assessment or of program design?

*Assessment literacy*

Regarding preparedness of some learners to transition to learning strategies that are compatible with higher education and training, there seem to be a disconnection between a “teach towards the test” approach followed in secondary education and the learning strategies desirable in higher education. Maybe this transition could be facilitated by clear communication to the students about what is understood by assessment in higher education and what they are to expect; also provide training in skills they will need (e.g. critical skills).

*Assessment strategy: What should a programme assessment strategy address? What should the purpose of a programme assessment strategy be?*

Programme assessment strategy should be developed alongside with programme LOs and should address/ensure evaluate appropriately if such LOs have been achieved. It should include means to provide feedback, to enable assessment for learning.

*Engaging learners as partners in assessment: What can be done to further engage learners as partners in assessment of, for and as learning?*

Peer assessment can be challenging to implement and resource-intensive, if done properly. Perhaps a more effective approach would be to incorporate provision of feedback and reflective practices on assessment strategies/approaches.

*Would it be useful for QQI to publish general principles and guidelines for assessment?*

General core principles and guidelines could be useful; however, it should be taken into account that different programs may require specific adaptation of those general principles and provision for such adaptation should be observed.

*What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?*

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.

*Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so what do you think such guidelines should address?*

This would be a major undertaking: on what criteria would be QQI select or appoint topic experts for topic specific QA guidelines on assessment? The requirements can vary significantly from topic to topic. Also would this not interfere with how each institution envisions the formulations of the ILOs for their programmes and have control over their choices on most appropriate assessment practices?

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This would be quite difficult to achieve, as to be truly meaningful they would have to be quite specific - general, across-disciplines broad classifications may be achieved, however if the conventions are too loose, they may not fulfil their purpose.

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The external examiners can advise to some extent if the standards and LO of a programme are appropriate; however, comparisons with programmes in other institutions would be beyond the role of what would be expected for an external examiner. Also different programs in the same discipline may have different focus in different institutions, so a certain degree in variability is to be expected. At the same time, institutions should have the flexibility to design their programs with their particular vision on LOs, without compromising their standards; a centralized-discipline based regulation could endanger this.

*Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?*

There is too broad a landscape across all FET and HET institutions-would these guidelines be able to accommodate them in order to be meaningful/useful?

*Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.*

Objectivity in assessment starts at the micro level, informed by meso and macro level policies and guidelines. These guidelines need to be clearly defined, fair and feasible for a sustainable experimentation across the three levels - micro, meso, macro. Appropriate training should be provided to people responsible for assessment at the different levels so that awareness of and implementation of these guidelines can take place effectively.

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

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*Page 28*

*NVAO Peer Learning Event on Assessment and Demonstration of Achieved Learning Outcomes*

The recommendations about assessment - i.e., moving from teaching-centred assessments that assess the curriculum to student-centred assessments are extremely valid and some efforts have been made; however, we must recognize that this presents an enormous challenge due to resources - this may not be feasible across the board.

*Page 32 "programme approaches to assessment and feedback in Irish higher education"*

This is a very interesting area to be developed; nevertheless, it poses significant challenges, mainly alluding to need to develop effective channels for feedback on assessment to students, in particular regarding summative assessment strategies.

*Page 35: We do not dwell, in this Green Paper, on the economic context but it is relevant nonetheless because the maintenance of assessment infrastructure requires significant resources.*

Unfortunately, this is a reality: some assessment methods can be extremely resource costly - so implementation may not be feasible on economic grounds; however, we should strive to find cost-effective, fit-for-purpose strategies for assessment.

*Page 50-section 7.3 and 7.4 and 7.5: Writing intended learning outcomes statements is an art. The statements must be comprehensible at an appropriate level to learners, to teachers, to members of the discipline's wider communities of practice and to other key stakeholders.*

In summary, many of the issues discussed in this green paper arise from the fact that in the transition to a modular system, LOs have been identified in a program to comply with QA policies (top-down approach), rather than revise or design programs starting from intended LO (bottom –up approach). Part of this is that academics involved in program design are not appropriately trained. Articulation of LOs and strategies for assessment can be challenging. To acquire this knowledge/training could require significant resources and investment.



Higher Diploma in Further Education  
2017-2018  
**Assignment Cover Sheet**

Students

Students Email

**Module Code**

AD533[A]

**Assignment Title**

Green paper

Date

14/11/2018

We are three students currently completing the Higher Diploma in Further Education course in Maynooth University. While studying, we are also completing a work placement in the field of further and adult education and can gain first-hand knowledge on how specific education settings are functioning and how learners are evolving within these settings. As part of our History and Policy in Further Education module, we have read and examined the



Green Paper on Assessment of Learners and Learning. In groups, we presented our findings from the Green Paper, and now we will write an essay giving feedback to QQI of our findings.

This essay will provide feedback to Quality and Qualifications Ireland (QQI) with regards to the Green Paper on Assessment of Learners and Learning. It will discuss if the green paper answers the question; 'do you think award classifications are consistent and when considered at the national level, for all concerned are they fair?'. We will also discuss some general points about the paper with regards to its ease of understanding and if the purpose of the green paper has been fulfilled.

The green paper begins with the approach QQI will take which is from an IEO (Input Environment Output) perspective (2018, pg. 9) We agree with this approach and how it is essential to understand what the learner was exposed to before, during and at the end of the course when determining the impact of the programme (Austin, 1991). This also helps to ascertain if the attainment of the students is due to the programme itself or the selective nature of enrolment.

We also agree that it is not sufficient to focus on outcomes when assessing the rigour of a course. Moreover, summative and formative assessments are essential to teaching and learning. We created a diagram (fig. 1) that shows the purposes of assessment and this is in line with the purpose of assessment set out in the green paper. Learning cannot happen without assessment, and it should be integral to any course being taught. However, we question the number of assessments that students should go through. The number of assessments and learning outcomes we encountered while on placement is staggering. In one module, Safety and Health (5N1794), one learning outcome was being assessed twice in two different modules.

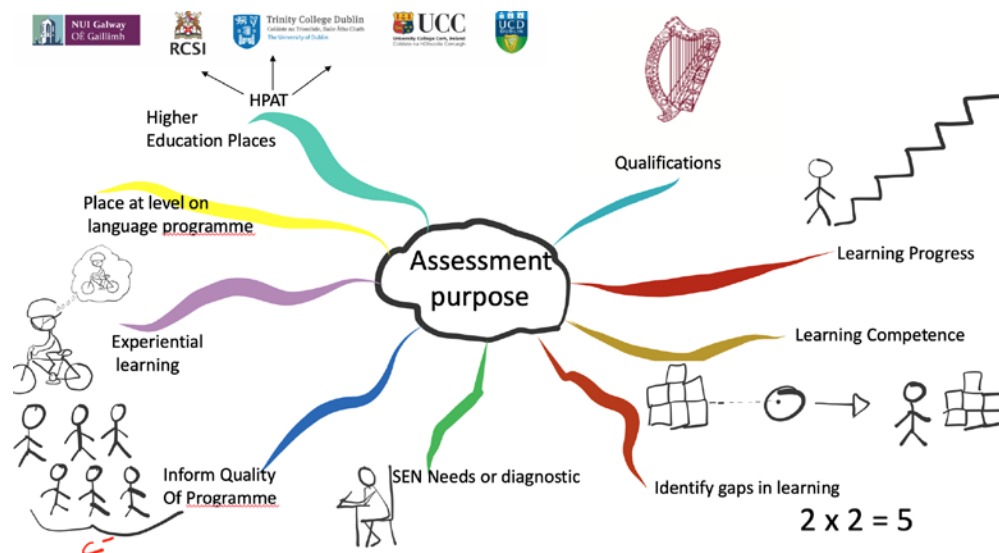


Fig. 1

QQI sets the standards but provides no curriculum support and sets no examinations. On the one hand, this gives teachers the freedom to choose how they achieve the standards, which is liberating. However, it also becomes troublesome as teachers are being told what to do without any guidance on how to do it.

The green paper sets out to start a discussion with those in further, higher and in English language education with the focus on assessment (2018, pg. 1). Considering the intended audience come from a varied and broad background the paper fails to use a language that would be accessible to all. As student teachers reading the paper as part of a university course, we found the paper overly technical and complicated in its approach to discussing assessment. Since QQI intends to gain feedback, we felt that this would limit the number of responses that would have otherwise been received if the paper was written in a more user-friendly language.

Another point that we found problematic was the lack of ownership of the paper. Why the anonymity? We could not find the names of the authors who contributed to the writing of the paper. We felt that this was disingenuous considering QQI asks those who provide feedback to write their contact details on submission of the feedback.

From our reading of the paper, we have deemed that award classifications in Ireland are currently both consistent and inconsistent. Consistency would be the grading classifications within Further Education. For Example, in FE, awards at level 1, level 2 and level 3 are classified as Successful where a learner has achieved all the outcomes for the award.

Awards at level 4, level 5 and level 6 are classified as Pass, Merit or Distinction where a learner has achieved the standards for the award within the grading criteria. To be awarded a pass grade a learner must have achieved a mark of between 50-64%. To be awarded a merit the learner must have achieved a mark of between 65-79% and to be awarded a distinction the learner must have achieved a mark of 80% or over. These markings are consistent overall FE settings.

In our opinion, the inconsistencies we discovered outweigh the consistencies. As we have previously stated, the QQI sets no curriculum or exams. Although somewhat liberating, allowing teachers too much freedom and providing little curriculum guidance may favour students within different FE centres. For example, a level five course in one centre may be more difficult than in another centre, depending on what content a teacher decides to include or how they choose to assess it. (something about not having a set-out exam)

“Being one of four discrete sectors of the Irish education framework that also includes primary, secondary and higher education sectors, FET is a distinct and important sector in its own right. The sector provides a wide range of courses not available elsewhere for a diverse range of individuals over sixteen years of age” (Solas,2014). FET is not restricted to one type of learner but instead caters to a wide range of students, all taking different journeys in life. In its 2014-2019 strategy, Solas stated that “Serving a uniquely diverse cohort of learners achieve learning outcomes at Level 1 to 6 on the National Framework of Qualifications or equivalent, FET enables individuals and communities to achieve their developmental, personal, social, career and employment aspirations”. Unlike other educational sectors which rely heavily on ‘banking’, which is essentially depositing information into the learner, FE is concerned with so much more than that and focuses on the learners social, personal and development skills across a wide age bracket. Therefore, we do feel the current system in place is fair. Having a ‘one size fits all approach’ would undermine diversity and innovation that would likely be to the detriment of the overall quality of the sector and the outcomes of students from different backgrounds.

It also allows teachers and students the freedom to agree as a group the possible content which will be covered and how it will be assessed. Once all the needs of the learner are being met, it is reasonable for the system to be considered fair.

Effectively managing diversity and promoting learning in the Further Education sector is a difficult task for all educators who have been given the responsibility of turning statute into reality, with very little advice (Peart and Wallace, 2014). Therefore, we feel it is necessary to provide teachers with adequate opportunities to help overcome these challenges. A straightforward idea we proposed was for teachers across the same subjects to collaborate, share resources and give each other ideas.

Peart, S. and Wallace, S. (2014). *Equality and diversity in further education*. Critical Publishing LTD, p.2.

SOLAS “Further Education 2014 – 2019 Further Education and Training Strategy 2014 – 2019 and Training Strategy.”, p. 20.

QQI Green paper on Assessment of learning and Learning pg. 2018 pg. 9

Name(s):

Email(s):

Date:

**6 December 2018**

We are a group of four post graduate students studying the Higher Diploma in Further Education at National University of Ireland, Maynooth. One of our modules is ‘The History of Adult and Further Education in Ireland’ and as part of our assessment for this module, we were asked to critique the QQI Green Paper on Assessment of Learners and Learning. We presented our findings to our tutors and fellow classmates and we were required to use the knowledge and suggestions garnered from this assessment to develop a written submission to QQI.

We believe that as student practitioners in the Further Education sector, our observations from placements, and our own experiences as students, have given us adequate insight into the area of learning outcomes and assessment and we welcome the opportunity to respond to the consultation on the Green Paper.

As a group, we have chosen to specifically provide a response to one of the general issues concerning assessment highlighted in Section 17 of the Green Paper:

**“What more can be done, to build expertise in the use of statements of learning outcomes in teaching, learning and assessment?” (Section 17.1; Page 107 Green Paper, 2018)**

**Introduction:**

As a group, we adopt the definition of learning outcomes from the ECTS Learner’s Guide as being “what learners are expected to know, understand, and/or be able to demonstrate after completion of a process of learning” (Kennedy and McCarthy 2016 p.47). We accede that the formulation and expression of learning outcomes should come from a genuine comprehension of what a person is expected to have learned by the end of a programme (Green Paper 2018).

**Anthropological Research/ Findings from our Teacher Training Placements:**

As students on the Higher Diploma in Further Education course, we are required to undertake at least 100 hours of Teaching Practice in a QQI Accredited Further Education Centre during the course of the academic year. Those of us in placement in Further Education Colleges have witnessed first-hand, the difficulties that arise in the use of learning outcomes. For instance, we noted, that to achieve a major QQI award at Level 5, learners have to navigate through over 100 learning outcomes. As all these Learning outcomes are to be assessed, there is hardly any room for creativity in the way the module is taught. Teachers are forced to teach to the test, to tick the boxes

and ensure that all learning outcomes are addressed. Some members of our group, shared their experiences of working with learning outcomes in their placement settings. Learning outcomes were filled with academic jargon that made little or no sense to the students or even the trainee teacher.

As a group, we recognize the need for Minimum Intended Module Learning outcomes (MIMLOs) which identify the redline/threshold outcomes to be achieved and evidenced by a learner achieving certification, and Minimum Intended Programme Learning outcomes (MIPLOs) which identify what the learner is expected to know, understand and / or be able to demonstrate in order to be successful on the programme and achieve certification. We found the metaphor used by QQI (2016) very useful in identifying what MIPLOs and MIMLOs mean-

*“A metaphor for a programme is a journey with points of departure and destination. MIPLOs are the destination. MIMLOs are intermediate destinations. The entry standard for learners is the point of departure”*

We would argue though, that learning outcomes, no matter how comprehensive they are, cannot possibly define all the learning that takes place in a learning situation. Kenny and Finn (2018) suggest that “we cannot easily measure students *understanding* of our subjects. We can only measure what they do to *show us* what they have learned”.

A key issue that came up in our deliberations was the issue of Fear. There seemed to be an almost palpable fear in both students and teachers regarding learning outcomes. The students, because there seemed to be assignments and deadlines constantly hanging over them, and the teachers, because they seemed to be driven to ‘cover’ learning outcomes before the term ran out. For the learners, the fear is often only expressed in private with no forum for them to share with their peers or teachers, therefore, it remains invisible and may never be dealt with throughout the learner’s educational career. For the teachers, this fear of ‘not covering’ the learning outcome stifles their creativity and innovation and leads invariably to the very unhelpful ‘banking’ of knowledge (Freire 1996).

To build expertise in using learning outcomes in teaching, learning and assessment, we make the following submission:

## **1. Training and Continuous Professional Development**

Teachers, Assessors, Further Education Providers, Managers, Stakeholders and all those involved in the process of achieving learning outcomes should engage in specific, target oriented training and professional development. This training on learning outcomes should be delivered, bearing in mind, the Domains of Learning (Kennedy 2007). There should be a space during these trainings, for actual learning outcomes to be discussed, critically analyzed and improved upon. Training should address the following:

### **A. Advancement in Technology**

While on placement, members of our group noticed that there were quite a number of obsolete Learning outcomes for some modules. Learners in a particular Youthreach setting for instance, were still expected to learn about ‘memos’ and other such outdated forms of communication. As technology changes rapidly in today’s digital age, it is vital that the needs of today’s learners are catered for by taking advantage of the ongoing evolution and new technological advancements that are unfolding, and by creating an ongoing strategy that combines new e-learning tools with traditional methods. This training should be ongoing so as to be able to deal with changes that may arise not only in technology, but also in legislation or any such areas.

### **B. Language**

Rather than long and convoluted statements, teachers and education providers, should be encouraged to keep the learning outcomes communicated to learners, short, simple and to the point. As Ireland is becoming more and more cosmopolitan, there should be a shift from the ‘Irish/European’ centered learning outcome drafting styles to styles that accommodate the multi-cultural entity that Ireland is becoming. Again, language used in learning outcomes should reflect the Cognitive, Affective and Psychomotor domains of learning to allow for a broad and holistic programme of learning for the learners (Kennedy 2007).



### **C. Holistic Process**

The training provided should also encourage teachers and educators to use learning outcomes as “a tool for developing and improving education not as a goal in its self” (de Bruijn, 2016 p. 21). We would strongly argue for the learning outcomes to be designed in a way that encourages and encompasses adult education principles. If education is to be truly transformative, it is not sufficient for educators to merely tick the boxes in order to achieve results. At the core of all learning outcomes should be the achievement by the learner through andragogical teaching methods, of a deep sense of personal and professional development and not just a distinction, merit or pass.

### **D. Design of Assessment**

To evaluate what learners have achieved, assignments and skills demonstrations must be designed in such a way as to capture the achievements of the learners accurately. The designing of these assignments and skills demonstrations used as assessments of learning outcomes, is a specialized skill that needs to be mastered by all those involved in the process of assessment. Stakeholders should be trained on how to design these means of assessment, bearing in mind, cultural and ethnic diversity of the learners, gender, learners with additional needs and such other factors.

## **2. Bank of Learning Outcomes**

We suggest that there should be a bank or pool containing well drafted learning outcomes and module descriptors drawn from these outcomes, available to assist newly qualified teachers (and experienced teachers who may require it), in developing their programme modules. This process should be implemented and monitored by qualified and experienced personnel.

## **3. Other Nations**

We suggest that Ireland should look to countries that have a track record for effective educational practices in order to draw from their expertise. For instance, Sweden has introduced what we believe is an effective model of pedagogical leadership, where principals or heads of educational institutions are brought to the fore of teaching and student learning along with teachers. Principals and heads of institutions are held accountable for the overall results of students. This

automatically creates an internal Quality Assurance system and causes a more hands on approach to learning within the classroom. This seemingly simple concept, has created a positive impact on the learning of students and has created a shift in the activities and duties of the principal thereby creating a democratic leadership (Arlestig and Torsen 2014). This innovative holistic method that makes the principal or the head of the institution partially responsible for the learner's outcomes not only allows for new branches of conversations to be created across all levels, but also requires strategic thinking and new learning guidelines to be created. Sweden ensures that there is collaboration between the head of the institution and the teachers. The teacher's role is however not underestimated or undermined as border setting guidelines are put in place. This model would enhance learning environments in Ireland to improve their overall standards, both for the schools and for the learning outcomes of the students.

### **Conclusion**

We welcome the opportunity to be part of the discussion concerning the QQI policy on Assessment of Learners and Learning. This submission has outlined our position on the importance of ensuring that expertise in the use of statements of learning outcomes in teaching, learning and assessment should always be contemporary and based on Adult Education principles. We have outlined a number of suggestions that could enhance the effectiveness of the process for all those involved in the achievement of learning outcomes. Central to this, we suggest the absolute necessity of engagement in continuous professional development so that learning outcomes can be continuously critically analyzed and where necessary, improved upon. We believe that if education providers and teachers embrace the idea of learner centered, holistic and transformative learning in Further (and Higher) Education settings, then learning outcomes should reflect this. Learning outcomes therefore need to be clear, achievable, and productive both personally and professionally for all.

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As participants in the Higher Diploma in Further Education (HDFE) in Maynooth University, we, as a group, were asked to critically analyse the Green Paper as part of our History of Adult and Further Education in Ireland module. To begin with, we read the paper individually from cover to cover; underlining key areas we felt most stood out for us. Following this, we were put into our groups and assigned four sections from the Green Paper- sections 4, 5, 6 and 7. Specifically, we were asked to answer the following question on section 7:

**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)**

We worked for two weeks on picking apart and analysing the Green Paper. Subsequently, reading literature around the subjects we felt the most passionate about, that were discussed in the paper at length; but also, those that were not discussed enough. We met regularly as a group to flesh out our ideas and bring them together in a cohesive manner for presentation. We were then asked to present our findings on the Green Paper to the class. Following which, we had to then propose suggestions that could be useful to QQI on those findings.

We now present these findings to you as a group; and we shall present them in the following way: Firstly, we will critique the layout of the Green Paper, commenting on the language, headings and content. Secondly, we will outline some of the positive aspects that we read in the Green Paper. Thirdly, we will present our findings under clear and easy to follow headings, outlining what we feel to be areas that need to be expanded on in the Green Paper; and speaking about themes we feel should have been included in the paper. Finally, we will conclude with reiterating the points made under each heading; and suggestions we feel QQI could usefully take into account when designing policy.

We feel it is essential to state at the beginning of this proposal that all members of the group have been educated in the Further Education system between 1995 and 2011; and as participants in the Higher Diploma of Further Education, we are currently in placement in Further Education centres across two counties. This has given us an invaluable insight into how assessment affects both the learner and the teacher.

## **1.1 Layout**

We found the language of the Green Paper to be quite dense and inaccessible. There were far too many acronyms throughout; and we felt that it was geared more towards policy makers at the expense of FE practitioners/teachers and other staff. Less acronyms and clarity in expression would make the Green Paper accessible to those who are most engaged in assessment design and those affected by its content. The layout, however, was very clear. This made the Green Paper quite easy to navigate. The headings were laid out in a succinct manner and were clearly numbered. This was invaluable to us when referring back to the paper and locating sections that were important to our presentation.

## **1.2 Positive Findings in the Green Paper**

One of the overwhelmingly positive aspects of the Green Paper is that facilitators have autonomy in setting assessment. However, we feel that this needs to be expanded on and stated more explicitly in the document (3.5 & 3.6). We also felt the Green Paper's emphasis on writing learning outcomes as sentences rather than using bullet points, was extremely useful, as the latter could be misinterpreted and lead to confusion for a practitioner (7.4). Another overwhelmingly positive aspect of the paper was its stance on writing learning outcomes that are fully comprehensible and understandable to learners at all levels.

## **1.3 Recognition of Prior Learning**

In section 7.8 of the Green Paper, we agree with and support the recognition of prior learning, as it considers learning as a life-long process. However, it was noted that due to governing body regulations in specific professions, life-long learning runs the risk of being compromised. In Social Care, for example, one member in the group was awarded entry to third year of a four year degree based on her prior learning in Further Education. However this will no longer be available for students in the future. CORU have issued their standards of proficiency which now require a minimum of 800 work placement hours and state that:

*“The education provider must maintain a thorough and effective system for approving and monitoring the quality of all practice placements. Students, the practice education team, placement providers and all relevant stakeholders – including service users where appropriate - must have a role in this review process including mechanisms for obtaining regular feedback.” (CORU, 2017)*

We feel that prior learning in Further Education is at risk if we do not communicate with governing bodies. Students in Further Education now feel that the learning they have received has been diminished and devalued. As students who have travelled the Further Education route- and are now training to become educators- we agree with the student population. The value of this route is being threatened and we need to look at how we assess placement. Furthermore, we feel that this discourages students in continuing their learning which is anathema to what we hope to achieve as future educators.

#### **1.4 Identifying Personal Transformational Processes**

As a group, we all agreed that Transformational Learning is one of the main goals of Adult and Further Education; and that it has the potential to increase self-esteem, self-perception and self-confidence. However, we feel as a group this needs to be acknowledged. We realise this acknowledgement requires specific teaching methodologies and a pedagogical framework that perhaps could somehow measure the ‘soft ‘outcomes of student learning (Rogers 2010, p295). A student’s willingness to continue their study, their increased motivation from the teaching learning programme, or their ‘walking tall’ are all learning outcomes which should not only be evaluated but also ‘acknowledged’ (ibid, p.306). As one of the group recalls from their own experience of returning to Further Adult Education, the personal transformation aspect of the learning experience meant even more than the ‘value added outcomes’(ibid p295). In terms of assessment, we agree with section 3.1 in the paper that self-assessment is part of the reflective process. Should we as adult educators be promoting autonomy in self-assessment? We feel that it is a prerequisite. The Green Paper also suggests in Higher Education a partnership model between educator and learner in terms of assessment. (7.21) Should this be considered in FE? Can assessment be adapted holistically? Again, we feel that it can.

## **1.5 Presentation Question**

We all agreed that, in relation to our question (Section 7.12), teachers and programme designers can sometimes struggle to address all the dimensions of the NFQ adequately in teaching and particularly assessment.

Our group equates to five members who have been educated in the Further Education system between 1995-2011. Upon discussion, we all agreed from stories shared that assessment has not changed in those years. Each member completed a Communications module as part of their Further Education course and are all in agreement that the amount of assessment added too much stress. Assessment became a mere case of ticking boxes at the expense of the importance of Communication. Progression was also discussed; and the fact that sending a Fax and a Memo are still part of the Communications criteria highlights the fact that assessment is not changing with the times. The Further Education sector is increasing in size and learners reducing in age. Therefore, we must ensure that assessment and practice reflect these changes and we work for the learners.

Based on our own experiences and those of our colleagues we have learned that many practitioners focus on achieving learning outcomes and measuring the achievement of those outcomes through the assessment of learning. The outcome of this approach is that individual learning outcomes that could be assessed in a single assessment are instead at times assessed individually. It is our belief that this emphasis on assessment of learning increases the workload for both teacher and learner (Harland *et al*, 2015) (8.1) as well as depriving them of the benefits of assessment for, and as, learning (NSW Syllabus, 2018) e.g. reflection on learning, goal setting, feedback for teacher and learner. Also the lack of clarity found in learning outcomes statements as well as the amount of them, causes much confusion to educators as we have seen on placement. We question the amount in comparison to Higher Education and feel that Further Education is heavily assessed because of this.

Finally, we feel that when it comes to assessing knowledge skills and competence the difficulty lies in assessment due to the lack of creativity. Assessment we feel needs to be focused around the learner holistically. A wide variety of assessment techniques should be adopted, and we feel QQI need to explicitly state this. An example on placement from one of the group members was that students have questioned the assessment techniques and quantity

to be met with responses that suggest the external examiner or QQI have asked for this form of assessment. This we argue is the barrier as students become frustrated.

We feel that the culture of over assessment has formed in Further Education. We noticed upon entering Higher Education a dramatic decrease in the quantity of assessment and an increase in the quality of assessment. It is key to practice we meet our learners where they are at and vital our assessment does too. Focus not only needs to be shifted to creativity in teaching but also assessment. Knowledge, Skills and Competence are difficult to assess using standard assessment techniques.

### **1.6 Interculturalism and Diversity in Further Education**

One theme we felt that was not dwelt upon enough in the Green Paper is Interculturalism. Interculturalism is a theme that should be at the heart of all levels of education- particularly at Further Education level. One member of our group completed a University Access course in 2004/05 and states that there were only white Irish students enrolled on the course. This same group member is now teaching this same Access Course as part of their placement and states that there are now four different ethnicities enrolled. This is progress. However, the course material does not reflect this diversity, as it is still firmly Eurocentric.

There are now over 100 different nationalities in Irish primary schools. (Learning For Life, 2000. P 51). FE must change with the trends of Irish demographics. Interculturalism is a need to frame educational policy and practice in the context of serving a diverse population as opposed to a uniform one, and the development of curricula, materials, training and in service, modes of assessment and delivery methods which accept such diversity as the norm. (Learning For Life, 2000. P51). The White Paper explicitly states that Interculturalism is one of the core principles that should underpin Adult and FE. However, the Green Paper discusses diversity in a mere three lines (Green Paper, 7.6).

Interculturalism is a challenge, however. Many minority groups in Ireland (like the traveller community) find it difficult to achieve success in the educational system. Respect for diversity around a shared identity is another challenge of interculturalism. (Learning For Life, 2000. P50). There are many difficulties when introducing Interculturalism into Further



Education. Like choosing teachers that can deal with diversity issues; there can be language barriers when dealing with refugees. Refugees and asylum seekers, in particular, have many unique needs. Most will have undergone a trauma in their native country. Therefore, the Further Education sector needs facilitators who have been specially trained to deal with these issues- particularly facilitators who are specialised in teaching the English language to foreign speakers. Further Education must also acknowledge that native Irish students also have specialised needs in coping with diversity. Precluding the growth of racism and xenophobia must be an integral part of Further Education policy.

### **1.7 Conclusion**

As former students in the Further Education sector; and as present trainee practitioners, one could suggest that we are becoming 'experts' in assessment. From our own personal experiences and journeys through Further Education; and in our current placement it has come to our attention that the issues we had as students in Further Education are still relevant today. Further Education is heavily assessed, with tick box exercises that focus on meeting learning outcomes to the detriment of holistic and life-long learning. Consequently, we suggest assessment become more holistic.

In relation to our question on knowledge skills and competence, we feel that this could be addressed by disposing of outdated methods and the adoption of new, more modern, methods; for example, keeping up with current trends in technology and utilising them in assessment. We feel it key that QQI explicitly state that assessment warrants creativity. In conclusion, it is paramount to this group, as future educators, that not only the culture of Further Education is learner-centred; but that our assessment techniques are too.

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**Subject:** History & Policy of Further Education

**Module code:** AD533

**Assignment title:** QQI Submission

**Institution:** Maynooth University.

**Due date:** Friday 07/12/2018.

## **Proposals for Quality and Qualifications Ireland Green Paper 2018**

As aspiring educators this Green Paper is of particular interest to us given that it has the potential to impact on our future careers. Following our analysis of chapters 4 /5/6/7 of the paper, this submission concentrates on three particular areas we felt need attention. We examined the influence of the European Union (EU) on assessment and accreditation discourses. While acknowledging positive aspects we also exposed some shortcomings that need addressing regarding external inputs (Earley, 1999). We explored the ever-present theme of quality assurance and how that impacts on both students and educators. We then concentrated on assessment and the implications associated with same. We suggest a move away from final assessments to a more continuous approach. Additionally we suggest the lack of Irish research requires immediate attention through action. As our question enquired about the importance of assessors maintaining regular contact with communities of practice this was addressed in the final section. We recommend that these communities should be exploited in a positive manner through trust and consensus and in tandem with educators and students, thus culminating in more positive outcomes.

From a contextual point of view there are both local and global contexts to assessment and policy in Ireland. It is important to establish from the outset that Irish policy regarding course content and assessment appears to be influenced by a European agenda (DES, 1998). People regularly associate such origins of accreditation with policy convergence measures that emerged as part of the European lifelong learning policies of the 1990s and 2000s. The Copenhagen, Sorbonne, and Bologna Declarations spring to mind as initiatives that have shaped contemporary Irish practices (UN, 1995; EU, 1998; EU; 1999). For example those signing up to Bologna accepted the development of easily transferable awards at tertiary level. We suggest that a shift from more global influences to those situated in the local allows for both students and educators alike to have a role in the assessment and accreditation policy making processes. This could be achieved by implementing one of the more positive aspects of the paper, ESG standard 1.3 which states that:

*“Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.”*

(QQI, 2018: 26).

After all it is the students who ultimately have the most to lose or more importantly, to gain, through consultation and involvement in decision and policy implementation.

EU influence is also hugely important ideologically and financially, especially in developing industrial training. It is a policy shaped by neo-liberal discourses, adapting emancipatory adult education principles suiting and catering for certain logics. These logics are responsible for reproducing workers to serve this capitalist ideology which in turn serves the needs of big business (QQI, 2018; Grummell, 2007). All policy-making requires resources. EU aid has been instrumental in ensuring, promoting, and maintaining the skills required for a market driven economies. This funding becomes more important given that any education policy funded by the EU requires the Irish government to simultaneously contribute. While this means increased funding will be made available for EU backed policy, it can also mean that projects outside the remit of the EU become casualties. Community education, intent on giving those who were initially failed by the system a second chance, can suffer as a result. A neoliberal emphasis on assessment and certification, heavily influenced by the EU, can have the effect of repelling those seeking a second chance given that it was rote learning and rigid coercive assessment that initially saw them disengage educationally (Fitzsimons, 2017). EU ideology also favours more individualistic approaches advocating individual responsibility to undertake a lifelong process of educating themselves and up-skilling in order to improve life chances, especially those chances associated with the workplace (Grummell, 2007; EC, 2001). Education is merely reduced to an active labour market policy. We recommend that due consideration be given to community projects that undoubtedly result in empowerment and greater social cohesion and awareness for those more susceptible to marginalisation in modern Irish society.

Emphasis on quality assurance (QA) is a common theme throughout the 2018 Green Paper. In order to achieve greater QA standards the paper recommends “using external examiners.....enhancing validity of assessment” (QQI, 2018: 25). These recommendations have their origins in a peer learning assessment event involving representatives from 13 EU countries. However as Fitzsimons (2017) astutely posits, the word ‘quality’ means different things to different people let alone people from different countries with diverse cultures. There is the distinct possibility that there may not be agreement between internal and external perspectives. There is also the issue, perceived or otherwise, that as QA measures evolve they may be misconstrued as processes of surveillance. Significant power dimensions

may result which could ultimately culminate in a breakdown of trust between educators and external adjudicators in superior positions unconnected to programmes they endeavour to authenticate. Bourke et al. (2013) liken this process to that of a hierarchical observation which is controlling the educators performance. Empirical evidence exists suggesting the most effective measure to ensure quality is to resist imposition of QA models on educators and is worth consideration (Anderson, 2006). Once trust is breached it is increasingly difficult to re-establish. We do not suggest a cessation of external inputs but a more inclusive approach whereby both educators and outside influences can work in tandem based on healthy consensus. It is the educators operating at the coalface, so to speak, who are often best placed to make judgements or recommendations regarding assessment and should be acknowledged when implementing future policies.

The green paper acknowledges three primary forms of assessment, assessment *of* learning, assessment *for* learning, assessment *as* learning, however in practice it can be argued that there is generally an over reliance on one method to the detriment of others (QQI, 2018). Of the 12 countries focused on by the CEDEFOP (2015) study, 9 out of the 12 researched countries awarded a qualification based solely on final assessment. While three types of assessment are highlighted as important in the green paper, we argue that there is an over reliance of 'assessment *of* learning' in the form of final summative assessment. The issue with this type of assessment is that it is too late to gather an understanding of how well the students understand the topics covered, it does not paint a fair picture of how hard a student has generally worked throughout the year, it encourages 'rote-learning' and discourages student empowerment.

The structure of current assessment methods can even hinder students who show creativity in their work and instead produce a 'uniform response' and does not make any progress in breaking down the long established barriers between our current education system and full inclusivity (Fitzsimons, 2017). While the green paper loosely acknowledges these issues, it offers no signs or advice to combat it. We as a group believe that the green paper should instead promote assessment *for* learning or formative assessment. The method of formative assessment offers many advantages over the summative approach including the production of continuous feedback to students, allowing them to adjust and improve their learning and knowledge and providing a more accurate representation of a learner's ability to practitioners (Juwana et al., 2004). We believe as a group that QQI should

advocate practitioners focusing on the process and progress of personal development rather than solely the outcome.

Further limitations found in the Green Paper can be seen in its lack of relevant and recent research. The paper cites nothing of Irish education research at any level and little research within the last ten years. A fundamental question we must ask is why are we writing a policy on Irish education without consulting Irish students on where the education system is failing. While we acknowledge that QQI have enlisted the advice of practitioners on this matter as a positive step, there is no representation from current Irish students and were the document to be given to students for their opinion, the probability is that an issue of comprehension would arise. The paper is poorly structured, not easy to read and completed with a free use of complex education terms and/or jargon. A suggestion made by this submission may be as simple as creating an online survey and appealing to students in different forms and levels of further education via their respective institutions.

As articulated in detail within the Green Paper, assessment as it relates to further education in Ireland is at a major crossroads and is need of some reform. Communities of practice are absolutely vital when it comes to improving how students in further education are assessed in Ireland. By way of a definition, communities of practice are any group of people who share a concern or passion for something they do, and then learn to do it better (Wenger and Wenger-Traynor, 2015). The principles of trust and partnership are critical for communities of practice to feel fully invested in the sphere of further education and assessment that relates to their respective professional disciplines or areas of interest. Fundamentally, if QQI's fail to engage with practitioners and experts in the field, i.e. the world of work and real-life practice, then assessment quickly becomes outdated and it will therefore increasingly fail to meet the requirements and expectations of "industry".

Assessment in education needs to be dynamic and responsive, and especially so in a field of study that evolves quickly, for example cloud computing, cyber-security, medicine, or engineering. It is vital that communities of practice are given the opportunity to tap into their expertise base to ensure that tuition and assessment combine to create the practitioners of the future. By way of ensuring that communities of practice are deeply and systematically involved in assessment, clear guidelines and an agreed schedule of engagement need to be put in place. QQI and faculties of learning must engage with the various relevant professional bodies and industry representative groups (e.g. Engineers

Ireland, Irish Medical Association, Irish Hotel Federation, Law Society of Ireland). A schedule of engagement should be agreed that is frequent, structured, outcomes-based, and guided by a clear agenda. This should be carried out with a view to the advancement and maintenance of the relevant programmes of learning. More specifically, such engagement may include the direct participation of industry professionals in setting curricula and determining the criteria that may be used to best assess a student's level of competence. Retirees and the more active members of professional bodies may be very willing to make this investment of their time. Encouraging a greater volume of guest lecturers and external adjudicators, would be other means of ensuring an ongoing high-level of engagement with communities of practice.

As educators, we owe it to our students and to our chosen subject matter to maintain regular contact with our respective communities of practice. When students, academics and critically, communities of practice are all involved in the design and assessment of curricula, the benefits that follow will include deeper student engagement in learning, increased staff enthusiasm for teaching, programmes of learning that better meet students' needs and practitioners of the future that are more ideally prepared for the community of practice that awaits them. The positive outcome that can result from communities of practice involvement is that students and faculty are empowered with a more up-to-the-minute understanding of what skills and knowledge systems are required and there is better alignment when they enter or return to the workforce.

In conclusion the proposed inclusion of students in decision making processes was acknowledged and viewed progressive. External influences need to be checked especially that of the EU. EU backed policy can have the effect of promoting certain policies and local initiatives, like community projects and marginalised groups, suffer as a result. Attention was drawn to quality assurance and the possibility that those actually teaching can be undermined by external adjudicators if not consulted. Next we explored forms of assessment. Overreliance on summative assessment comes at the expense of formative measures which can stymie creative learners and promote rote-learning. Continuous assessment was posited as a more progressive approach. A dearth of Irish research also needs to be remedied and could be achieved by more student input. Additionally by employing more user-friendly language students can better understand such documents and act accordingly. The importance of communities of practice was then explored. The



principals of trust and partnership were deemed essential in building relationships between various stakeholders. The need for constantly updating modern technologies may be neglected without expert input from these communities. This can occur by frequent and structured contacts. Again this should not happen in isolation but in partnership with both educators and students thus promoting inclusiveness and consensus. We trust our suggestions will be seriously considered and envisage some of our proposals progressing to White Paper stage and ultimately shaping policy.

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7<sup>th</sup> December 2018

### Response to the Green Paper on Assessment of Learners and Learning

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning on behalf of Meitheal Mara. We wish to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

Meitheal Mara is a community boat yard and charity in Cork city, formerly accredited through NCVA and then FETAC. We promote and foster maritime culture and traditional skills based on boatbuilding, woodcraft and seamanship. We provide work and training for young people and adults of all ages, with training tailored to suit needs, abilities and time-scales. We work closely with other local youth, education and community organisations to help participants to learn, progress and develop.

### Comments on the Green Paper

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

- 1) Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education provider, learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.
- 2) Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.
- 3) The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to

Culture of river  
and sea  
*Na báid agus saol na  
ndaoine*



- Researchers and builders of the Irish currach
- Youth rowing and boat building programmes
- Consultancy, boats and crews for special events, exhibitions, films, etc.
- Maritime education in the community
- Boatyard and training centre

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Charities Regulator No. 20039011

- 4) ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.
- 4) **Establish a national Recognition of Prior Learning policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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.

As a provider, supporter, influencer of community education in Ireland. We wish to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country. The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in the AONTAS submission the education system in Ireland will fail to effectively widen and diversify the population of adult learners participating in education, regardless of other policy changes made in the years to come.

Yours faithfully,



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<sup>1</sup> SOLAS, *National Further Education and Training Strategy*. p.93.



**Mayo, Sligo and  
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7<sup>th</sup> December, 2018

MSLETB welcomes this opportunity to make a formal response to QQI's Green Paper on Assessment of Learners and Learning.

We have documented below a set of comments under certain headings taken from ETBI's Consultation Feedback Form. This submission is based on the feedback gathered at a meeting specially convened to discuss the QQI Green Paper and involved staff who work in the area of Training Standards and Quality Assurance. This response is also informed by the experience and knowledge of FET staff.

Fiona Kieran and Ann McNamara of MSLETB completed this submission.

## **FUTHER EDUCATION AND TRAINING ISSUES**

**Question: Unitisation of Assessment - The practice of unitisation/modularisation of Assessment is widespread in FET, what impact does this have on Assessment? What are the Pros and Cons?**

***Pg 70: "...unitisation of assessment is problematic when it facilitates the omission of explicit assessment of overarching outcomes."***

***Pg 70: "Unitisation of assessment can also lead to inefficiencies for learners, who may be 'over assessed' as a result of each unit being individually assessed."***

This model needs to be available to part-time learners. The possibility of over-assessing a learner is one disadvantage that is associated with unitisation of assessment. This requires careful planning at the outset of a programme with key players being familiar with all aspects of the programme and having the ability to inform the learner in order for the learner to make an informed decision. The mapping of all learning outcomes in a programme is one possible solution to aid with this planning.

**Question: Burden Of Assessment on Providers - What are the implications on consistency of individual providers designing and implementing summative assessment? What collaborative models could be explored? How can efficiency be ensured also?**

***Pg 71: "...designing and implementing summative assessment procedures and tasks that are...nationally consistent..."***

***Pg 71: “Collaborative approaches to final summative assessment may be one way to distribute the burden more realistically.”***

A range of solutions were discussed including:

- Having a bank of exams
- Having assessments peer reviewed
- Having assessments reviewed by a third party
- Having assessments reviewed on a regional or national basis

**Question: Centralised versus Distributed Assessment - What are the challenges in consistency of distributed model of assessment in FET? Current practice has mixture of both through SOLAS programmes and former VEC programmes. What is feasible in terms of a model for the future?**

***Pg 72: “...an expectation that providers would collaboratively established arrangements to help calibrate local summative assessment.”***

In terms of creating a model for the future a number of challenges were identified including the responsibility of maintaining a system of centralised assessment as well as the administration needs of such a unit. If teachers/instructors are to act as SMEs in order to update and devise new assessment, what arrangements would be put in place in relation to remuneration for such work? It would appear that resourcing a centralised system is the main barrier to implementing such a system.

A combination of both a centralised and distributed assessment is required. Any training gaps that may exist need to be addressed. Retention of diverse approaches to assessment must be maintained especially with lower levels on the NFQ.

**Question: CAS Implementation within QBS and Grading- What issues arising with the current classification and grading calculation for the compound award? What alternatives could be considered?**

***Pg 73: “The 2012 Act is clear that assessment is the provider’s responsibility and the calculation of the grade is part of assessment and therefore is the provider’s responsibility.”***

There is a need for the QBS to support locally devised assessment criteria, for example, if a particular grade is required in a section of a programme module in order for a learner to pass, there should be a facility for providers to record this requirement on QBS.-

At present we have four grades , there may be a case for having more than four grades. The calculation of overall grade for an award is difficult to comprehend for learners.

## **APPRENTICESHIP ISSUES**

**Question: What can be done to enhance capacity for developing MIPLOs and MIMLOS?**

***Pg 86: "In practice, many providers find it challenging to think in terms of programme-level outcomes and to demonstrate the necessary consistencies and alignments."***

There is a need for training for subject matter experts in the area of curriculum writing if the current approach is to be continued. Again, there is an issue around resources.

**Question: What can be done to help increase the reliability and validity competency of assessment in the workplace?**

**Pg 84: "...(QQI) have noted....that there can be a lack of sufficient integration between on-and off-the-job training and assessment."**

**Pg 85: "...there are indications that mentors require more support than they currently receive to assess learners consistently."**

MSLETB's recently validated Apprenticeship in Craft Butchery has made provisions for providing workshops for workplace mentors in relation to assessment, including formative assessment as many of the work-based assessment events are carried out by an MSLETB assessor. The workshop also includes training in giving learner feedback. It is the view of MSLETB based on this experience, that a similar mode of training for workplace assessment could be rolled out across the ETB.

**Question: What can be done to encourage industry to become more involved in discussions about approaches to assessment?**

There needs to be a distinct forum for industry to become more involved in these discussions. There is also a need for supports to be put in place for employers in the event that they have an issue and there needs to be communication around these supports.

**Question: What can be done to help support professionals in industry who are responsible for mentoring and assessing apprentices?**

See above

**Question: Should workplace assessment results be graded as distinct from being reported as successful/unsuccessful without gradation?**

MSLETB would be in favour of such a system where workplace assessment is either successful or unsuccessful.

**Question: Would it be useful to try and establish a general methodological framework to assessment in the context of apprenticeship and traineeship?**

Caution should be exercised in relation to this as we feel this needs further careful consideration. A one size fits all framework is not possible.

## **ACADEMIC INTEGRITY IN THE CONTEXT OF ASSESSMENT**

**Question: What could QQI do to promote and support academic integrity in FET?**



QQI could develop a charter or code of conduct around academic integrity and provide training around same.

**Question: What can, and should providers do to promote and support academic integrity in FET?**

- Peer reviewing
- Monitoring/oversight
- Cross moderation
- Anti plagiarism software
- Training

## **GENERAL GUIDELINES ON EXTERNAL MODERATION OF SUMMATIVE ASSESSMENT FOR NFQ QUALIFICATIONS**

**Question: Would it be useful for QQI to publish general guidelines on external moderation and mechanisms (external examining and external authentication)?**

Yes

**To whom should the guidelines apply?**

All providers of QQI awards.

Teachers, Tutors, Instructors, IAs, EAs, co-ordinators

### **General Items:-**

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.

The diverse range of learners that participate in further education and training needs to be considered carefully.

Assessment of learners at the lower levels on the NFQ needs to be considered in the green paper.

Many learners do not progress to higher education so assessment needs to be relevant to establishing their competency for the workplace.

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# National Adult Literacy Agency Stakeholder Feedback for QQI on the Green Paper on Assessment of Learners and Learning

8 December 2018

## Introduction

This document has been produced by The National Adult Literacy Agency (NALA) in response to the call by QQI for stakeholder feedback regarding the [Green Paper on Assessment of Learners and Learning](#).

NALA welcome the identification of assessment issues within the Green Paper and the opportunity that QQI has provided to stakeholders to discuss these issues through workshops, focus groups and through written feedback. NALA welcome the contextual background material and the useful definition of terms that appear in the Green Paper.

## Comments

[Section 2, What We Mean by Assessment of Learners, p. 12]

NALA welcome this section and the clear exposition of what is meant by assessment of learning. It is very useful to name summative assessment issues such as teaching to the test.

[Section 6, Programmes as Transformational Processes, p.46]

In this section there does not seem to be any mention of assessment-related issues in the context of the programme validation process. It would be useful to consider

whether and how the programme validation process has facilitated transformational teaching and learning.

[Section 7.4, Capturing Ideas of Learning Outcomes in Statements, p.50]

This section states that ‘critical analysis can be incorporated into outcomes at **any one** of the 10 levels in the NFQ’. NALA welcome this and the acknowledgement that the process of critical analysis is common across all levels.

NALA note the following sentence: “To critically analyse the relative efficacy of several different targeted therapies for treating a particular type of metastatic cancer is clearly not as straightforward as to critically analyse the different ways of making a Victoria sponge cake”. We found this somewhat confusing as it seems to reintroduce a “levels-type” distinction in relation to the process of critical analysis in different scenarios.

[Section 7.6, Diversity and Assessment, p. 52]

We would recommend further expanding this section.

[Section 7.24, Data Protection, p.64]

There is a concern about the collection of learners’ personal information for both the Personal Effectiveness and Personal and Interpersonal Skills assessments. Is there another way that this could be assessed? What are the guidelines for dealing with this personal data? NALA welcome that QQI plan to host a workshop on this in early 2019. (In the Green Paper it says early 2018).

[Section 8, Further Education and Training Issues, p.67]

It is welcome that the Green Paper recognises that there was some confusion around the assessing of the expected learning outcomes and whether it is necessary that they all need to be achieved. In the next iteration of the assessment guidelines it would be beneficial if there was more clarity around this area.

[Section 8.1, Issues for Discussion, Burden on providers, p.71]

We note the equity issues in relation to the “cost of compliance” (p.52) and the burden on providers. We welcome the recognition that there is a need to identify

what can be done to enable smaller organisations to contribute to the provision of education and training services. From NALA's perspective this is essential in order to ensure **all** adult literacy learners have access to QQI awards. We believe that it is important that smaller organisations are not excluded, for financial or resource reasons, from designing and delivering QQI accredited programmes.

[Section 8.1, Issues for Discussion, Micro-management by regulation, p. 73]

It is welcome that the Green Paper recognises the fact that providers sometimes feel that they must adhere rigidly to the current QQI Guidelines on Assessment. We suggest that the flexibility for providers should be highlighted in the next iteration of this paper. The aim should be to get a balance between guidance and flexibility for practitioners. The new broad standards will assist with this. It would be very useful to give some exemplars of what an award might look like under the broad learning standards and to develop sample modules or programmes.

## Opportunities

- NALA would welcome the opportunity to have a system through which there can be shared recognition for all centres who have been involved in a learner achieving a Major award.
- NALA would welcome a system which would allow shared recognition for programmes in cases where there is a shared responsibility for providing the validation of a programme and for the provision of the teaching and learning. For example, a Major Award obtained by a learner who has attended an ETB programme using WriteOn, would recognise both NALA and the ETB on the certificate.
- There is an opportunity to increase awareness of Recognition of Prior Learning amongst learners and providers.
- There is a burden of assessment in terms of both the physical evidence and the administration for centres. Programmes using NALA's eLearning platform WriteOn could assist with this issue. The teaching and learning can be carried out in the centre and the assessment, verification, results approval and administration of the programme is carried out by NALA. The majority of

assessment is carried out through the eLearning system, and additional assessment which are carried out in the e-portfolio section on WriteOn.

- NALA welcomes the development of Guidelines for Online Learning. The online context needs careful consideration and NALA is happy to contribute to the development of these guidelines.

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NALA is happy for this submission to be published in full.

## Feedback on QQI Green Paper on Assessment

NCI welcomes the publication of the Green Paper on Assessment and indeed, the many opportunities provided across various actors in the sector in recent months to discuss its contents.

Rather than answer each of the questions posed at the end of the Green Paper we have chosen to highlight specific areas of interest to NCI.

### Principles and Guidelines for Assessment of Learning

Section 14 of the Green Paper **deals with “TOWARDS GENERAL PRINCIPLES AND GUIDELINES FOR ASSESSMENT OF LEARNING** and suggests the following questions for consideration:

Would it be useful for QQI to publish general principles and guidelines for assessment?

What should the principles and guidelines address?

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)?

The short answer to the first question above is yes.

There are numerous benefits to publishing clearly stated and inviolable principles. 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 upon which ‘conventions’, ‘protocols’ and ‘interpretations’ may be based.**

A troublesome aspect of the current regime is that much of the technical detail is phrased in a manner that is not easy to interpret. This is especially true for students and teachers who are not familiar with the scholarship of teaching and learning. Early in the document, the Green Paper (following CEDFOP) discusses three activity levels as macro - the systemic level of activity, meso - corresponding roughly to the institutional level, and micro levels - activities of teachers, individual assessors and, we would *add*, students.

The trouble is, that there is no clear line of discourse between these levels - students trust their teachers to frame assessments because they believe they know better, teachers frame their assessments within institutional norms because they trust the central wisdom of the institution which in turn operates within the systemic level of regulation. Technical

documentation such as *Assessment and Standards revised 2013* and The Green Paper itself are not written for 'micro' level consumption or interpretation.

This point was well illustrated during a series of 'activity theory' research workshops involving FE teacher practitioners and HE education researchers. As part of the exercise, teachers decided to source the fundamental principles underpinning the assessment regimens within which they operate. Teachers worked with the *Assessment and Standards Revised 2013* document and tried to connect section 2.1 on Principles back to what they do at micro level. Two significant insights derived from the exercise; first, teachers valued and endorsed the principles and second, teachers found the language in which the principles were set out to be confusing and overly technical.

There is an obvious need for precise, well-defined and technically accurate statements of Principles of Assessment. Furthermore, these principles should be clear, concise and accessible to teachers and learners to discuss and appreciate.

The five Principles of Assessment as set out below are adapted from those set out in *Assessment and Standards Revised 2013*.

#### Principles of Assessment

1. The purpose of assessment is to support, validate and improve student learning by providing a means for students to demonstrate accomplishment.
2. Accomplishment is based on criteria that reference specified awards standards as well as programme and module learning outcomes.
3. Assessment procedures are fair, consistent, valid and reliable.
4. Assessment processes are clear, transparent and approachable for students.
5. Assessments are consistently reviewed, renewed and improved.

Using these statements, teachers are able to discuss and share the principles with their students and colleagues.

Sectoral conventions, protocols and everyday practice may be framed in the context of these principles. All three sectors HE, FE and ELE could then be seen to operate under the same over-arching principles..

Many questions can be discussed and interpreted at any level with reference to these principles; for **example, one would ask how the practice of 'capping' module marks is compatible with the first principle as stated above.** Furthermore, sectorial guidelines and examples of best practice can be published by means of reference to the adopted principles.

In that way all stakeholders can see what makes sense and what practices may be in breach of principle.

This is not a panacea for every debatable question; rather it is a means whereby all stakeholders, especially at those at micro level, can provide valuable insights and participate in the debate. The Green Paper poses many questions and suggests an openness to feedback on many issues. How then can this feedback be prioritised and what will evolve to influence practice change? The suggestion here is that by **going 'back to first principles' we** have a set of common values that may be used to guide reform and improvement.

Concise statements of Principles of Assessment such as those presented above, do not reduce or simplify the complex issues involved. There will always be a need for rigorous interpretation and precise protocols. However, the process of drafting these should always connect to common values and principles.

The core of the matter is the choice between a quality regime operating as a central technocracy or a regime where assessment quality is an open shared value. What is needed is an **assessment practice is 'reviewed, renewed and improved' through on-going** discourse and interpretation of solid foundational principles. This is what our students and teachers deserve.

#### Sectoral Conventions

We believe that for learners to be treated consistently agreement on and adherence to, sectoral conventions relating to award classifications and bands is critical. This is especially relevant now as more diversity is introduced into the system with the introduction of technological universities and with institutes of technology being designated as degree awarding bodies. Without sectoral conventions there is a danger of increased fragmentation of practice which will not serve learners well.

#### On the issue of repeat for honours

NCI has adhered to this Sectoral Convention and in doing so, has observed that many learners have been demoralised by its impact. While having procedures to allow for extenuating circumstances can mitigate this somewhat, in adhering to the principle that assessment procedures are fair and consistent by applying the convention, learners have been negatively impacted. We have seen behaviours that **could be attributed to 'strategic deferral' which introduce** another element of unfairness into the process.

A method of classifying a degree using a second or repeat sitting is to use a maximum result of the second sitting for the purpose of calculating the award at 40% (ie the



minimum pass mark) . The actual attainment of the learner in the second sitting can still be communicated to the learner. The award classification is then based on all eligible modules which have been passed.

Conventions could be created to allow for a maximum number of credit that can be used and the number of times a learner may attempt to pass the module and still be eligible for an honours classification.

### Integrated Assessment

What can be done to help ensure that the overarching intended programme learning outcomes are given due prominence in teaching, learning and assessment?

There is scope to look at how we ought to be developing cohesive and integrated assessment to ensure that the programme learning outcomes are both deliverable and assessable in a more holistic way. Where modular structures don't **have a** Capstone project or dissertation, learners often take a programme as a series of discrete modules where they do not, for example, make the full connection between HR decisions and their impact on the finance or marketing functions.

### Apprenticeship Issues

#### 1. Grading of Workbased Learning

Section 11 of the Green Paper focuses on Apprenticeship Issues. Page 86 of the Green Paper asks: Should workplace assessment results be graded?

In considering the award classification of learners where a workbased learning is a significant component of the award year, a common approach to the grading of workbased learning is required. On an apprenticeship there is a requirement that there is a minimum of 50% on-the-job learning, however 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. This is at odds with the nature and purpose of apprenticeship. A minimum contribution toward the final award category should be set.

Notwithstanding our view that on-job-learning should be graded, if the on-the-job element is not to be graded, a minimum number of credits that can be used to calculate an award classification must be agreed. A learner undertaking a traditional higher diploma for example, should not be treated differently to a colleague who is undertaking a similar award but in an apprenticeship context.

2. What can be done to enhance ***capacity for developing and using MIPLO's and MIMLO's?***?

Training from QQI for those who are leading programme development for apprenticeships and leading the completion of submission documents should be given routinely each year.

3. Integrated approaches to assessment – what can be done to help and by whom?

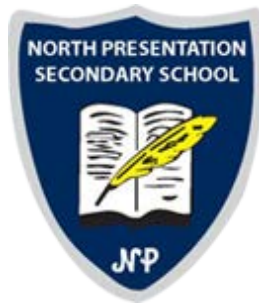
Best practice of integrated approaches to assessment could be circulated or presented by QQI to those leading programme development. This would provide examples and encourage greater integration.

4. There are many issues concerning the assessment of work-based learning, particularly in the areas of uniformity, reliability and validity.

Not mentioned in the Green Paper is qualification to be an assessor in work-based learning. The UK requires assessors to complete work-based learning assessor qualifications in order to act in the capacity. Should this be considered?

Sinéad O'Sullivan  
Director of Quality Assurance & Statistical Services

On behalf of NCI.



**North Presentation Secondary School/Centre for Further Education**

**Farranree, Cork City.**

**Adult Education Department**

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**Subject: Response to Green Paper on Assessment from QQI**

**Introduction:**

**Firstly thank you for seeking an input re above Green Paper from us in North Presentation Adult Education. I am undertaking the response as the adult education coordinator for the programme for over twenty years and I have also extensive teaching experience on our programmes.**

**Secondly we are very glad to avail of the opportunity to have our voice heard as a “small provider”, as increasingly the tendency is to work with the bigger organisations and let the smaller ones play catch up or tag along on the coat tails of these bigger concerns. I am absolutely passionate in my belief that the community based learning schemes, the small providers such as ourselves, have a role in community education that should be valued and preserved in any grand education plan.**

**I spent a good deal of time reading and re- reading the Green Paper trying to get a sense of what its main tenets are and where the implications re assessment etc are detailed. I have to say it was not an easy read and despite my experience I found it difficult to make headway with it at times. Therefore I am not sure if what follows is what you are looking for but it is given from the perspective of twenty years involvement with adult education**

at North Presentation in Cork. An involvement that has ranged from DES based assessment via traditional methods such as Junior/Leaving Certificate Examinations process to the QQI model of assessment based learning through assignments, in house examinations and self directed learning.

That said what I have to say is heartfelt and I trust that when you sought our contribution you were equally heartfelt in wanting it and therefore are willing to give what I have to say some consideration. So let's begin!

#### **Background:**

**Brief contextualisation of who we are as providers and where we fit in to FET in Ireland :**

North Presentation is a DEIS Voluntary Secondary School located on the northside of Cork City in the area known as Farranree. The school's involvement with Adult Education Provision began twenty years ago when the then Principal sought to broaden the provision of education to parents and grandparents of students in order to improve the levels of literacy and numeracy within the community. At that time, in 1998, unemployment was high in our area, drop out rates from school were also high and we noticed that very little by way of provision of academic subjects for adults existed in our area. We began with a pilot Leaving Cert programme of just 3 subjects with 8 students. We continued on a very small scale up to 2000 when the BTEI initiative kicked in and the then NCVA provision of assignment based learning really helped our adult ed programme to grow. Currently we have upwards of 150 adults taking our courses ranging in age from the late 20s to late 80s!!

I have no doubt whatsoever that the assessment based learning via NCVA and then FETAC was a huge draw to the kind of adult student we get at North Pres. This is why I am so passionate about supporting that kind of learning , about ensuring its quality in terms of delivery and assessment and above all its accessibility both to the student and the provider. In our case adult students have responded so positively to our pathways to learning approach that we see great development both personal and academic even through attainment of a minor component at level 3 for example.

Our provision is at level 3 and level 4 currently where we have been approved for General Learning Programme at both levels. It is part time provision, mostly mornings with some night time classes. It suits the age profile, the social circumstances and the goals of our students. Many are carers, minders of grandchildren, pensioners,; others are out of work for various reasons, a number are undergoing chemotherapy, others are from the traditional "working in the home " role and yet again some come to us from ENABLE IRELAND. The QQI approved programmes that we deliver are ideal for these learners. They can keep up with learning, deliver assignments, and above all not feel overwhelmed

with taking on too much in any given year or period of study. Most importantly for us is the continued effort to keep coming to the classes even if they miss a number for whatever reason and so not lose touch with their peers. Sense of self worth as well as academic achievement is very important for us to support in our students.

For us as providers, this part time provision has worked very well within our existing school structure. It has integrated well into the daily working of the school's life and it is a matter of great pride for me to see young students passing their parents and grandparents in the corridor as they all head to class!! Albeit with different goals and different learning outcomes but what is being underlined is twofold: the value of learning and that learning is for life. I will return to this question further down as I feel this has a crucial bearing on some of the issues raised in the Green Paper.

It has also helped us to keep delivering our programmes to a very good standard and to have a good number of students for assessment each year. We are always conscious that we are part time providers within a second level set up so we deliver what we can deliver and no more. This would be my greatest concern about the changes coming down the line and that this Green Paper seems to be highlighting and what lies ahead for the small provider. Again I will address this further down.

Issues raised in the Green Paper:

Total Learning Approach:

I was very heartened to read the emphasis being put on not just achievements recorded in terms of learning outcomes i.e. grade achieved at end of programme but also on acknowledging prior achievements, acquired life skills etc. Further it is my understanding that the paper seeks to advance the value of a student's development by acknowledging their maturation, interaction and motivation while pursuing a course of study. This I find a very positive approach. Let me show you how I have seen it happen in our provision:

Student "A" (male, construction worker , early 70s) had been in literacy project just improving reading and writing; recommended to take the next step and join formal education programme; I spoke to student "A" discovered he wanted to keep up English but at a pace he could manage so he came into the old level 3 communications course. We had 6 other students on the course at the time and gradually he integrated, was willing to read aloud, to answer questions and to go on outreach mornings with us. I discovered he loved history and the following year he joined our historical studies class.

He has come to love the subject, be a valuable member of the group and when he developed Parkinson's disease two years ago he grew despondent because he thought since he could no longer drive or hold a pen, his days in the course were finished.

However fellow students now drive him to and from the class. He achieved a distinction in his historical studies portfolio through audio presentation; we were able to facilitate that because the assessment procedure provided by that minor component at level 4 allowed for that leeway. His sense of well being was reinforced, his socialisation was enhanced and his academic grade was well achieved. He went on to be deemed a student of the year in our school and is currently taking a political studies component with us.

Now from my perspective:

Student A achieved a broad range of goals precisely because we offered him a chance to learn in stages through minor components. His stamina is such that he would not be able to undertake much more. Indeed the progression of the disease is such that he was so motivated to complete the course as he knows he is on "borrowed" time. His achievement in historical studies concretised for him a goal set, a goal attained and the hope of more to do.

However I have concerns then that this Green Paper seems to raise question marks over the continued provision of the minor components/awards in favour of provision of full major awards. I am not advocating one over the other but as with my example above I am convinced that both approaches have their place in the spectrum of education provision and assessment procedures.

In other words let's not undervalue the minor awards and over value the great goal of delivering major awards. Don't get me wrong; these are valuable and very important accreditations to achieve but we can't ignore the idea that everyone has their place on the ladder of achievement. That goes for providers too! Not all can be, nor should they be, providers of third level standards and full suite of awards. The community based group can and does do valuable work in getting learners into the habit of learning again and doing so at small but deliverable levels. I would love to see this acknowledged in any discussion of assessment of education provision.

**Green Paper and "Family of Learning Approach"**

I would definitely concur with this outlook re the educational experience. In my experience it is down to a number of key issues: the atmosphere created in the environment of learning by both the provider and learner; yes very definitely the impact of the individuals involved (tutors etc) is crucial. I have seen that myself; it is not always the most qualified tutor that is effective but one that also has empathy for the student and obviously a love of their subject. I would agree that the student deserves the best from his/her educational experience that the provider can hope to deliver. However I think a bit of realism is no harm here. Again the family of learning approach can mean a range of things to different providers and I do believe that any policy arrived at needs to be flexible in its application to providers.

I am not advocating a weakening of standard expectations from one provider to another nor am I agreeing with the “one size fits all” approach either. I have a suggestion to make in this area which I think if thought on by better minds than mine, could help to deal with other issues that the Paper has raised question marks over, namely assessment standards, assessment approaches, cost of provision and accreditation of courses etc:

My suggestion is this:

Firstly seriously question the modern “One size fits all” approach in setting standards, in applying quality control, in awarding programme provision etc. Surely surely we have learned in this country that this approach has not solved problems or delivered a better quality product say for example in the Health Service; that in forcing everyone to drink from the same trough so to speak, some will never make it near enough the water to drink, others with more strength and resources will have taken it all in and eventually those trying to get their drop of water will be so exhausted with the process that they will give up and withdraw or plead with the stronger ones to give them a drop of water for a price!

Joining a bigger concern is not in itself a bad thing and for those of us trying to run everything ourselves I see a certain logic in going that route. Yes certain streamlining would take place and probably less duplication of programmes etc. And of course for QQI there is the attraction of reducing the numbers to be quality assured. However one’s autonomy and one’s unique provision and delivery of one’s own programmes within a community are eroded, gradually and perhaps unwittingly, by the bigger provider. Voluntary secondary schools are particularly vulnerable here, especially small providers like ourselves who work solely under BTEI.

My suggestion : instead of “One size fits all” approach why not have a “graded” quality assurance approach that would take in type and level of programme provision; type and level of assessment procedures; for example a model that would apply to fulltime providers of full major awards at levels 5,6,7etc where that provision is leading onto degree level courses and or to apprenticeships; similarly have a model for the community based/ vocational type provision where small providers are delivering either one or possibly two full awards or like ourselves are providing components for a minor award within a wider second level school/community set up.

In other words not one contract for all, not requiring all providers to meet the same standards when they are clearly NOT in the same league nor do they want to be; but instead a league table of contract agreements tailored to ensure that depending on where the provider is on that table they get quality assured accordingly; ie to deliver minor awards that have the potential to take their learners to the next level and carry those

credits with them to the next institution; or be granted the right to undertake full award provision for apprenticeships/ full degree courses etc. And expect standards within that position on the table to be adhered to.

My belief is that this approach could be implemented through cooperation with QQI, ETBs, JMB and the Minister of Ed. I would still be advocating that within that League table each provider would have responsibilities re provision, delivery and assessment of programmes. So I'm not advocating any diminution of standards but rather an acknowledgement of the reality of the broad breadth and depth of education provision in HET and FET at the very least. And I do think it would have an impact then on some of the other questions the Green Paper raises re assessment procedures and methods

**Assessment Procedures and my questions re Green Paper:**

By accepting that there is a league table of providers that also inherently accepts that there is a scale of assessment procedures too. Again as in the old module descriptors there was a lot of merit in acknowledging that the level of assessment at level 3 minor award was not as exigent as that of level 4 minor award and so on up the scale. The green paper asks key questions about levels of assessment and the type of learning that is undertaken and rewarded or even acknowledged. For my part I don't see any problem with the notion that Learning Outcomes can mean different things because that is precisely the beauty of this type of learning through assessment. It is meant to take account of the fact that learners are not all square pegs in round holes and neither for that matter are providers. We are all different; we learn in different contexts, we approach same situations from different perspectives. Taking cognisance of that reality of the human condition is surely the very pathway to mature learning and teaching. It recognises and values differences in learners and the learning experience. And yes it does mean distinguishing between ILO/ALO/ELO.

I noted that the Paper underlined the idea that effective learning and effective teaching go hand in hand and lead to the core development of the both the learner and the teacher. I would agree wholeheartedly with this and have seen incidences of both positive and negative learning over the years that I have been involved with adult ed. I know how important it is to get the right people to tutor on your programme, to keep in touch with your students to ensure all is well. We like to have some kind of social engagement once a month that encourages students and staff to engage in a less formal setting; we started a process of providing tea in the morning when the students first come in. A simple thing but it has led to a great camaraderie among the early bird students and for those acting as carers etc in their own homes it is probably the first cup of tea they have had just for themselves. How do you quantify that in procedures and policies and assessments??? You don't because you simply can't quantify it but you can notice its knock on effects in the learning environment, in the enthusiasm for coming to class, in the interaction with one's peers and in the taking ownership of the classroom for that time space in the morning.



What I would describe as effective learning does take place because students feel comfortable and more willing to engage and set goals to achieve. Will that be to deliver a portfolio in terms of formal assessment? Possibly and hopefully. However that would not be my only goal for considering the programme a success for any student. Take for example my early morning English/ communications class level 3:

Student B (female late 50s) suffers from depression that comes in a wave and then leaves her vulnerable. So what do I quantify as effective engagement for her? Attendance, interaction, asking to read from the novel, asking can she come on an outreach visit, gaining the confidence to travel to her daughter's graduation, willingness to deliver a line in a group poetry presentation. These are all indicators for effective learning taking place and personal development. Taking one minor component at a slow pace is her starting point. For others it would be more or higher levels. We should embrace the range of learning, not be wondering about it!!!

I was intrigued by the idea raised in the paper that it is necessary to assess learners at the beginning and at the end of the programme. Looking at my notes I see I have written "What"??? and again "How"??? I think my issue here was again attempting to regularise something that goes on quite naturally in good teaching and also that again can mean different things to different people. At the level of our provision in North Pres we wouldn't necessarily have any formal assessment but we would meet with each student for informal chat to suss out where they are coming from, what kind of plan if any they might have and try to place them in a course and with people that they would work well with. After a few weeks we would recheck how they are progressing both personally and academically. We measure progress at the end of our course delivery on a number of ways: completion and attendance rates; desire by student to continue or progress with their study and if they go for formal reassessment with a portfolio. How our students respond to their time with us matters a great deal to us. The approach we try to use is a "family" based one, where tutors, students and our school are engaged with each other and that we feel part of the whole process of learning.

The Green Paper raises a query re methods of achieving qualifications.

We especially like the way in which our students can achieve qualifications through accumulation of units, modules, credits through our QQI programmes. I really like this way of learning in bite size modules for adults because it facilitates their family/work lives, it encourages them to attain goals in step by step approach and if crises emerge, the adult student can take time out to sort out issues and return to learning without having to make up too much ground. Currently we have two students undergoing chemotherapy. One completed their portfolio a few months before everyone else so that they could be ready to undertake the treatment and know that their work is done and ready for

assessment well in advance. This leaves them free to come to class when well and take part but without the added stress of completing assignments. As a small provider we have the flexibility of supporting that student in that way and not get too bogged down in deadlines etc. It allows for learning at one's pace; it allows for quality delivery, easier management of programme and good standards of assessment.

**Green Paper and issues on standard of assessment:**

I would definitely be an advocate for CAS system of awards. I like the way it sets certain standards to be achieved by learner and tutor; i like the approach of internal monitoring coupled with external monitoring. It gives us and our students the chance to have a good in-depth check of portfolios. It is an ideal approach for our type of adult student, our part time tutors and us as a small provider to operate. I think the expected learning outcomes do ct as guiding statements for us to set standards of work for our students to achieve. I like that system and I think it has much to recommend it particularly for the minor awards.

I would beg to differ with the paper when it says and I quote from it :

**“Assessment practices that were once valid and reliable may no longer be either in the context of current technology and access to information...”**

**Why? Why not? I think we get too enamoured with modern technology for modern technology's sake and become in danger of “throwing the baby out with the bath water” so to speak!! By this I mean if practices have served us in good stead up to now then it may mean only a tightening up of those practices going forward. Let's keep a calm approach and use common sense here.**

I was disappointed with the paper's emphasis on assessment procedures lacking in reflection when documenting less concrete areas such as interaction between learners and teachers. Surely it stands to reason that it is much easier to quantify and document concrete concepts such as inputs and outcomes but less so when looking at more subtle concepts in education such as goals and interaction levels. Again to my mind not everything can be “policied” up or pinpointed. Perhaps they could be approached in an aspirational way. Example: in primary school the teacher can point to the copies with the spelling tests, writing passages, maths tests etc to give the student concrete examples of progress. However it is the interaction over the year between student and teacher that will help that teacher to embellish and deepen the report he/she gives on the student to the parent. It can't be quantified, only attained through experience.

I was also very disappointed with the suggestion that consistent good grades for a subject could mean something more sinister than simply good consistent grades. Here again I think there is a good case for my league table suggestion re assessment. I think the Paper is trying to apply to all examiners and all courses, standards of behaviour that do not necessarily ring true for all. While I am not naive enough to know that wrongdoing takes place in all walks of life, I find it hard to accept that someone at level 3 minor award in a small community programme would plagiarise material or that a tutor would undermine their own and the programme's integrity by falsifying marks. I think this is going way beyond the pale and I take grave exception to the implied suggestion that either our adult ed students or our tutors who get good grades do so not out of merit but out of underhand practices. This is undermining their integrity and has more than a hint of "the valley off the squinting windows" attitude to it!

That said assignment based learning can lend itself to bad practice if the policies surrounding assessment are not fulfilled by the provider or approved by an outside body. I have found the practice of tutor marking, followed by internal monitoring followed by external monitoring to be a very solid system for our level of assessment at North Presentation. Each stage is overseen by myself and a report written up. A long time ago though I did raise serious questions about in-house assessments and the diminution of external assessment. It is the exact same problem being raised by colleagues with the department of education re the new Junior Cert assessment procedures. I believed then and still believe that the assessment process to be really effective and to avoid the problems suggested by the Paper need a solid role by an external examiner and or written exam marked by external examiner particularly for the higher levels and the major awards. Again for lower levels or minor components standards appropriate to that level should be laid down and followed by all concerned.

I come back to my earlier point though and take issue with the Green Paper on its rejection of the idea of one bad apple doesn't make the whole barrel bad. I have a great regard for people in my profession and an even greater regard for the adult learners I have met in the last twenty years. Not once have I ever come across a student that tried to cheat the system. In my experience yes they wanted to get the best mark they could but NOT at the cost of their integrity; a student knows if they deserved a grade or not. Similarly does the tutor. I think that while we must legislate for standards of examination and assessment, we must also apply common sense and also common humanity in how we acknowledge our students results. Could it not be just good teaching, good learning environment if there are consistent distinctions awarded to a programme? I would certainly like to think so.

## **Conclusion:**

I have given the Green paper a lot of thought as you can see from above. I found it difficult in places, thought provoking in others. I was very despondent when I read the paragraphs relating to the “unsustainable burdens” for continued provision of programmes by the small provider. That of course is us at North Presentation Secondary School. Where do we lie in this new plan? We love what we do in adult education and want to continue it. 20 years is not a paltry commitment. We see value and merit in our pathways to learning approach in our community and we believe that the success of our programme has been down to engaging first with NCVA, then FETAC and lately QQI approved component programmes leading to minor awards.

We want to continue but are worried about being pushed out of provision by the onerous burdens of new financial and approval burdens. As a voluntary secondary school we are gradually becoming one of the few still working the BTEI. We want to go on. That is why I would ask that a fresh look would be taken at the “one size fits all” approach and acknowledge that not all pegs can fit into the same holes. I would urge those planning through this paper to ensure that there will always be room for the learner and indeed the provider such as ourselves who do not always fit the bigger profile in education but who do provide valuable service to our community through our education programmes. It is a matter of great concern to me that this paper underlines the threat to small providers by forthcoming changes. I sincerely suggest that this needs to be looked at again so that local provision is enhanced and embraced rather than undermined by levels of costs and demands that cannot be sustained as by those with big provision.

Is mise le meas,

**Joanne Twomey MA HDEd**

**Adult Education Coordinator**

**North Presentation Secondary School Farranree Cork.**



7<sup>th</sup> December 2018

## **Response to the Green Paper on Assessment of Learners and Learning**

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of Northside Family Resource Centre as I want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

Northside Family Resource Centre, located in Ballynanty on the northside of Limerick City and has been a provider of accredited and non-accredited courses for many years. We currently provide QQI accredited courses in Childcare Level 6, Childcare Level 5, Healthcare Level 5, Culinary Level 3, Community Development Level 5 and General Learning L4. Our focus is to provide courses and modules to members of our community who would not otherwise engage in learning and support them by providing a positive educational experience.

### **Comments on the Green Paper**

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

- 1) **Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with learners. As a community education provider learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.
- 2) **Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.
- 3) **The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit

to development of new quality assessment processes. This requires financial resources to achieve.

- 4) **Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019<sup>1</sup> 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.

As a provider of community education in Ireland I want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

Kind Regards

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# Centre for Excellence in Learning & Teaching



Galway,  
December 6<sup>th</sup> 2018

Dear Colleagues,

The Green Paper is a very comprehensive document which we have found invaluable in stimulating discussion and debate internally within our organisation and as part of a collaborative multi-institutional project on *Leading in Teaching & Learning*.

At a general level issues which arose in these discussions and which resonated with themes within the Green Paper included:

- Over-assessment and its increased likelihood in modular programmes.
- The practical challenges of addressing the assessment of programme level outcomes, again, in modular and flexible programmes.
- Consistency of practice in assessment load and level within programmes, and more generally, where appropriate.
- 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).
- The challenge of assessment in the context of poor SSRs and other workload demands, particularly given the recognition of the invaluable role of *formative* feedback in developing students' achievements and potential.
- The challenge of cross-/multi- disciplinary programmes and the variation of assessment norms associated with each discipline.
- How are 'norms' developed and shared in disciplines and/or institutions?

We welcome, also, the recognition of the importance of institutional (and departmental) culture with regards recognition of the multi-faceted aspects of assessment as not only a summative measure of attainment, but as an effective learning tool when used in a formative and ipsative manner. Further, that local culture and context is important in maintaining consistency of standards, quality of provision and in nurturing an evidence-informed reflective practice.

At the most senior levels within any HE institution, leadership in learning and teaching is crucial, not just in terms of managing systems and operations, but in inspiring and supporting innovation, in maintaining currency with 'best practices' and scholarship in the field, as well as linking policy and resources in a way that reflects real needs at the 'chalkface'.

In terms of specific questions raised in the document, we do recognise the potential value of QQI publishing general principles and guidelines on assessment and these would provide a useful reference point for assessment and programme design and review. Similarly, recommendations and guidelines (drawn from the expertise and experience within the sector) on aspects of arrangements for assessment of work-based learning, the role of external examiners, etc, would all be useful and provide relevant benchmarking statements for our work.



In practice, there are sometimes questions around the extent of (individual) professional autonomy and the potential tension between this and consistent practices/norms. Transparency of grading/rubrics and the rationale for the choice of assessment methods (at modular and programme levels) will help with these aspects. There are sometimes also constraints imposed by external examiner recommendations where their experience and educational philosophy may be quite different to members of the programme team, or indeed the local institutional context, trends in the discipline, etc. Training and support for those in the role of programme leader or head of school, with respect to 'leadership in teaching and learning' would also be welcomed.

We note, as does the Green Paper, that the *National Forum for the Enhancement of Teaching & Learning* has supported an extensive range of initiatives on the broad theme of assessment and that its eight principles are being increasingly adopted.

Clear connections between forms of assessment, learning outcomes (at programme and modular levels), graduate attributes, and other relevant aspects as part of an overall integrated curricular design approach present opportunities to develop a holistic student learning experience. Any frameworks, or guidelines, of course should act as enablers of innovation and creativity in teaching, learning, and assessment, and diversity of practice (bolstered, perhaps, by the sharing of exemplars and case studies) rather than be perceived as 'standardisation' in the stifling sense!

A specific focus on the nature of assessment in the digital age, identifying the mixture of risks and opportunities, and incorporating the notion of flexible credit accumulation models, would all be useful, especially taking into account the implications of GDPR, security, and integrity of systems.

We welcome, also, the identification of academic integrity as a shared value in higher/further education. There is currently very little discussion nationally around academic integrity and including this as an "explicit theme in QA reviews and annual dialogues" and "as a topic for thematic review to identify examples of effective practice", as suggested in the document, may help to address this. We feel that the focus should be on *integrity*, rather than on 'essay mills' and 'contract cheating', and specifically around the development of an 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 (as can be seen in evidence from Australia). Empirical work on academic integrity in Ireland would be invaluable in providing an evidence base and a clearer picture.

Overall, the Green Paper is extensive and covers many more issues and questions than we have addressed in this short response, but the approach taken to this consultation has been most welcome. It allowed a focus, over an appropriate period of time, on a key issue, stimulating discussion and reflection, and the workshop/consultation event was also very valued by those of us who participated.

Yours

Dr. Iain MacLaren, Dr. Sharon Flynn, and Dr. Michelle Tooher



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06 December 2018

## **Response to QQI Green Paper on 'Assessment of Learners & Learning'**

To whom it may concern,

Thank you for your Green Paper Assessment of Learners and Learning which contained an excellent review of the whole area of assessment, both in Ireland and abroad. Although our organisation has considerable experience in the area of assessment, it was helpful and refreshing to have a clear summary of the issues in what is a very complex scene.

We are involved in assessment at several levels and can see it from different perspectives: i) we train teachers and others in education in psychometrics and using assessment tools; ii) we assess the competence of the teachers and when appropriate award them a qualification in Test Use from the British Psychological Society and iii) we are currently examining the possibility of providing courses which will lead to a QQI award.

Aside from the chapters outlining the current position, we found Section 7 on General Assessment Issues particularly interesting. One point that is well made is the need for some kind of overarching assessment, where subskills that have been learnt are integrated to demonstrate a higher level skill (particularly one which is important in a work context). The whole is not simply the sum of the parts and it needs to be assessed separately. This is true whether in Further Education, Apprenticeships or Higher Education. For instance, we teach the basics of psychometrics, validity, reliability, and the administration, scoring and interpretation of tests. Knowledge and competence in these tasks is assessed: but the competence that we really want to see is whether this knowledge and skill can be integrated, so that the person can write a report on a pupil, clearly identifying their educational strengths and needs and can make appropriate recommendations for the pupil's development. We also want to see that the person can transmit this information in a clear, easily understandable fashion to a parent or another teacher. These are typical practical tasks that teachers need to be able to do and these are the overarching skills that we assess. We regularly find that those who have successfully mastered the discrete subskills still



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need additional help in integrating these skills to produce a good report or to transmit their findings to others – assessing component skills in isolation is not enough.

As was mentioned above, the certificate qualification that we run is verified by the British Psychological Society (BPS). From a different perspective, while we are interested in having our programme validated by QQI, we are somewhat daunted by the potential cost of applying to do this. We appreciate that QQI needs to ensure that quality standards are set and maintained but in some ways the QQI awarding structure is similar to that of the British Psychological Society although BPS is only awarding one qualification. Nevertheless, it too just sets standards and identifies the competences which must be assessed but does not set the examination. This is done by other bodies (e.g. our own company) but the assessment methods and their use are verified by BPS which also requires Assessors to periodically submit the portfolio of a randomly selected candidate so that there is a Quality Assurance of the ongoing use of the assessment methods. The costs of maintaining this quality assurance infrastructure are quite manageable for us but I fear this may not be the case for a QQI award.

The issue of the reliability and comparability of standards is important and it is encouraging to note that QQI has been feeding data back on certificate grades. This could provide important information on quality (if it is used properly) and ideally would provide a basis for discussion with QQI and/or with other providers. We recognise the logistical difficulties this might create but we found that the seminar we attended on the Green Paper was effective in eliciting debate about standards and that this would be very helpful if it was facilitated by QQI and grading feedback was available.

Once again, thank you for the stimulating Green Paper

Yours sincerely

**Rebecca Good**  
Director

(Sent on behalf of the organisation, Éirim: The National Assessment Agency Ltd)

To whom it may concern,

The RIAM welcomes this paper on assessment of learners and learning, and offers the following points in response. In particular, we wish to draw two handbooks to your attention which may be helpful in drawing up future publications.

***Section 14. Would it be useful to publish general principles and guidelines for assessment? What should the principles and guidelines address?***

RIAM would welcome such guidelines, and would use them in our review of current assessments. An example of such a document for the music conservatoire sector is the one produced by the Association of European Conservatoires (AEC) under the EU funded Polifonia Project. It is a concise and clearly laid out document. <https://www.aec-music.eu/userfiles/File/en2a-aec-handbook-admissions-and-assessment-in-higher-music-education.pdf>

***Section 7.24 Data protection. QQI plans to take a proactive position to help providers to explore the implications of the judgement. To this end we propose to host a workshop early in 2018.***

We would support this and would be eager to attend such a workshop.

***Section 17.1 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?***

The AEC has developed a handbook for the music conservatoire sector on developing learning outcomes across the three cycles of higher music education. It is an agency which represents almost 300 music conservatoires across the sector and develops such papers drawing on members' expertise. The handbook on learning outcomes is practical and allows scope for different cultures/approaches to higher music education. [https://www.aec-music.eu/userfiles/File/customfiles/aec-learning-outcomes-2017-english\\_20171218113003.pdf](https://www.aec-music.eu/userfiles/File/customfiles/aec-learning-outcomes-2017-english_20171218113003.pdf)



Higher Diploma in Further Education

2018-2019

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<b><u>Assignment Title</u></b>	<b><u>Part 2 Group Submission to QQI</u></b>
Date	03/12/2018

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## **INTRODUCTION**

The second part of our History of Adult and Further Education in Ireland assignment required to work in the same already pre-set groups and prepare a submission based on previously designed presentation on Green Paper analysis.

Analysing the Green Paper wasn't an easy task. With combined backgrounds in law, animation, social care practice and business in management, as a group we found ourselves on 'foreign' grounds. Although we as student teachers work in the areas such as addiction studies, law, creative design, human growth, child development, food hygiene and ESOL, the in-depth analysis of the paper challenged our understanding of assessment and its purpose. We were assigned sections 1-3 and 7.2 of the document. As a result of that, our group outlined general issues related to the paper, we analysed and answered the question that was given to us ('What can be done, and by whom, to help build expertise in expressing learning outcomes and suitability aligning assessment with them at module level and especially at programme level?'). Finally, we drew opportunities and made suggestions and, after a thorough study, we presented our findings in this submission essay.

## **GENERAL COMMENTS IN RELATION TO THE GREEN PAPER**

This Green Paper has been already pre-determined based on the Qualifications and Quality Assurance (Education and Training) Act 2012 which has a statutory basis and there is a legal framework restricting its application to what, we believe, should be a more equitable and holistic approach to adult education. The paper itself is very difficult to read because of the complex concepts and repetitive language used throughout. The style and format of the paper is intimidating, lacks clarity and creates confusion to everyone except the well informed stakeholders. Therefore, without a complete understanding of the technical language used in this paper, it is off putting to the people whom it's aimed at, assisting in the assessment process between student and teacher.

The paper appears to promote standardised assessments and fails to take into consideration the difference between lifelong learning, and education for training, of which we believe there is a clear distinction between the two. The fact the Green Paper sets out a framework and context for discussing assessment only shows the limitations in this Paper to look or even discuss alternative methodologies in adult education in Ireland. There is a real need for the lifelong learning approach to be more holistic and we believe a more student lead approach to the training for education or QQI level is appropriate.

## **ANALYSIS I**

There is an assumption that all students transform, which is problematic, because there is a timeframe in which this transformation is expected under the QQI assessment process. This standardisation which the green paper seeks can be detrimental to the lifelong learner in adult education for a variety of reasons.

After closely examining the MMM model, we believe we have discovered some overlooked issues. The model lacks clarity and understanding of people with additional needs. Also, human error or lack of buy in from all the stakeholders may cause this particular process to be difficult to implement at every level. A key problem we envisage is the lack of clear flowing information to each level of the MMM system.



We believe this is problematic due to the lack of communication between the Macro, Meso and Micro levels. We think, this is because the top down system of disseminating information is flawed, when dealing with adult education and education for training. We feel a more holistic approach to adult education and a more student centred attitude to education for learning requires a free flowing circular form of communication. This is necessary and empowers the students at the micro level to self-assess and reflect on their own learning outcomes.

The Paper mentions three learning outcomes: expected, intended and actual, and use the assessment methods such as diagnostic, formative and summative. This doesn't cater for other assessment models like student self-assessment and reflective practice which in turn create a greater understanding for the lifelong learner.

## **ANALYSIS II (THE QUESTION)**

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

An educated country is a strong country, therefore, all the institutions and individuals involved should work as one tight team promoting healthy relationships and transparency. Trust and confidence is not something that we have, but something that is built and learned. None of the activity levels can exist on its own: Macro level should guide Meso level and consider Micro level throughout design and implementation of policies and procedures.

We feel that the Macro, Meso, and Micro levels should all engage in continuous reflective practices, and ask themselves a question: ‘what do we know now that we didn't know yesterday?’ (Brookfield 2017, p.103). Furthermore, reflections should be analysed, whilst conclusions and improvements should be made. Only then positive changes can be implemented.

We believe this can be achieved starting from the bottom up, which are the students. This information can then be relayed through continuous feedback to QQI representatives by us, the educators. Modules on ‘reflective practices’ could be implemented into FEI for students, as to

allow time for this process of change. Educators could also be allocated time for reflective practice during class or after college hours, with pay. We believe that 'open' communication from all parties should be maintained and used efficiently to achieve this.

Education across the country shouldn't be a competition as there will always be a demand for a variety of services. Consequently, practitioners across the board should collaborate and share knowledge, resources and reflections. Additionally, in order to make assessments more relevant and the learning outcomes more suitable, the expertise of local professionals (doctors, lawyers, social workers) depending on the programme, should be used and adapted. This practice would help transferring learning to real life situations. This, we feel, can be achieved by hosting seminars on a quarterly basis, whereby working professionals can collaborate towards new and improved teaching styles, strategies and practices.

### **OPPORTUNITIES AND RECOMMENDATIONS**

We feel the 'Green Paper' would be better read using a user-friendly approach. Keeping terminology simple, using well known words and shorter sentences as opposed to complicated words and long unnecessary sentences, in which the paper presents. Also, the use of clear headings and sub headings throughout the document, as to break up the long and laborious read. We also suggest less acronyms were used within sections 1-3 and 7 for example, IEOs, IPOs, CEDEFOP. These acronyms are found throughout the document proving difficult to remember, which leads to an off putting read. Therefore, using full words might be more appropriate.

The needs of learners as individuals should be taken into consideration because one shoe doesn't fit all. Learning / assessments shouldn't be solely considered as a final product but more as a process and praxis, because learning is not just about getting a job at the end. Therefore, we suggest steering away from grade-based assessments, which promote competition, rivalry and class stratification within our society, and begin introducing more descriptive and formative assessment practices.

We also suggest teaching styles should lean more towards a self-assessment approach, whereby, students assess and judge their own work, seek individual styles of learning and learn to recognise areas for improvement. Sadler (1949, p. 55) suggests an educator's role is to guide students on how to evaluate their own work and to adjust their own learning. Sadler (1949, p. 55) also states that 'for students to become self-sustaining producers of high quality intellectual and professional goods, they must be equipped to take control of their own learning and performance'. We suggest that interpersonal skills modules become an integrated module across the board and are used to assess self-development in terms of confidence, communication, reflection, problem solving and decision making. This, we feel, can be achieved through self-assessment using online assessment tools, observations and narrative assessment.

The paper mentions an inclusive society, however, it makes no reference in terms of disability and equal access to education for all. We suggest the introduction of new and improved structures of supports, teacher training and access to other resources. Therefore, bridging the gap between health resources and education services is essential towards social inclusion in the education sector. We also propose integrating a disability support service (SENOs) into the selection process to provide more equal opportunities for everybody.

Programmatic assessment considers assessments as an optimization problem (van der Vleuten, Heeneman & Schuwirth 2017, p. 625). For individual assessments, learning could be optimized by selecting a method of assessment using a holistic approach which would allow to measure significant soft skills (e.g. social skills, confidence, interpersonal skills and teamwork).

## **CONCLUSION**

In conclusion, we feel that the Green Paper should be more user-friendly to all who reads it. We realise that there is a lot of work in progress, however, one institution or individual can't change anything. It's very much a job for the whole team across the Macro, Meso and Micro levels, which will make a significant difference to the education system in Ireland.

From our observations and critique of the Green Paper, learning and assessments shouldn't be solely considered as a final product, but more as a process and praxis because learning is not just about getting a job at the end.

We suggest to steer away from grade-based assessments, and introduce more descriptive, formative assessments as opposed to summative assessments. Collectively, we feel that promoting more self-assessments will allow students to set their own goals and judge their own progress whilst recognising areas for improvement.

Finally, we feel there's a real need for more resources and training in order to facilitate learners with additional needs into mainstream FEI and QQI courses.

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Dear QQI

You have summarised the positive role of assessment and certification well in the closing paragraph. We would suggest its expansion to include some or all of the following points:

Good assessment

- engenders good learning outcomes for students and a positive 'backwash effect' on course delivery processes and attainment standards,
- supports and promotes appropriate learning and complete and course coverage,
- supports and promotes high quality delivery by way of appropriate high levels of training provision so as to achieve the intended outcomes to a high standard,
- supports and promotes transparency and equality both in delivery and the awarding achieved standards,
- supports and promotes the recognition and high values placed on the achieved qualifications, and the recognition and transferability across a global economy.
- provides a high level of accountability on course/qualification providers by setting high attainment standards.

*State Examinations Commission*



**Trinity College Dublin**  
Coláiste na Tríonóide, Baile Átha Cliath  
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## **Trinity Response to QQI Green Paper on Assessment of Learners and Learning**

### ***General Context***

Trinity College Dublin, the University of Dublin, welcomes the opportunity to respond to the QQI Green Paper on Assessment of Learners and Learning.

Trinity has had a strong focus on the enhancement of assessment practices for a number of years. Within the context of an extensive reform of the undergraduate curriculum in Trinity ('The Trinity Education Project'), the [Trinity Assessment Framework](#) was approved by the University Council in 2016. The Trinity Assessment Framework is based on principles of assessment of, for and as learning, and recommends the institution-wide adoption of a programmatic approach to assessment. The Framework has four current areas of focus: taking a programme approach to assessment, assessment of graduate attributes, ensuring students experience a purposeful range of assessments, and promoting self- and peer-assessment.

Trinity recognises that assessment of learning is fundamental to assuring quality standards. However, it is also increasingly understood, both through research and through practice, that many of the attitudes, skills, knowledge and underpinning behaviours and competencies encompassed in the Trinity Graduate Attributes can be best engendered through assessment practices that exist in the 'for' and 'of' space. With a view to the achievement of Trinity Graduate Attributes, such assessments encourage students to self-monitor their own learning and outcomes, or to give and receive feedback, as they will need to do in their future careers and lives.

Institution-wide efforts are currently underway to implement the Trinity Assessment Framework across all Schools and programmes. As such, it is hoped that any upcoming developments in the quality assurance/enhancement of assessment at the macro level will take account of the direction institutions such as Trinity are already taking.

### ***Specific Considerations in Response to the Green Paper***

- This Green Paper endeavours to address assessment of learners and learning in further education and training, higher education and training and English language education contexts. While this may make sense at the stage of a Green Paper, assessment practices and the associated language and requirements can differ between contexts. For clarity, it may be beneficial, in any subsequent documents, to separate higher education from further education and training and English language education contexts. This would enable such documents to be more focused and to be consistent in their use of terminology for the given audience. Equally, the diversity of higher education institutions within the higher education sector needs to be recognised in any future documents.
- Terminology for assessment in higher education has been agreed by those who support teaching and learning at institutional level, following extensive nationwide consultation, and has been

[published](#) by the National Forum, through its enhancement theme 2016-18. Trinity contributed into this enhancement theme at every stage. Those involved in teaching and learning, and its underpinning policy development, must be in a position to rely on clarity of terminology and understandings.

- In Trinity, we focus on Assessment of Learning, Assessment for Learning and Assessment as Learning, in keeping with the national sectoral understanding of assessment, and with recommendations from related international research. Trinity has endeavoured to work towards a balanced emphasis between the three purposes of assessment and distinguishing them from each other is an important first step in this process. While the distinction between assessment of, for and as learning is provided on page 32 of the Green Paper, page 12 appears to imply that assessment of learning is to be understood to encompass all three purposes of assessment, which may read as somewhat contradictory. Ultimately, once the distinction between the three purposes of assessment are understood, an effort should be made to encourage the design and support of learning opportunities and the demonstration/development of learning in a manner that achieves all three purposes.
- The ideas and examples presented by Prof. Lambert Schuwirth during the consultation day on Nov 12<sup>th</sup> were welcome and it is hoped that these can be incorporated in any future White Paper or other documents on assessment in higher education. There was particular value in his reflections on how assessment can be optimised within the context of varying professional body requirements and how digital innovations can enhance assessment practices while accounting for challenges such as identity authentication and essay mills.
- Trinity welcomes the focus on programme approaches to assessment and integration of assessment across a programme (Sections 6 and 7.5). We look forward to understanding better how this is to be achieved at the macro level. The Trinity Assessment Framework has a strong focus on programme approaches to assessment and developed, in collaboration with UCD, a [National Forum digital badge on programme approaches to assessment](#). Further, Trinity is currently in the midst of an initiative to support programme teams across the University in implementing a programme approach to assessment. It is hoped that any macro-level developments to enhance assessment practices from a programme perspective will build on these positive developments.
- The discussion of learning outcomes is somewhat confusing in this document. The terminology and references to various types of learning outcomes adds to the confusion. It may be that this is because the document aims to serve the purposes of higher education, further education and training and English language education contexts. There are some statements that are questionable and seem anecdotal rather than research-informed:
  - Section 7.2: We also have the impression that minimum intended programme learning outcomes (MIPLOs), when they are specified, may sometimes be created more to comply with our requirements than as educational goals that govern the design and delivery of programmes and, particularly, assessment strategies. And if they don't govern assessment strategies then it is unlikely the assessment will be either valid or reliable to determine achievement of the MIPLOs.
  - Section 7.3: Higher order outcomes can only be abstracted by (i.e. approximated by) textual statements. Further, such statements will normally need to connect with norms (tacit or explicit) established by the relevant professional, scientific or academic communities



(especially where specialist language is involved). The recognition of the achievement of learning outcomes in such cases also generally defers in part either implicitly or explicitly to peer review by members of those communities.

Any discussion of learning outcomes should relate to their assessment, and the challenges of assessing programme outcomes or softer skills, and the full spectrum of graduate attributes, including 'wicked attributes'.

- Other areas where clarification or further explanation would be welcome include the following:
- Sections 7.13-7.15 and 7.17 raise some questions regarding the quality assurance of teaching staff. Trinity has an [Early Career Mentoring Programme](#), as well as the [Ussher Development Programme](#). There are also accredited professional development opportunities for staff who teach. We would appreciate guidance on this topic in any future documents, in the context of ESG 1.5 ('Institutions should assure themselves of the competence of their teachers. They should apply fair and transparent processes for the recruitment and development of the staff') and of Core Statutory QAG 4.3 Staff Development.
- With regard to Section 7.16, the grading of work-based learning is an area on which further guidance would be welcome. In particular, the issue of discrepancies in grades between internal assessors and those assessing within the placement context, in particular overseas placement providers, is one that would benefit from further teasing out. Robust rubrics have the potential to provide descriptors at either side of the pass/fail mark, and also at levels of unacceptable, very good, exemplary, etc. We view rubrics as, in the first instance, a guide for students to support their development (as a self-assessment and peer-assessment tool) and as a guide to assessors within and external to the programme/subject team.
- Regarding Section 7.18, recognition is needed that there is a specific skillset required to teach effectively via online platforms, to moderate. It can be inappropriate for lecturers to transfer the practices they use in face-to-face teaching and learning to the online environment. There is a need to invest in academic development to support academic skillsets in this area. Trinity has been working to enhance [staff skills in online and blended learning](#). It is hoped that the upcoming QQI White Paper on Online Learning will address the tricky issues of identity authentication, plagiarism, cyberbullying and mechanisms to address 'essay mills'. Trinity has a Virtual Learning Environment Policy, and over 60% of modules are now on Blackboard. [Enhancing the use of Blackboard for online assessments](#) is now a focus. We are optimising the use of Turnitin in Blackboard, providing feedback to students on assessments in Blackboard, and incorporating Captivate videos, blogs, discussion boards, etc. into assessment strategies. We have noted the importance of ensuring policies and guidelines for digital teaching and learning keep pace with developments as issues such as intellectual copyright, digital footprints, and content management are confronted.
- Any discussion of equivalences, as referred to in Section 9.1, needs to allow for institutional autonomy and recognition of the heterogeneity of academic missions. Theoretically, a Level 7-9 Taught Major Award is equivalent across different HEIs. However, the curricula differ, each has a different focus and the marking criteria and rubrics are different. There is therefore no conformity and any attempt to introduce conformity or standardisation would likely be resisted by the university sector as it does not recognise our competitive advantages in different disciplines across HEIs. Also, our experience suggests that employers appreciate differences in

focus across degree programmes; to standardise would risk negating their contribution to programme differentials.

- Also, in Section 9.1, with regard to integrated assessment, the Trinity Education Project focuses on taking a programmatic approach to assessment, which will see progress towards assessments being integrated horizontally and vertically across programme curricula. Assessment Fellows and Assistants are being appointed to assist in the mapping of assessments across programmes and the subsequent enhancement of assessment strategies and practices. Issues have been noted through the reports of external examiners and through feedback from students regarding the manageability of assessments and assessment workload. It is anticipated that the current approach will have a positive impact on student and staff workload. Further, it is hoped that the current approach will assist students to appreciate their learning across modules and veer away from a compartmentalised experience of learning.
- The importance of assessment literacy is paramount and efforts to ensure that students and staff understand the terminology surrounding assessment and associated principles are to be welcomed. Regarding what supports need to be put in place to help learners engage optimally with assessment, an appropriate scenario might be one in which students complete an assessment literacy module upon entry to higher education. This could sit within induction programmes (such as the [Trinity in Twelve Weeks Programme](#)), with students required to declare completion of the module in tandem with their first assessment submission.
- Regarding general principles and guidelines for assessment of learning (Section 14), we consider that the principles of assessment published by the National Forum are suitable and that guidelines are not appropriate for those with Designated Authority.

#### ***Responses to Questions Regarding General Issues Concerning Assessment (Section 17)***

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

This is an issue best addressed at local level - it pertains to academic development and the provision of appropriately-supported formal and informal professional development opportunities for academics. Ensuring staff are motivated and supported to engage with such professional development is an issue of academic governance and falls within the responsibilities of the Head of School. Supportive structures include School and College mentorship programmes, buddy programmes, and formal academic qualifications such as the [Special Purpose Certificate in Academic Practice](#) and the [Research Supervisor Development Programme](#).

- *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?*

Discipline communities of practice have potential to be beneficial in prompting enhancements but only when they emerge from the grassroots level. They cannot be imposed.

- *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?*

Yes, as mentioned, a key current focus for Trinity is the implementation of a programmatic approach to assessment University-wide.

- *Please comment on the accommodation of diversity.*

The [Universal Design for Learning](#) principles are an appropriate guide for ensuring assessment is appropriate for diverse student cohorts. The multiple means of expression, representation and engagement they advocate suggest that allowing students to have a choice of assessment methods or allowing them to experience a range of assessment methods can be positive. It is crucial, however, 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 practice any given assessment method. Otherwise diversity in assessment can be counter-productive.

- *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?*

Trinity adheres to its own descriptors for Awards. These are embedded into the New Course Proposal Approval Process, stand-alone modules, Trinity Electives or where there are substantive changes to a programme or Award.

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

Trinity's RPL Policy can be seen [here](#). The assessment of RPL is dispersed across the institution, as it is across the sector more generally.

*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?*

This is a shared responsibility of HEIs and associated professional statutory accreditation bodies and professional registration bodies. This role is also overseen by external examiners, many of whom attend OSCEs, which aim to evaluate occupational competence to register for practice. Trinity has a [Fitness to Practice Policy](#) that also addresses this issue.

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

If we assume that you refer to those assessments which aim to embed discipline specific skills, such as weekly lab reports in STEM or professional case/file notes in health sciences, although such assessments may be low-stakes in terms of marks, they are integral to the development of a professional ethos and an ability to enact technical practice skills upon graduation. External examiners sometimes reflect that some students will not participate in assessments that have low-value marks, preferring to dedicate their time to higher-grade assignments. There is a need to achieve a balance and to communicate effectively the purpose of assessments, emphasising their inherent learning value, beyond the demonstration of achievement of learning.

- *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 classifications form the basis for admission for higher and postgraduate education, including the estimation of equivalencies for recruitment of international students. Supporting consistency in actual standards of achievement is the *raison d'être* of external examiners systems and processes.

- *What do you think are the main challenges involved in remote assessment?*

Challenges include identity authentication, different cultural attitudes to plagiarism, online essay mills, ensuring appropriate skills of the moderator, system support, clear guidelines and policies, etc. Consideration of these issues is critical for experiential placements aligned with academic credit. Not only are we 'using' preceptors to evaluate demonstration(s) of relevant behaviours (aligned with relevant competency frameworks), but online assignments and group discussions are being evaluated with a view to awarding 'marks' towards ECTS allocation(s).

- *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?*

The risk is centred on the assessment practices of academics being constrained by the limits of requirements from professional bodies. However, members of professional bodies are often academics themselves and it is hoped that this risk can be negated by clear communications and those academics who serve on professional bodies advocating for meaningful assessment practices and ensuring that requirements do not hinder their realisation. The most important time for HEI engagement/reaction is when core competency frameworks are being reviewed.

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

Assessment practices should be rooted in relevant research and should be appropriate to the disciplinary context. Being involved in relevant communities of practice can be helpful to this.

- *What can be done to further engage learners as partners in assessment of, for and as learning?*

In line with ESG 1.3, Trinity aims to ensure students are active participants in their learning. Trinity's [Student Partnership Policy](#) is an example of how this ethos has been embedded in institutional structures. 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.

- *What principles do you think should underpin the quality assurance of assessment in the workplace?*

Within our School and Programme Review Procedure, we query the following:

- Are the expected learning outcomes/competencies expected from the placement/off campus learning arrangement documented? Where?
- Is there a formal student learning contract/compact?
- Is there a documented assessment strategy, defined progression requirements?

- Is information on placements/off-campus learning arrangement available in student/programme handbooks, or on the School or programme website?
- Do students receive appropriate orientation/induction that includes Health & Safety, and student conduct while on professional placement/off-campus learning?
- *External examining and authentication are widely used in higher and further education respectively. What purposes do you think they serve? How can they better serve those purposes?*

External examiners support the comparability of education standards across Trinity programmes and awards with those of other national and international institutions.

*Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?*

Guidelines that are common to FET and higher education may not be ideal due to different expectations in the different contexts. Another concern is whether guidelines would address taught programme provision as well as research. The majority of our external examiners come from the UK where there is a national set of guidelines on external examining and we often receive requests for an equivalent set of guidelines for the Irish context. One area where guidance would be welcome is in the issue of external examiners as data processors (with respect to GDPR). Questions that have arisen include whether they can retain exam scripts, for how long, and how they should dispose of them.

- *Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.*

Trinity sends all our new course proposals out for external review prior to approval by the University Council. We support the retention of external examiners, the seven-year cycle of quality review, and the input by professional accreditation bodies.

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On behalf of Trinity College Dublin

## General issues (All Providers)

Green paper Question	Context	Response
<p>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)</p>	<p>(QQI's) validation policy is more explicit, requiring that programmes specify minimum intended programme learning outcomes that must be achieved by all who pass. In other words, they must specify the learning outcomes that must be achieved to warrant a minimum passing grade.</p>	<p>Distance Workshops or blended learning short courses run by QQI on a VLE could inform providers about IPLOs MIPLOs &amp; MIMLOs</p>
<p>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)</p>	<p>Certain kinds of expected learning outcomes can be written in such a way that they will be interpreted consistently by all. Outcomes such as memorisation of specific identities or the ability to execute a simple specific procedure are examples of ones that can be interpreted relatively unequivocally. In practice, this clarity does not extend to most kinds of outcomes that are of interest and all the more so where creativity or higher-level outcomes are involved.</p>	<p>Yes – disciplinary communities have an important role in supporting consistent interpretation of leaning outcomes. Improvement: follow through with External Authenticators Standardisation via VLE forums webinar or other interactive forum allowing for interpretation of LOs.,</p>
<p>What more can be done to build expertise in the use of statements of learning outcomes in teaching, learning and assessment? (Section 7.4)</p>	<p>The expression of learning outcomes needs to come from a genuine internalised understanding of what a person is expected or intended to have learned by the end of a programme or module. Individual word choices are not that important if the ideas are comprehensible.</p>	<p>Distance Workshops or blended learning short courses run by QQI on a VLE could inform providers about IPLOs MIPLOs &amp; MIMLOs. In some training in cross-checking with award type descriptors for those developing MIPLOs and MIMLOs could help.</p>
<p>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)</p>		<p>a focus on the compound award as a primary indicative source of assessment, could help providers develop a more integrated overall strategy in implementing assessments, as opposed to the major focus being on the component award – which can lead to fragmentation</p>

Green paper Question	Context	Response
<p>Please comment on the accommodation of diversity. (section 7.6)</p>	<p>Designing an assessment invariably involves making some assumptions about learners. An assessment that is valid and reliable for learners who have come through the Irish secondary school system may be less valid and reliable if used to test international students or mature learners who have been away from formal education for many years.</p>	<p>assessment methodology should reflect the learner profile, but yet remain faithful to LOs</p> <p>Providers in FE in particular tend to take a very literal approach to assessment as contained in the component awards as a safe option. Providers need to be aided in changing this mind-set, and QQI have to enable the provider to do so as part of validation.</p>
<p>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? (section 7.7)</p>	<p>For scantily resourced prospective providers providing niche programmes for few learners, the cost of establishing and maintaining assessment procedures that are reliable and valid may be unsustainable. Such prospective providers and especially their prospective learners might be better served by arrangements alternative to validation by QQI. They may be better working, for example, as collaborating providers with organisations that have the resources to sustain valid and reliable summative assessment.</p> <p>Unsustainable burdens create perverse incentives for providers that can undermine quality and trust in qualifications. QQI must be able to ensure that only those providers who can undertake their responsibilities can access (or continue to access) QQI validation of their programmes.</p>	<p>While the notion of collaboration is quite good, it could be problematic from the point of view that the provider delivering the content would aim to deliver to the test as opposed to the holistic learning outcomes.</p>
<p>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)</p>	<p>Assessment in the context of RPL can potentially be challenging because learning is presented in atypical ways that require confident handling. Additionally, in some instances, bespoke tests are required to be constructed e.g. in technical areas and that can be onerous and expensive depending on the discipline and economies of scale. This might be supported, for example, by national co-ordination in particular fields of learning, and in other ways.</p>	<p>A person may have specialist skills in RPL, but unless they have the support of a subject matter expert, and a person who can standardise / moderate the result against national standards. Assessment through RPL could become unreliable if reserved solely for those who specialise in RPL where technical subject matter is under consideration.</p>

Green paper Question	Context	Response
<p>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)</p>	<p>In general, where there is summative assessment of learning to determine whether a candidate for an award has met the prescribed learning outcomes, it is more transparent for those outcomes to be expressed as minimum requirements, i.e. threshold as distinct from typical standards. Threshold standards can be complemented by other kinds of standards, such as expected median standards.</p>	<p>This could be useful and reasonable, however it would be very important to then take into account that what must be specified are the minimum, and this could in itself become limiting, unless there was a division to indicate minimum, and desirable (which would be above the minimum)</p>
<p>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?</p>		
<p>Do you agree that well-intentioned but non-strategic arrangements for assessment can hinder the achievement of intended programme learning outcomes? (Section 7.11 )</p>	<p>Learning to become, for example, a carpenter, nurse, or journalist involves achieving knowledge, skill and competence that transcends what can be taught in any single module or subject. It involves developing the confidence for creative practice of the profession within the bounds of acceptable professional practice. Learners need time and space within a programme to develop this confidence. High frequency, highly granular summative assessment designed to keep students working on constituent subjects (that may be competing with one another for learners' attention) within a programme can interfere with this development.</p>	<p>Sometimes the credit system does not allow for the learner effort required for development.</p> <p>granular assessment can be disjointed if over granular, so the overall context of the programme (MIPOs) and the associated compound award needs to be considered in context in assessment design</p>



Green paper Question	Context	Response
<p>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)</p>	<p>Our experience of working with standards development groups is that different disciplines tend not to be equally comfortable in expressing expected learning outcomes in all three domains. One discipline might find it easiest to express skills outcomes, another knowledge outcomes.</p> <p>We don't yet know whether there might be a corresponding preference for some kinds of assessment over others and whether that might lead to gaps in assessment and consequently in formation of learners. Such gaps would be problematic.</p>	<p>Yes – it is not easy to address all dimensions particularly in delivery and assessment.</p> <p>Implications include:</p> <ul style="list-style-type: none"> <li>• disjoint with the compound award or MIPLO's</li> <li>• inadequate assessment</li> <li>• possible selectivity of assessment might occur</li> </ul>
<p>What applications can you think of for norm referencing in the context of assessment? (section 7.13)</p>	<p>Norm referencing, where properly implemented (including being based on an accurate statistical model that justifies the approach) and permitted, is, in principle, unproblematic provided it is clear to all concerned that norm referencing is being used. Norm referencing is problematic in systems that profess not to use norm referencing, which may seem a trite point until one reflects on the ease with which unintended norm referencing can creep into assessment. In practice, it is quite easy for assessors to drift into relativistic practices, marking students relative to each other rather than to a standard that is independent of the group. External examining and authentication can also introduce relativistic influences.</p>	<p>Skills assessment readily lends itself to norm referencing provided there is a standard norm identifiable reference – identifiable to the assessor as well as the programme developer, assessor and sector at large.</p> <p>a set of simple questions might help to identify a standard norm e.g. testing a series of skills... standard norm reference question – “Would I employ this person to do that skill for me?”</p>
<p>What are your views on the purpose and necessity of grading in the context of assessment for/of learning? (section 7.14)</p>	<p>To design an assessment system that validly and reliably determines whether a person has achieved intended programme learning outcomes is challenging enough; to design a classification or grading system that fairly and consistently differentiates performance beyond this is even more challenging. This is one issue that has led some to question the utility of grading.</p>	<p>Pass / fail works but it is a blunt instrument, with the inherent weakness of not being able to credit those who perform to a minimum standard and those who perform above the minimum</p>

Green paper Question	Context	Response
<p>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)</p>	<p>We suspect, given the motivations (higher classifications may lead to better job prospects for students) and the limited number and efficacy of stabilising influences, that the link, for a given award-type, between the award classification and the actual performance may not be absolute, but may depend, in some measure, on the programme, the institution, the discipline, the enrolment selectivity and when the award was made.</p>	<p>Variation is inevitable in award classification practice across providers, and even between assessors within providers. Standardisation within a provider, as does a common external authenticator (EA) to monitor grading across a series of programmes helps to mitigate this. Where there are multiple EA's standardisation with the group might help. Implications: Lower level of trust in the value of grades by interested parties.</p>
<p>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?</p>	<p>That would mean that reliance on classification to discriminate between people who studied different programmes would not be safe.</p>	<p>Award classification can be very meaningful to the learner so from this perspective it is worthwhile. Consistent classification is practical but it requires standardisation across EA's. A set of easy to read statements, universally relatable could aid this process.</p>
<p>What can be done to support consistency in the actual standards of achievement that must be demonstrated and assessed to qualify for Framework awards?</p>	<p>We doubt that either external examining in HET or external authentication in FET as currently practised can prevent gradual divergence.</p> <p>We consider that systematic research is warranted to resolve the uncertainty</p> <p><b>7.16 GRADING WORK-BASED LEARNING</b> Apprenticeships and many other programmes involve assessed work-based learning. One issue that often arises is whether work-based learning should contribute to the final award classification or grade and, if so, how to ensure consistency.</p>	<ul style="list-style-type: none"> <li>• include a capstone</li> <li>• include assessment of the compound award</li> <li>• standardise across EA's and assessors</li> <li>• Use a set of easy to read statements/ questions, universally relatable e.g. "Would I engage this person to do X for me?...." etc.</li> </ul>

Green paper Question	Context	Response
<p>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)</p>	<p>Society expects its educational institutions, professions and employers to validly and reliably assess diverse learners, practitioners and trainees. The issue of competence to assess arises. Different parts of the education and training system have different ways of selecting and approving people who will be involved in the assessment of learners.</p> <p>There is a question about how institutions manage competing interests to ensure that they retain a balance of competences suited to the needs of their enrolled learners. In this context, for example, the criteria for appointing new staff may be relevant. There can be competing interests involved in the appointment of new staff. An HEI, for example, might be tempted to prioritise a new appointment as an opportunity to increase its research prestige over one to increase the HEI's pedagogical competence</p>	<p>Staffing issues, employment rights, HR issues, internal politics etc.. make this complex. In addition there is no one best practice.</p>
<p>What do you think are the main challenges involved in remote assessment? (section 7.18)</p>	<p>While the use of technology in assessment is ubiquitous, remote assessment in certain situations can involve specialised knowledge and equipment that may not be generally available. It should not be assumed that all learning can be practically assessed remotely. Using remote video to assess a practical skill might work with several remotely controlled high-resolution cameras but be unreliable with a single webcam.</p>	<p>only some types of assessment lend themselves to remote assessment. Physical invigilation remains reliable in all assessment instances. Challenges are variable from broadband availability to IT proficiency of assessor and assessee, to software capability.</p>
<p>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)</p> <p>How can/do professional bodies help support the validity and reliability of assessment in the context of professionally oriented programmes?</p>	<p>representative professional bodies can take a special interest in education and training. Some, for example, have processes and criteria for the accreditation of programmes. Professional regulators may also be involved in the regulation of programmes of professional education and training</p>	<p>It is possible and likely where award standards do not reflect either industry requirements, or professional regulator requirements. In addition assessment can be limited by time, facilities, and the absence of reality in an assessment. As a minimum award standards should be sufficiently flexible to reflect industry / professional regulator requirements. Industry / professional regulators should input into standardisation</p>

Green paper Question	Context	Response
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)	In principle, problems could arise where persons responsible for assessment are disconnected from (i.e. not in regular contact with) the relevant communities of practice.	Yes – it ought to be a condition of engagement as a tutor and/or assessor
What can be done to further engage learners as partners in assessment of, for and as learning? (section 7.21)	Learners can be engaged as partners in assessment (see for example (Healey, et al., 2014) and the resources published by the National Forum). This leads us to question what can be done to further engage learners as partners in assessment of, for and as learning?	Assessment design to reflect real life, making it tangible to the learner. Allowing the learner scope within the assessment to demonstrate linked learning
What principles do you think should underpin the quality assurance of assessment in the workplace? (section 7.22)	<p>This topic is important for apprenticeship programmes and for many professional programmes. It arises in FET and HET. With the growing interest in the inclusion of work-based learning in programmes interest in this topic is widening.</p> <p>There is a range of approaches to 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.</p>	<p>Full consistency in workplace assessment in any one sector is impossible, however an acceptable degree of consistency is possible.</p> <ol style="list-style-type: none"> <li>1. Providers should standardise against each other and against industry norms</li> <li>2. providers should train and give very clear assessment criteria (that relate to LO's) to assessors of workplace assessment that can translate into a mark</li> <li>3. Provider should visit the learner at the workplace to ensure quality of this section of the programme</li> <li>4. Students can only be permitted to train with approved hosts who have undertaken, attained and practice a standard of “work based learning” as part of their culture</li> </ol>
What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?		Remote testing should be possible for some types of assessment. assessors and tutors need to be fully aware of GDPR etc..

## FURTHER EDUCATION AND TRAINING ISSUES -

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

Green paper Question	Context	Response
<p>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.</p>		<p>The compound award should be part of the assessment strategy, and should contribute towards an overall award. The compound award should not be a stand-alone determination of the overall award. Providers (who are not awarding bodies or who do not have DA) should not calculate the grade – this is a function of QQI - to do otherwise would be to potentially introduce additional inconsistency</p>
<p>Please respond to the commentaries on the issues raised in section 8.1, viz.:</p>		
<p>The unitisation of assessment</p>	<p>unitisation of assessment is problematic when it facilitates the omission of explicit assessment of overarching learning outcomes. This problem can be alleviated by including some 'capstone' units whose purpose is to provide an opportunity to achieve and demonstrate overarching outcomes that would not otherwise be assessed. Unitisation of assessment can also lead to inefficiencies for learners, who may be 'over assessed' as a result of each unit being individually assessed.</p>	<p>The compound award should be part of the assessment strategy, and should contribute towards an overall award. The compound award should not be a stand-alone determination of the overall award however its inclusion if properly designed as part of the assessment strategy should aid to reduce the assessment burden</p>

Green paper Question	Context	Response
<p>The sustainability of the burden of assessment on providers.</p> <p>We need to identify what can be done so that we do not risk undermining trust in qualifications while enabling smaller organisations to contribute to the provision of education and training services. Collaborative approaches to final summative assessment may be one way to distribute the burden more realistically.</p>	<p>Ireland’s further education and training system benefits from having numerous and diverse organisations providing training for the workforce. All providers from the smallest to the largest can and should be involved in assessment of learning including summative assessment. However, designing and implementing summative assessment procedures and tasks that are:</p> <p>a) valid and reliable for the purposes of certification; b) nationally consistent; c) fair and suitable for use in competitive allocation of places in higher education; may be, realistically, we suspect, beyond the unaided capabilities of many providers under the current arrangements.</p>	<p>Collaborative arrangements could reduce the burden of assessment, however it could potentially lead to training to the test. In addition the assessor must retain responsibility for assessment and any collaboration should not allow a separation of responsibilities associated with training and assessment. This is stated in the context that national assessment is impossible given the diverse nature of qualifications and training nationally.</p> <p>Perhaps the sharing of assessment materials could be a type of collaboration that leave the responsibility of assessment to each provider, the weakness being maintaining the integrity of the material</p>
<p>Centralised versus distributed assessment</p> <p>Distributing responsibility for assessment to providers of validated programmes has advantages, but it makes consistency more difficult.</p> <p>A two-part approach to summative assessment with centralised written exams on some widely studied subjects (such as mathematics) combined with provider-set examinations on vocational subjects is a way that some have tried to ‘resolve the tension between the two approaches’ (CEDEFOP, 2015, p. 67).</p>	<p>We (QQI) are not angling to become involved in centralised assessment or its promotion. Rather, we need to consider whether there should be an expectation that providers would collaboratively establish arrangements to help calibrate local summative assessment. Benchmarking assessment results against those in comparable third-party examinations is one potentially useful device. An example of a promising initiative of the ETBs is the Maths for STEM programme’s use of a shared centralised online assessment tool for part of the summative assessment</p>	<p>Standardisation / calibration of summative assessment must go hand in glove with a standard interpretation, approach to delivery and standardisation of training materials for learning outcomes, - and almost a synchronisation of assessment schedules - otherwise validity, reliability and fairness can be questioned</p>

Green paper Question	Context	Response
Perceived ambiguities in the QQI regulations	<p>A principle of QQI validation policy and this Green Paper is that providers must establish MIPLOs and MIMLOs that are consistent with the relevant QQI awards standards and it is the MIPLOs (or MIMLOs) (which are approved by QQI when it validates a programme) that must be achieved before an award can be recommended in respect of a programme (or module).</p> <p>The minor awards specifications state:  “Programme validation will require providers to map each learning outcome to its associated assessment technique. All learning outcomes must be assessed and achieved in accordance with the minimum intended module learning outcomes set out in the validated programme”.</p> <p>The intention of this paragraph is the same as the first paragraph of this subsection, but it is not as clear and might be open to other interpretations.</p>	<p>QQI can help this situation by the inclusion of practical examples as part of their regulations and policies, where it would serve to reduce the ambiguity.</p>
Micro-management of assessment through regulations	<p>These guidelines were intended to be helpful, but they run the risk of getting in providers’ way and encouraging an excessively rules-based approach to assessment that does not afford due latitude to providers and teachers. Controls are necessary, but many of those controls are best established locally, where they can be situationally optimised, rather than centrally, where they cannot. Quality is, frankly, harmed by excessive control from the centre.</p>	<p>Providers in FE sector in particular have been conditioned as a legacy to take absolutes from award standards. Moving from this has the advantage of more flexible assessment but the disadvantage for external authenticators of determining validity and reliability of assessment and a reduction in consistency across common standards to name two, has to be weighed against the benefits. Providers and programme designers would also require training to ensure gains in a change from this position. It is clear in CAS that there is some latitude at present, within reason.</p>
Patchiness of current guidelines	<p>Indeed, QQI is not best placed to provide such examples in a general guideline. However, examples would be useful. There is an extensive literature on effective practice in assessment. Providers would be better tapping into this than looking to QQI for guidance at that level of detail. Ways also need to be found to stimulate the emergence of instructive examples of effective assessment in the Irish FET context.</p>	<p>A portal or even a public website with such resources should be considered – as this would make assessment more transparent</p>

Green paper Question	Context	Response
<p>Assessment in the context of the QBS implementation for the Common Awards System</p>	<p>There are assessment-related implementation problems with the CAS. Currently we (QQI) calculate the grade for a compound award based on the results for the component awards—there are historical reasons for this. Our involvement is problematic because achievement of the components is not necessarily a valid or reliable indication that the compound’s ELOs have been achieved. The 2012 Act is clear that assessment is the provider’s responsibility and the calculation of the grade is part of assessment and therefore the provider’s responsibility.</p>	<p>The compound award should be part of the assessment strategy, and should contribute towards an overall award. The compound award should not be a stand-alone determination of the overall award.</p> <p>Providers (who are not awarding bodies or who do not have DA) should not calculate the grade – this is a function of QQI - to do otherwise would be to potentially introduce additional inconsistency</p>
<p>Please comment on the questions posed in section 14.</p>	<p>We (QQI) are privileged to work with three distinct parts of Ireland’s educational system: FET, HET and ELE. Different paradigms apply in each part and this has substantial implications for procedures for the assessment of learners.</p> <p>Nevertheless, there is, we propose, a core set of principles and guidelines that might apply across the board at least to relevant providers of QQI validated programmes or with delegated authority to make awards.</p> <p>Stakeholders are invited to address the following questions:</p> <p>Would it be useful for QQI to publish general principles and guidelines for assessment?</p> <p>What should the principles and guidelines address?</p> <p>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)?</p>	<p>Principles and guidelines are generally useful however there is already a myriad of these and to add to the list without reforming the list might not be helpful.</p> <p>It should address as you suggest core principles</p> <p>If it is a QQI award the underlying principles should apply across the board with, if required, sector specific ones where general principles are not pragmatic or applicable.</p>



Green paper Question	Context	Response
<p>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 FET sectoral protocols and conventions? In addressing this please be specific</p> <p>What might usefully be addressed by sectoral conventions?</p> <p>What might usefully be addressed by reference assessment protocols?</p> <p>What changes are required to the implicit protocols and conventions in Quality Assuring Assessment - Guidelines for Providers?</p>	<p>The motivation for conventions and protocols stems from a recognition that, while each relevant provider is responsible for assessing their learners, sectoral agreement between QQI and providers on how certain matters pertaining to assessment are handled benefits all concerned by providing for consistency where otherwise there might be confusing divergence. These would be matters that would go beyond the principles and guidelines discussed earlier</p> <p>Grading schemes and award classification rules are among the topics that could be addressed through conventions and protocols mutually agreed between QQI and providers in consultation with other stakeholders</p> <p>Before considering the question on a sector-by-sector basis it may be helpful to consider where the natural division lies between the different layers/zones of control. It is useful to reflect on where to find the optimal balance between regulation, guidance, agreed conventions and protocols (macro) and provider-specific (meso) and programme-specific (micro) arrangements for assessment: which topics should be addressed at each level?</p>	<p><u>Sectoral conventions:</u> broad definitions for FE type assessment vs HE if relevant and valid</p> <p>Principles on the implementation of shared programmes and QA management, programme delivery and assessment.</p> <p><u>Reference assessment protocols –</u></p> <p>Grading - inclusion of universally understood statements with tangible examples</p> <p><u>Conventions in QA:</u> Interpretation of award standard verbs and acceptable demonstration techniques of their achievement</p>
<p>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).</p>		
<p>Any other issues</p>		

## 17.5 APPRENTICESHIP ISSUES

Green paper Question	Context	Response
<p>What can be done to enhance capacity for developing and using MIPLOs and MIMLOs?</p>		<p>Distance Workshops or blended learning short courses run by QQI on a VLE could inform providers about IPLOs MIPLOs &amp; MIMLOs. In some training in cross-checking with award type descriptors for those developing MIPLOs and MIMLOs could help.</p>
<p>In general terms, what are the challenges in developing integrated approaches to the assessment of apprentices that avoid them taking a silo-based approach to developing understanding of theory, practice skills and role/context competence? What can be done to help and by whom?</p>		<p>Standardisation of grading using universally understood relatable statements, developed by QQI with sectoral consultation. Apprenticeships, irrespective of level have a common thread of employment, employability, and the ability of the apprentice to operate autonomously. This facilitates the above approach.</p>
<p>What can be done to help increase the reliability and validity of competence assessment in the workplace?</p>		<ol style="list-style-type: none"> <li>1. Providers should standardise against each other and against industry norms</li> <li>2. providers should train and give very clear assessment criteria (that relate to LO's) to assessors of workplace assessment that can translate into a mark</li> <li>3. Provider should visit the learner at the workplace to ensure quality of this section of the programme</li> </ol> <p>Students can only be permitted to train with approved hosts who have undertaken, attained and practice a standard of "work based learning" as part of their culture</p>
<p>What can be done to encourage industry to become more involved in discussions about approaches to assessment?</p>		<p>Personal contact and consultation in an informal accessible way with industry representative bodies. Broad impersonal contact is less likely to succeed</p>
<p>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?</p>		<p>It might be appropriate in some instances for QQI to do this and in other instances for the provider, depending on circumstance, nature of the requests and relationships. Professionals mentoring and assessing apprentices are already engaged and have a stake in the process. In general they welcome support</p> <ol style="list-style-type: none"> <li>1. Ask the mentoring professionals what they need</li> <li>2. Develop supports / materials in accordance with their requests and within the context and bounds of the award</li> <li>3. Respond positively</li> </ol>

Green paper Question	Context	Response
<p>Should workplace assessment results be graded as distinct from being reported as successful/unsuccessful without gradation? Why/why not?</p>		<p>Apprenticeships rely very much on on-the-job delivery and assessment.            Successful/unsuccessful is extremely blunt and does not necessarily allow for recognition of excellence for what is likely to be a large part of the training programme.            Gradation is imperfect and problematic if it is not standardised, but it is important to reward excellence. Gradation therefore is needed but it need not necessarily translate fully into a numeric value. Statement values or bands might help to more accurately distinguish excellence.</p>
<p>Would it be useful to try establishing a general methodological framework for assessment in the context of apprenticeships and traineeships?</p>		<p>It possible could be very helpful for programme and assessment design provided that it did not become a crutch to which providers slavishly attached which in-turn would stifle potential gains that could otherwise be made</p>
<p>Please raise any other issues that need to be considered.</p>		
<h2>17.6 MACRO, MESO AND MICRO</h2>		
<p>We suggest that you consider what kinds of things might be done at the macro level (in our case these might be quality assurance guidelines, validation policies and criteria, sectoral conventions and reference protocols established jointly with providers); meso level (at institutional level e.g. ETB, university, college) and micro level (e.g. school/centre, programme, module) to help regulate and support assessment of, for and as learning. What can QQI do to help?</p>		<p>Macro – In general, providers of QQI awards are positively disposed to QQI principles and policies. As such it is likely that they would feed into the development of a portal or fora that provide tangible resources required, co-ordinated by QQI and requested by providers. QQI despite being at macro level tend to enter micro level detail (in fairness often through necessity as it is complex work) in how information is presented and as such it becomes difficult to navigate. If this happened in the above suggested portal or fora, it would be likely that it not be used.</p> <p>Guidance on interpretation of QQI policy and procedures.</p> <p>Meso - Standardisation of shared programmes, programme materials and resources</p> <p>Micro – Mentoring for new staff, contact points for sub-contractors,</p> <p>At meso and micro, QQI need to include these as part of validation and provider QA</p>

Green paper Question	Context	Response
Do you think QQI should consider developing macro-level topic-specific QA guidelines on assessment? If so what do you think such guidelines should address?		Gradation of assessment in particular to non-numeric methodologies Interpretation of LOs and their assessments so that a universally accepted interpretation can be implemented and followed.
Do you think that there should be any conventions agreed across the whole HET sector (e.g. on degree classifications)?	HET sector	
Please comment on the need or otherwise for macro-level assessment principles and guidelines on assessment. What should any such principles and guidelines address?	HET sector?	
<b>17.7 EXTERNAL EXAMINING AND AUTHENTICATION</b>		
External examining and authentication are widely used in higher and further education respectively. What purposes do you think they serve? How can they better serve those purposes?		Purposes served – <ul style="list-style-type: none"> <li>• consistency of delivery, assessment and standards</li> <li>• identifying areas for improvement at provider level</li> </ul> CPD for EA and Ext. Examiners at sectoral level - online webinars demonstrating best practice in EA or EE
Do you think that external examining and authentication 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? Please comment on the guidance on external moderation of assessment in QQI's <i>Effective Practice Guidelines for External Examining</i> (QQI, 2015) having regard to the questions posed in section 16 (i.e. consider whether the guidance could usefully be generalised to all moderation).	Stakeholders are invited to comment on these principles considering the following questions: Would it be useful for QQI to publish general guidelines on external moderation mechanisms (external examining and external authentication)? To whom should the general guidelines apply?  What changes could be made to improve QQI's <i>Effective Practice Guidelines for External Examining</i> (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?	Nationally, EA for similar subject areas must standardise themselves, so they recognise variations in standards and so they can then correctly moderate marks, issue recommendation etc..
Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?		Yes but they need to be pragmatic and tangible – not aspirational.
Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.		

## 17.8 GENERAL ISSUES CONCERNING ACADEMIC INTEGRITY (ALL SECTORS FET, HET AND ELE)

<p>Please comment on the presentation of the issues (section 13).</p>		<p>This is well covered. Where deficiencies are highlighted , e.g. plagiarism scenario, they need to be addressed</p> <p>As suggested, academic integrity should possibly be made explicit in NFQ competence indicators</p>
<p>Recognising what is already being done, please indicate what additional actions you think should be taken, and by whom, to help support academic integrity in general and in your sector in particular.</p>		



**Quality and Qualifications Ireland (QQI): Consultation on Green Paper on Assessment of  
Learners and Learning**

**Submission of the Technological Higher Education Association (THEA)**

**7 December 2018**

## **1. Introduction**

THEA welcomes the opportunity to provide feedback to QQI's consultation on its Green Paper on Assessment of Learners and Learning. THEA notes that the paper is intended to set out a framework and context for discussing assessment issues, including particular issues pertaining to assessment in FET, ELE and HET, and about how some of these issues might be tackled. In this context, THEA's submission is intended to contribute to the general discussion, and reflects the views of the THEA executive. It is necessarily at a high level, as the THEA executive does not engage directly as a practitioner in assessment. THEA's institutional members have contributed, or will contribute, to the discussion either in the workshops and focus groups associated with the consultation, or in their own individual written submissions. As policy options are further clarified in future Green and White Papers or draft policy and process documents, THEA would request that a more formal engagement with the technological higher education sector would be sought through THEA, as part of the process of determining any future policies relating to assessment that directly impact upon the sector.

## **2. General Observations**

### **Approach**

THEA very much welcomes the approach that QQI has taken to this important policy discussion. The Green Paper is a comprehensive document, which covers a very wide range of issues relating to assessment in the education and training system generally, and in particular parts of the system. It is a well-informed document, drawing upon an impressive body of literature, which provides valuable, and very readable, access to current thinking in what is by nature a very technical subject.

THEA also welcomes QQI's openness to and respect for the many assessment enhancement initiatives undertaken within education and training institutions, and the acknowledgement that such initiatives reassure the national quality assurance agency that the different parts of the education and training system treat the subject of assessment with great seriousness. THEA notes QQI's well argued need for a 'basis' for tackling the issues of assessment in a systematic way, and would support the favoured approach of an Inputs/Environment/Outputs (IEO) model, which takes a broad view of assessment that extends beyond crude outcome measures. THEA also notes the other dimension of QQI's basis for tackling assessment — activity levels at the macro, meso and micro levels — which demonstrates that there are many actors, sometimes with partially overlapping or analogous roles, that contribute to the overall health of assessment in education and training. It is important that the contribution of all of these actors continues to be recognised, and that they are enabled to feed in to the next round of policy development on assessment.

## **Pedagogical and quality assurance dimensions of assessment**

An interesting theme or aspect of the Green paper, which is not referred to explicitly in the document but is implicit throughout, is what may be described as a tension or lack of integration between the quality assurance dimension of assessment, personified to some degree by QQI as the national quality assurance agency, and the pedagogical dimension, which is personified, again to some degree, by the National Forum for the Enhancement of Teaching and Learning. Interestingly, both organisations' documents are cited liberally throughout the Green Paper. The tension or lack of integration is also implicit in the distinctions made between 'assessment of learning' and 'assessment for/as learning', or between assessment in support of learning (Green Paper, section 3.1) and in support of certification (Green Paper, section 3.4); and even in more general terms like 'regulation' and 'enhancement'.

It is too crude a distinction to argue that the regulatory/quality assurance and pedagogical dimensions of assessment are the preserve of particular bodies. In reality, the ownership is permeable. Quality assurance practitioners or regulators are, of course, often interested in enhancement measures, while no individual or institution interested in the pedagogical dimension of assessment can fully divest themselves of the need for some rules and processes for assessment, whether that assessment is summative or formative, or whether it is a low or high stakes activity. In truth, this tension is best described as a cultural phenomenon, but real nonetheless. It is something that permeates higher education institutions, who will usually employ quality assurance officers that are predominantly concerned with the quality and regulatory aspects of assessment, and teaching and learning officers that are predominantly concerned with its pedagogical dimensions. The struggle to integrate the two aspects of assessment is a matter that also extends to representative bodies. THEA itself plans to establish a new teaching and learning committee, but hopes that it will be able to do so in such a way that the quality and pedagogical dimensions of all aspects of teaching and learning, including assessment, are addressed in an integrated fashion, and that suspicions or fears on both sides of the cultural divide will not lead to sectoral thinking being developed in silos. THEA would ask QQI to consider this issue as part of its deliberations on assessment, and to explore with providers and the National Forum for the Enhancement of Teaching and Learning how it might be best addressed.

## **Future QQI Policy documents on assessment: guidelines or principles**

At various points in the document, QQI asks whether there would be any value in establishing general QA guidelines on assessment, or general principles, protocols and conventions for assessment (Green Paper, page 22; sections 14-16).

In principle, THEA would support the notion of developing core general principles and guidelines for assessment. However, QQI would need to proceed with caution on this, and canvas support from the key stakeholders across the education and training system. There would be a need to secure an opt-in from those awarding bodies/institutions that are independent of QQI in relation to their awarding functions, and, in this context, 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. QQI would also need to think about how it would distinguish between its own needs as an awarding body, and its role as the national quality agency and promoter of quality generally. There is an argument that this is an area that would sit more easily with QQI acting in the role of promoter of quality enhancement, rather than as an awarding body or qualifications regulator. In this connection, the assessment principles might be an agreed document, developed in partnership by the key stakeholders, in a manner similar to the old IHEQN principles' documents, or the more recent National Framework for Doctoral Education. Through this approach, QQI would be a contributor/facilitator rather than the sole progenitor of the principles. It would also be able to draw upon the combined wisdom of the education and training sector and, consequently, would not fall foul, however inadvertently, to the charge of extending approaches to assessment for the purposes of its own awards to a broader constituency. Such an endeavour might provide a framework for discussing the issue of integrating pedagogy and quality alluded to above, and might usefully include the National Forum for the Enhancement of Teaching and Learning.

If the process for developing general principles for assessment was successful, there might be merit in extending this to the development of sectoral conventions. THEA can only speak in relation to higher education, where the possibility of developing conventions around grading schemes and award classification rules in HET is mooted in the Green Paper (pp. 104-5). Again, THEA would advise that such a move would need to proceed in a cautious manner, and would require the careful building of trust between the various stakeholders to ensure success. Boundaries would need to be respected both between QQI and the Designated Awarding Bodies and amongst the Designated Awarding Bodies themselves. It would also depend on a voluntary opt-in approach as opposed to one of compulsion and compliance. And, here too, QQI would need to separate its own needs and role as an awarding body from that of its role and functions as the external quality agency for much of the education and training system. Whether it is feasible for QQI to enter into a partnership with other awarding bodies on an equal footing to develop agreed sectoral conventions and protocols would depend, first and foremost, on whether all the key players could enter the process with sufficient levels of confidence, maturity and generosity; on whether there is a shared view that there are problems around award classification rules and grading schemes that need to be fixed; and whether a process of engagement could be designed or facilitated that would allow progress to be made in what has traditionally been an area of contention not just between awarding bodies, but also between faculties and different disciplinary areas within institutions.

### **3. Some specific issues**

#### **Sectoral conventions for assessment and the establishment of institutes of technology as designated awarding bodies**

In the discussion on Higher Education Issues (Green Paper, section 9), a question is posed about assessment in the institutes of technology in the aftermath of them becoming designated awarding bodies, specifically, ‘What if anything ought to replace the conventions for the institutes of technology that become designated awarding bodies? (Green Paper, p. 76). Naturally, THEA has strong views on this matter. It is anticipated that, on foot of the passage of the Qualifications and Quality Assurance (Education and Training) (Amendment) Bill 2018, and the ongoing implementation of the Technological Universities Act 2018, that all institutes of technology will shortly become designated awarding bodies, either as standalone institutes of technology (up to Level 9), or as technological universities (up to Level 10). THEA would expect that the same conditions pertaining to assessment amongst those institutions that are currently designated awarding bodies (the 7 universities, DIT and RCSI) would also apply to the institutes (these are outlined in the Green Paper section 5.2). In this context, the institutes of technology would become providers of higher education programmes that set standards for their own awards using the NFQ as a guide. With regard to assessment of learners, they would be guided by QQI’s quality assurance guidelines; required to establish procedures for access, transfer and progression in accordance with QQI’s policies and criteria for access, transfer and progression; and required to include each of their awards in the NFQ under the legislative arrangements currently being put in place in the QQI Amendment Bill. Any sectoral conventions that might exist after the acquisition of designated awarding body status would necessarily be voluntary in nature. The sector would, of course, be very happy to engage in any discussions on guidelines and principles around assessment, including in relation to the development of agreed sectoral conventions on the rules for classification of awards and grading schemes, should they be inaugurated by QQI, and should they encompass the other designated awarding bodies.

#### **Engaging learners as partners in assessment**

THEA fully supports the concept of engaging learners as partners in assessment, but believes that there is a need for a significant, coordinated effort on the part of key stakeholders, both to promote and embed the concept and to support its development in a systematic fashion. How this might be done and funded is a matter that will require discussion amongst the key stakeholders and an honest assessment of where it resides in the many priorities now competing for the attention of the education and training system. As far as higher education is concerned, THEA would consider this to be an element of the broader student engagement agenda, and very much located on the enhancement side of the quality assurance house. In this context, there is an argument that the National Forum for the Enhancement of Teaching and Learning, in collaboration with QQI, IUA, THEA, USI and HEA, might convene a group 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. In proceeding in this manner, however, it would be important at the outset to consider the level of priority afforded to this objective across the system, and the need for, and the likelihood of securing, appropriate resources to achieve tangible progress within specified timelines.

### **Apprenticeship issues**

THEA notes the issues identified in relation to the assessment of apprentices in the paper [Green Paper, section 11], which, in the main, are focused on the matter of workplace assessment, and on encouraging and supporting industry professionals who are responsible for mentoring and assessment of apprentices. One area that needs to be examined in this regard is the extent to which such professionals actually have any interaction with education providers that have experience of assessment practice, especially in the traditional craft apprenticeships. The current regulatory arrangements, and the quality assurance arrangements that underpin them, do tend to encourage silo-based approaches, as employers tend to have relationships with the regulator rather than with institutions experienced in assessment. Notwithstanding the new apprenticeships are still relatively new and that many are still under development, it would be interesting to compare the experiences of employer assessors in the context of new apprenticeship consortia, against the employer assessor experience under the traditional craft apprenticeship model, to determine whether the new apprenticeship consortia actually do, or potentially could provide more supportive communities of practice for industry mentors and assessors. Issues around assessment in apprenticeship are difficult to discuss in isolation from other matters pertaining to quality assurance and the current model for delivering apprenticeship, and would benefit from being part of a broader discussion.

### **Conclusion**

THEA very much values the publication of the Green Paper on Assessment and believes that it has, and will continue, to generate important discussion on this critical topic. THEA looks forward to engaging with QQI, and the broad community of education and training stakeholders, in the next phase of policy development.

# **Response to Green Paper on Assessment of Learners and Learning QQI (2018)**

**Maeve O' Regan**

**Doctoral student - School of Education**

**Trinity College Dublin**

**12<sup>th</sup> November 2018**

## **Overview**

I am interested in understanding how FE and HE education in Ireland can provide students with opportunities for transformational learning, employability, career development and a meaningful student experience across academic cycles as outlined in the National Qualifications Framework (e.g. Level 5 – e.g. FETAC Certification- to Level 10 doctoral qualifications). I present a Chart and 5 suggestions on how to build assessment and learning outcomes into the curriculum and across academic cycles (e.g. from UG to PG to PhD) to enhance scholarship, skills development and ownership of the academic process, at all stages, by the student.

## **Background**

I am a part-time doctoral student with 10 years of work experience in TCD as a Student Learning Advisor. My background is in Occupational Psychology which has included roles as a researcher and policy evaluator (Centre for Research in Innovation Management – CENTRIM – University of Brighton), Careers Advisor (Dublin City University) and HR and training roles with public, private sector and not for profit clients. My doctoral topic is concerned with exploring part-time doctoral students' experiences of accessing academic programme-based and pastoral support from the academic institution and whether doctoral students demonstrates agency in developing their own academic and personal support networks during the doctoral journey. Part-time doctoral students have been described as invisible in policy and practice (Bates & Goff, 2012; Neumann & Rodwell, 2009).

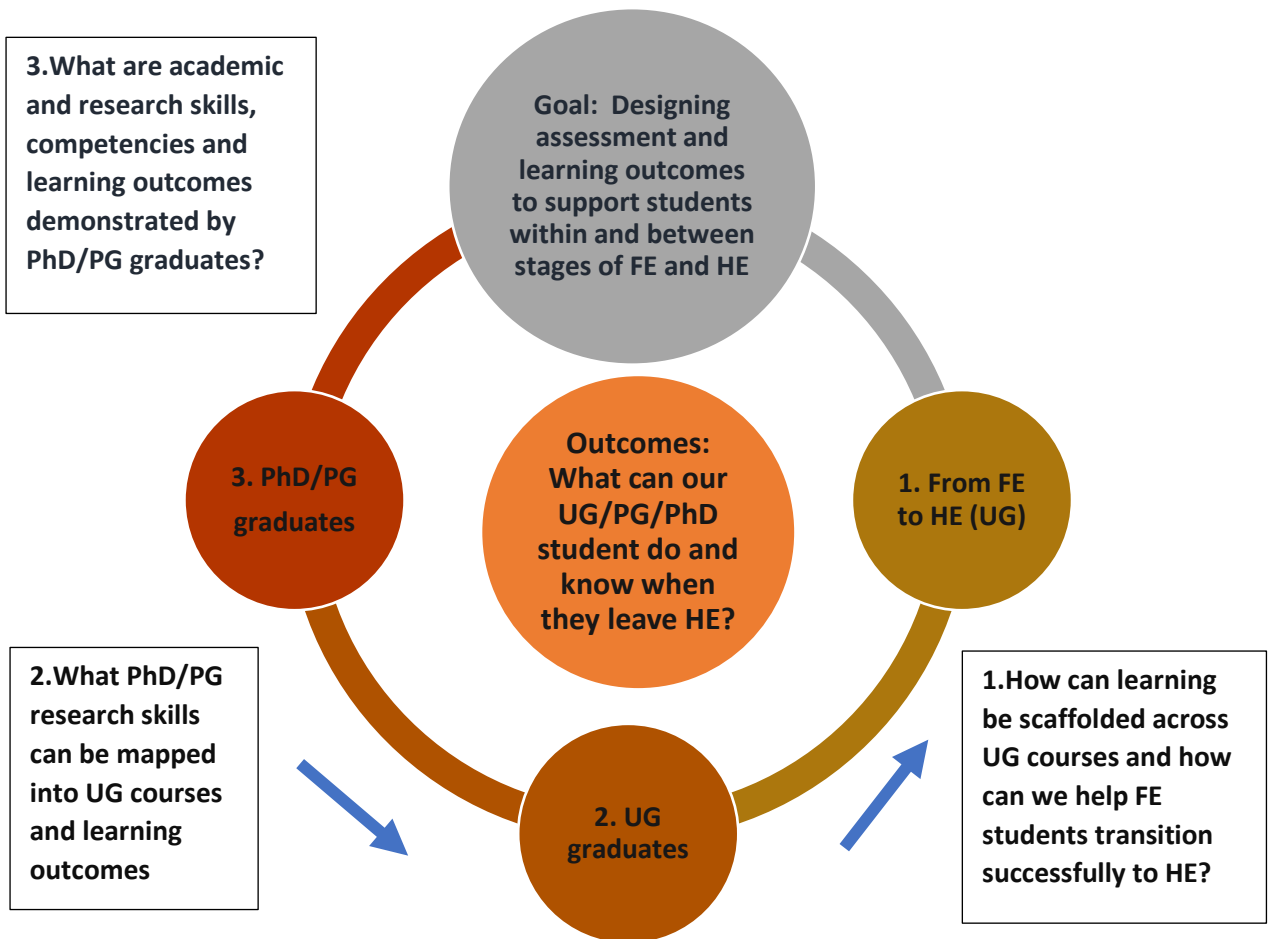
The aim of my doctoral research is to provide insights to academic institutions and other stakeholders (e.g. policy makers, supervisors and individual doctoral students) on how to support students who, research has found, spend limited time on campus, during the 9-5 day, compared to full-time students (Watts, 2008) and have less access to research networks than their full-time and science based peers (Deem & Brehony, 2000). The findings should also be beneficial to stakeholders interested in supporting diverse groups of students in HE such as part-time, mature and distance learners who have been highlighted by policy makers in Ireland as important in terms of ensuring equality of access to learning opportunities (Department of Education and Skills, 2011).

## **Recommendations for curricular reform in terms of teaching, assessment and learning outcomes:**

The following points are a summary of recommendations and responses to the QQI Green Paper on Assessment and Learning (2018) as illustrated by the following diagram.

**Diagram 1:**

**Working backwards to plan forward (e.g. curriculum design, assessment and learning outcomes from first year UG to graduating UG/PG or PhD).**



## Summary of recommendations

- 1. Adopt a top down rather than bottom up approach to designing assessments and learning outcomes within programmes.** By this, I mean starting with, for example, the final year undergraduate degree programme outcomes, to establish what skills, abilities and competencies the student should have on graduating at BA level and then work backwards to establish what skills and learning outcomes students will have at each stage of the programme (e.g. third year, second year and first year) and how they will be assessed. This is an alternative to the current bottom up approach which tends to focus on transition into college, retention of first years and “pushing them up” through the curriculum – which I think, from my experience of working with students can lead to a kind of “blindness or passiveness” about what happens next, or a focus on modular or semester level assessments rather than a sense of the big picture across a whole programme from entry level to graduation. By creating greater links in terms of expectations, forms of assessment and learning outcomes within and between academic programmes (e.g. UG to PG) will help develop a culture of ownership, from the student perspective of their own learning goals and outcomes over a whole course of study from year to year, than waiting to be guided by the lecturer – who may only be delivering a single module across a whole academic year or programme. I think this would encourage a culture of independent learning within institutions and perhaps help academic staff have a greater shared vision of their individual modules as contributing to the overall student qualification and experience.
- 2. Expand the focus of assessment and learning outcomes beyond the undergraduate programme to include postgraduate and doctoral level assessment, training and learning outcomes.** Again, adopting a top down approach by working backwards from doctoral level and other postgraduate programmes to undergraduate programmes will help policy makers and practitioners to design programmes, forms of assessment and learning outcomes at key stages in the curriculum that anticipate what skills a student might need to progress successfully to the next stage of the academic cycle (e.g. transition from FE to HE; from UG to PG and from PG to PhD.)
- 3. Encourage students to take ownership of their own learning and to become independent, self-regulated and proactive learners** by designing forms of assessment, at all stage of the curriculum, that encourage goal setting, reflection and self and peer assessment.
- 4. Encourage Scholarship, critical thinking and research skills within all stages of the curriculum from UG to PHD,** based on the concept of “Slow Scholarship”, which was discussed in the QQI Green Paper on Assessment of Learners and Learning. The goal of doctoral level education is for students to demonstrate critical thinking, and independent learning and to produce an original piece of research that contributes to knowledge generation, enhancing competitiveness and transfer of information (European University Association, 2016). Helping students to become familiar with critical thinking, independent learning, academic literacy and research methods early on and throughout the UG and PG curriculum, will not only produce highly skilled graduates but will help students to build confidence throughout the academic journey to meet the challenges of the next stage of their careers, whether it is further studies or a career within or outside academia.

5. **Diversity and Equality** – include the voices of students, who have been described as invisible in policy and practice (e.g. the part-time PhD students). Part-time students, mature learners and students who balance studies with employment, caring roles or have limited proximity to campus supports (e.g. distance learners, or those with a long commute) can provide valuable lessons to FE and HE providers on how to provide face to face and online teaching learning and assessment mechanisms to meet the needs of a diverse student body with varying individual needs and capacity to interact with the campus environment, supports and resources.

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## **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 CDETCDU 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, CDETBDU working with QQI has been active in 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 for 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 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 practitioners 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 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 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 to be 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 H1, 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 initiative 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 detriment 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 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 meet 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 met 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 CI 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 would 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.



# UNIVERSITY COLLEGE CORK

## Institutional response to QQI's

### GREEN PAPER ON ASSESSMENT OF LEARNERS AND LEARNING

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## 1. Introduction

UCC's institutional response to QQI's Green Paper on *Assessment of Learners and Learning* has been developed by the University's Quality Enhancement Unit, in consultation with the Registrar's Office (Student Records and Examinations Office), the Vice-President for Learning & Teaching, the University's Academic Council Teaching & Learning, and disciplinary colleagues representing the four Colleges of the University. UCC welcomes the paper as setting a "context and framework for discussing assessment issues", and values the opportunity to engage in national discussion and debate to promote and support effective assessment practices. The University notes the comprehensive reach of the Green Paper in its coverage of issues relating to the assessment of learners and learning as well as its sectoral breadth in encompassing a wide variety of providers. This response comments on relevant issues from the perspective of a Degree Awarding Body given the changing and evolving institutional, national and international context within which assessment policy and practice operate.

The opportunity for discussion at the "Let's Talk About Assessment in Higher Education" conference, which was jointly hosted by QQI, the National Forum for the Enhancement for Teaching and Learning in Higher Education, and the Students Union of Ireland, was welcomed. This highlighted the value and the need for an approach, which places the student (as opposed to standards) as the centre of the process; this is in line with the student-centred focus of the ESG (Standards and Guidelines for Quality Assurance for Higher Education in the European Higher Education Area). The principles of assessment outlined by the National Forum (also included in the Green Paper) along with the resources, project outcomes and dissemination activities of the Assessment Enhancement theme will support institutions' development and enhancement of student-centred assessment practices. This student-centred ethos is central to UCC's core academic mission as outlined in Goal 1 of the University's Strategic Plan 2017 – 2022 which is to:

Implement an academic strategy to deliver an outstanding, student-centred teaching and learning experience with a renewed, responsive and research-led curriculum at its core.

## 2. Recent Institutional Developments

The Green Paper coincides with the recent publication of UCC's Academic Strategy, 2018 – 2022, launched on December 4<sup>th</sup>, 2018<sup>1</sup>. Following a period of extensive engagement and consultation University-wide, finalisation of the Academic Strategy heralds a resolute commitment to a connected University approach to the design, delivery, and enhancement of education at UCC. Placing significant focus on the issue of assessment, the Academic Strategy is already addressing many of the issues raised in the Green Paper at institutional level. Furthermore, the process of developing the Academic Strategy has led to increased institution-wide awareness around many of these issues.

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<sup>1</sup> UCC Academic Strategy, 2018 – 2022, available at:

<https://www.ucc.ie/en/registrar/theconnecteduniversity/academicstrategy/>



The development of the Academic Strategy at UCC arose from the recognition that, in recent decades, the University has grown considerably more complex, with a rapid growth in student numbers and a substantial increase in curriculum offerings. In a culture of continuous quality enhancement, the Academic Strategy acknowledges that “While the university has made great strides, when we listen to our stakeholders it is clear that there is more to do.” Taking a holistic approach, the Academic Strategy is underpinned by the core principles of the Connected Curriculum, which sees “*curriculum principles and programme architecture ... preparing students for their future, developing academic excellence, character, professionalism and the capacity for critical, creative and independent thinking.*”<sup>2</sup> The central role of assessment in delivering the University’s mission is evident in the following headline statement in the Academic Strategy:

*The core principle of UCC’s Academic Strategy is that student learning and research will be facilitated through a Connected Curriculum that aligns with demand, university priorities and effective assessment practices.*<sup>3</sup>

To support realisation of the stated goals and ambitions of the Academic Strategy, UCC has already identified lead individuals and associated task groups responsible for the implementation of learning actions within 6 identified priorities. Implementation will be responsive to both contemporary and evolving challenges and opportunities, underpinning a progressive and innovative connected learning experience for UCC students. Priority 3 of the Academic Strategy deals with Assessment, explicitly to “Constructively align effective assessment practices with learning outcomes”. The stated objective for this priority

*is to ensure that assessment is aligned in an effective and visible way with module and programme learning outcomes and with graduate values and attributes. In this way assessment and feedback will be used to empower students to become self-regulated lifelong and life-wide learners.*<sup>4</sup>

The associated actions will involve the development of a University assessment strategy; the alignment of LOs with assessment; and the design of more flexible academic pathways and progression routes through the curriculum. Some Colleges within the University have already led out on reforming their assessment practices. The College of Medicine and Health, for example, had concerns around overassessment as a result of 5 ECTS credit modules. Responding to the increased workload of students and staff, the College has undertaken to complete a review of PLOs, assessment and credit weighting to ensure best practice for students.

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<sup>2</sup> UCC Academic Strategy, 2018 – 2022 p.7

<sup>3</sup> ibid

<sup>4</sup> ibid

### 3. Discussion on the Green Paper

#### 3.1 *Assessment in Complex Organisations*

The Green Paper acknowledges the many existing macro-level stakeholders for assessment such as funding agencies, statutory bodies and professional regulators. In addition, there is acknowledgement of the sectoral protocols and conventions across groups of providers to which institutions and disciplines already subscribe. With a growth in transnational links and international mobility of graduates, the range and complexity of macro-level stakeholders is expanding. Traditionally, there may have been an over-reliance on systems in the British Isles and increasingly, institutions are looking beyond legacy boundaries to achieve professional accreditation in certain disciplines. Exposure to systems beyond the UK and Ireland are impacting positively in areas of policy and practice in curriculum development and assessment – and this may become progressively more significant, post-Brexit, as Ireland will need to be more aligned with European and international contexts. Irish Universities, as institutions of increasing complexity with a broad range of disciplinary, professional and sectoral macro-level stakeholders, need to remain flexible and agile to respond to current and emerging needs.

#### 3.2 *Autonomy and Trust*

The Green Paper highlights the extent to which qualifications and assessment depend on trust relationships with multiple stakeholders – from the individual student to professional communities and our wider society. UCC, as an autonomous institution with Delegated Authority, fully acknowledges the importance of this trust relationship which is underpinned by robust quality assurance and enhancement practices. In line with the University's obligation to support assessment (as explicitly set out in the Qualifications and Quality Assurance (Education and Training) Act 2012) and consistent with national and international good practice, 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”<sup>5</sup> – including industry, employers and community-based stakeholders.

#### 3.3 *Diversity*

In an increasingly globally competitive environment for Higher Education, institutions will need to retain their distinctiveness internationally, and to identify and promote their KPIs. Learning communities in Ireland are becoming more diverse, incorporating a broader diversity of cultures and nationalities. UCC takes the viewpoint that a differentiated higher education sector comprising of distinctive institutions and missions that are responsive to the needs of a wide diversity of students will enable a wide cohort of students to realise their full potential. UCC's 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. There is no straight line between Learning Outcomes and assessment, and different approaches to gathering information and data for the purposes

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<sup>5</sup> Green Paper on Assessment of Learners and Learning, p.21

of holistic assessment need to be available. These include both qualitative and quantitative means of gathering evidence.

In planning for assessment, UCC wishes to support the development of positive student learning behaviours and to acknowledge the individualised learning pathway of students. In a paper discussing “the assessment arms race” Harland *et al.* (2015) state that “Lecturers rewarded student work with grades and controlled study behaviour with assessment”.<sup>6</sup> They found that, because of an interminable schedule of assessment, students have very little time to reflect and develop such positive behaviours but are reacting to the next high stakes (or sometimes even low-stakes) assessment. Consequently, Harland’s data showed that “study and learning intensification ... seemed to marginalise aspects of student scholarship”.<sup>7</sup>

Assessment has a key role in the formation of graduates and the certification of these graduate outcomes at institutional and programme level. However, the University acknowledges that there also can be 'institutional barriers' to integrated assessment – for example, for interdisciplinary programmes such as Public Health where active consideration needs to be given to ensuring knowledge integration and enabling student scholarship. In developing a more Connected Curriculum through the Academic Strategy, issues such as integrated assessment will be addressed across the institution in collaboration with disciplinary colleagues.

Assessment is truly effective when it is diverse, comprehensive and inclusive and when it offers the opportunity to balance requirements for certification with requirements for formative and diagnostic assessment, which encourage positive student learning behaviours rather than adherence behaviours. Irish universities will only remain internationally competitive where they have the ability to remain agile and flexible, defining their own expertise and learning profile that will support a dynamic response to evolving learning, professional and societal needs.

### 3.4 *Alignment of Learning Outcomes with Assessment*

Considerable progress has been made nationally, over the past decade, in implementing a Learning Outcomes based approach in Higher Education. Despite this, it is acknowledged that there is still a way to go in embedding a deeper understanding of Learning Outcomes across the sector. There is an onus on institutions to ensure that learning outcomes and assessment at programme and module levels are appropriately and effectively aligned. UCC’s progress in this area has already been outlined in section 2 above.

UCC prides itself on the strength of its research-led teaching and values the autonomy to build on this strength. It is fully acknowledged that a high degree of sophistication is required in calibrating the alignment of learning outcomes, curriculum and assessment – particularly at

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<sup>6</sup> Tony Harland, Angela McLean, Rob Wass, Ellen Miller & Kwong Nui Sim (2015) An assessment arms race and its fallout: high-stakes grading and the case for slow scholarship, *Assessment & Evaluation in Higher Education*, 40:4, 528-541. pp. 528

<sup>7</sup> *ibid.* pp. 537

programme design stage. The University's Academic Strategy will effect a highly connected approach to programme design and assessment through intra-institutional collaboration between the University's key functions engaged in the Programme Approval Process (e.g. CIRTL<sup>8</sup>, the QEU and the academic development teams, which include research active colleagues). The University takes very seriously its responsibility under standard 4.1 of QQI's Core Standards "to assure itself as to the competence of its staff". There has been considerable focus on supporting and upskilling staff in areas of teaching and learning by means of the accredited programmes delivered through CIRTL. Currently, 70% of academic staff at the University have undertaken these programmes. UCC is most fortunate to have particular expertise in the area of Learning Outcomes, through the work of our esteemed colleague Dr Declan Kennedy. An internationally renowned expert in the area of Learning Outcomes, Dr Kennedy's work has been translated in several languages and he has supported many national accrediting bodies in the development and implementation of their National Framework of Qualifications. UCC is most be most happy to continue to share this expertise, and reciprocally to benefit from the experience of others, through working collaboratively at national and international levels.

### 3.5 *Recognition of Prior Learning (RPL)*

UCC acknowledges that there are areas which require specialist knowledge – one being RPL – and Irish institutions will need to develop expertise in this area. 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. This would require high degrees of specialism as the complexity for RPL increases and it seems reasonable that this would be developed or supported through national coordination, by for example, building on the activities of the RPL Practitioner Network Ireland.

### 3.6 *Award Classification Practice*

It is critical to uphold the value intrinsic to awards classification across Irish institutions and the issue of grade inflation is one which requires additional understanding and examination. Grade inflation is defined as "an upward shift in [student grades] over an extended period of time without a corresponding increase in student achievement".<sup>9</sup> While this phenomenon has been examined closely in the UK, there has not been, to date, any significant empirical evidence to support that this is an occurring trend in Ireland – although there is anecdotal evidence that there is grade improvement in the Irish HE sector. Grade improvement might be a factor of many advancements in the education system over a period of time – not least improved access to education across previously under-represented communities; in addition, as outlined in Bachan (2018) grade improvement may arise from "improvements in university

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<sup>8</sup> Centre for the Integration of Research Teaching & Learning

<sup>9</sup> Rosovsky and Hartley, 2004, cited in Bachan, R (2018) *The drivers of degree classification*. University of Brighton: UKSCQA

efficiency, such as the introduction of better learning and teaching methods and curriculum developments that *produce high-achieving graduates*” (original emphasis).<sup>10</sup>

In the context of criterion referenced assessment arising from a Learning Outcomes approach, students are assessed against particular criteria and rubrics, and consequently results and grading are merit-based as opposed to context-based. UCC recognises that there can be no one approach to fit all disciplines and consequently, supports a merit-based achievement system which applies discipline-based threshold standards, underpinned by robust quality assurance and enhancement processes, including Extern Examiners. Bearing in mind, however, the potential impact of algorithms on award classification, UCC’s Academic Strategy (Priority 3) is reviewing the institution’s Marks and Standards. This project is due for presentation at Academic Board by Q1 in 2019 and for full implementation across the entire institution by Q4 in 2022.

### 3.7 *Disciplinary and Sectoral Issues*

The following sectoral issues were presented by the College of Medicine Health (CoMH) – many of which are also relevant to other sectors in the University. The Green Paper on Assessment of Learners and Learning was discussed as a formal agenda item at both CoMH Teaching and Curriculum Development Committee (04-10-18) and College Council (11-10-18). Given the wide range of implications for such a document it was also circulated to School curriculum committees for comment, and specific contributions towards this response were received from the School of Nursing and Midwifery and the School of Public Health.

The College of Medicine and Health has a number of discipline related observations as the majority of the programmes are accredited programmes with a range of professional bodies such as the Dental Council of Ireland, Irish Medical Council, Pharmaceutical Society of Ireland, CORU and Nursing and Midwifery Board of Ireland.

#### **Professional Bodies, Clinical Competency and Professionalism**

- References to Green Paper sections 5.3, 7.10, 7.11, 7.12, 7.14, 7.15 and 7.19
- A significant concern of the College was the role of Professional bodies in the consultation process. A number of members of Council are also active members (including a Chair of the Education & Training Committee) of a Professional body yet this paper has not been circulated by QQI to all Professional bodies such as the Dental Council.
- The regulation and standards of professionally accredited programmes are entwined with the requirements of the regulatory body and any assessment changes would have to be done in consultation with these bodies.

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<sup>10</sup> Bachan, R (2018) *The drivers of degree classification*. University of Brighton: UKSCQA. P. 7.

- Clinical competency was a major point for discussion and the assessment of “professionalism”. The atomistic approach to assessment discussed in section 7 formed the basis for discussion. As professionalism is across the whole programme and assessment is complex we agreed with the statement that high frequency, highly granular summative assessment may interfere with the development of professional characteristics.
- Further guidance / clarification on 7.14 “Whether to grade” would be welcomed. Ensuring consistency of assessment of clinical competencies when accompanied by a grade presents a number of challenges to University staff and clinical preceptors.
- Professionalism as a distinct characteristic underpins many of our awards yet formal assessment of an overarching feature would be complex within a highly modularised framework.

## **Sectoral Issues**

Given the proposed amendments to the 2012 Act in relation to commercial third-party services for the provision of assessments, the matter of academic integrity and all forms of third party involvement in writing assessments is one which could be explored further at a national level. This would allow institutions to share policy/ practice approaches and as well as provide for the development of integrated approaches, with some national coordination, to protect the integrity of assessment processes at sectoral level.

### **4. Conclusion**

The Green Paper is capturing a point in time – where the Higher Education sector in Ireland has arrived almost two decades after the Bologna process. The progress and advancement in that time have been extraordinary and it is difficult to envisage what the landscape will look like in 10 years’ time.

Great strides have been made in the past decade around curriculum alignment of Learning Outcomes and assessment. There is, however, more to be done in this area and national focus and support for the areas outlined above would be welcomed. UCC perceives this as an on-going process and much is to be achieved by creating a culture of scholarship around assessment and through dissemination of good practice. To cement or sediment standards without enabling the exciting opportunities for Ireland to build on its international success in implementing the Bologna Process could be limiting and restraining. Ireland is at an exciting precipice with much to learn from European and international practice in relation to assessment. UCC would welcome continued leadership on the part of QQI and the National Forum in enabling institutions to develop excellence in assessment practices nationally. It will be important that this will be a collaborative and iterative process; in that respect – it will be critical that effort is directed appropriately – towards a better understanding of effective assessment rather than a premature compliance and standards-focused system.

The Higher Education sector in Ireland will rely for its international reputation on its diversity and agility – to be able to engage with international institutions to ensure that its graduates are global citizens. Sectoral autonomy will be required to enable institutions to robustly respond to students’ needs and to recognise the individualisation of student pathways. To achieve this, complex institutions need to be able to manage the structures and architecture of their programmes and assessment practices to ensure that they remain fit for purpose.

Response prepared by the School of Medicine in University College Cork to Quality and Qualifications Ireland Green Paper on Assessment.

Dec 2018.

This response to Quality and Qualifications Ireland's (QQI) Green Paper on Assessment <sup>1</sup> has been prepared by the School of Medicine in University College Cork and refers to assessment as it pertains to medical education in our institution. University College Cork (UCC) has recently released its Academic Strategy for 2018 – 2022 <sup>2</sup>, which makes reference to many of the issues described in the Green Paper, including Learning Outcomes and possible over assessment of students as a results of semesterisation. Thus, we have not commented further on these issues. This response will be confined to issues which are of particular relevance to medical education. Additionally, the School of Medicine at UCC is currently developing a programme assessment strategy which will be informed by the Green Paper.

In section 9.1, the authors of the Green Paper refer to the need to move to an examination system which is "absolutely valid and reliable". Reviewers are invited to comment on QQI's 2009 Sectoral Conventions for Assessment <sup>3</sup>.

Sectoral Convention 1 on Award Classifications states that "Classification of awards shall be criterion-referenced as distinct from norm-referenced."

We agree with this convention and criterion-referencing is already the preferred modality in medical education. In the context of medical education, we have a cohort of students who have already been highly successful during their second level education, and who have achieved high point in the Leaving Certificate and in the Health Professions Admissions Test (HPAT).

In the interests of fairness, and also in the interests of protecting the public, passing standards in medical education should be based on demonstration of competence. Norm referenced classification of awards causes problems for high stakes and professional examinations as the ability of groups of candidates could vary from cohort to cohort and the content of the assessment may also vary over time <sup>4</sup>. It is possible that, in a poor cohort, a poor or incompetent candidate may reach a passing standard derived using norm referencing <sup>5</sup>. For this reason, norm referencing is usually deemed unacceptable for high stakes examinations and professional examinations, which aim to ensure that candidates are safe to practice <sup>6</sup>.



Sectoral Convention 2 on Mixed Grading Systems states that “Each provider shall adopt either the percentage grading system or the alphabetic grading system (for all of its provision), in accordance with Sectoral Convention 4.”

In line with University College Cork’s guidelines on marks and standards <sup>7</sup>, grading in the School of Medicine follows a percentage based system, where 50% is a Pass, 60% is a Second Class Honour and 70% is a First Class Honour.

However, the practice of using a pre-fixed set mark (eg 40% or 50%) is also not ideal in the context of medical education and is also difficult to operationalise alongside criterion referenced assessment. How happy would society be with a doctor who only carried out half of the required steps when, for example, taking a blood sample, or prescribing a drug?

Therefore in the School of Medicine, in line with best international practice in Medical Education <sup>8</sup>, we perform standard setting based on the concept of “competency” as the bench mark for passing an examination. This has led to the concept of the “minimally competent” or borderline student, where experienced assessors define the minimum criteria required to pass the examination in question <sup>9</sup>. These standards then define the cut scores for passing and grades. Cut scores, as determined by appropriate standard setting procedures, are adjusted to the university pass mark if necessary. A number of different methods of standard setting are used depending on the nature of the assessment <sup>4</sup>.

Our approach is far from unique. A recent study, that evaluated the standard setting methods used in Final Year medical examinations in 29 medical schools in the United Kingdom, found the use of standard setting methodologies similar to those we use to be widespread <sup>10</sup>. A variety of standard setting methods were used depending on the type of assessment. In total, the 29 schools described the use of 77 assessments, most commonly Multiple Choice and Objective Structured Clinical Examinations. A fixed pass mark was used in only 2 of 77 (2.6%) assessments described.

This approach is endorsed by the World Federation of Medical Education (WFME), who publish Global Standards for Quality Improvement: both Basic Standards, which must be met by all universities offering undergraduate medical degrees, and Quality Development Standards which constitute best practice in medical education and to which medical schools should aspire <sup>11</sup>. Irish medical schools are obliged by the licensing body of the medical profession (the Irish Medical Council) to adhere to these WFME standards.

This practice of standard setting is also considered as best practice for postgraduate professional medical examinations and is widely used both in Irish and international postgraduate medical education <sup>12,13</sup>.

Professional bodies, such as the Medical Council, can support the validity and reliability of assessment by following evidence-based practice, and adopting best international practice.

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## University of Limerick feedback on Green Paper on Assessment of Learners and Learning

### Respondent 1:

Although the Green paper on Assessment of Learners and Learning espouses a broad conceptualisation of assessment to include assessment of, for and as learning, several of the issues and questions raised reflect a very narrow focus on grades and grading. For this reason, I welcome the all too short section 7.14 and the question raised on page 109, “what are your views on the purpose and necessity of grading in the context of assessment for/of learning?” Please find attached a paper I have co-authored and published in *Studies in Higher Education*, which extensively addresses this specific question. The question of “whether to grade” (p. 59) is an extremely complex question as highlighted by McMorran (2017) referenced in this green paper and the consequence of a broader debate on this very question could result in a very different set of issues and questions being raised in place of those presented in this consultation document. Building on this point, while the list of general issues concerning assessment in section 17.1 is extremely extensive in its scope, many of the questions raised lack acknowledgement of the nuances associated with assessment and many others are predicated on a deficit conceptualisation of existing practices. For example, one of the questions raised on page 109 asks “do you agree that persons responsible for assessment need to maintain regular contact with the relevant communities of practice (e.g. scientific communities)?” Such a question would suggest that this is not currently the case. When this question is juxtaposed with some of the prior questions on the same page around the role of professional bodies or professional regulators regarding assessment and programmes of education, there would appear to be incongruity in the position held around current levels of engagement with “relevant communities of practice”. Within the HEI sector and particularly at university level, the majority of programmes offered are heavily accredited requiring extensive relationships with relevant communities of practice. I have no doubt that there may be various exceptions to this, but I strongly feel that any discussions around assessment should build on existing strengths as opposed to taking a “lowest common denominator” position and focusing only on potential gaps in practice. In my opinion, the discourse should be positioned around expanding and building on good practice as opposed to addressing poor practice.

One of the questions that this paper raises for discussion is around the “need or otherwise for macro-level assessment principles and guidelines on assessment. What should any such principles and guidelines address?” Whatever about guiding principles, I personally would be concerned around the language of guidelines as it would suggest a very technicist view of higher education. Guidelines could be interpreted (perhaps erroneously) as directives or as a set of instructional practices, removing educators’ professional autonomy, flexibility and potential for responsiveness. Again, this question and others raised in the green paper, appear to suggest a deficit interpretation of existing assessment practices. When considering such questions I would encourage engagement with the extensive work completed by the National Council for Curriculum and Assessment (NCCA) and the supports that they have developed for educators within the second level sector (see some examples [here](#)). Recent developments at second level have attempted to significantly shift the focus of assessment toward formative feedback. Considerable effort has gone into developing supports and professional development opportunities for educators on how to provide students with meaningful and effective feedback.

Another concern I wish to raise is that at times some of the issues raised in this green paper appear to question current levels of compliance with core principles of the European Credit Transfer and Accumulation System (ECTS). For example, the ECTS Users' Guide (2015, p. 30) highlights that “given the diversity of programmes and HEIs, it is unlikely that the credits and learning outcomes of a single educational component in two different programmes will be identical.... An open and flexible approach to the recognition of credits obtained in another context, including learning mobility, is therefore recommended, based on compatibility of learning outcomes rather than equivalence of course contents.” Given this and our involvement with the Bologna Process, while the green paper raises important questions on page 76, they could be seen to extend to questioning ECTS or at least one's observance of it. For example, see questions such as:

- “If we pick two first class honours bachelor degree qualifications from different institutions but in the same subject should we expect them to be equivalent?”
- “Is there an ‘A list’ group of providers whose qualifications are significantly more valuable in some sense?”

Given that one of the requests is for “comment on the conceptualisation of assessment as set out in this paper” (p. 107), I would return to my opening comment and appeal for consistency in maintaining a broad interpretation of assessment throughout. For example, in raising concerns around potential over assessment on page 77, the green paper directly references the work of the National Forum and their report ‘Profile of Assessment Practices in Irish Higher Education’. While this report does raise some concerns around the number of assessments and assessment load, this is with regard to assessment OF learning. With respect to assessment FOR/AS learning the report highlights that “while there is much evidence of diversity, innovation and commitment to effective assessment in Irish higher education, there remains scope for further enhancement” (National Forum for the Enhancement of Teaching and Learning in Higher Education 2017, p. 33). This is important for two reasons. First, the language employed in the National Forum's report attempts to build on existing strengths while consistently embracing a broad conceptualisation of assessment. Second, a broader examination of the National Forum's report would suggest that while in certain disciplines there may exist issues of over assessment OF learning, this could also mask issues of under assessment FOR/AS learning.

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Respondent 2:

I scanned through this document, with special attention to references on technology. I was surprised that, expecting a brief reference to '7.18 ONLINE OR REMOTE ASSESSMENT' in page 61, and a reference to the white paper published in August 2017 "Topic-Specific Quality Assurance Guidelines for Blended Learning", the huge amount of literature and practice evidence in technology-enhanced assessment and feedback provision is overlooked otherwise.

Also, I read with interest the section 13.4 PROMOTING AND SUPPORTING ACADEMIC INTEGRITY. There is a good account of literature evidences there, with further scope to include reference to the need of institutional codes of conduct that include all stakeholders (including SU) such as advocated by McCabe.

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Respondent 3:

1. 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)
  - a. There probably needs to be a body to which module/programme coordinators are referred when attempting to pass through module designs or changes through APRC or Course Management Committees for approval. Committees who deem the learning outcomes to be unclear or unreasonable or invalid could refer those submitting to this body.
  - b. This body could be available before submission to the APRC or Course Management Committee, but these committees would be where the buck stops.
2. 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)
  - a. This is difficult, because there can be competing associations vying for legitimacy with a particular disciplinary community—organised around schools of thought or political or economic goals. The Engineers Ireland accreditation body is a good example of a relatively cohesive community. The Modern Language Association is the go-to authority for the English (literature) and Composition (rhetoric and writing) community in the U. S., but do not hold as much sway here in Europe. Engineers Ireland have a list of very specific learning outcomes that a programme needs to deliver, but I am not sure how rigorous they are in quizzing the effectiveness of the method by which students achieve that outcome or even insisting that the method be revealed. It seems to be the promise is enough. To be honest, I am not sure why there are not more lawyers interested in the rigour of programme planning, but then, you would need students who are savvy enough and motivated enough to critically examine whether the acquisition of the advertised, promised outcomes are facilitated by the programme design or whether students are expected to attain to those outcomes despite the design.
3. What more can be done to build expertise in the use of statements of learning outcomes in teaching, learning and assessment? (Section 7.4)
  - a. See my answer to question 1.
4. 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. When talking to students about writing an FYP or a Masters dissertation, I find it disconcerting when I am not able to take them to the learning goals of the programme. Some programmes outline what the degree holder should be able to do upon completion of the programme, but many others give no indication or vague indication of what the student will be able to do or what the employer can expect from the potential employee. It is my perception that programmes are put together rather quickly just to get them off the ground with the details to be worked out later. Maybe those programmes develop over time into something very coherent, but obviously, if we are talking about it here, not always.
5. Please comment on the accommodation of diversity. (section 7.6)

- a. This is an interesting point because of the potential for profiling inappropriately and because this is spoken about largely in terms of international students or mature students, two groups set apart from students who come through the system in a traditional fashion. I think, sometimes, more thought should be given to some of the assumptions teachers have about those traditional students. I have seen studies on the effect of age on critical thinking, for instance, that indicated that the ability to infer degrees of truth or falsity or probability from given information, to identify assumptions, to reason deductively, to weigh evidence and interpret its generalisability and to evaluate the strength of others arguments peaks at 35 years and begins waning again at the age of 40. How often do teachers design learning outcomes into first-year modules that are not achievable at the age of 18? I also think that teachers design curricula around a negative view of Irish student intentions. I am often stymied when aspirational or innovative ways of teaching are shot down because of the way Irish students are profiled as being single-mindedly strategic about getting the grade, as if they do not identify with the field or get invested in the knowledge acquisition required to function in that field. I agree with the idea of thinking about the student, but I think that mature and international students shouldn't be set in opposition to traditional students. Those two groups bring strengths as well as weaknesses, and sometimes people don't fit the profile.
6. 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? (section 7.7)
  - a. I am unsure that I understand why a well-resourced programme with many students is better positioned than poorly resourced programmes with few students to perform reliable, valid summative assessment to QQI standards. I don't get it. I would think that any programme that is under-resourced might have difficulty meeting the demands (in terms of time or quality) of a over-subscribed or even well-subscribed programme.
  - b. This issue doesn't seem to pertain to us, but to FETAC and HETAC providers.
7. 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)
  - a. Could we not consider the parallel situation of hiring lecturers whose qualifications are established in industry, such as some of those employed in the Kemmy School, Health Sciences and Engineering? How are their hirings justified? What criteria is used? Who formulates that criteria? Are there restrictions in respect of who is capable of teaching a module or course? Who can't make those assessment? People in other, unrelated disciplines?
8. 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)
  - a. This sounds like a good idea. I wonder, though, if this question has to be asked, how rigorous and detailed the grading criteria is and how well the criteria conforms to the learning outcomes and goals of the module/programme. Shouldn't this already be the case?
9. 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?



- a. I think that when the learning goals and outcomes are the same, this idea make sense. However, requiring all programmes of a similar type to assume a uniform mould seems to me to stifle innovation, even the evolution of a programme.
10. 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)
  - a. I think this issue addresses a frustration most teachers would identify with in the way too many students are motivated to learn. Learning discrete skills without making logical and practical connections to the application to those and other related skills and issues in the context is not adequate preparation for the real-world situation in which those skills are employed. I can imagine that in some cases, such inadequacy of preparation could expose the learner and those exposed to his or her practical application of those skills to danger.
  - b. In terms of generic skills, I do think transferable skills is best learned in some kind of context, but then, the discussion of how that skill applies in other relevant situations has to happen if the learning is to be codified.
  - c. The implication is that critical thinking is important even here.
  - d. A second implication is that learners need a framework for assessing contexts and be able to consider how generic skills fit into that context.
11. Do you agree that well-intentioned but non-strategic arrangements for assessment can hinder the achievement of intended programme learning outcomes? (Section 7.11 )
  - a. I believe in play. People should have opportunities to take risks, fail and learn from those failures. People should have the opportunity to make creative connections—for instance, and this speaks to broadening, there are times when a knowledge gap in my field might be illuminated through an attempt to understand this gap by way of theories from other fields. The concept of space, for instance, is not confined to physics or maths, but conceptually in language, architecture,... Room should be made for creative connections and suspension of logic if it leads to better understandings of phenomena.
12. 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)[Page 109]
  - a. I am not sure I agree. I think that if the assessment is well designed, specific learning outcomes can be evaluated. If there is a struggle, it might be with having too many outcomes to assess, which is a time issue. We may assess a skill for instance or knowledge, but not give opportunity for students to revise their understanding or performance. One shot is not enough. People need feedback and opportunity to assess and reassess their own understandings, skills and competencies.
13. What applications can you think of for norm referencing in the context of assessment? (section 7.13)
  - a. I don't think grades should be put on a curve. I have experienced cohorts who scored high and other cohorts in other years, subject to the exact same lesson plan, score really low. It must be possible to have cohorts of low achievers. I think assessing why that is would be a great sociological study, but I don't think that I would adjust my lesson plans or criteria based on one low-averaging cohort. If it were repeated, I'd consider what I am doing wrong, but if I scale, I am hiding an issue that started before they got to me.

14. What are your views on the purpose and necessity of grading in the context of assessment for/of learning? (section 7.14)
  - a. Not everything needs a grade. Some learning goals can be ticked when students demonstrate an attempt to understand, even if it isn't a whole-hearted attempt. Other outcomes need to receive a grading partly because students have become dependent on them as have employers. I think a completely gradeless system is an ideal that cannot be achieved without a massive cultural shift.
  - b. I think there should be more opportunities in courses to perform learning outcomes that can be self- or peer-assessed, followed up with other, later opportunities to perform those same outcomes for a grade.
15. 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)
  - a. I think they should be rationalised on a European level.
16. 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?
  - a. It is probably not practical to have rigid consistency, but I think it practical to establish some consistency. It would require that particular learning outcomes be measured consistently—there would have to be standards.
  - b. The problem is that employers rely on classifications. Therefore, students rely on classifications.
  - c. It may not be desirable, but it seems inescapable.
17. What can be done to support consistency in the actual standards of achievement that must be demonstrated and assessed to qualify for Framework awards?
  - a. In each area of study, there are basic assumptions that people in the field agree upon, even if a programme is taking an unusual stance or approach to an area of study.
  - b. Many programmes differ from other programmes in terms of these stances or approaches the school or department wish to teach. But it is probably rare that there are programmes that take a stance that no other school or department takes on a particular issue in the field. It is these commonalities that are probably where standards can be rationalised.
18. 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)
  - a. Our degrees in learning, teaching and scholarship
  - b. An executive Dean of Learning and Teaching that can issue policy that can be enforced.
19. What do you think are the main challenges involved in remote assessment? (section 7.18)
  - a. This is an area that is unique, it seems, to particular fields. The medium does limit assessment choices and, possibly, what can be measured.
20. 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)
  - a. I have an experience with block release learners in various masters programmes in Six Sigma or Lean or similar types of programmes that are paid for by the employer and require the learner to develop a project that will save their company anywhere from 10 to 100 thousand euro. I was being told by some of these learners that if the

project did not perform that level of savings, the company was not going to pay for their tuition. I wasn't sure if that was true or not, but it was obvious that there were competing interests there. When talking to these learners about their writing context, I stressed that the award came from the university and that their assessment should be prioritised over their workplace, as if the university was happy, their bosses should be equally happy. I found that a difficult sell. Many learners resisted the idea and felt that the employer should be pleased first. Business ethics and academic ethics are often at odds. That situation posed problems for the learners.

21. How can/do professional bodies help support the validity and reliability of assessment in the context of professionally oriented programmes?
  - a. My experience of such a case is Engineers Ireland, the body responsible for accrediting the engineering programmes at UL. They sent the programme director for the MEng in MABE a set of seven learning outcomes, each with five or six sub-outcomes by which Chartered Engineer Status was measured. I had to map which of the outcomes my Advanced Technical Communication module satisfied and to what degree it contributed to the overall score of the module.
  - b. I found it rewarding that there were six sub-categories in the area of communication and that communication was one of seven major categories.
  - c. I didn't find that they compromised the academic goals of the programme in any way. If anything, they enforced a teaching/learning focus on a community that would probably devote less to this area were it not for the society that regulates their field. This goes to their regard for more abstract notions such as ethics as well.
  - d. If Engineers Ireland were in doubt, there was an inquisition. I saw this in action. They wanted clear and detailed explanations for why a learner was being put forward in the programme when their produced work did not support the pass.
22. 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)**[Page 110]**
  - a. There has always been a strong link between knowledge and its application in society at UL. Necessity is the mother of invention. Social needs are as good a way as any to inspire new directions for knowledge acquisition. I am sure there is a place for an ivory tower too.
23. What can be done to further engage learners as partners in assessment of, for and as learning? (section 7.21)
  - a. CTL has its undergraduate research conference, and I think this is a good model. In the US, Honors Societies function in this way for high achievers, but the idea of disciplinary societies that showcase students' initiation into the community, I think, are the way to go.
24. What principles do you think should underpin the quality assurance of assessment in the workplace? (section 7.22)
  - a. My sense is that workplaces have someone who monitors the standards as failing to do so is unsustainable. The workplace will falter or fail. If the workplace has goals such as profits, increased uptake, market presence, etc., the degree to which those goals are attained could be measured and serve as the focus of instruction and the measure of the performance of the student.
25. What kinds of changes is information and communications technology bringing to assessment? What significant future change can you anticipate?

- a. I see this as opportunity. New modes of communication have their own properties and studying those modes may allow new avenues for assessment that have not previously been possible.
  - b. The biggest challenge, I would think, is in framing what is permissible so that we can decide what is possible.
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7<sup>th</sup> December 2018

### **Response to the Green Paper on Assessment of Learners and Learning**

I am providing this submission to QQI in response to the Green Paper on Assessment of Learners and Learning.

I am making this submission on behalf of Warrenmount Community Education Centre as I want to ensure that the issues highlighted here get the attention they deserve as part of future discussions on assessment of learners and learning in Ireland.

### **Information about Warrenmount Community Education Centre:**

#### Vision

Our vision is that Warrenmount Community Education Centre will be perceived as a Centre of Excellence in the provision of community education.

#### Mission Statement

At Warrenmount Centre, we aim to meet the needs of the local community by creating opportunities, building confidence and developing skills. We do this through a learning style that is person-centred, participative and informal. Through this, we hope to give people a voice enabling them to create a better society.

Guided by the charism of the Presentation Congregation the Centre is committed to providing an open, friendly, welcoming atmosphere where people are respected and valued.

### **Comments on the Green Paper**

Based on the information and points of discussion raised in the Green Paper our organisation would like to support recommendations being made by AONTAS, the National Adult Learning Organisation. These recommendations are:

**Assessment policies need to be reviewed, and developed in the future, to account for the needs of all learners.** Assessments should not be a one size fits all system and should be developed to the extent possible in consultation with

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learners. As a community education provider learners are at the centre of the education system and assessment should be varied and inclusive of all learners. 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.

**Create policy frameworks that allow for the creation of assessments which support learners working to complete specific modules, or Minor Awards.** 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.

**The resources available for creating quality assessment must be equal to the costs of providing quality assessment.** To ensure quality assessment, investments must be made in administrative and teaching supports so that the professional teachers and tutors who develop assessments have the capacity to ensure quality and the capacity to be innovative. Teachers and tutors in FET and HE are incredibly skilled but require the time, in addition to time spent teaching, to commit to development of new quality assessment processes. This requires financial resources to achieve.

**Establish a national RPL policy.** For assessment to be learner focused and have the result of widening participation to lifelong learning 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 2014-2019 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.



Warrenmount

Community Education Centre

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As a provider of community education in Ireland I want to state the benefits that implementing these recommendations will have for the creation of a more vibrant learning environment for learners across our country.

The *Green Paper* highlights many issues and trends of importance to learners and practitioners of FET. However without implementation of the recommendations made in AONTAS' submission the education system in Ireland will fail to effectively widen and diversify the adult learners participating in education, regardless of other policy changes made in the years to come.

Kind Regards,

Lia Clarkson  
Centre Manager

Phone: 014542622

Email: [lia.clarkson@warrenmountcentre.ie](mailto:lia.clarkson@warrenmountcentre.ie)

I am sending this letter on behalf of Warrenmount Community Education Centre.

**Board of Directors: Chairperson:** M. Healy, **Secretary:** P. McGaley, **Treasurer:** G. Long, A. Byrne, D. Corrigan, E. Hunt, L. Kilbride, A. Moylan, G. Wright

**Written Submission by the Union of Students in Ireland (USI)  
to Quality and Qualifications Ireland (QQI)**

# **Green Paper on Assessment of Learners and Learning**

*December 2018*

## **1. The Union of Students in Ireland**

The Union of Students in Ireland (Aontas na Mac Léinn in Éirinn) is the national representative body for third-level Students' Unions in Ireland. Founded in 1959, USI now represents more than 374,000 students in Further and Higher Education Colleges across the island of Ireland. The goal of USI is to work for the rights of students and a fair and equal post-secondary education system in Ireland.

USI is a full member of the European Students' Union (ESU) which represents students from 46 National Students' Unions in 39 countries, and a member of Eurodoc, the European Council for Doctoral Candidates and Junior Researchers.

## **2. Introduction**

USI welcomes the development of the Green Paper on Assessment of Learners and Learning by the QQI, believing that the Paper represents an important national development that can and has begun a conversation on assessment practices in Ireland. The Green Paper is also an innovative step internationally and demonstrates that Ireland, through the QQI, is again leading on developing quality assurance systems that are cutting edge, that are reflective of ongoing developments in third-level, and that weaves enhancement through its core activity. It also demonstrates the willingness of the QQI to engage in meaningful, yet difficult dialogue, with the sectors and institutions it seeks to quality assure, while also pushing the boundaries of what is possible through the processes it has created and seeks to uphold.

The Green Paper raises a substantial number of questions, which is perhaps an indication of the need to develop this work in itself. However, it also indicates that there may be a reluctance to push the boundaries too far, and from the student perspective, this is somewhat disappointing. Throughout this response USI aims to amplify the ongoing concerns of our members, the day-to-day small-scale battles they must undertake to ensure assessment standards in their contexts, while also balancing that with a more visionary concept of how assessment should be in modern Ireland. For that vision to be reality, and reflect the significant body of work created through existing communities of practice like the National Forum for the Enhancement of Teaching and Learning in Higher Education, then the QQI must recognise the role it should play in holding institutions to account for avoiding setting its own minimum policy standards, or worse-still, flouting them. Any successor to the Green Paper must set that expectation.



### 3. **Assessment and Feedback**

It is important from the outset to state that after discussion<sup>1</sup> with Students' Union Officers from across our membership, and upon reflection of our own policies, USI would strongly advocate for a refocus of the current Green Paper to become more inclusive of issues of feedback. Officers concluded that given the ongoing advocacy work across Irish HEI's being spearheaded by Students' Unions that it is critical that the term 'Assessment and Feedback' is normalised and embedded across third-level.

To illustrate the point further, the Green Paper has 62 references to the word *feedback* yet the vast majority of these are either in the introduction seeking feedback as part of the consultation process, directly quoting the National Forum's work on Assessment Of/For/As, or in the bibliography and glossary. If the Green Paper truly aims to be "uncomfortable reading"<sup>2</sup> then more explicit reference to feedback must be included throughout the paper.

The National Forum for the Enhancement of Teaching and Learning in Higher Education (NFETL) states that the terms 'assessment' and 'feedback' "overlap", with feedback often more denotative of *formative assessment*, defined by the NFETL as Assessment FOR Learning<sup>3</sup>. While USI recognises that the QQI has deliberately focused on Assessment OF Learning, the Green Paper does state that there is interest in developing an understanding of:

"both summative and formative purposes of assessment. We see assessment as integral to the curriculum, to teaching and to learning."<sup>4</sup>

With that in mind USI advocates that the Green Paper must set out a strong statement from the QQI that a quality system in third-level education must consider assessment and feedback as integral to that system. Indeed, at the joint QQI and NFETL conference on assessment practices in Higher Education, USI argued that "assessment and feedback are interlinked and interdependent."<sup>5</sup> That interlinked nature is certainly compatible with a successful quality assurance ecosystem.

In order to ensure any future publication flowing from the Green Paper can rise to the challenge presented by feedback and quality assurance, there are a number of considerations. Firstly, based on the opinions of the Sabbatical Officers engaged by USI in the process of developing this submission, there was concern that without a more "controversial" or challenging title for the paper itself feedback will continue to be the poor relation to assessment in any consideration by those who work on quality within their institutions when trying to apply and implement the paper's conclusions.

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<sup>1</sup> These discussions were held in the *Academic Affairs Working Group*, a sub-group of USI's National Council, largely made up of Education Officers. There are approximately 30-35 active members in this group, all elected full-time Officers, working to support students on academic and related matters, and on policy issues in their colleges.

<sup>2</sup> Pg 8 QQI Green Paper on Assessment of Learners and Learning

<sup>3</sup> National Forum for the Enhancement of Teaching and Learning in Higher Education, 'Expanding our Understanding of Assessment and Feedback in Irish Higher Education', 2017. Available at: <https://www.teachingandlearning.ie/publication/expanding-our-understanding-of-assessment-and-feedback-in-irish-higher-education/>

<sup>4</sup> Pg 9, QQI Green Paper on Assessment of Learners and Learning

<sup>5</sup> 'Assessment: The Student Perspective', 2018. In: *Let's Talk About Assessment: Higher Education (QQI)*. Dublin: Union of Students in Ireland.

Secondly, feedback must be defined in tandem with the attempts to set our definitions of assessment, and at all opportunities throughout the paper, the relationship and interaction of assessment and feedback should be explored. For example, it is regrettable that more opportunity is not taken to set out that relationship in discussions about the impact of assessment and feedback at a programme-level.

#### **4. General Issues of Assessment**

In this section we aim to address some of the key issues raised by the Green Paper, however, we also wish to draw particular attention to the ongoing and perennial issues that our Students' Unions face.

When considering the student perspective on assessment it is important to first take a step back from the weightier concepts of quality assurance and examine what the real experiences of students are within their disciplinary, departmental, and institutional contexts. USI has worked with Student Officers, primarily based in Students' Unions in Higher Education Institutions, on a plethora of issues related to assessment. However, these issues are often disappointingly repetitive, indicating that real student concerns and solutions are not being resolved by our institutions.

In section 5 of this response we set out the need for institutional policies that clearly define minimum standards in our institutions. This section sets out some of the most pressing problems that such policies would resolve, or at the very least, ensure that the minimum expectations of students are recognised formally.

Considering the hugely positive step that the QQI has taken to create "uncomfortable" conversations, it is imperative that the "uncomfortable" questions that student representatives have been asking in committee meetings for decades, without fail, are also included. Basic logistical and technical questions are left unanswered, ignored, and refused. 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.

##### **4.1. Repeating for Honours**

A number of USI's Member Organisations (Students' Unions) continue to advocate and work towards institutional regulations that allow for repeating for honours. It remains a deep concern for USI that this standard is not being met by institutions in modern Ireland. Given that there remains a significant way to travel for assessment to be more inclusive of diversity and accessible to students with a range of learning styles it is unacceptable that the right to repeat for honours continues to be denied. This is not to say that multiple repeats are necessary, but without more concerted efforts to implement diversity in assessment practice, students will continue to face an uphill struggle to progress. This is further exacerbated by unclear marking and grading criterion, and a lack of feedback across third-level.

Some Students' Unions have also looked to 'pass by compensation' and 'carry fail' procedures as linked issues, and as a possible solution on behalf of their students.

#### **4.2. Anonymous Marking**

Anonymous marking is referenced under Principle 4(e) of QQI's Assessment and Standards<sup>6</sup> as follows:

“Appropriate measures should be in place to ensure that learners are confident about the fairness and objectivity of their assessment procedures. Anonymous grading of summative assessment, where feasible, is an example of an effective confidence-building measure.”

It is a cause of deep frustration to a number of Students' Unions that anonymous marking has not been introduced by their colleges. This standard needs to be reiterated, strengthened as a necessity, and implemented.

#### **4.3. Grading**

USI welcomes the dialogue QQI has sought to open up in the Green Paper on aspects related to grading and award classifications. The student conceptualisation, or lack of, marking and grading is interlinked with the broader issues of feedback. Developing a clearer understanding of performance and knowledge against set criterion and awarded marks should be a priority for anyone developing assessment. Often poor feedback standards and apparent inconsistencies in marking across peer groups create a deep distrust among students towards their teachers. When issues that may be perfectly resolvable arise between the student and a teacher, or their institution more broadly, these issues can be exacerbated by that inconsistency and distrust.

Furthermore, the continued use of high stakes examination as a dominant mode of assessment entrenches the difficulty of developing and communicating accessible marking criterion. Examinations rarely are accompanied by meaningful feedback that is conducive to personal and academic development. Students often view the depth of knowledge demonstrated in an exam to be of a lower standard than forms of continuous assessment given the pressurised and constrained nature of the traditional exam hall setting, yet grading may not reflect this general opinion.

#### **4.4. Academic Integrity**

Firstly, and importantly, USI wishes to reiterate that “most students never engage in breaches of academic integrity”<sup>7</sup> and add that many who do are often unaware that they have done anything wrong. Issues of academic

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<sup>6</sup> Quality and Qualifications Ireland, 'Assessment and Standards', Revised 2013. Available at: [https://www.qqi.ie/Publications/Publications/Assessment\\_and\\_Standards%20Revised%202013.pdf#search=assessment%20and%20standards%2A](https://www.qqi.ie/Publications/Publications/Assessment_and_Standards%20Revised%202013.pdf#search=assessment%20and%20standards%2A)

<sup>7</sup> Pg 88, QQI Green Paper

integrity or academic offence, USI believes, are best prevented through effective integration in to 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. Indeed, the Green Paper correctly states that:

“The skills of academic expression need to be developed and honed and will not be acquired without concerted effort and guidance.”<sup>8</sup>

Indeed, when a potential offence is detected the first and basic assumption should be one of innocence, with investigation itself based on educating the student on how an offence can be unwittingly committed.

In this regard it is interesting, yet worrying, that the QQI references research that indicates a significant lack of awareness in Irish third-level teacher’s awareness of what constitutes academic integrity. It is therefore not unfair to indicate that the focus should be on building capacity and knowledge with staff first and foremost.

With models of ‘high stakes’ examination in mind, USI is concerned that there can be an inconsistent approach to exam preparation, recognising that exams are often an unnecessary form of assessment, preventing any meaningful representation of the assessed students own knowledge and skills. The QQI has rightfully identified exam question disclosure, easily predicted examinations, and ‘teaching to the test’ as obvious examples of breach of integrity. These issues may well stem from an over-reliance on the examination model and can only be truly prevented by a move towards more engaged assessment as learning, with students afforded more opportunity to design their own assessment.

USI recognises that the QQI will hopefully gain strengthened powers under the Qualifications and Quality Assurance (Education and Training) (Amendment) Bill 2018<sup>9</sup> if it passes the Oireachtas, which will allow it to more proactively tackle the issues of academic integrity and ‘essay mills’. USI is willing to play its part in this work.

#### **4.5. Timetabling and Timeliness**

Timetabling of examinations and the conditions under which they are taken remain inconsistent and unstable. Year-on-year students face logistical problems, including timetable clashes, sudden and uncommunicated timetabling changes, incorrect exam papers, and issues such as poorly heated buildings and lack of space. Furthermore, students consistently face multiple examinations within very short spaces of time, for example, 2 long exams in one day, or 5 exams over 5 days in a row. Students’ Unions should not have to continue to dispute whether or not these practices are poor or not when it should be clear to institutional management that they are deeply

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<sup>8</sup> Pg 98, QQI Green Paper.

<sup>9</sup> Available at: <https://www.oireachtas.ie/en/bills/bill/2018/95/>

inconsistent with a quality, fair, and accessible education.

Further to this is the issue of timeliness, both in releasing examination timetables and releasing assessment results. Over-assessment is also related to the issues of timeliness and timetabling, with multiple assessment deadlines scheduled for the same date or week, with a lack of programmatic communication or of the use of continuous assessment models. Such issues should be reviewed under the QQI Assessment and Standards as well as in any Guidelines published from the Green Paper.

#### **4.6. Over-Assessment**

The modularisation of education has resulted in ‘assessment overload’ across third-level, which has in turn driven the national conversation around programmatic approaches. Enhancement-aimed reform around continuous assessment has also been blamed for the over-assessment of students, but it is USI’s 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. Indeed, the Green Paper references the NFETL’s own findings<sup>10</sup> on over-assessment across a profile of 5 ECTS and 10 ECTS modules.

While modularisation may inevitably have led to this problem, lessons may be learned from interdisciplinary approaches. With more cohesive programmatic design and review, with students at the heart of these processes, assessment can be made more manageable and more relevant to the overall learning aims of the programme itself. USI looks forward to the outcomes of the *NStEP* Project 2 on the ‘Design, Review, and Delivery of Programmes’<sup>11</sup> in March 2019, which may help to inform a student partnership approach to resolving issues of over-assessment.

#### **4.7. Diversity of Practices**

The Green Paper references diversity of students and learners, yet does not posit ideas on diversity of practices. Students’ Unions and USI have a particular concern that there is not enough being done to diversify assessment practice, which in turn can remodel the learning environment along the principles of UDL (Universal Design for Learning). While it is important to understand the diversity of our student body, no cohort is homogenous, therefore it is practice itself that should become responsive and proactive in ensuring inclusivity of learning needs. The engagement of students as partners in this endeavour is imperative.

The QQI has a real role to play in encouraging enhancement in third-level education, and to this end the Green Paper is not strong enough on the use of

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<sup>10</sup> National Forum for the Enhancement of Teaching and Learning in Higher Education, ‘Report Profile of Assessment Practices in Irish Higher Education’, 2017. Available at : <https://www.teachingandlearning.ie/publication/insight-profile-of-assessment-practices-in-irish-higher-education/>

<sup>11</sup> There are 5 national projects being led by 5 institutions under the *National Student Engagement Programme*, available here: <https://studentengagement.ie/5-national-projects/>

practices such as continuous assessment. It is the view of USI that if an examination cannot be justified then it is reasonable to assume that a more engaging, formative assessment practice could be developed in its place. The role of reviews in quality assurance should be able to more proactively ask these fundamental questions and seek justification for the continued use of arguably more archaic practices. Our Students' Unions are increasingly aware of examination practices that prevent real learning and development, that stunt interrogation of the discipline by the student, and that deny the student real ownership over their own learning.

#### **4.8. Professional Accreditation**

With reference to the previous section (4.7) professional accreditation bodies must not be immune from questioning their view of examination models of assessment. PSRBs cannot become barriers to effective enhancement practices, and the QQI has a powerful role in engaging such Bodies in that endeavour.

#### **4.9. Work-Based Learning**

Work-based learning, internships, and placements, continue to be an area of significant concern for USI across educational provision in third-level. There are abuses of the term 'experiential learning' in use to prevent payment and recognition of labour rights in numerous programmes and disciplines. Quality assurance has a significant role to play in counteracting these abuses and the QQI must not shy away from that.

USI welcomes the discussion in the Green Paper on the role of assessors outside of the classroom, though more focused consideration of the role of placement providers or other such actors within a work-based learning setting is required.

Specific Guidelines on Work-Based Learning and Placements should be developed by the QQI in order to tackle these issues.

### **5. Enabling Policies and Approaches**

Reflecting on the previously outlined concerns of our students, and noting the often technical, organisational, or procedural nature of these issues, it is important to consider what policies for assessment exist within third-level education in Ireland. It is notable that the Green Paper, in its contextual sectoral outline, reflects on the emerging policy standards in Further Education and Training, yet on Higher Education it reflects primarily on what would be considered enhancement practices. This is to assume that policies in Higher Education are clear or encompassing - in fact, often they don't even exist.

The national dialogue has very much shifted to issues of student partnership, engagement, transitions, and student success. These points are rendered moot in an environment where students cannot point to clear policy standards or have little information available or accessible to them. Our colleges are more willing and nimble when putting policies of governance in place, yet seem more unwilling or slow to

shape policies that interact with the day-to-day concerns of academia, teaching, and student-facing issues. This is certainly the case when it comes to assessment and feedback.

USI believes that institutions must define a clear Assessment and Feedback Policy (section 5.1) and develop a complementary Assessment and Feedback Strategy (section 5.2), or integrate one in to a wider Teaching and Learning Strategy. Current practices around Marks and Standards policies have proven to be inadequate.

### **5.1. Institutional Policy**

USI believes that institutions should clearly lay out standards for assessment within their own contexts, encompassing aspects such as development and delivery, timing of assessment, assessment deadline setting, communication to and from students, timetabling standards, feedback standards, grading, reviews and complaints.

However, institutional policies should also set out the ethos of assessment in the college, defining reasoning for assessment practice. For example, does the institution wish to assess knowledge, or is assessment a core part of the learning itself? Setting out such an ethos for the benefit of students and staff is a crucial way that an institution can demonstrate its interpretation of assessment of/for/as learning in their setting.

Key aspects of such policies include the need to strongly define assessment as a part of the curriculum, how assessment criteria informs effective design of practices, and how learning outcomes development interacts with assessment, and connects it to the curriculum. The Green Paper touches on many of these aspects, but moves in to 'programme strategies' without first laying out the need for an institutional opinion first.

Institutional policy should also set out the burden on the institution to centrally support design and delivery of assessment, be that through teaching and learning support in order to guide teachers through curricula development, or through central processes such as timetabling that can ensure students are not disadvantaged by poor bureaucratic practices. Flowing from that policies can then set out a layered approach to assessment, with clearly defined expectations, roles, and responsibilities of each level of governance.

USI views assessment as "everybody's business", therefore it is imperative that the burden of effective delivery of assessment is not confined to simply a modular or programmatic approach, but that the institution can clearly set standards that it must then uphold. Students should expect no less.

### **5.2. Institutional Strategy**

While clearly defined and accessible institutional policies are required, in order to meet the growing demand for enhancement of practice and the development of pedagogy that complements assessment, strategies for change allow for more visionary approaches to emerge over a longer period of time. USI is keen that assessment and feedback innovation emerges more

strongly through existing teaching and learning enhancement, continuous professional development, and through work on both student engagement and student success<sup>12</sup>.

The setting of institutional Strategy can create effective space for much needed dialogue on issues around diversity of assessment and the much needed move away from 'high stakes' examination. Such Strategies can set out the interaction between professional development and assessment literacy of staff<sup>13</sup>, including concepts around the design of learning and application to assessment as learning.

Many of the other issues raised in the Green Paper can be more strategically developed as part of wider enhancement undertaken as reform, with institutions opening up student-centred change through meaningful actions. For example, there is a reluctance to address the assessment and recognition of prior learning (RPL) across third-level, yet it could benefit from serious consideration under wider assessment strategies.

In the Green Paper the QQI also asks if competences, skills, and knowledge should be more clearly linked to assessment through programmatic assessment strategies. While not seeking to definitively address this point, USI does believe that if institutions themselves can set out a clear assessment ethos and accompanying strategy for enhancement, with sufficient centralised support in place, more detailed programmatic approaches can be undertaken. After all, it is within the discipline itself that students are most engaged and through assessment that is student-centred and relevant to the discipline (rather than solely as a measure of competence) a more fulfilling learning experience can be fostered.

## **6. Students as Partners in Assessment**

The Green Paper references 'student partnership' as an aspect for consideration in developing assessment, however USI recognises that a number of other related terms are now commonplace across third-level in Ireland. For reference USI has attempted to define the relationship between a number of these concepts:

*"Student engagement builds student partnership capacity, fostering a culture of student centredness."*<sup>14</sup>

USI is 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 it's inclusion, but for its lack of development. The QQI has worked proactively with USI through the *National Student Engagement Programme (NStEP)*

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<sup>12</sup> Note the requirement for HEIs to development Strategies for Student Success by 2020 in the HEA System Performance Framework. The concept of 'student success' provides a new sphere in which to discuss the enhancement of assessment practices, including *of/for/as*.

<sup>13</sup> Note that the Green Paper only refers to the assessment literacy of students/learners.

<sup>14</sup> 'Reflecting on the 10 Principles of Student Engagement: Are we making progress?' 2018. In: *Best Practices in Student-Centred Approaches in Education and Training* (QQI et al.). Dublin: Union of Students in Ireland



to increase student engagement through enhancement activity. Therein lies the issue: quality assurance creates a bedrock for quality enhancement, yet student engagement has to some extent developed despite the deficits in quality assurance expectations.

Inclusion of student partnership in and of itself is positive, but effective student partnership requires consistent reference and consideration throughout the document. For example, the question of Learning Outcomes (MIPOs) could be strengthened by linking the issues of student engagement within it. What questions could the QQI posit to those reading and applying the Green Paper to their context? For example, how can student understanding (or lack of) inform a meaningful conversation on the link between MIPOs and programme development? How can students be proactively included in reviewing module-based assessment and any link (or lack of) to overall programme learning outcomes and aims?

With these issues in mind, it seems that the momentum in the Higher Education sector specifically is having an informative and transformative effect on the QQI's thinking on the interaction of the student with quality assurance. However, this also sets out a challenge for the QQI in ensuring that all standards and guidelines reflect the need for student partnership throughout practices, policies, and procedures.

For comparison, the *Quality Assurance Agency (QAA) UK* sets out a specific section in Chapter B of its Quality Assurance Code on student engagement. The comparator QQI Core Guidelines<sup>15</sup> contain no such comparative section, and therefore it is difficult to measure how any successor to the Green Paper could confidently include student partnership without strong basis in the Core Guidelines, that could then be reflected across all QQI QA publications. USI advocated for specific Guidelines on Student Engagement in a previous submission<sup>16</sup> to the QQI, and we wish to strongly reiterate that ask in this submission. Without such guidance, efforts for student engagement in QA will continue to be sporadic and disjointed.

A useful resource for consideration in assessment and feedback work is the National Union of Students (NUS) UK Assessment and Feedback Benchmarking Tool<sup>17</sup> that can be used to develop student partnership based policies.

## **7. Further Education and Training**

Given USI's previously stated belief that the Green Paper is an important opportunity to set out the QQI's interest in driving enhancement, it is welcome that the need for communities of practice are specifically singled out as important components of quality. The National Forum (NFETL) of course provides such a community in Higher Education, however, the '*Let's Talk About Assessment*' FET conference brought the lack of an obvious comparator in that sector in to sharp focus. This, and a number of

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<sup>15</sup> Quality and Qualifications Ireland, 'Core Statutory Quality Assurance Guidelines' (2016) <http://www.qqi-qaguidelines.com/core.html#core-sections>

<sup>16</sup> Union of Students in Ireland, 'Consultation Response to the QQI's White Paper on Statutory Quality Assurance Guidelines for Blended Learning', 2017. Available at: <http://usi.ie/wp-content/uploads/2018/02/Consultation-Response-to-QA-Blended-Learning-Guidelines.pdf>

<sup>17</sup> National Union of Students UK, 'Assessment and Feedback Benchmarking Tool', 2015. Available at: <https://www.nusconnect.org.uk/resources/assessment-and-feedback-benchmarking-tool>

other issues specific to FET, are worth noting in this Submission.

It is important to state that USI has historically represented a relatively small number of students in FET in the Republic of Ireland, but does represent all Further Education students in Northern Ireland. We are actively seeking to address this imbalance. However, it is important also to note that concepts of student representation, democracy, engagement, and partnership transcend HE and FE.

### **7.1. Communities of Practice**

The issue of nationally consistent assessment modules and tools is noted by the Green Paper. Without a bank of tools for assessment design and delivery ensuring consistency of approaches and standards seems elusive. QQI has a role to play in encouraging Education and Training Boards to develop these practices and provide such resource to providers. Indeed, the Green Paper notes the need for collaboration to establish more alignment on learning outcomes (LOs), and as previously stated in section 6 (Students as Partners) this is a particular opportunity to develop practice with the student at the centre. This is also relevant to issues of external authentication and assessors.

### **7.2. Recognition of Prior Learning**

FET may well be in a particularly unique position to develop student-centred approaches to RPL. Such processes are all too often considered bureaucratic, incomprehensible, and expensive. USI believes that RPL should be rather viewed as a process of engagement with the student, seeking to understand their skills through a lense 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. In this light we would not advocate for restricting RPL assessment as a specialisation.

### **7.3. Students as Partners**

The Green Paper references the sponsorship of student surveys in FET<sup>18</sup> and while it appears to have been a suggestion restricted to the issue of academic integrity, USI would encourage such a development considering that the Irish Survey of Student Engagement is only relevant to Higher Education students. Such a move would be welcome in a sector where student representation is underdeveloped.

## **8. Apprenticeships**

As with section 4.9, USI is concerned that practices around on-the-job assessment are not sufficiently developed, supported, or consistent. Work-based learning assessment in Ireland delivered on-site requires, in our view, a more systematic interaction of practitioners and industry assessors or mentors with professional

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<sup>18</sup> Pg 100, QQI Green Paper

development around assessment practices and standards, including apprentice or trainee personal support.

## **9. QQI as an Advisory Body**

USI welcomes that the Green Paper specifically identifies the economic context that underpins and interacts with assessment, or indeed, any policy or quality issues within third-level. While recognising that funding is not the remit of QQI to comment on, resourcing for quality purposes is. The 2016 QQI on 'Quality in an Era of Diminishing Resources' outlined that:

“Increased pressure on the remaining staff [after cuts to staff numbers under the Employment Control Framework] has led to limited time available to develop and innovate learning and teaching methods, for example, the development of Technology Enhanced Learning, an innovation which arguably could save time if used appropriately. Other reports noted that impacts were now apparent in the reduced provision of tutorials, academic student support, services available to students and assessment feedback provided to students.”<sup>19</sup>

Staff to student ratios remain perilously high in 2018, and arguably the issues of resourcing and funding have not improved since the report's publication, rather those issues have become entrenched features of Higher Education. Indeed, in Further Education and Training, the move to consolidate and grow has also stretched that sector after the period of austerity. Across the board there is a significant pressure to perform, reform, and enhance, while maintaining quality. The conversation on assessment cannot ignore this context, and the QQI must fully recognise its role as an advisory body to the Department for Education and Skills in this regard. Resourcing is an integral feature of quality education.

## **10. Summary of Key Recommendations**

USI believes that the QQI has instigated meaningful national dialogue on assessment through the Green Paper and accompanying '*Let's Talk About Assessment*' conferences, and as a result should publish Guidelines for Assessment and Feedback in Education and Training. The topics covered in the Green Paper are welcome and relatively comprehensive. The issues and topics covered in this Submission represent the key areas for concern for USI and the students of Ireland.

The most significant change required in order to ensure any Guidelines are effective, valuable, and relevant is the need to fundamentally ensure that assessment and feedback are recognised as mutually exclusive concepts that are integral to assessment as a cyclical process of learning.

Considering the previously mentioned national dialogue it is imperative that such Guidelines are applicable to both the FET and HET sectors. The conferences that preceded the consultation deadline generated real goodwill toward this endeavour, and while momentum has begun it must be maintained through sectoral interactions at any opportunity available. This should include real student engagement, building on the student partnership recommendations outlined in section 6 of this Submission.

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<sup>19</sup> Quality and Qualifications Ireland, 'Quality in an Era of Diminishing Resources' Irish Higher Education 2008-15, QQI Report, March 2015. Available at: <https://tinyurl.com/yaywktu7>

Any agreed Conventions or Protocols should be underpinned by institutional policies and strategies across the layers of governance, as outlined in section 5 of this Submission. These institutional approaches must inform programmatic strategies.

While USI does not have specific policy on external examination or authentication, there is concern that practice is currently not robust enough to identify failures within an institutions internal procedures. Furthermore, given that students are consistent in raising concerns over grading and criteria, specifically around the ability to understand and interpret such criteria, there is a particular need to consider the role of external examination in improving standards and providing feedback.

Through the development of the Green Paper USI believes that the QQI has inadvertently identified two additional areas that require published Guidelines, in the areas of student engagement and in work-based learning.

## **11. Conclusions**

The Union of Students in Ireland welcomes the publication of the QQI Green Paper on the Assessment of Learners and Learning, and believe that it has begun an important and crucial national conversation across Further and Higher Education on assessment and feedback. Fundamentally, in order to ensure the student voice is recognised through the publication of any future Guidelines on Assessment, the interlinked issues of feedback must be tackled by the QQI.

We would like to take this opportunity to thank the QQI for their continued to commitment to partnering with USI and the students we represent, not least through the recent Student Centred Approaches conference and in the two concurrent conferences on Assessment in HE and FET.

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Ulearn would like to make a contribution to QQI's Green Paper on Assessment of Learners and Learning, making particular reference to the Certificate in English Language Teaching (CELT) programme.

The soon to be defunct ACELS CELT has been a long-standing Irish programme that provided graduates with entry into the field of English language teaching. For many years, this programme compared favourably against other recognised awards in Ireland, most notably, the CELTA and the Trinity TESOL (both UK awards). However, under the QQI Assessment and Standards policy, the new QQI CELT (having been assigned 12 ECTS points) would mean a drastically altered assessment structure. Where previously CELT grades of *Not Approved*, *Approved* and *Distinction* were in place, the new QQI CELT programme would, essentially, have only a Pass grade.

The proposed assessment standard would put the new QQI CELT at a serious disadvantage against the above-mentioned, comparable awards and will do little to enhance its reputation in an already competitive market.

It is suggested that QQI consider either:

i. A change to the assessment and standards policy regarding programmes of 60 ECTS or fewer

Or

ii. An exemption to allow a distinction grade to be awarded as part of the new QQI CELT grading scheme.

In our view, this is one of a few changes that is required to maintain equipollence with competing programmes and the long-term survival the CELT.

I attended the consultation event on November 12th and provided feedback at the scheduled consultation sessions which was recorded for feedback purposes.

In addition, I wish to reiterate the following:

It would be very useful for QQI to publish general principles and guidelines for assessment of learning (including work based learning). These guidelines should include the necessity for institutes to build staff expertise in expressing PLOs/MLOs and the alignment of assessment with both. MLOS and PLOs must be linked with the required knowledge, skill and competence of the graduate.

I agree that all programmes should include a *programme* specific assessment strategy (and assessment schedule) as indicated in the Green Paper. Assessment must have a purpose-as/of/for learning, and must be a manageable workload for both the student and the assessor.

I propose a move away from '*student centred*' teaching, learning and assessment to '*learning centred*' teaching, learning and assessment. The focus must be on the *learning*, through a collaborative partnership (with associated responsibilities) between the student, the lecturer, the class group and the Institute, not only a focus on the student.



## **Submission on Green Paper on Assessment**

The main challenge to valid assessment in the Institute of Technology sector, and quite possibly throughout the whole of our tertiary educational system, is not a technical or an educational one but is a simple matter of honesty. Throughout my 25 years as a lecturer in this sector, the institutional priority by a very long stretch has never been the quality of education or the standard of graduates. It has been throughput. At every level in the system the overriding emphasis has been the drive to maximise the number of students entering and progressing through the system each year and to retain them for as long as possible. The top down message at all times is that this is the number one priority to which all other considerations are subservient. That is what the funding model for the sector encourages and that is what it delivers.

In a self regulating system where standard setting, teaching and assessment are conducted by the same set of actors, the message to those actors is clear and with obvious effect. The objectives of the processes they are responsible for are primarily to maximise student numbers within the system. Inevitably, then, a culture pervades the sector which reflects that priority and all schedules of reinforcement work to that end. Of course, all the while, elaborate lip service must be paid to what the priorities should be: objective standards setting, quality education, valid assessment and qualifications which mean "what they say on the tin." This is just an elaborate facade.

In reality, the sector encourages and then turns a blind eye to every possible device by which the figures can be gamed. Standards are eroded under a wide variety of seemingly acceptable guises. 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.

In any system where for a very long time, the message from the top has been consistently in a given direction, that is exactly what the majority of individuals within it will comply with. Moreover, by a wide variety of psychological mechanisms they will explain their actions to themselves in socially acceptable ways. The reckless lending throughout the whole banking system in the long lead up to the great crash in Ireland should disavow anyone who knows about it of the notion that the majority of people in any walk of life will do anything other than what they are rewarded for irrespective of how dishonest or irresponsible that is. Anyone who points this out will, of course, always be ignored, laughed at or abused depending on their level of persistence. They will be cast as Jeremiads, nay sayers, deluded and with their own private personal axes to grind. The treatment of Sargent McCabe within the Garda Siochana serves as the perfect example. As with Sargent McCabe, anyone within the system who refuses to go along with the whole dishonest process is punished at every step. Understandably, the vast majority do go along with the process.

The unpalatable fact is that, for a long time, standards within the Institute of Technology sector have been declining. Assessments and examinations are treated as devices to be gamed and manipulated in every way so as to conceal the poor

learning achievements of a very large cohort of students within the sector. As with all such processes, this decline is self sustaining. The lower the standards fall, the poorer the students who will be allowed into the sector and the less they feel they have to make an effort to get their qualifications. The greater then is the necessity to 'game' the system.

Discussion and debate about the technical aspects of assessment is entirely purposeless when the sector retains the power to invent its own success statistics. What is needed is forensic external oversight designed to expose and eliminate the endemic abuses. 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.

The views I have expressed above are my views and do not reflect the views of any organisation.

Yours sincerely  
Martin O'Grady

# **Hibernia College Response to QQI Green Paper on Assessment of Learners and Learning**

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## Overarching Thoughts

The Green Paper opens with the statement that the Paper is pitched at “persons who are well informed about assessment and who may perhaps be involved in recognising, promoting and supporting effective assessment practices”. It is important to consider that the depth to which persons are “informed” may vary, and given the breadth and depth of the commentary in the Green Paper, it is probably a very select audience of teaching staff who would be able to engage in all dimensions discussed and in the depth provided. Acknowledging this reality is important to enable future implementation, both by programme staff, but also by members of validation panels and members of professional bodies who may also be approving programmes. This is particularly an issue where programmes lead to professional recognition, and there are distinct cultures and communities of practice in diverse professions.

Novelty and creativity operating from first principles is only possible where there is a deep understanding of the many dimensions of assessment, and there is always a danger that programme design and programme approval processes may default to a normative model imitating what has been done in the past. In order to really widen and deepen understanding and practices, there needs to be a national context and agreement on key areas – across all awarding bodies, even if those areas are very broad, or limited in the first instance. The National Forum has a significant role to play in development of ideas and supporting teaching staff in undertaking training and diverse forms of professional development. It is essential that any developments in assessment thinking be complemented by both a realistic understanding of the current capacity of teaching staff in Higher Education and also by a plan to support professional development.

As part of Hibernia College’s response to the Green Paper a number of areas have been considered including sectoral conventions, external examining and workplace assessments. Significantly, a detailed consideration on technology in assessment has been provided. Ideally the ensuing White Paper should include a section on this, but if this is not possible a dedicated guideline should be developed.

The submission that follows captures the collective views of Hibernia College on the expansive set of issues set out in the Green Paper but with a particular focus on the technology and blended learning dimensions.

*The Hibernia College Team*

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## Considerations of Assessment of Learners and Learning at the Macro and Meso levels

It is imperative that there be some agreement on sector conventions across all types of Higher Education Institutes. The NFQ has been a harmonising feature, but some additional national agreements on matters such as classification (not necessarily rubrics, but rather at a principle level, e.g. the implication of different classification models between different institutions particularly for similar programmes; the design of programmes for different types of learner, where the definitions are not agreed, e.g. full-time, blended, etc.; volume of learning (and therefore assessment) for different types of qualification where different institutions use different credit calculations. Furthermore, limitations in the type and model of assessment are imposed by professional, regulatory and statutory bodies which operate independently.

Peer review panels, in formal quality assuring review processes, can interpret regulation in their own way. Not all panels have the level of assessment expertise that would be expected, for example of a reader of the green paper. Technology can be an enabling factor for enhanced Quality Assurance processes. Virtual site visits could allow remote attendance of discipline experts.

### Sectoral Convention 3 on Determination of Award Classification

As specified in Assessment and Standards sectoral convention 3<sup>1</sup>, an "honours classification, or any classification higher than 'Pass', shall be made based on first attempt grades". Notwithstanding exceptional circumstances, this means that students can potentially experience one 'bad day' and have their final award classification capped at a Pass award.

The rationale for this convention is not clear. Is it not merely a difference in attained standard after multiples of attempts – is it about transparency on the number of attempts?

This practice is limited to QQI Awards and is not a consistent practice in the sector. This means students whose awards are validated by QQI are potentially at a disadvantage to those who attend Institutes of Technology or Universities.

This convention needs to be consistent across the sector for equity of educational experience for learners.

### Reasonable Accommodation

There is limited reference to reasonable accommodations in the Green Paper. While there is some sectoral guidance in this area from AHEAD<sup>2</sup>, DAWN<sup>3</sup> and

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<sup>1</sup> Quality and Qualifications Ireland, Assessment and Standards, Revised 2013, Section 3. Available at: [https://www.qqi.ie/Publications/Publications/Assessment\\_and\\_Standards%20Revised%202013.pdf](https://www.qqi.ie/Publications/Publications/Assessment_and_Standards%20Revised%202013.pdf) [Accessed 28/08/2018].

<sup>2</sup> AHEAD and Higher Education Authority, 'Charter for Inclusive Teaching and Learning' (2013)

<sup>3</sup> DAWN: Everything you wanted to know about Reasonable Accommodations and supporting students with disabilities but nobody bothered to tell you... (2013)

DARE<sup>4</sup>, 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.

With the influx of students presenting with mental health issues entering education on the rise ([approximately 50% in the past number of years](#))<sup>5</sup> there is a constant navigation of new waters in this area specifically. The University of Highlands and Islands developed a [Mental Health Toolkit](#)<sup>6</sup> 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.

### QQI Award Classification for Professional Masters

The current QQI award classification for Professional Masters degrees banding offers three distinct classes; first, second and pass. This model of classification is different from the bandings in other awarding bodies and is disadvantaging graduates who have the same percentage marks in their award, but from some institutions it is classified as an honour and from QQI as a pass. In the context of the Professional Masters in Education, this causes discrepancies in the ways in which Hibernia College graduates, who hold QQI awards, are perceived and it has negative influences on their professional progression. As a professional qualification graduates may register with the Teaching Council. The Teaching Council records the classification of a graduate's degree. Employers also seek information on the classification of a degree.

Looking at the picture overall there are a number of concerns:

- There is a very significant difference between a student who attains 40% and a student who attains 59%, yet they are still in one band
- The previous professional qualification for the same professional role was a Higher Diploma, the classifications for that award included a 2I and 2II
- The pass band is now from 40-59 i.e. 40-59 **and** 50-59  
And fundamentally,
- Other providers of professional teaching qualifications do not utilise this wide band for a Pass award. As such, it is affecting the job opportunities and the profile of our graduates; this is not, therefore, a level playing pitch for QQI award holders

At meetings of boards of examiners this has **been raised repeatedly by external examiners who have experience with a number of awarding bodies as unfair:**

"From my attendance at previous Board of Examiners meetings, I have become aware of an external imposition on Hibernia whereby GST's cannot be awarded a 2.2 Grade. A GST who

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<sup>4</sup> DARE: Disability Access Route to Education Handbook (2018) Available at: <http://accesscollege.ie/wp-content/uploads/2017/02/DARE-Handbook-2018-Web.pdf>

<sup>5</sup> <https://www.ahead.ie/press-release-participation-2016-17>

<sup>6</sup> <http://staffresources.uhi.ac.uk/mhc/>

barely passes School Practice and fails other modules may eventually obtain a Pass overall through the compensatory marks process. On the other hand, a GST who gains a high mark in School Practice equivalent to a Second Hons and who achieves marks not too distant from Second Hons. standard in all the other modules may also be granted a Pass overall. In the final analysis, the former GST may be at just Pass level whereas the latter GST may be just below Second Honours but both are deemed to be Pass candidates. In other colleges the latter GSTs would obtain Honours status by being granted a 2.2 grade. This would be a much fairer recognition of the achievements of such students. In addition, these students are also at a disadvantage when competing for posts as school interview boards tend to prioritise Honours graduates over Pass graduates. If other colleges are granting 2.2 awards and Hibernia cannot grant such awards then its graduates are disadvantaged. This discrepancy raises a fundamental question of fairness and should be addressed by QQI as a matter of priority.

With regard to Point 16, I would be of the opinion based on my experience of probating teachers from all the colleges, the 46 students in the September 16 Cohort that I observed were on a par with students from those other colleges with regard to satisfactory practice.”<sup>7</sup>

Please see [Appendix 1](#), which provides detail on the different Irish awarding body classification of Professional Master qualifications. Hibernia College graduates over 700 newly-qualified teachers each year. TCD, UCC, NUIM, UCD, UL and NUIG all have either a second division in respect of second class honours, a third division or in some instances, both. Hibernia College graduates more teachers annually than each of the other HEIs, yet their award classifications are not comparable, leading to potentially unfavourable comparisons between our graduates.

**Hibernia College requests that QQI review the classification for the Professional Masters and includes either a third class honour or second class honour grade II at the 50-59 boundaries.**

If this was a proposal to change the classification of all Taught Masters, perhaps it may require a significant review and reflection in respect of such a global change, but an immediate change to classification bandings in respect of the Professional Masters only, arguably a different award, may be possible.

Alphabetic Grading - moving away from absolute number grading

Conventional numerical grading systems are fit for purpose in some contexts and assessments where outcomes are definitive, objective and/or absolute.

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<sup>7</sup> Included with permission



Currently, the QQI Assessment and Standards policy<sup>8</sup> allows independent providers to adopt either GPA or PPA grading systems which restricts the methods available in comparison with other providers of Higher Education. Hibernia College would welcome a discussion around these systems to understand the pedagogical appropriateness of these systems, and whether other systems could be considered for use.

Where assessments require an assessor to use their subjective judgement to arrive at a measurement of the value of the student's work, it is less clear how very specific numbers can be reached. It is even more difficult to provide a rationale for minor differences between students' results i.e. how does an assessor arrive at a judgement that one person's work is worth 65% and another's is worth 66%?

Assessors are already making judgements that students' work falls within in a band on a traditional grading matrix during the grading process. The rationale behind making this judgement is clear as grading matrices define the requirements for each grading band clearly. However, it is not clear what characteristics define specific grades when grades are further broken down within these bands where a student can achieve a mark anywhere between 1-100%. Therefore, moving towards a system that used letter grades, such as that used in University College Dublin (UCD)<sup>9</sup> and pictured below, would make the system more transparent and equitable for students.

Grade	Lower	Upper	Calculation point
A+	76.67	100.00	78.33
A	73.33	76.66	75.00
A-	70.00	73.32	71.67
B+	66.67	69.99	68.33
B	63.33	66.66	65.00
B-	60.00	63.32	61.67
C+	56.67	59.99	58.33
C	53.33	56.66	55.00
C-	50.00	53.32	51.67
D+	46.67	49.99	48.33
D	43.33	46.66	45.00
D-	40.00	43.32	41.67
E+	36.67	39.99	38.33
E	33.33	36.66	35.00
E-	30.00	33.32	31.67
F+	26.67	29.99	28.33
F (FM)	23.33	26.66	25.00
F-	20.00	23.32	21.67
G+	16.67	19.99	18.33
G	13.33	16.66	15.00
G-	0.02	13.32	11.67
NG	-	0.01	0.00

Figure 1 UCD component grade scale

<sup>8</sup> Quality and Qualifications Ireland, 'Assessment and Standards, Revised 2013', 2013, sec. 2.2.10. Available at: [https://www.qqi.ie/Publications/Publications/Assessment\\_and\\_Standards%20Revised%202013.pdf](https://www.qqi.ie/Publications/Publications/Assessment_and_Standards%20Revised%202013.pdf)

<sup>9</sup>

<http://www.ucd.ie/registry/assessment/documents/modular%20grades%20explained%20staff.pdf>

Description	Alphabetic grade	Grade point value
Passing grades	A	4.0
	B+	3.5
	B	3.0
	B-	2.75
	C+	2.5
	C	2.0
	D	1.5
Outright failing grade	F	0.0

Figure 2 Alphabetic grades and grade point values in GPA system

UCD’s component grade scale system, outlined in figure 1, provides for significant variations between grades. It features 15 variations in passing grades with an additional breakdown of non-pass grades. It is more detailed than the GPA system, outlined in figure 2, which allow for eight variations in grades.

**As with all discussions around assessment and assessor, staff and institutional capacity to employ these methods is critical. Any type of guidance, training and resources that could be developed to support this would be welcomed.**

### Staff Capacity to Develop Learning Outcomes and Assessment

Frontline academic teaching staff are not necessarily trained academic developers. Each academic brings different levels of experience, different perspectives and different passions to their teaching. This diversity is a positive feature of higher education and should be encouraged. However, a downside of this is that there are significantly varying levels of experience in developing any type of learning outcome and constructively aligned assessment across the sector. For those who are particularly new to academic development, the process may be overly focussed on using NFQ level appropriate language in learning outcomes, using tools such as those based on Bloom’s Taxonomy<sup>10</sup>, rather than the intended knowledge, skill or competency that a learner should acquire. Developing learning outcomes and assessments that are constructively aligned is a skill that evolves over time.

In relation to adaptability, the National Forum’s professional development framework could be developed further to capture qualifications and continuing professional education (CPD) in higher education and thus play a vital role in developing staff assessment literacy. Where a rigid framework dictating the types of assessment that should be used could be ultimately damaging to assessment design, equity of access to high standard CPD in best practice in assessment as it develops would be valuable.

**Support and training is required for anyone involved in the development of learning outcomes and assessment to ensure a consistent standard is maintained across the sector. The professional development framework could provide scaffolding for this development. Online resources, such as a digital badge MOOC, and/or creating a buddy-system between**

<sup>10</sup> Bloom, B. S.; Engelhart, M. D.; Furst, E. J.; Hill, W. H.; Krathwohl, D. R. (1956). *Taxonomy of educational objectives: The classification of educational goals*. Handbook I: Cognitive domain. New York: David McKay Company.

**skilled academic developers and those new to these processes could enable development and the distribution of knowledge across the sector.**

## Assessment and Technology

It is of note that QQI did not specifically address the issue of technology and assessment in the Green Paper. Perhaps this is intentional, so as not to distinguish technology and assessment as something unique and different. Perhaps all of the issues raised in the Green Paper could be seen through the lens of technology. Or perhaps QQI overlooked the issue altogether – deliberately or otherwise.

**As a provider of blended and online courses, Hibernia College is committed to enhancing the entire teaching, learning and assessment experience for students using technology and welcomed the publication of the QQI Guidelines for Providers of Blended Learning Programmes but would welcome further clarification of these guidelines.<sup>11</sup>**

The vast majority of our assessment involves technology at different levels:

- Student use of technology in completing assessments
- Staff administering and managing assessments using technology
- Faculty grading and providing feedback using technology

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. Hibernia College staff have expertise in embedding technology in teaching, learning and assessment and this expertise also guides our use of technology in assessment.

### Student use

It is unlikely that any student, in the course of completing an assessment, would not use technology at some point. Researching using online databases and journals and preparing written assessment using word processing software are the two main assessment activities students would engage in using technology.

Beyond these basic activities however, technology can be used effectively to enhance the completion of assessments by students.

Students' near ubiquitous access to a camera and microphone– either on smartphones or tablets – affords educators the opportunity to use audio-visual assessment, whereby a student would express themselves in alternative modes to text. Such audio-visual assessment could be live and remote, thus allowing the learner flexibility of where to engage in their assessment. Naturally, as with all forms of assessment, whether traditional or technology-enhanced, ensuring academic integrity and security is key. The same challenges in a traditional setting are present in a technology-enhanced setting, although the steps in mitigation may differ.

Remote assessment is an example of making use of technology to move away from the traditional examination hall. In an online/blended learning environment

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<sup>11</sup> <sup>11</sup> Quality and Qualifications Ireland (2018) Statutory Quality Assurance Guidelines for Providers of Blended Learning Programmes.  
<https://www.qqi.ie/Publications/Publications/Statutory%20QA%20Guidelines%20for%20Blended%20Learning%20Programmes.pdf>

remote proctoring systems such as **Remote Proctor Pro** and **Examity** make use of technology to provide the same security that a traditional examination hall provides. The use of viva voce interviews can add a further layer of authentication.

Students could also complete audio-visual assessments asynchronously. In doing so they could develop digital literacy and digital creativity skills, which would be beneficial as they enter the workforce.

A key challenge for educators in designing such technology-enhanced assessments is the limits on their own knowledge of what is possible. Too often, assessment strategies remain traditional and single-modal despite the related teaching and learning strategies being multi-modal and technology-enhanced. It is important for educators to widen their knowledge about what assessment strategies are possible using technology.

**Guidelines, forums, training courses and more could be provided to help overcome this challenge and shift assessment strategies into the 21st century. Communities of practice among groups of providers or could also lead to a 'bottom-up' approach to enhancing assessment using technology. QQI could lead or support some of these initiatives to begin the shift.**

### Management and administration

It is unlikely that any QQI provider does not utilise a Virtual Learning Environment (VLE) or Learning Management System (LMS) to some extent or other. In Hibernia College, our VLE is mission-critical, central to the entire operation of the College. Without it, we simply could not offer programmes to our students.

A key feature of the mainstream VLE solutions is assessments. Most VLEs provide tools for grading different types of student work, from short quizzes to lengthy dissertations. Using these VLE tools ensures security and confirms identities, as each student would hold a unique account to the VLE. A continuous audit trail of student work would also be available through a VLE, including data around when and how they completed assessments, and often where (by capturing IP addresses).

Assessment information, policies, briefs, guidance, templates, deadlines and more can be distributed via a VLE to students and their engagement with the aforementioned tracked, to see if they have engagement with the material. The connectivist features of a VLE – such as discussion forums, bulletin boards and chat - can allow educators to clarify assessment requirements and provide guidance to students in a way that ensures all students receive the same information and said information is captured centrally, asynchronously and always available for students to revisit.

VLE gradebooks can be used to make grades and feedback available to students in a timely manner and in one central location, available to them at all times during their semester/stage/programme so that they have access to a clear and transparent picture of their progress.

All VLEs look and feel different to one another and offer differing features, but the aforementioned management and administrative features around

assessment are present in nearly all VLE solutions, and certainly the main ones, such as Moodle and Blackboard.

**As ever, the key challenge is ensuring academic and academic support staff know about these features and how to use them effectively and efficiently. QQI could raise awareness of these management and administrative tools through the issuing of guidelines or papers to provoke discussion and exploration.**

#### Faculty grading and provision of feedback to students

Effective use of a VLE can reduce a heavy administrative load experienced by academic staff, such as the inputting and maintenance of grades and feedback. Certain assessments can be designed to be auto-graded by a VLE, requiring setup only once by an educator and scalable to an exponential number of students. Multiple-choice quizzes are the most popular example and almost all VLEs offer superb quiz features. Hibernia College utilises VLE quizzes extensively as formative assessments and has expertise to share with the wider QQI family in this regard.

Other assessments, particularly high-stakes assessments, will almost always require an educator to make their own academic judgement and generate feedback on each individual student's work. No solution – technological or otherwise – would reduce an educator's workload in that regard, but VLEs can assist in making the process consistent, streamlined and as efficient as possible.

Hibernia College has particular expertise in this regard, as it uses all the features of its Moodle-based VLE to allow faculty to grade and provide feedback on individual student's work, through the use of templated grading forms and schemes that are programmed into the VLE at site level. This requires a once-off setup and such grading forms and schemes are available forevermore. Utilising this feature ensures grades and feedback can only be awarded to student according to these templates and are therefore consistent for the entire student cohort when it comes time for them to be released to the students.

They are all captured in the same central location, so the faculty can easily revisit assessment grades and feedback at any time. Furthermore, as this grading data is present within the VLE it is stored in a format readable by the VLE and almost always transferable to other systems, such as a Student Information System (SIS).

It is said many academics work in 'silos' and if so, likely have different approaches to entering grades and feedback for students. This can result in students having different and inconsistent experiences when receiving grades and feedback. There is also a risk of misinterpretation or a perceived lack of transparency for students if their grades and feedback are entered and made available to them in different manners. Using VLEs effectively can reduce grading workload for academic staff, ensure time and resources are used efficiently, provide a consistent experience for student and enable the easy transfer of grading data to other systems.

**As before, the key challenge is making educators aware of what is possible and exposing these benefits to them. QQI could help tackle this through the provision of good practice exemplars and guidelines.**

## Text-matching and academic integrity

The Green Paper dedicates a not-insignificant section to academic integrity, which admittedly is a very prominent issue across all levels of education and not necessarily linked to the use of technology or to text-based material only.

The Green Paper does make reference to technological tools being used to address academic impropriety and support academic integrity:

“Nor is it enough to install plagiarism detection software and leave it at that. This kind of software is necessary and makes an important contribution to supporting academic integrity, but it is not sufficient.” P. 98

Hibernia College concurs with this statement, having recently deployed such software to its VLE after a long spell of testing, preparation and training for staff, faculty and students. Hibernia College explicitly refers to this software (URKUND) as “text-matching” not “plagiarism detection”. In deploying this software, we took cognisance of [the research \(albeit five years old at this stage\) from the University of Applied Sciences in Berlin](#). In it, they state:

“So-called plagiarism detection software does not detect plagiarism. In general, it can only demonstrate text parallels. The decision as to whether a text is plagiarism or not must solely rest with the educator using the software: It is only a tool, not an absolute test.”

We iterate this message to our academic staff and faculty involved in grading students, so that they use their own academic judgement to decide if plagiarism occurred, they do not simply take the URKUND results on face value.

A conscious decision was taken by the College to deploy URKUND as a formative tool first and foremost, not a punitive tool. The College followed the example set out by Dr Vivien Rolfe of De Monfort University, UK in her article *Can Turnitin be used to provide instant formative feedback?* (British Journal of Educational Technology, 4(11), 2011).

By giving students access to URKUND in advance of submitting written assessments, it was hoped they would interrogate the analysis report, explore the matches that URKUND generated, and decide for themselves if they had done something improper or not. If they did engage in impropriety, whether intentionally or otherwise, they would have an opportunity to ‘mend their hand’ before final submission.

Anecdotal evidence from staff and students indicates that URKUND is being used in the way it was intended, and that students are mindful of consulting their URKUND analysis report before making their final assessment submission. 2019 will mark one full year of using URKUND in Hibernia College and it is planned to analyse the impact of the text-matching software on students’ assessments.

**Hibernia College has performed a significant amount of research on text-matching using URKUND, has developed an extensive suite of resources for students and staff, and has practical knowledge of rolling out the software and troubleshooting it. We would be eager to share our experience and expertise with the wider QQI family in this regard.**

## Wider concerns

As indicated elsewhere, the key challenge to enhancing assessments with technology is digital literacy, mainly at staff level but also at student level (we cannot assume all students have a high level of digital literacy and therefore competent to use technology in assessment).

The first step in overcoming this is enabling and empowering educators to think about how technology can enhance assessments.

The second step is to provide ongoing and consistent support and encouragement to educators to change their assessment strategies and change how they manage assessments, using technology.

In using technology in assessment we need to be mindful of all parties in the assessment process, their needs, their capabilities and indeed their emotions regarding their capabilities with technology.

A factor that permeates all aspects of assessment, not simply assessment and technology, is GDPR and data protection. It goes without saying all educators need to operate within data protection legislation and utilise technology that is compliant with it, but room for innovation using technology is also needed. As educators we should not shut down the conversation around technology and assessment simply because of data protection. We should always strive to design the best assessment experience for students, using the best tools, whilst always remaining within the bounds of data protection and other legislative or QA frameworks.

**Working together and thinking creatively is key to all of this. Hibernia College, as a leading provider of blended and online programmes is committed to disseminating our knowledge, experience and skills among the QQI family.**



## External Examining

The idea that external examiners 'absolutely' safe-hold benchmarking in the sector is flawed in itself. An external examiner has limited exposure to sectoral practice- their own employment and maximum a couple of additional providers in the role of extern. Whilst an important mechanism to contribute to fairness and comparability, it has limitations and challenges which should be more readily acknowledged.

Do you think that external examining and authentication 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?

This is unlikely. There are many factors that result in different award standards between the disciplines and institutions. These include entry level of cohort, the quality of the learning and teaching experience and variation in standards of assessment. The external examination system is concentrated on the assessment/examination elements only and considers only a sample set of materials. Due to the factors mentioned above there may be legitimate reasons why there are variation in standards between awards for the same discipline in different institutions.

What changes could be made to improve QQI's Effective Practice Guidelines for External Examining (QQI, 2015)? Could these guidelines be generalised to cover all kinds of external moderation in all educational sectors?

The external examining system typically works by the appointment of an examiner from Institute X to Institute Y. As the examiner is generally a current practitioner he/she will probably only be examining in a small number of institutions at the same time due to time constraints. This mitigates against the external examiner's ability to moderate standards in a discipline across the whole HE system. Should consideration be given to the development of a cadre of professional external examiners who can better ensure comparison of standards across the HE system?

Do you think that a set of guidelines could usefully be established that would apply to all external moderation in FET and HET?

Yes. Although there are different requirements and practices between FET and HET there may also be many common principles, policies and procedures that may merit a common general guideline followed by sector specific elements.

Comment on other oversight mechanisms that you think might help support objectivity in the assessment of learners by providers.

Other oversight may be provided by Academic Councils who have responsibility for the periodic training and performance review of external examiners. Academic Council's should ensure that external examiners are changed at regular intervals (usually three years). Academic Councils oversight should also ensure that the external examiner's reports and the programme board's responses to same are considered by the council on an annual basis.

## Workplace Assessments/Competence for Occupational Practice

### Employer Led

For the majority, every programme is intending to produce workplace-ready graduates and multiple stakeholders (students, employers, academics, professional bodies and standards, regulatory bodies) need to be actively involved in programme development to enable that outcome. Early involvement of all stakeholders is critical because there is a need to create synergy between all of their associated requirements. Importantly, we need to be confident in our definitions of terms and language so that we can translate it effectively and make sure everyone has a shared understanding.

There is an intersection between apprenticeship learning and traditional work-based learning where both are forms of employer-led learning. This suggests that all work-based learning can sit in one over-arching framework rather than creating individual frameworks for each. Although employer consultation has always been important, the apprenticeship has created a new emphasis which purposefully puts the employer at the forefront of development.

Many assessment topics, issues, discussions arising around apprenticeships will be relevant to Hibernia College as they are linked to the professional award standards and work-based learning. For example, an apprenticeship QA specific excerpt:

“The final assessment of apprentices must ensure that they are immediately capable of performing the activities and carrying out the responsibilities normal to the occupation. This assessment should be:

- holistic in that it measures the general competency of the candidate.
- final in that success should mean the entitlement to an award and to registration in the occupation where this is an intended outcome of the programme.”<sup>12</sup>

### Grading Work Placements

Regulations around placement grading are dictated at a macro level and can vary depending on the professional bodies. For example, nursing placements are pass/fail as dictated by the NMBI who also ban compensation on (some) Bachelor of Science in Nursing programmes. Teaching placements, conversely, are graded by requirement of the Teaching Council.

**Hibernia College would welcome collaboration between the various regulatory and professional stakeholders to synchronise assessment conventions within disciplines.**

### Learning contract, delineation of roles and privacy concerns

There needs to be a clear delineation of roles and expectations of stakeholders (including students, supervisors, assessors) involved in work-place learning specifically to prevent learners having inconsistent learning

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<sup>12</sup> Quality and Qualifications Ireland (2016) Statutory Quality Assurance Guidelines, Section 4.2.4.  
<https://www.qqi.ie/Publications/Publications/Apprenticeship%20Programmes%20QAG%20Topic-Specific.pdf>

opportunities and experiences. Mutual understanding can be supported by learning contract which clarifies expectations. These can be structured around MIPLOs and MIMLOs which have been coherently linked to occupational needs. Guidelines to support this process could be beneficial to create sectoral consistency without relying on prescriptive requirements which could constrain autonomy to create and structure work-place learning opportunities.

Constraints of confidentiality and highly regulated environments can impact upon assessment in the work-place and access. Non-disclosures may be required for access of anyone involved in assessment at any stage including first, second and external markers. Regulatory issues could be considered as part of the learning contract so that terms are negotiated in advance.

### Assessment, MIPLOs and Competency Development

Traditional modes of assessment which are thought of as reliable should be used with caution in the workplace. An emphasis on academic assessments and outcomes should not be conflated with actual work-place performance. The practicalities of scaling up assessments that require multiple layers of moderation for reliability purposes needs to be considered.

Hager's<sup>13</sup> *integrated* understanding of competence identifies key occupational tasks and aims to illuminate the related attributes the learner needs to convey in order to complete those key tasks is a good model. All skills should be learned in context so that learning can be transformational rather than task-based. Key occupational tasks can be identified through an occupational profile modelled on the apprenticeship requirements, which can be used to scaffold development MIPLOs and MIMLOs with work-place requirements at the forefront of development.

Intuitively speaking, work-place supervisors who are witnessing learners in action are best placed to determine if they are achieving their intended goals. In practice there can be a disconnect where work-place supervisors don't view themselves as 'assessors'. Training is required for work-place supervisors to clearly outline expectations and requirements. Standards for non-academic work-place assessors could help inform training and resolve this disconnect.

### Delivery Modes

Scheduling is another consideration. Traditional block-release modes of learning can cause siloed learning where students are re-climatising to a specific mode of learning at each block rather than integrating theory with practice. Sequential structures that allow theory to be taught in tandem to work-based learning (time split between traditional learning and work-based learning on an ongoing basis) can allow students to consistently apply and develop their understanding of theory as it becomes contextualised in the work-place.

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<sup>13</sup> Hager, P., 2017. The Integrated View on Competence. In: M. Mulder, ed. *Competence-based Vocational and Professional Education*. s.l.:Springer International Publishing Switzerland, pp. 203-228.

## Additional Commentary

### Degree Algorithms and Norm Referencing

There are interesting references to **UK Universities: Understanding Degree Algorithms**. This raises issues of the validity of comparisons of degree results between HEIs and between disciplines within HEIs. It is stated within the paper *'the link between the award classification and the performance may depend on the programme, institution, discipline, enrolment and **when** the award was taken... That would mean reliance on classification to discriminate between people who studied different programmes would not be safe'*.

This would be viewed by many persons in HE as truism, albeit one which is accepted without grand scale empirical studies. This is an elephant that is ignored as its 'truth' could completely undermine confidence in assessment. But this is another reason there is a need for some national conventions or acceptance of principles and context. This should be transparent rather than avoided because of its complexity or contentiousness.

The discussion of Norm Referencing is interesting.

"Norm referencing is problematic in systems that profess not to use norm referencing"

Relativistic practices sneak into the picture. Effective and consistent grading matrices could help this but is there a specific standard requirement for these?

There certainly isn't consistency between different types of HEI. Practices such as selecting low, mid and high range grades for review by external examiners automatically creates comparison processes.

A slip into an accidental bell-curve means all iterations of the same degree are not created equal let alone differences between programmes and institutions. This can certainly influence degree dilution or inflation.

Norm V criterion referencing is briefly discussed. Should this be made more explicit by inclusion on transcript, parchment etc? QQI does not allow norm referencing (see page 58).

Dialogue on the role of the NFQ is very welcomed. It appears that the NFQ as implemented and communicated has encouraged an outcomes- based approach to assessing value of qualifications rather which doesn't leave room to consider transformational learning really.

### Learning outcomes/achievement

Learning outcomes/achievements are repeatedly referred to in terms of knowledge, skill and know-how. Is the **knowledge** element still so relevant given the advances in AI and digital information? In other words, do learners still need to spend as much time acquiring discipline knowledge or is it sufficient that they know it exists and how to find it? If you agree then that would change how you assess knowledge?

The paper refers to *Intended, Actual and Expected* Learning outcomes. It is unclear as to the distinction between Intended and Expected LOs other than the possibility that they may come from different perspectives e.g. LO designers and LO users.

## Quantum of assessment and transformative processes

There is little discussion in the Green Paper on the quantum of assessment. The challenge is to strike the balance between the appropriate amount of assessment and not distorting learning by over emphasis on assessment.

There is a high level aspiration that a programme is a 'transformative process' and that this transformation should be measurable. The implication is that a diagnostic assessment would be undertaken at the point of entry and summative assessment at the end. How practical is this suggestion?

## Holistic Programme Assessment

There is reference to holistic programme assessment. This could be understood to mean that something other than component/module assessment is required to establish that overall programme LOs are met (e.g. capstone projects?) This feeds into the issue of over assessment, and the fear of programme designers or programme validators to 'allow' less assessment, in case every MIMLO or MIPLO is not assessed. Assessment of multiple MIMLOS or MIPLOS in a single or multiple of cross modular assessments is not readily embraced for fear that one has not adequately constructively aligned the assessment to the intentions. There is an over mechanistic approach, as there is a weakness in the competence of programme designers to making real but tacit attainment of knowledge, skill or competence, explicit or recognized, and a fear in programme approvers of allowing this.

## Diversity, Reasonable Accommodations & RPL

Please comment on the accommodation of diversity – international students and mature students (section 7.6)

The student body in Irish Higher Education is increasingly diverse. As participation rates in HE grow there is increasing representation from mature, first generation, learners with disabilities and other learners from backgrounds that were traditionally under represented. In addition, and in part as a need to generate private income), most HEIs are actively trying to increase their international student numbers.

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.

## Academic Integrity

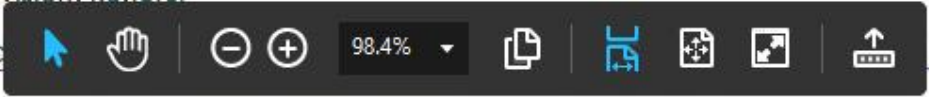
Recognising what is already being done please indicate what additional actions you think should be taken, and by whom, to help support academic integrity in general and in your sector in particular.

To date discussion on academic integrity has concentrated on student issues such as plagiarism and essay mills. It follows that legislation should be introduced to make it illegal to either offer or avail of such services. Academic integrity in the wider sense includes issues such as who has prior knowledge of the assessment, QA of assessment (such as moderation and external examiner), potential for positive or negative bias on the part of the internal examiner and security of examinations/assessments. In HE it is often the case that the teacher/lecturer has set (or has prior knowledge of) the assessment. This can result in intentional or unintentional teaching to the test rather than covering the full set of module or programme learning outcomes.

There is obvious potential conflict of interest for the lecturer/examiner where internal and inter-institutional comparisons are being made. Mitigation in this case is moderation, external examination, double marking and blind marking measures. Examination leaks can also impact on academic integrity. These can be mitigated by robust security throughout the full examination development process involving all parties such as internal examiners, moderators, external examiners, examination office and examination hall.

## Appendix 1 Overview of Irish Awarding Body Classification of Professional Master Qualifications

College Name	Assessment rubrics/classification	Approximate PMEPP Numbers	Approximate PMEPP Numbers
Trinity College Dublin	<p><b>Assessment and Examinations:</b> Students are evaluated by coursework, assessment, including School Placement supervision, throughout the year and by written examinations. Students must complete all the exercises prescribed. If a candidate’s performance is judged unsatisfactory, the Court of Examiners may grant one supplemental examination only, which shall normally be taken in the same calendar year. Where the student’s school placement performance is considered unsatisfactory, the Court of Examiners in exceptional circumstances may allow a further period of school placement, which should be completed satisfactorily within the following two academic years, subject to the payment of the appropriate fee. Students must successfully pass all of the requirements of the first year of the course to progress to the second year.</p> <p>Successful candidates for the Professional Master are divided into three classes according to merit. They are awarded</p> <ul style="list-style-type: none"> <li>• first class honors,</li> <li>• second class (first division) honors,</li> <li>• second class (second division) honors.</li> </ul>	No primary programme	120-130







College Name	Assessment rubrics/classification	Approximate PMEP Numbers	Approximate PMEPP Numbers
	<ul style="list-style-type: none"> <li>• third class honors.</li> </ul> <p>Supplemental candidates or students who have failed to complete the requirements of the Professional Master course by the beginning of the annual examinations for other than duly certified medical reasons, can only qualify for the award of the Professional Master with third class honors. The final mark is calculated as a credit-weighted average of the mark awarded in each module.</p> <p>The PME with Distinction may be awarded to candidates who have not failed an assignment or examination and have obtained an overall average of 70% or higher across all assignments and examinations, including a mark of 70% or higher in their School Placement modules. Students who have successfully passed all of the elements of the first year but who choose or are recommended not to proceed to the second year, or who have accumulated at least 60 credits over the 2 year course but failed the School Placement modules may be considered for a Postgraduate Diploma (exit award).</p> <p>Graduates who have exited the course with a Postgraduate Diploma may not subsequently register for the course to attempt to complete it for an award of a Professional Master of Education.</p> <p>Students who have not failed an assignment or examination and have achieved 70% or higher on 5 or more assignments or examinations and achieved an average of 70% or higher across all of their assignments are eligible to be considered for an award of Postgraduate Diploma with Distinction.</p>		

College Name	Assessment rubrics/classification	Approximate PMP Numbers	Approximate PMEPP Numbers
	<p>Candidates should note that, in accordance with the requirements of the Teaching Council, a minimum of three-quarters attendance at all components of the course is mandatory.</p> <p><a href="http://www.tcd.ie/calendar/1516-2/part-iii/specific-regulations-for-taught-graduate-courses-by-faculty/faculty-of-arts-humanities-and-social-sciences/school-of-education/education-professional-master-in-education/">http://www.tcd.ie/calendar/1516-2/part-iii/specific-regulations-for-taught-graduate-courses-by-faculty/faculty-of-arts-humanities-and-social-sciences/school-of-education/education-professional-master-in-education/</a></p>		
UCC	<p>To be eligible for the award of Honours, candidates must obtain an aggregate of at least 400/800 marks (i.e. 50% and above) in ED6330 and ED6340. Honours are awarded for the Professional Master of Education on the aggregate marks over Year 1 and Year 2 as follows:</p> <ul style="list-style-type: none"> <li>• First Class Honours: an aggregate of at least 1680/2400 marks (i.e. 70% and above).</li> <li>• Second Class, Grade 1: an aggregate of at least 1440/2400 marks (i.e. 60% and above but less than 70%).</li> <li>• Second Class, Grade 2: an aggregate of at least 1200/2400 marks (i.e. 50% and above but less than 60%).</li> <li>• Pass: an aggregate of at least 960/2400 marks (i.e. 40% and above but less than 50%).</li> </ul> <p><a href="http://www.ucc.ie/admin/registrar/marksandstandards/2016CACSSS.pdf">http://www.ucc.ie/admin/registrar/marksandstandards/2016CACSSS.pdf</a></p>	No primary programme	70

College Name	Assessment rubrics/classification	Approximate PMEP Numbers	Approximate PMEPP Numbers
<b>Maynooth University</b>	<p>Masters Degrees</p> <ul style="list-style-type: none"> <li>• First Class Honours 70-100%</li> <li>• Second Class Honours Grade I 60-69%</li> <li>• Second Class Honours Grade II 50-59%</li> <li>• Pass 40-49%</li> </ul> <p>The marks are the weighted average of the module marks, provided the conditions for passing overall have been fulfilled.</p> <p><a href="https://www.maynoothuniversity.ie/sites/default/files/assets/document/PG%20MarksStds_implementation%20Sept14_v3.pdf">https://www.maynoothuniversity.ie/sites/default/files/assets/document/PG%20MarksStds_implementation%20Sept14_v3.pdf</a></p>	30	140
<b>UCD</b>			120

3 Taught Awards: Honours Classification Table

**UCD TAUGHT AWARDS: HONOURS CLASSIFICATION TABLE:** The relevant Programme Examination Board will classify the overall awards within all of the University's programmes according to the following:

AWARD	NFQ LEVEL	AWARD TYPE	HONOURS CLASSIFICATION	
University (Level 7) Certificate	7	Minor Award	Greater than or equal to 3.68 From 2.48 to 3.67 inclusive From 2.00 to 2.47	Distinction Merit Pass
University Diploma	7	Minor Award		
University (Level 8) Certificate	8	Minor Award		
Honours Bachelor Degree	8	Major Award	Greater than or equal to 3.68 From 3.08 to 3.67 inclusive From 2.48 to 3.07 inclusive From 2.00 to 2.47 inclusive	1 <sup>st</sup> Class Honours 2 <sup>nd</sup> Class Honours, Grade 1 2 <sup>nd</sup> Class Honours, Grade 2 Pass
Higher Diploma	8	Major Award		
Professional Diploma in Education	8	Major Award		
Professional Certificate	7 or 8 or 9	Special Purpose Award	Greater than or equal to 3.68 From 2.48 to 3.67 inclusive From 2.00 to 2.47	Distinction Merit Pass
Professional Diploma	7 or 8 or 9	Special Purpose Award		
Certificate of Continuing Education	6 or 7	Special Purpose Award		
Diploma of Continuing Education	6 or 7	Special Purpose Award		
Certificate of Continuing Professional Development	8 or 9	Supplemental Award		
Graduate Certificate	9	Minor Award	Greater than or equal to 3.68 From 3.08 to 3.67 inclusive From 2.48 to 3.07 inclusive From 2.00 to 2.47 inclusive	1 <sup>st</sup> Class Honours 2 <sup>nd</sup> Class Honours, Grade 1 2 <sup>nd</sup> Class Honours, Grade 2 Pass
Graduate Diploma	9	Major Award		
Masters Degree (taught)	9	Major Award		
Professional Masters Degree (taught)	9	Major Award		

[http://www.ucd.ie/registry/academicsecretariat/docs/academic\\_r.pdf](http://www.ucd.ie/registry/academicsecretariat/docs/academic_r.pdf)

College Name	Assessment rubrics/classification	Approximate P MEP Numbers	Approximate PMEPP Numbers
<b>NUIG</b>	<p>8. Award of Honours Honours are awarded only on completion of the programme according to the following scheme:</p> <ul style="list-style-type: none"> <li>• H1 70% on the aggregate</li> <li>• H2.1 60% on the aggregate</li> <li>• H2.2 50% on the aggregate</li> <li>• H3 40% on the aggregate</li> </ul> <p>Note (1): Honours are awarded only on the aggregate performance at an Examination as a whole. Honours are not awarded on the basis of results obtained in individual modules. Note (2): Credit awarded on the basis of a prior award or on the basis of Recognition of Prior Learning (RPL) <a href="http://www.nuigalway.ie/academic_records/documents/updated_pgt_marksstandards_04april2016.pdf">http://www.nuigalway.ie/academic_records/documents/updated_pgt_marksstandards_04april2016.pdf</a></p>	None	120
<b>DCU</b>	<p>Regulations pertaining to the classification of a Level 9 Award by the University</p> <p>8.1.3 Level 9-Taught: Master's Degree: To be eligible for consideration for the award of a Level 9 Master's Degree, a student must accumulate the requisite credits as specified in the Award Descriptor. A taught Master's award consists of a minimum of 60 ECTS credits of taught modules and a maximum of 30 ECTS credits for the dissertation/practicum.</p> <p>The mark to be used to determine the grade of classification is the precision mark based on the first attempt at the relevant, approved modules. Where the original precision mark is less than 40%, and the student subsequently successfully completes the requisite credits, the student will be awarded a Pass classification, irrespective of the final marks achieved.</p>	60	90

College Name	Assessment rubrics/classification	Approximate P MEP Numbers	Approximate PMEPP Numbers
	<p>able 6: Level 9 Taught Master's Degree Classification  Precision Mark Award Greater than or equal to 70% First Class Honours  Between 60% and 69% inclusive Second Class Honours  Between 40% and 59% inclusive Pass 8.1.4</p> <p><a href="https://www.spd.dcu.ie/site/registrar/documents/MarksandStandards2015.1.pdf">https://www.spd.dcu.ie/site/registrar/documents/MarksandStandards2015.1.pdf</a></p>		
UL	<p>2.7 Master's Degree (by Coursework and Dissertation)</p> <p>2.7.1 A master's degree by coursework and dissertation may be awarded at honours classification (first class, second class or third class honours). To be eligible for the award of a master's degree by coursework and dissertation at honours classification, a candidate must:</p> <ol style="list-style-type: none"> <li>satisfy all the assessment and other requirements set for the programme of study</li> <li>have achieved a minimum grade of C3 in the dissertation component of the programme</li> <li>achieve a minimum final cumulative QCA of 2.00, with full credits in all prescribed elements of the programme of study</li> </ol> <p>2.7.2 In the case of a linked graduate diploma/master's degree programme of which the taught element, in whole or in part, constitutes a graduate diploma programme, a student shall be required to attain a minimum honours 2.2 standard in the taught component to be eligible for progression to the master's component of the programme.</p> <p>2.7.3 All cases referred to and provided for in item 2.7.2 shall require the approval of the appropriate faculty postgraduate studies committee for progression to the master's component of the programme in question.</p> <p>2.7.4 The classification of honours awards shall be determined as follows:  Award Classification Cumulative QCA First class honours 3.40  Second class honours grade 1 (2.1) 3.00</p>	60	120

College Name	Assessment rubrics/classification	Approximate PMEP Numbers	Approximate PMEPP Numbers
	Second class honours grade 2 (2.2) 2.60 Third class honours 2.00  <a href="https://www2.ul.ie/pdf/388196739.pdf">https://www2.ul.ie/pdf/388196739.pdf</a>		

