



Teachers' Union of Ireland
Response to QQI Consultation
(January 2016)
To be sent to consultation@qqi.ie

TUI represents education staff (16,000+) employed by Education and Training Boards (ETBs) and in Community and Comprehensive (C&C) Schools, teachers in further and adult education and lecturers and researchers in the Institutes of Technology. Following a request for submissions on “*Quality Assurance Guidelines*” and “*Validation Policy and Criteria*” from QQI, TUI respectfully makes the enclosed points.

TUI welcomes the general tenor and thrust of both documents. TUI would like to highlight some elements of both documents in particular.

Quality Assurance Guidelines

In relation to the policy document, TUI especially welcomes the QA context principle i.e. that quality systems are context dependent and should be demonstrable publicly. TUI also welcomes the externality principle but would welcome some clarification on the definition of “persons who are independent of the provider” as there are already external monitors.

In relation to the guidelines document, Section 2.1 on the five elements of a quality assurance systems, and the six basic activities are most welcome. However, it is important that procedures nationally be coordinated as different processes should not be pursued in different geographic areas or within a geographic area. Section 2.1.3 refers to “the continuous enhancement of quality”. TUI agrees with the concept but has concerns that some organisations have been subjected to dramatic cuts in staffing and budgets in recent years and it may take some time before those organisations are in a position to move beyond “surviving the present”.

In a similar vein, TUI agrees strongly with Section 2.4 on staff recruitment, communication and development. Sadly however, it has been the case recently that staffing has been cut in many public providers and communication to staff has sometimes been made up of communication of pay cuts. Furthermore, staff development and training has frequently been cut significantly especially in further and higher education centres/institutions. In this context, TUI has considerable concerns about the reference in Section 2.4.3 to “imparting feedback to staff members on their strengths and areas requiring improvement”. Performance appraisal has been abandoned even by organisations which made money “selling it” (see Lucy Kellaway: A blast of common sense frees staff from appraisals, Irish Times, July 27th 2015) and there seems little point in telling staff how to improve if there’s no training available to do so.

In relation to page 30, TUI would welcome clarification on point f: “where possible, assessment is carried out by more than one examiner”. Does this mean ‘externs’ as used in higher education institutions or does it refer to something else? Alternatively, does it mean that in QQI levels 5 &6 staff may be asked to mark each other’s work? Such a scenario was suggested in the past by FETAC and TUI was then , and is now, totally opposed to it.

In relation to page 33, TUI would welcome the provision of career guidance by qualified personnel in all courses.

In the context of Section 2.9.3, TUI would welcome some additional information on what was intended, before it would express a view on the idea.

Validation Policy and Criteria

TUI strongly welcomes the reference in Section 2 to providers needing to have sufficient “capacity” to successfully provide high quality courses.

Many public providers of further and higher education already have extensive experience of self-evaluation. TU welcomes the reference in Section 3.3 to all providers engaging in self-evaluation. However, as noted in the document, providers may need some additional support and advice from state bodies in this area. TUI needs to know what type of questionnaires would be given to students and who would own the data when it is collected and how would it be used.

TUI welcomes Section 11.3 on a five year enrolment timeframe. TUI sees that timeframe as a reasonable balance between competing considerations. TUI also welcomes the suggestion in Section 19.7 that providers would have to be able to provide a course for up to five years in order to achieve recognition.

In a similar vein to that set out above for the Quality Assurance Guidelines, TUI is unable to express support for Section 19.6 of the White Paper without knowing what is meant by “staff performance is reviewed and there are mechanisms for encouraging development and for addressing underperformance”. Any such mechanism, coming in the wake of savage cuts to training, staffing and pay in recent years, would need to a matter of significant concern to TUI. Furthermore. TUI would not be in favour of any such mechanism being used without national agreement.

Ends

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